

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS; bryce.tanner@arup.com
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Bryce Tanner
Date: Monday, May 15, 2023 7:24:15 PM

Commenter Contact Information

Name: Bryce Tanner
Date: 5/15/2023 12:00:00 AM
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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.

GWP limits in the table for both steel and concrete are extremely high. It is unlikely that more than a few producers will need to make any changes to meet this standard. If the state's 2035 target for carbon emissions is to be met, these values will need to be dropped precipitously in future years. It may be more harmful to industry to make such severe cuts later than it would be to start making cuts now.

9 Point Criteria Info:
18930(a) 7(A)