

From: [Kubiak, Lauren](#)
To: CBSC@DGS
Subject: 45-day comment for Title 24 Part 11 rulemaking
Date: Monday, May 15, 2023 4:27:53 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;
- Do not cross over to jurisdiction of other state agencies;
- Are in the public interest;
- Are not unreasonable, arbitrary, unfair or capricious;
- Have reasonable costs, based on the overall benefit;
- Are not unnecessarily ambiguous or vague;
- Incorporate model codes and standards;
- Have been formatted to be consistent with other codes and standards; and
- Do not conflict with standards of the State Fire Marshall.

Addressing emissions from embodied carbon – the emissions associated with production of materials used in buildings – is crucial to meeting California's climate targets. Globally, embodied carbon emissions contribute to 11 percent of energy-related carbon emissions but are estimated to increase as new construction is undertaken to meet the needs of growing populations. Existing policy frameworks in California do not comprehensively address embodied carbon emissions and this proposed rule is an important step toward tackling emissions in this sector.

The proposed rule would require the consideration of embodied carbon in buildings over 50,000 square feet, which represent a small portion of projects but a large portion of square footage and new construction embodied carbon emissions. Projects would be able to choose between three different compliance pathways, both prescriptive and performance-based approaches, which gives the projects flexibility in determining the most suitable compliance pathway. In addition, the requirements could be met using existing technologies, so could be implemented as soon as the rule goes into effect. By limiting the project types to only the largest buildings, and providing flexibility in determining their compliance pathway, this proposed rule will have a minimal impact on project costs but will have a significant impact on project emissions. It would also represent a significant

step forward in tackling emissions from materials used in the built environment.

Embodied carbon emissions can only be addressed at the beginning of a project. The sooner this rule is adopted the sooner we can start to address emissions in this sector. NRDC strongly supports the timely adoption of this new rule so that California can begin to unlock important emission reductions from embodied carbon in new buildings.

Thank you for your consideration of this important rule.

Sincerely,
Lauren Kubiak

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