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Dustin Curb
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Washington State Department of Enterprise Services
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Cc: Ariel Brenner, New Buildings Institute

Re: Public Comments on Embodied Carbon Proposal 24-GP-118-R4/BRFW

Dear Council Members & Members of the Building, Fire, Residential and WUI Codes (BRFW) Committee,

The American Institute of Steel Construction (AISC) is pleased to submit the following in response to your request for public comment.

Collaboration with the Proposal Proponent

AISC is aware of the efforts of the New Buildings Institute (NBI) to make embodied carbon building code proposals in many jurisdictions. As such, we've had detailed discussions with NBI about incorporating AISC's embodied carbon policy priorities into their standard proposal template. In particular, two of those priorities are most relevant to NBI's efforts, namely #3 and #4 from our *Buy Clean Guidance for Structural Steel Products*¹ publication, which are described further in the following section. NBI has indicated that they are in support of these two AISC priorities and their associated proposal revisions, as they are reasonable and equitable.

Although NBI supports our position, due to timing, AISC's two revisions didn't make it into NBI's current WA State proposal. As such, I was compelled to voice opposition to the current draft during the State Building Code Council Meeting on Friday, June 13, 2025. However, if AISC's comments can be incorporated into the proposal, we will withdraw our opposition.

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<https://www.aisc.org/contentassets/937a380ddd404a2da0c48669d438bf3b/buy-clean-guidance-for-structural-steel-products.pdf>

AISC's Two Requested Revisions

First, per AISC's *Buy Clean Guidance for Structural Steel Products*² publication, #3 is "Focus requirements on high impact areas". As such, global warming potential (GWP) thresholds for structural steel products should reflect cradle-to-mill-gate LCA scopes only. Justification for this position is included in the Buy Clean Guidance document and extensively in sections I.C.4 and I.C.5 of *Global Warming Potential Impacts of Domestic Steel Construction Products*³, authored and published by the domestic steel construction industry in support of the FHWA Low-Carbon Transportation Materials (LCTM) Grant Program.

Specifically, we request striking the following three rows in TABLE Q103.3.1:

<u>Structural steel products</u>	<u>Hot-rolled sections – unfabricated</u>	<u>1,000</u>	<u>kg CO₂e/metric ton</u>
	<u>Hot-rolled sections – fabricated</u>	<u>1,220</u>	<u>kg CO₂e/metric ton</u>
	<u>Hollow structural sections – unfabricated</u>	<u>1,710</u>	<u>kg CO₂e/metric ton</u>
	<u>Hollow structural sections – fabricated</u>	<u>1,990</u>	<u>kg CO₂e/metric ton</u>
	<u>Decking</u>	<u>2,320</u>	<u>kg CO₂e/metric ton</u>
	<u>Plate – unfabricated</u>	<u>1,480</u>	<u>kg CO₂e/metric ton</u>
	<u>Plate – fabricated</u>	<u>1,730</u>	<u>kg CO₂e/metric ton</u>

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<https://www.aisc.org/contentassets/937a380ddd404a2da0c48669d438bf3b/buy-clean-guidance-for-structural-steel-products.pdf>

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<https://www.aisc.org/globalassets/aisc/sustainability/steel-industry-report-for-fhwa-lctm-program-dec-2024.pdf>

Second, per AISC's *Buy Clean Guidance for Structural Steel Products*⁴ publication, #4 is "Include all relevant materials". In this sense, NBI has taken the good step of referencing the Carbon Leadership Forum's (CLF) 2023 Material Baseline report to assemble their list of covered products and their associated industry-average GWP values. It is essential that all materials that provide a similar function within a building are included in this proposal for WA State. However, the full list of mass timber products from the CLF baseline report is not included in the current proposal. Astoundingly, CLT, NLT, DLT, and MPP are absent. The CLF report notes that "There are no current North American IW-EPDs for CLT, NLT, DLT, or MPP" and the tables continue, "No adequately representative data source" [exists to set a threshold].

The wood industry's shortcomings on data transparency and disclosure is not an acceptable excuse to exclude their products from this embodied carbon proposal. In consultation with CLF, NBI has developed acceptable GWP thresholds that may be used for this purpose, and AISC requests the inclusion of CLT, NLT, DLT, and MPP into TABLE Q103.3.1.

On behalf of AISC, we appreciate your consideration of these comments, and we are ready and willing to advise and collaborate with you.

Thank you,

Max Puchtel, SE, PE

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American Institute of Steel Construction, Chicago, IL

Based in Chicago, AISC is a non-partisan, not-for-profit technical institute and trade association established in 1921 to serve the structural steel design community and construction industry in the United States. AISC supports a wide variety of technical and market-building activities, including specification and code development, research, education, technical assistance, quality certification, standardization, sustainability, and industry advocacy. Together with its National Steel Bridge Alliance division, and including its Professional and Student classes, AISC has more than 60,000 corporate and individual members, and represents nearly 1,000 U.S. businesses that fabricate structural steel for America's steel bridges, buildings, infrastructure projects, and skylines. The U.S. structural steel industry directly supports approximately 200,000 jobs, 82,000 of which are in fabrication.

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<https://www.aisc.org/contentassets/937a380ddd404a2da0c48669d438bf3b/buy-clean-guidance-for-structural-steel-products.pdf>