

April 14, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: March 13th Workshop on Proposed Reporting Options for Embodied Carbon

To Whom It May Concern,

The California State University (CSU) appreciates and supports the efforts of the California Air Resources Board (CARB) to reduce emissions in the building and construction sector and beyond.

With regard to CARB's proposed Project Reporting Requirements, we request CARB to consider potential duplicative or restrictive reporting and compliance requirements, particularly for state higher education institutions. The CSU, as its own Authority-Having Jurisdiction, constructs capital projects that are already regulated by both CALGreen building code and Buy Clean California Act (BCCA) rules. With the addition of CARB's proposed framework, reporting under three separate frameworks to three separate entities for projects of varying occupancies, sizes, and materials will inject uncertainty and heavy administrative burden for projects and campuses which, in good faith, wish to comply with the intent of the regulation.

Streamlining reporting processes and aligning with existing regulatory frameworks will ensure efficiency and provide clarity for our universities working to meet multiple environmental standards. For instance, CARB may consider aligning its project reporting schedule to align with CALGreen's current requirements to document § 5.409.2 Whole Building Lifecycle Assessment compliance when construction documents for a project are completed and filed. Additionally, CARB may consider developing reciprocity or a shared reporting framework for projects already covered by CALGreen that overlap with CARB's proposed regulation. Lastly, CARB may consider partnering with its sister agencies, the Department of General Services (DGS) and the California Building Standards Commission (CBSC), to provide trainings, resources, and/or direct outreach to support clarity and compliance for projects potentially regulated by multiple frameworks.

CSU Campuses

Bakersfield
Channel Islands
Chico
Dominguez Hills
East Bay

Fresno
Fullerton
Humboldt
Long Beach
Los Angeles
Maritime Academy


Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego

San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus

Thank you for the opportunity to comment on the proposed embodied carbon regulations. The CSU looks forward to continue to be active partners in the ongoing development of these rules and their implementation.

Should you have questions, please do not hesitate to call me at (562) 951-4297 or hkaplan@calstate.edu.

Sincerely,

A handwritten signature in cursive script that reads "Hank Kaplan".

Hank Kaplan
Scope 3 Emissions Manager
CSU Office of the Chancellor