



StopWaste is the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency.

Member Agencies:

- Alameda County
- Alameda
- Albany
- Berkeley
- Dublin
- Emeryville
- Fremont
- Hayward
- Livermore
- Newark
- Oakland
- Piedmont
- Pleasanton
- San Leandro
- Union City
- Castro Valley Sanitary District
- Oro Loma Sanitary District

May 12, 2023

Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95833-2936

RE: Support for CALGreen Recommended Amendments to Address Embodied Carbon

Dear Commissioners:

StopWaste is a joint powers authority of the local governments in Alameda County. We support our member agencies with sustainability programs and policies, including those related to green building. In the early 2000's we supported their adoption of the first green building ordinances in the state, which predated and supported the original development of CALGreen.

We support the addition of the proposed embodied carbon requirement in this interim code cycle and urge the BSC not to delay adoption to the next code cycle update. We have heard sufficient evidence of feasibility for the state's largest projects to comply with the flexible pathways. As an agency committed to reducing waste, we particularly support the inclusion of the building reuse pathway. We also believe that the other pathways of LCA's and EPD's will stimulate markets for new circular economic development, because reused and recycled materials typically have lower GWP than newly extracted materials.

In the last two years, we have been convening a working group of sustainability staff of local governments in the Bay Area interested in reducing embodied carbon. Many of the participating **jurisdictions have included an interest in reducing embodied carbon in their respective Climate Action Plans. These range from large cities like San Francisco and Oakland, to smaller cities like Albany, and less urban communities like Dublin, Livermore, and Pleasanton.** The group collectively has identified codes as a key strategy for targeting the highest impact materials in large nonresidential construction. Embodied carbon codes are best applied at the state level, particularly for the largest of projects, whose developers and project teams work across broad regions.

By addressing embodied carbon in CALGreen, the state's leadership would create cross-jurisdictional consistency and statewide standardization that will provide consistent and predictable direction for industry. In the absence of statewide code action at this time, we anticipate that individual jurisdictions will continue to attempt a range of code

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amendments to address single or multiple materials, creating a patchwork of requirements throughout the state. The divergence will confuse the industry and put greater onus on adopting jurisdictions' building department staff to write requirements and devise enforcement mechanisms on their own. It will be a more costly and inefficient use of public funds overall.

We encourage state agencies to work closely with local governments to ensure that the code enforcement processes and requirements are consistent with the capacity of existing staffing and resources in our local building departments. The state has an opportunity to support this transition to lower embodied carbon construction by providing centralized leadership and tools, trainings, and data collection mechanisms to create efficient processes statewide.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Burroughs". The signature is written in a cursive, slightly slanted style.

Timothy Burroughs
Executive Director