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April 14, 2025

California Air Resources Board
Embodied Carbon Group

RE: Comments on the Workshop on Building Embodied Carbon on
March 13, 2025

To Whom It May Concern:

We are pleased and supportive of the California Air Resources Board's (CARB) consideration of minimizing embodied greenhouse gas emissions in the built environment. We are grateful for California's longstanding leadership on climate, including addressing building emissions from operations and materials. As the Federal government retreats from these areas, we encourage CARB to step in where needed to help continue the recent momentum on embodied carbon.

In addition to the recommendations provided by AIA California (for which we are a signatory), we have the following additional recommendations based on the topics covered in the workshop:

1. We recommend CARB take an inventory of current efforts to collect and standardize embodied carbon data in the building sector. Based on this inventory, CARB should identify gaps it can fill, and areas where it can align and boost existing efforts. CARB's role could include collecting data and sharing it (with appropriate aggregation / privacy protections) to enable research, improvement of existing templates and other key metrics, and more complete datasets. This could include WBLCA project-level data as well as product level data in EPDs.
2. For building project-level reporting, CARB can take a lead in collecting this data, but in doing so should align with existing efforts in the industry. The Embodied Carbon Harmonization & Optimization (ECHO) collaborative group, for example, has guidelines for reporting embodied carbon data from WBLCA. The

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efforts from members of ECHO are intended to harmonize requirements for projects and compile project data anonymously in a way that can lead to analysis and research to support continued work on embodied carbon, including leading to project-level embodied carbon intensity values (ECIs per square) for buildings. For these reasons, we strongly recommend aligning with ECHO wherever possible.

3. CARB can help streamline project workflows by aligning with our Leadership in Energy and Environmental Design (LEED™) Rating System for reporting of embodied carbon data. The WBLCA pathway in CALGreen is already complementary with LEED requirements, and USGBC has committed to working on recognizing the CALGreen WBLCA pathway when chosen for LEED projects in California. With the forthcoming release of [LEED version 5](#), we are also working to harmonize pathways within new credits in LEED with similar requirements from Buy Clean and CALGreen.

We welcome continued communication and collaboration with CARB on our recommendations above. For example, we can facilitate engagement with ECHO members as USGBC is a founding member of this group. We also can engage with technical members of the LEED team to address harmonization and reporting requirements as appropriate. Please let us know how we can be of assistance.

Sincerely,



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