City of San Leandro

Civic Center, 835 E. 14th Street San Leandro, California 94577 www.sanleandro.org



May 4, 2023

Building Standards Commission 2525 Natomas Park Drive, Suite 130 Sacramento, California 95833-2936

RE: Support for CALGreen Recommended Amendments to Address Embodied Carbon

Dear Commissioners:

As the sustainability manager for City of San Leandro, I write to support the CALGreen embodied carbon amendments recommended by the Code Advisory Committee and as found in the 45-day public comment proposal of the 2022 Intervening Code Adoption Cycle. This support is for both the BSC and DSA-SS proposed code amendments that address embodied carbon of building materials (proposed Express Terms sections # 5.105.1, 5.105.2, 5.409.1, 5.409.2, 5.409.3, and corresponding worksheets and voluntary Tier measure sections). Reducing California's embodied carbon emissions related to our buildings is critical for meeting the deep global reduction targets. City of San Leandro has committed to achieving 80% reduction by 2050 and reducing the embodied carbon in our buildings. Our latest climate action plan adopted in 2021 contains the following strategy: Work with local, regional, and State partners to expand the awareness of, availability, and coast-effectiveness of low carbon or carbon-free construction materials.

By addressing embodied carbon in CALGreen, the state's leadership would create crossjurisdictional consistency and a clear signal to industry. In the absence of statewide code action at this time, it is likely that individual jurisdictions will resort to use public funds less efficiently to adopt a patchwork of policies and code amendments that will confuse industry.

The high threshold of 100,000 square feet will provide a good initial phase to work out details with projects most resourced to comply. While we acknowledge the importance of addressing embodied carbon, any new requirements add to compliance check processes. We request that state agencies work closely with local governments to ensure that the code enforcement processes and requirements are consistent with the capacity of existing staffing and resources in our local building departments. We request that state agencies provide centralized training resources, worksheets for project teams, and standardized tools to ease compliance verification and minimize the impact on building departments.

Juan González III, Mayor •

Victor Aguilar, Jr. City Council:

Bryan Azevedo

Peter Ballew

Xouhoa Bowen

Celina Reynes

Fred Simon



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Sincerely,

Hoi-Fei Mok, PhD Pronouns: they/them Sustainability Manager City of San Leandro Cell: 510-672-3108

Email: hfmok@sanleandro.org

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Bryan Azevedo