

From: [Rachelle Habchi](#)
To: CBSC@DGS
Cc: [Luke Lombardi](#)
Subject: 45 Day Comment for Title 24 Part 11 rulemaking
Date: Monday, May 15, 2023 9:42:56 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

On Behalf of/Name: SEAOSC Sustainable Design Committee

Email: Luke.Lombardi@BuroHappold.com

Recommendation: Approve based on the following:

Members of the SEAOSC Sustainable Design Committee reviewed the building standard and support as proposed. SEAOSC recognizes the need for legislation and policy, as well as coordinated action across all communities, in order to achieve the globally stated goal of net-zero carbon by 2050. As such, we support legislation and policy that works to reduce the embodied carbon of the built environment through requirements such as: design for functional recovery, repurposing or refurbishing existing buildings, retrofit of existing buildings, use of low-carbon construction materials, exploration of alternative design and construction methods for increasing efficiency, and reducing construction waste. This proposal meets all nine criteria from Health and Safety Code Section 18930(a) and it is the committee's judgment that it is required to meet the State's decarbonization goals.

Additionally, it is the personal opinion of the SEAOSC Sustainable Design Committee Chair that the following items be included and implemented:

1. For the third option compliance option of the CRCC (product GWP compliance-prescriptive path), placing GWP material limits to "175 percent BCCA GWP values" does not promote sustainable-driven design, does not encourage reduction in GWP material limits and is far too achievable that it will disproportionately be used to comply with the compliance requirement. The limit should be reduced to a more reasonable percent of BCCA GWP values (for example, 100 percent currently with a tiered reduction plan for future dates).
2. Seismic resilience and sustainability are inherently intertwined. We would like to see seismic resilience be incorporated into future revisions of the code.

Thank you,

Rachelle Habchi | MS, PE
Project Engineer

GS Consulting Engineering



Creative Thinkers, Cleverly Disguised as Engineers.

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