

New Buildings Institute Comments to March 13, 2025 Workshop on Building Embodied Carbon

The New Buildings Institute (NBI) is highly supportive of the ongoing efforts undertaken by the California Air Resources Board (CARB) to develop a consistent and holistic methodology for measuring and reducing the embodied carbon associated with the state's built environment.

We believe that these efforts will go a long way towards realizing the state's greenhouse gas reduction target and towards achieving a safe, healthy, and sustaining environment for all Californians. As a leader on ambitious climate action, California must adopt methodologies, practices, and requirements that are practicable and replicable for practitioners and industry, as well as for states and jurisdictions looking to California's example to inform their own policies to address their respective embodied emissions.

With this in mind, NBI offers the following recommendations for CARB's consideration:

- **Alignment with existing state policies:** The scope and requirements for reporting submitted under CARB's framework should be developed with a consideration of alignment with other existing state embodied carbon policies. These include the mandatory provisions under CALGreen and the Buy Clean California Act. Consistency among these programs will alleviate burden and confusion among project teams required to submit documentation under multiple programs. Alignment will also lend itself to clarity around policy adoption for other states and jurisdictions looking to implement similar programs. At present, it seems likely that the provisions under this program will expand beyond the scope of current CALGreen requirements. We encourage CARB to work with other state agencies to indicate how CALGreen provisions might evolve to match these requirements in the future, including through this year's intervening code cycle. Considerations for alignment should include:
 - Life cycle scope
 - Systems included in the building (i.e., structure, envelope, interiors, MEP, site hardscape)
 - Materials and products covered under EPD reporting (we suggest expanding CALGreen provisions as more product-level data becomes available).
- **Reporting Repository:** We understand that CARB plans to share its plans for the collection of reporting submitted by manufacturers and project teams in later phases of this program's development. We encourage CARB to consider coordinating the development of a single interagency repository for data submitted

under California's multiple embodied carbon reporting mechanisms, including CALGreen and Buy Clean California, to streamline and simplify data collection and reductions tracking.

- **Baseline and Reduction Calculation Methodology Alignment:** The definition of the life cycle scope of the 2026 baseline methodology should be aligned with the life cycle scope of project level reporting. NBI recommends the consistent inclusion of life cycle stages A-C for both baseline and project reporting frameworks. Alternatively, CARB should define how any misalignment between the baseline calculation and reporting requirements will be reconciled.
- **Product Data Quality:** This program has the opportunity to act as a strong mechanism for pushing for a higher specificity of EPD and LCA data over time. Toward this end, consider phasing out the alternative compliance pathway for manufacturer EPD reporting over time and phase in product- and facility-specific EPD requirements for all products. Additionally, consider how these requirements may evolve in parallel with CALGreen and Buy Clean provisions.
- **Manufacturer Reporting Materials Scope:** NBI supports the phased-in approach for expanding the coverage of product types over time and encourages CARB to consider the inclusion of gypsum wallboard. CARB should also clarify how data for MEP systems will be addressed within the state, through this program or other state initiatives.
- **Project Reporting Data Availability:** NBI supports the breadth of the scope of items included under the project reporting framework, including structure and enclosure, interior construction and finishes, site hardscape and walls. We suggest that CARB lay out a clear compliance pathway for systems and products that do not yet have significant representation on the EPD market and, again, clarify how data for MEP systems will be addressed within the state, through this program or other state initiatives.
- **Baseline Methodology:** The Oregon Department of Environmental Quality (DEQ) recently conducted a sector-based greenhouse gas inventory, which measured the emissions produced within Oregon by economic sector. This inventory informed the agency's [recent report](#) identifying priority, high-impact actions to reduce the state's embodied emissions. We recommend that CARB connect with Oregon DEQ to learn about their methodology in creating this inventory and tracking emissions in multiple sectors.