

Planning & Development Department

Building & Safety Division

City of Berkeley

Department of Planning and Development

Building and Safety Division1947 Center St, 3rd Floor

Berkeley CA 94704

May 15, 2023

To:

Building Standards Commission

2525 Natomas Park Drive, Suite 130

Sacramento, California 95833-2936

RE: Support for *CAL*Green Recommended Amendments to Address Embodied Carbon

Dear Commissioners:

I write to support the *CAL*Green 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 the City of Berkeley has committed to achieving. Berkeley City Council adopted Berkeley’s Climate Action Plan in 2009 and reaffirmed and strengthened commitments in 2018 by declaring a Climate Emergency and the goal of becoming a Fossil Fuel Free City as soon as possible. Berkeley is committed to reducing the embodied carbon in buildings as evidenced by our local amendments to *CAL*Green to require low-carbon concrete in all construction projects since 2020.

By addressing embodied carbon in *CAL*Green, the state’s leadership would create cross-jurisdictional 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. Berkeley’s 2022 *CAL*Green reach code already puts projects on a path to compliance with its 25% reduced cement in concrete requirement. Currently there are a small number (~<10) of project in excess of 100,000SF in the City of Berkeley’s development pipeline which would comply if their building permit application occurred on or after July 1st, 2024.

We do request that state agencies work closely with local governments to ensure that the code enforcement processes and requirements, particularly in field verification, are consistent with the capacity of existing staffing and resources in our local building departments. Incorporating detailed minimum requirements for project documentation at submittal for the three proposed compliance pathways into the relevant *CAL*Green section(s) will support enforceability and help design teams with compliance. 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.

Sincerely,

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Kurt Hurley | Program Manager - Green Building

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Pronouns: He/him/his