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To: CBSC@DGS
Subject: 45 day comment period on California Green Building Standards Code, Part 11, Title 24
Date: Monday, May 15, 2023 11:58:15 PM

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Thank you for the opportunity to comment on the proposed updates to the California Green Building Standards Code. I support the addition of embodied carbon considerations to CalGreen and respectfully submit the following comments on Whole building life cycle assessment and product GWP compliance:

Comments regarding 5.402

- A definition for “reference baseline building” has not been provided in the definitions section. Care should be taken in defining a reference baseline building to ensure that true GWP reductions from business-as-usual are achieved. It is unclear whether the baseline is intended to be an earlier version of the building design prior to embodied carbon optimization or based on another similar building, or if both are acceptable. Guidelines for a baseline should guard against design teams using as a baseline a version of their building design with unnecessary materials added on.

Comments regarding 5.409.2 Whole building life cycle assessment

- 5.409.2.1 limits the building enclosure components to glazing, insulation, and exterior finishes. I suggest that wall framing and sheathing materials should be included with the building enclosure. I also suggest that the language be clarified to indicate that framing (such as curtainwall, storefront, or window framing) is included with glazing.

Comments regarding 5.409.3 Product GWP compliance – prescriptive path.

- The exception in 5.409.3.1 states “For the purposes of this exception, industry wide EPD’s are acceptable.” Industry wide EPDs do not provide sufficient information to determine whether a specific concrete mix, or group of multiple concrete mixes used on a given project, meets the GWP limits. Product-specific EPDs would be needed to demonstrate compliance.
- There appears to be an error in Exception EQUATION 5.409.3.1. Volume should be expressed in m³, not kg³.
- Comment on Table 5.409.3: The National Glass Association’s FAQ about the Buy Clean California Act (found at <https://www.glass.org/sites/default/files/2020-04/NGA.EPD%20FAQs%2004.2020.pdf>), states “Processed glass is utilized in construction. Flat glass is not installed into completed commercial buildings; only processed glass is installed in buildings and processed glass is not included in AB262.” To achieve the intent of setting limits on GWP of glass products installed in buildings, processed glass should be included.

Thank you,

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