

Responses to External Stakeholder Comments

Overall Comment Count	Organization	Representative	Organization Comment Number	Comment Category	Subject	Department of General Services (DGS) Response
1	American Architectural Manufacturers Association	Janice Yglesias	1	Global Warming Potential (GWP) Baseline	Environmental Product Declaration (EPD) vs Life Cycle Assessment (LCA)	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.
2	American Architectural Manufacturers Association	Janice Yglesias	2	Compliance	Facility specific vs Product specific or Industry-Wide (IW) EPDs	For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its Product Category Rules (PCR) and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.

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3	American Architectural Manufacturers Association	Janice Yglesias	3	Legislation	Legislation based on exclusion	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
4	American Institute of Steel Construction	Brian Raff	1	Legislation	Legislation purpose	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
5	American Institute of Steel Construction	Brian Raff	2	Legislation, Compliance	Approach to reducing GWP	DGS will consider the variations in supply chain for each industry when implementing the legislation.
6	American Institute of Steel Construction	Brian Raff	3	Legislation	Selection of affected materials	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.

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7	American Institute of Steel Construction	Brian Raff	4	Compliance	Financial impact on business	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS will decide on the best solution moving forward.
8	American Institute of Steel Construction	Brian Raff	5	Compliance	Inclusion of structural steel fabricators	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS will decide on the best solution moving forward.
9	American Institute of Steel Construction	Brian Raff	6	Compliance	Inclusion of structural steel fabricators	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS will decide on the best solution moving forward.
10	American Institute of Steel Construction	Brian Raff	7	Compliance	Inclusion of structural steel fabricators	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS will decide on the best solution moving forward.

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11	American Institute of Steel Construction	Brian Raff	8	Compliance	Inclusion of structural steel fabricators	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS will decide on the best solution moving forward.
12	American Institute of Steel Construction	Brian Raff	9	Compliance	Inclusion of structural steel fabricators	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS will decide on the best solution moving forward.
13	American Institute of Steel Construction	Brian Raff	10	GWP baseline	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.

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14	American Institute of Steel Construction	Brian Raff	11	GWP baseline	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.
15	American Institute of Steel Construction	Brian Raff	12	GWP baseline	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.

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16	American Institute of Steel Construction	Brian Raff	13	GWP baseline	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.
17	American Institute of Steel Construction	Brian Raff	14	GWP baseline	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.

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18	American Institute of Steel Construction	Brian Raff	15	GWP baseline	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.
19	American Institute of Steel Construction	Brian Raff	16	Legislation Compliance	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.

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20	American Institute of Steel Construction	Brian Raff	17	Compliance	Allow separate GWP limits for subcategories of materials	Current legislation allows DGS to "set different maximums for different products within each category and, when more than one set of product category rules exists for a category or set of products, may set a different maximum for each set of product category rules." DGS will be setting different maximums for material sub-categories where applicable.
21	American Institute of Steel Construction	Brian Raff	18	GWP baseline	EPD selection	DGS will review EPDs that are used to calculate the GWP limit.

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22	American Institute of Steel Construction	Brian Raff	19	GWP baseline	EPD consistency issues for fabrication	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.
23	American Institute of Steel Construction	Brian Raff	20	Compliance	Facility specific vs Product specific EPDs	For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.

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24	American Institute of Steel Construction	Brian Raff	21	Compliance	Facility specific vs Product specific EPDs	DGS acknowledges the potential impact to steel warehouses. However, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.

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25	American Institute of Steel Construction	Brian Raff	22	Compliance	Facility specific vs Product specific EPDs	There would be an incentive to reduce GWP values of other facilities if a supplier's demand exceeds capacity of the compliant facility. For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.

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26	American Institute of Steel Construction	Brian Raff	23	Compliance	Facility specific vs Product specific EPDs	For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.

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27	American Institute of Steel Construction	Brian Raff	24	Compliance	Facility specific vs Product specific EPDs	<p>The goals between Leadership in Energy and Environmental Design (LEED) and the Buy Clean California Act are different. LEED focuses on transparency whereas the Buy Clean California Act requires eligible materials to have a GWP below a maximum limit. For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.</p>

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28	American Institute of Steel Construction	Brian Raff	25	Compliance	Standardize implementation of AB 262 by awarding authorities	DGS will publish a standard framework of rules to implement the Buy Clean California Act in the State Contracting Manual, State Administrative Manual, and/or DGS website. Awarding authorities have been encouraged to apply the law consistently.
29	American Institute of Steel Construction	Brian Raff	26	Compliance	Supply chain study recommended	DGS intends to utilize the extra time to research issues and items of concern, including the variations in the industry supply chains. DGS will decide on the best solution moving forward.
30	American Institute of Steel Construction	Brian Raff	27	Compliance	Clearly identify producer vs fabricator methodology	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS intends to utilize the extra time for to research issues and items of concern, including the variations in the industry supply chains. DGS will decide on the best solution moving forward.

