



April 14, 2025

Emailed to embodiedcarbon@arb.ca.gov and posted as attachment to:

<https://ww2.arb.ca.gov/public-comments/comments-workshop-building-embodied-carbon-march-13-2025>

Subject: Comments on the Workshop on Building Embodied Carbon March 13 2025

From: The American Institute of Architects California (AIACA) et al.:



We are pleased and supportive of the California Air Resources Board's (CARB) consideration of minimizing embodied greenhouse gas emissions in the built environment. Reducing embodied emissions is essential to achieving continued progress toward meeting California's well-established objectives of reducing harmful emissions and mitigating the impacts of climate change. California's advanced energy code has supported significant strides in addressing operational emissions; however, considering the equally important embodied emissions has been more challenging to address. CARB's role as a subject matter expert will be foundational to continued progress in this arena, and we applaud the continued outreach and attention to the topic.

Following are some specific recommendations based on specific topics covered in the workshop:

1. CARB's efforts should be carefully aligned with California's existing embodied carbon regulatory environment, including but not limited to the recently enacted mandatory embodied carbon requirements in CALGreen and the long-standing Buy Clean California provisions. We welcome CARB's active engagement and technical expertise as the CALGreen provisions are refined and adjusted in the coming months and years. Alignment in terminology and reporting frameworks helps the industry and all stakeholders ensure an understanding of policy requirements, regardless of the state agency overseeing the policy. Misalignment and duplication add unnecessary costs while also ignoring the impacts of existing investments in time and effort in applying current regulations and codes. As a bonus, clear and consistent requirements support successful policy adoption and serve as best practices for other jurisdictions interested in implementing similar policies.
2. CARB is well positioned to become the backbone organizer for building-level embodied carbon emissions data in California by aggregating reporting from different policies. While Buy Clean and CALGreen project applicants are currently not *required* to report directly to CARB, it would be beneficial for CARB to establish a data collection framework for these

projects. Collecting data provides consistency in reporting and gives CARB direct insight into the materials and products used in the state, which can assist in developing baselines as well as insights into compliance.

3. We recommend CARB use measurement models closely aligned with existing and emerging California-specific building terminology and low-carbon research, such as that undertaken by the Carbon Leadership Forum. Models based on product-level cost accounting (such as EEIO) should be avoided because these are often unfamiliar to building professionals, and EEIO minimizes the accuracy of GHG emission reductions.
4. We recommend CARB reduce or eliminate reliance on data from sources which may become problematic due to changes emerging at the federal level. CARB should consider developing primary data for reporting consistency.
5. We welcome contributions in rigor and consistency that CARB can bring to the landscape of LCAs and EPDs, which are currently widely available (for some material types) and rapidly scaling due to multiple parallel efforts across a broad band of stakeholders and participants. LCAs and EPDs will continue to play a key role in connecting the industry, its various stakeholders involved in project delivery, and the regulatory landscape, which will monitor compliance progress.
6. We encourage CARB to step in where needed to refine and potentially adopt measures that may be needed at scale but may become stuck in the shifts are occurring at the federal level. California, as the world's fifth-largest economy, should, where necessary, stay the course in developing programs, standards, and foundational research that become necessary for our own continued GHG reduction progress.

We are very fortunate to work with a wide range of subject matter expert NGOs, and when they have concerns, we always stop and listen carefully. By working together, we can continue forward progress in reducing harmful greenhouse gas emissions while having industry, design professionals, and the wide range of stakeholders involved in shaping the built environment continue to mitigate these emissions over time while also continuing to work efficiently and effectively and innovatively to the overall benefit of our communities. We welcome continued communication and collaboration with CARB on this initiative, and we look forward to finalizing the

The American Institute of Architects

AIA California
1931 H Street
Sacramento, CA 95811
T (916) 448-9082
F (916) 442-5346


www.aiacalifornia.org

April 14, 2025

Page 3

details in both the CARB forums and the parallel forums, such as the workshops of the CALGreen Carbon Reduction Collaborative.

Respectfully submitted

A handwritten signature in black ink, reading "Scott Terrell". The signature is fluid and cursive, with the first name "Scott" and last name "Terrell" clearly distinguishable.

Scott Terrell
Director of Government Relations

The American Institute of Architects

AIA California
1931 H Street
Sacramento, CA 95811
T (916) 448-9082
F (916) 442-5346

www.aiacalifornia.org