

**From:** [DGS Website@DGS](mailto:DGS_Website@DGS)  
**To:** [CBSC@DGS](mailto:CBSC@DGS); [bryce.tanner@arup.com](mailto:bryce.tanner@arup.com)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Bryce Tanner  
**Date:** Monday, May 15, 2023 7:10:06 PM

---

Commenter Contact Information

Name: Bryce Tanner  
Date: 5/15/2023 12:00:00 AM  
Representing: Arup  
Mailing Address  
Number and Street: 635 San Gabriel Ave  
City: Albany  
State: CA  
Zip Code: 94706  
Telephone #: 4158239626  
Email: [bryce.tanner@arup.com](mailto:bryce.tanner@arup.com)

Proposed Building Standard

Title 24 Part #: Part 11  
Section #: 5, 5.409.3.2  
Proposing State Agency: BSC-CG  
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):  
Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

The proposed language states that Type III EPDs required to justify compliance with GWP limits shall be included in the construction documents. This is not consistent with typical contractual responsibilities. The construction documents are produced by the design team, which does not have the scope to specify products. The contractor selects the products, while the design team provides a performance standard. Type III EPDs cannot be obtained until the actual products are selected. For example, the construction documents might require a minimum concrete compressive strength and a maximum GWP; then prospective contractors will bid the project based on the construction documents, and after the contractor is selected they will develop a concrete mix design which meets the strength and include EPDs to justify the GWP limit is met. I propose that the EPDs be required to be included in as-built documentation.

9 Point Criteria Info:  
18930(a) 4