

October 11, 2024

Pamela Gupta
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Embodied Carbon in Buildings, Workshop 1

Dear Ms. Gupta and team,

The undersigned organizations write to express our enthusiasm for the work that CARB is undertaking to develop a framework for measuring the carbon intensity of building materials and a comprehensive reduction strategy, as outlined in AB 2446 and AB 43.

As your team ramps up its work over the coming year, our groups are specifically excited to support the development of the following elements of an embodied carbon policy:

Framework

AB 2446 and AB 43 provide a first-in-the nation opportunity to create a standardized, government-sanctioned method for conducting and updating Environmental Product Declarations (EPDs), and whole-building lifecycle analyses (WBLCAs). Lack of a robust collection of WBLCA models is an identified challenge to establishing a benchmark by which reductions can be measured.¹

To establish a baseline, the top-down approach proposed by CARB is a preferable approach that would leverage existing research and data available in the marketplace. A top-down approach would allow CARB to provide an initial baseline that could be improved upon through future bottom-up data collection and refinement. Utilizing the streamlined approach initially will allow CARB to adhere to its legislative deadlines, and still allow for future improvement.

Comprehensive Strategy

Our groups wish to see a robust strategy that is ambitious in its options for compliance. For example, a strategy that allows for material salvage, reuse, and lower carbon product choices would lead to the greatest change in the marketplace.

Achieve 40% reduction by 2035

Our organizations believe that a 40 percent reduction by 2035 is readily possible, but CARB should provide a robust framework and corresponding reduction strategy to guide this work. Ideally, this would be supported by a new regulation that includes a means of reporting and enforcement.

¹ <https://carbonleadershipforum.org/clf-wblca-v2/>

Sincerely,

Mikhail Haramati
Natural Resources Defense Council

Scott Morris
Director
The Low Carbon Initiative

Mary Solecki
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AJW, Inc.

Ash Lauth
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Industrious Labs

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