These comments are duplicative of comments filed using the on line form. Because these Embodied Carbon provisions cover a number of sections and two separate adopting agencies, I am also emailing them to insure they are in the public record in case there was a formatting issue in the use of the form. 45 day comments

On behalf of the American Institute of Architects California and our 11,000 members, I have previously provided a statement of support for the additions to CalGreen of embodied carbon considerations, as have been proposed for adoption by DSA and CBSC currently subject to 45 day review. As a follow up to that general and encompassing support, based on conversations with many stakeholders AIA CA recommends that verification of these requirements could be enhanced proved by adding some additional elements to verification and compliance. Specifically, AIA CA recommends:

> Adding compliance forms or worksheets for signature by the design professional of record for Sections 5.409.2 and Section A5.409.2 (Life Cycle Assessment) and sections 5.409.3 and A5409.3 (Product GWP Compliance prescriptive path).

> Referencing Sections 702.2 and 703.1 as provisions that may be required by the enforcing agency.

For convenience of those reading this comment, the applicable language of these referenced sections follows:

Section 702.2 adopted by CBSC in the current version of CalGreen reads as follows:

> *When required by the enforcing agency, the owner or the responsible entity acting as the owner's agent shall employ one or more special inspectors to provide inspection or other duties necessary to substantiate compliance with this code. Special inspectors shall demonstrate competence to the satisfaction of the enforcing agency for the particular type of inspection or task to be performed. In addition, the special inspector shall have a certification from a recognized state, national or international association, as determined by the local agency. The area of certification shall be closely related to the primary job function, as determined by the local agency.*

> *Note: Special inspectors shall be independent entities with no financial interest in the materials or the project they are inspecting for compliance with this code.*

Section 703.1 in the current version of CalGreen reads as follows:

> ***703.1Documentation.***
> *Documentation used to show compliance with this code shall include but is not limited to, construction documents, plans, specifications, builder or installer certification, inspection reports or other methods acceptable to the enforcing agency which demonstrate substantial conformance. When specific documentation or special inspection is necessary to verify*

compliance, that method of compliance will be specified in the appropriate section or identified in the application checklist.

Rational

The proposed changes increase consistency between the different paths for compliance; provide greater clarity as to roles, responsibilities, and stakeholders in the compliance process; and institutes points for review of conformance, both at completion of the design documentation part of project delivery as well as at the conclusion of construction. It is noted that material choices that may in some cases be made during the course of construction can impact the intended measurable benefits in reducing greenhouse gas emissions. It is also noted that the potential of additional worksheets or forms were discussed during the code development process.

Respectfully submitted

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ICC Existing Building Code Committee 2018-2023
AIA California President 2016
AIA National Director 2012-2014