

**From:** [Suyama Bodhinayake](#)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** In Support of CALGreen Changes - Title 24 Part 11  
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**Proposed Building Standard:** Title 24 #: Part 11

**Chapter and section:** CALGREEN CARBON REDUCTION RELATED measures including Chapters 2, 5, 8, Appendix A5

**Proposing State Agency:** DSA and CBSC

Comment intended for 45 day comment period

**My recommendation based on the criteria of Health and Safety Code Section 18930(a):** Please Approve as proposed

**The rationale as proposed:**

- 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

The urgency to address our deteriorating climate requires the reduction of 'embodied' carbon emissions – in ADDITION to energy conservation as mandated by the California Energy Commission.

Embodied carbon refers to the greenhouse gas emissions arising from the manufacturing, transportation, maintenance, and disposal of building materials. Studies show that it takes many decades for a highly energy-efficient building to recoup its significant emission impacts that occur during construction via energy savings . 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 - the time has come to require some level of consideration of embodied carbon in every project.

The proposed rules find a way to do many things at once: maintain economic vitality, consider principles of fairness, equity, inclusion, and just transition in business practices; while at the same time moving forward with bold climate action.

By limiting the application of measures for embodied carbon consideration to only the largest buildings, they will touch a large percentage of new square footage while applying to a very small numeric number of projects. The levels of compliance have also been carefully calibrated to encourage a shift in culture in the diverse and slow-to-change building industry without being disruptive. The standards as proposed will require little to no changes in budgets or project costs; just smarter choices among readily available options. The inclusion of a range of alternative

paths to compliance is also laudatory. 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.

Thank you for your consideration and leadership.

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