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Subject: Support for proposed Embodied Carbon Provisions for CALGreen by DSA and BSC
Date: Friday, April 28, 2023 6:32:26 PM
Attachments: [image001.png](#)

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These comments are duplicative of comments filed using the on line form. Because they cover a number of sections and two separate adopting agencies, I am 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

The American Institute of Architects California (AIA CA) is the voice of our state's architectural profession. Our 11,000 members design nearly all of the new and retrofit institutional, commercial, and high density residential built environment throughout California. We also are key in influencing all other types of design, everywhere. As an organization we agree with the many laws and policies established in recent years which are intended to limit greenhouse gas emissions, for the benefit of everyone. We recognize that buildings are major contributors to these emissions, and we support the many means in which California has taken leadership on this issue.

To date, much of the focus of these efforts has been on what is termed 'operational' carbon, and we applaud the significant strides we as a state have taken in both encouraging and mandating reduced energy use of buildings coupled with on-site energy generation and storage. The urgency required to address our deteriorating climate requires that we also include reduction of 'embodied' carbon emissions. These are the greenhouse gas emissions that occur when a building project is first built. Studies show that it can take many decades for a highly energy efficient building to recoup via energy savings the very large emission impacts that occur at construction. While many architects and other stakeholders in shaping the built environment have for years been using voluntary measures to address the full range of impacts - including embodied carbon - we believe the time has come when we need to consider embodied carbon in every project, not just those few covered by voluntary or public sector standards.

For these reasons, AIA CA has vigorously supported the newly launched CALGreen Carbon Reduction Collaborative. We have also joined with many other stakeholders to propose a number of significant measures that are now on the journey toward adoption. One group of changes work together to bring to CalGreen required consideration of embodied carbon impacts for large building projects. We are aware that change in the building industry need to find a way to do many things at once: maintain economic vitality, consider principals of fairness, equity, inclusion, and just transition in business practices; while at the same time moving forward with bold climate action. We believe the measures being proposed do in fact hit that sweet spot.

The proposed measures for embodied carbon consideration are limited to only the largest buildings. This strategy allows for significant square footage benefits, while touching a small number of projects. The levels for compliance have also been carefully calibrated to encourage a shift in culture in the diverse and slow to change building industry without being disruptive. We believe the

standards as proposed will require little to no changes in budgets or project cost; just smarter choices among readily available options.

We particularly applaud the inclusion of a range of alternative paths to compliance. These include both prescriptive and performance approaches. There is also a separate path for projects that leave significant amounts of existing infrastructure and associated embodied carbon in place.

We do understand this is a major step forward, and will bring new terms and tools for some. We are already underway in making appropriate information and training resources readily available. As the voice of our 11,000 members, we unequivocally state we are ready to put these measures into use, and that the rules, as proposed in the original framework :

- 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

Respectfully submitted

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Consultant AIA California



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