From: RMI Embodied Carbon Initiative

We are pleased to have this opportunity to provide comments to the California Air Resources Board (CARB) as your team develops a framework to measure and reduce Building Embodied Carbon. We have provided comments relating to two specific questions for feedback requested by the CARB team.

*Question: Staff are requesting feedback on the LCA scope and system boundary for the baseline. Are there additional considerations?*

* We recommend inclusion of the full lifecycle scope A-C for the baseline.
* The proposed hybrid EEIO + process-based calculation for high volume sectors, can be used to create a point-in-time emissions estimate.
* However, we do not recommend that the EEIO calculation be used to establish a baseline from which reductions are measured unless the baseline is updated to align with collected ‘bottom-up’, process-based reporting. For illustrative purposes – if CARB calculates a baseline of 100 MT GHG emissions using a hybrid EEIO and process-based approach, but subsequently gathers process-based emissions data from the market showing an emissions impact of 80 MT, it may inaccurately imply a 20% reduction when the difference is primarily due to misaligned calculation methodologies.
* We recommend expanding the use of process-based emissions baselining to include a broader range of product categories. One such reference for this list of products can be found in the recently published [Impact Accounting Methodology for Building Construction.](https://rmi.org/insight/impact-accounting-methodology-for-building-construction?submitted=1#thank-you)

*Question: At what stage of the project schedule should covered projects report? a) Planning permit? Building Permit Issuance? Obtaining certificate of occupancy? Other milestones?*

* We recommend project-level data be reported at both building permit application and certificate of occupancy.
* A key consideration to streamline project-level reporting for the industry is alignment with existing code requirements and permit milestones. For example, project teams complying with the CALGreen Embodied Carbon Code Provision are already required to submit documentation as part of their building permit application. We recommend that the state leverage this existing code requirement and develop a submittal process for architects to convey WBLCA reports to CARB at this design milestone.
* We recommend that CARB also gather an ‘as-built’ WBLCA report from project teams at the certificate of occupancy milestone. At this phase, the architect or LCA consultant can efficiently update WBLCA reports to include procured products and provide an accurate calculation of project-level emissions impacts.
* Overall, a project-based reporting process documented by design consultants and construction teams will streamline reporting and reduce administrative burden. We recommend avoiding compliance regimes that require real estate owners and developers to aggregate data from across their project portfolio and report to CARB on an annual basis.