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31	Atlas Tube	Bradlee Fletcher	1	Legislation	Scope of covered materials	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
32	Atlas Tube	Bradlee Fletcher	2	Compliance	Facility specific vs Product specific or IW EPDs	For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.
33	Crosswind Consulting	John Cross	1	Legislation	Legislation based on single impact category	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.

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34	Crosswind Consulting	John Cross	2	Legislation, Compliance	Attributional vs Consequential LCAs	The North American Product Category Rules for Designated Steel Construction Products, Version 1.0, is based on ISO 21930. The current ISO 21930:2017, follows the attributional rather than the consequential LCA approach.
35	Concrete Reinforcing Steel Institute	Amy Trygestad	1	Legislation	Scope of covered materials	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.

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36	Concrete Reinforcing Steel Institute	Amy Trygestad	2	GWP baseline	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.
37	Concrete Reinforcing Steel Institute	Amy Trygestad	3	GWP baseline	IW LCA vs EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.

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38	Concrete Reinforcing Steel Institute	Amy Trygestad	4	Legislation	IW LCA vs EPD	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
39	Concrete Reinforcing Steel Institute	Amy Trygestad	5	Compliance	Standardize implementation of AB 262 by awarding authorities	DGS will publish a standard framework of rules to implement the Buy Clean California Act in the State Contracting Manual, State Administrative Manual, and/or DGS website. Awarding authorities have been encouraged to apply the law consistently.

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40	Insulating Glass Manufacturers Alliance	Margaret Webb	1	GWP baseline	IW LCA vs EPD	<p>The third EPD associated with fire-rated glass has GWP numbers for both fire-rated glass and flat glass. DGS only used the GWP number of flat glass into the proposed formula.</p> <p>Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.</p>
41	Insulating Glass Manufacturers Alliance	Margaret Webb	2	Legislation	Timeline extension	<p>The Buy Clean California Act timelines have been revised by AB 1817. DGS will adjust expectations accordingly.</p>

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42	Insulating Glass Manufacturers Alliance	Margaret Webb	3	Compliance	Facility specific vs Product specific EPDs	For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.
43	Insulating Glass Manufacturers Alliance	Margaret Webb	4	Legislation	Legislation based on exclusion	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
44	North American Insulation Manufacturers Association	Angus Crane	1	Legislation	The narrow list of building materials is unfair and ignores some of the largest carbon emitters	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.

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45	North American Insulation Manufacturers Association	Angus Crane	2	Legislation	Singling out mineral wool as the only insulation board product subject to the Act will have an anticompetitive impact	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
46	North American Insulation Manufacturers Association	Angus Crane	3	Legislation	Implementation of the Act will have a negative impact on small business	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
47	North American Insulation Manufacturers Association	Angus Crane	4	Legislation	The Act is fundamentally flawed in its understanding of EPDs	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.

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48	North American Insulation Manufacturers Association	Angus Crane	5	Legislation	The Act Tries To Regulate Four Very Different Industries With the Same Set of Rules	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
49	North American Insulation Manufacturers Association	Angus Crane	6	GWP baseline, Compliance	Uniformity of Methodology for EPD Results is Critical	DGS intends to utilize the extra time to research issues and items of concern.
50	North American Insulation Manufacturers Association	Angus Crane	7	GWP baseline	No Fabrication EPDs for Mineral Wool	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS will decide on the best solution moving forward.

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51	North American Insulation Manufacturers Association	Angus Crane	8	Compliance	Facility-Specific EPDs are Problematic	For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.
52	North American Insulation Manufacturers Association	Angus Crane	9	GWP baseline	Measuring GWP	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.

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53	North American Insulation Manufacturers Association	Angus Crane	10	Legislation	Extension of Time	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
54	North American Insulation Manufacturers Association	Angus Crane	11	GWP baseline	Increase the 20 Percent Flexibility to 60 Percent	DGS intends to utilize the extra time to research issues and items of concern.
55	North American Insulation Manufacturers Association	Angus Crane	12	Compliance	Clarification of Regulatory Scope	DGS will publish a standard framework of rules to implement the Buy Clean California Act in the State Contracting Manual, State Administrative Manual, and/or DGS website. Awarding authorities have been encouraged to apply the law consistently.

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56	North American Insulation Manufacturers Association	Angus Crane	13	Legislation	Mineral Wool is not manufactured in the State of California and should not have been included in the list of building materials subject to the Act	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
57	North American Insulation Manufacturers Association	Angus Crane	14	Other	Mineral Wool and other insulation products save energy and help reduce pollution	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.

