

From: [Bill Leddy](#)
To: CBSC@DGS
Subject: 45 day comment for Title 24 Part 11 rulemaking
Date: Thursday, May 4, 2023 1:05:17 PM

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Chapter and section: CALGREEN CARBON REDUCTION RELATED measures including Chapters 2, 5, 8, Appendix A5

Proposing State Agency: DSA and CBSC

Recommend Approve as proposed

The rules as proposed:

- Do not conflict overlap or duplicate
- They do not cross over to jurisdiction of other state agencies
- They are in the public interest
- They are not unreasonable, arbitrary, unfair or capricious
- Cost is reasonable, based on the overall benefit
- They are not unnecessarily ambiguous or vague
- Model codes and standards have been incorporated
- They have been formatted to be consistent with other codes and standards
- And they do not conflict with standards of the State Fire Marshall

The global climate emergency demands urgent action to rapidly reduce the 'embodied' carbon emissions in new and remodeled buildings.

California can once again be a global leader by making embodied carbon reduction a requirement for all construction in the state.

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