

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS; typ@greenplumstreet.com
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Tien Peng
Date: Monday, May 15, 2023 3:03:00 AM

Commenter Contact Information

Name: Tien Peng
Date: 5/15/2023 12:00:00 AM
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Proposed Building Standard

Title 24 Part #: Part 11
Section #: Chapter 5-NONRESIDENTIAL MANDATORY MEASURES, 5.409.2 Whole building life cycle assessment
Proposing State Agency: BSC
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.

Whole Building Life Cycle Assessment (wbLCA) tools - Athena, GaBi, Oneclicklca, openLCA, SimaPro, etc - as well as their particular datasets are all different in some way. Choice of modeling tools and/or underlying dataset may yield results which are incompatible if it results in a disproportionately large/small contribution to one or more building impacts. Age of the dataset, geographic appropriateness, representative electrical parameters are all considerations that would affect the calculated wbLCA results. Therefore comparisons should be made with the same wbLCA tool and dataset.

Add following to Section 5.409.2 Whole Building life cycle assessment...

"The life-cycle assessment software tool and data sets to evaluate both the baseline building and the proposed building shall be the same."

9 Point Criteria Info:
18930(a) 8