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58	National Glass Association	Nicole Harris	1	GWP baseline, Compliance	Facility specific vs Product specific or IW EPDs	<p>For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.</p> <p>DGS intends to utilize the extra time to research issues and items of concern.</p>

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59	National Glass Association	Nicole Harris	2	GWP baseline	Methodology	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.
60	National Glass Association	Nicole Harris	3	Compliance	Facility specific vs Product specific EPDs	DGS intends to utilize the extra time to research issues and items of concern.
61	National Glass Association	Nicole Harris	4	GWP baseline	Timeline extension	The Buy Clean California Act timelines have been revised by AB 1817. DGS will adjust expectations accordingly.
62	National Glass Association	Nicole Harris	5	Other	Schedule additional outreach event	DGS will conduct future outreach events as needed.

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63	Oregon Department of Environmental Quality	Peter Canepa	1	GWP baseline	Methodology	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide data to set the limit.
64	Oregon Department of Environmental Quality	Peter Canepa	2	Compliance	Fabrication inclusion/exclusion	AB 1817 allows the exclusion of emissions that occur during fabrication stages when setting the initial industry average. DGS will decide on the best solution moving forward.
65	Sierra Club	Kathryn Phillips	1	GWP baseline, Compliance	Preference of EPDs	DGS acknowledges your comment.
66	Sierra Club	Kathryn Phillips	2	Compliance	EPD integrity	DGS agrees that third-party verification is important for EPDs.

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67	Sierra Club	Kathryn Phillips	3	Legislation	Timeline extension	The Buy Clean California Act timelines have been revised by AB 1817. DGS will adjust expectations accordingly.
68	Sierra Club	Kathryn Phillips	4	GWP baseline	Methodology	DGS intends to utilize the extra time to research issues and items of concern.
69	Sierra Club	Kathryn Phillips	5	GWP baseline	Methodology	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide EPD to set the limit.

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70	Steel Tube Institute	Joseph Anderson	1	Legislation	Challenges to suppliers	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
71	Steel Tube Institute	Joseph Anderson	2	Legislation	Economic impact to suppliers	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
72	Steel Tube Institute	Joseph Anderson	3	Legislation	Economic impact to state of CA	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.

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73	Skanska	John Bello	1	Legislation	Scope of covered materials	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
74	Sustainable Minds	Kelli Young	1	GWP baseline	IW EPD	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide EPD to set the limit.
75	Sustainable Minds	Kelli Young	2	GWP baseline	Tool for Reduction and Assessment of Chemicals and Other Environmental Impacts	DGS acknowledges your comment.

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76	Sustainable Minds	Kelli Young	3	Legislation	Consider use phase benefits for mineral wool	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
77	Thinkstep	John Jewell	1	GWP baseline	Methodology	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide EPD to set the limit.

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78	Thinkstep	John Jewell	2	Compliance	Facility specific vs Product specific EPDs	For compliance, current legislation requires the successful bidder for a contract to submit a current facility-specific EPD for each eligible material proposed to be used. DGS interprets a "facility-specific EPD" as a product-specific EPD governed by its PCR and originating from a single facility. Individual facility compliance cannot be verified through submission of multi-facility or industry-wide EPDs.
79	Thinkstep	John Jewell	3	GWP baseline, Legislation	Consider use phase benefits for mineral wool	DGS is required to "submit a report to the Legislature on any obstacles to implementation of this article, and the effectiveness of this article to reduce global warming potential." We will include your comment in this report.
80	Thinkstep	John Jewell	4	Other	Carbon footprinting, offsets, and renewable energy certificates	Recommendations for carbon footprinting offsets and renewable energy certificates are out of scope for DGS's responsibility to implement the Buy Clean California Act.

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81	UL Environmental	Anna Lasso	1	GWP baseline	Methodology	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide EPD to set the limit.
82	UL Environmental	Anna Lasso	2	GWP baseline	Increase allowance figure	DGS intends to utilize the extra time to research issues and items of concern.
83	UL Environmental	Anna Lasso	3	Other	Link EPDs used in GWP baseline to program operator's database	DGS acknowledges your comment.

Responses to External Stakeholder Comments

Overall Comment Count	Organization	Representative	Organization Comment Number	Comment Category	Subject	Department of General Services (DGS) Response
84	Vitro Glass	Timothy Bellovary	1	GWP baseline, Compliance	IW LCA vs EPD, facility specific vs product specific EPDs	Current legislation requires DGS to "set the maximum acceptable global warming potential at the industry average of facility-specific global warming potential emissions for that material with a phase-in period of not more than two years." DGS shall determine the industry average by consulting recognized databases of environmental product declarations. DGS will further investigate the possibility of utilizing an industry-wide LCA to set the limit.
85	Vitro Glass	Timothy Bellovary	2	Other	Schedule additional outreach event	DGS will conduct future outreach events as needed.