

Communication from Public

Name: Matthew Hinck
Date Submitted: 02/19/2024 11:20 AM
Council File No: 23-1391
Comments for Public Posting: Please see the attached letter for CalPortland Company comments on Council File Number 23-191. Thank you. Matthew Hinck



February 19, 2024

Los Angeles City Council Members
Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012

Members of the LA City Council

I am writing today on behalf of CalPortland Company to provide comments on Motion 23-191 sponsored by council member Nithya Raman concerning the embodied carbon content in the built environment. CalPortland is a construction materials company producing sand, gravel, cement, and concrete which is vital to the infrastructure and home building needs of the State. CalPortland started in Colton, California in 1891 as a Cement Company and has operated continuously for more than 130 years in the state, evolving to become a critical part of the construction industry supply chain. CalPortland is committed to the 2045 roadmap to carbon neutrality, laid out in AB-32 and SB-596, as we continue our long tradition of doing business in California.

CalPortland supports the use of Whole Building Life Cycle Assessments (WBLCA) as a scientific method to measure the overall lifecycle impact of a built structure in a material agnostic way. Our concerns however are in transparency. Only a very limited number of professionals can conduct WBLCA's – primarily architects and other building designers. It is only these professionals who have access to the whole scope of any given project and the associated materials and quantities used to construct, maintain, and demolish a building. Construction materials producers provide concrete, steel, wood, glass, insulation etc. to projects, but the only information known to a materials producer is the cradle to gate Environmental Product Declaration "EPD" of their product. Materials providers have no insight into WBLCA.

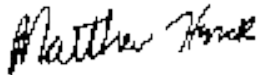
Embodied carbon limitations for structures will be established through WBLCA targets. It is vital then that material producers have knowledge of how their EPD's contribute to the WBLCA output. Without this cause-and-effect knowledge, material producers will be left in the dark on how their materials are impacting the overall WBLCA. How will concrete producers know if they are meeting or falling short of targets? Additionally, CalPortland is concerned that the design professionals tasked with designing structures must understand more about our materials than simply the embodied carbon content. For concrete specifically, a mix design may meet an embodied carbon target, but miss the mark on rheology, workability, plasticity, cure time etc., all of which are important to an on-time, safe and successful construction of a building.

Full transparency of the WBLCA process must be a three-way communication between the designers/architects, General Contractors, and material producers for this to be successful. CalPortland recommends that:

- WBLCA's reports be maintained in a publicly available database accessible to the construction community.
- WBLCA's are filed into the database in a timely manner (in real time)
- That the City form an advisory committee on WBLCA implementation that includes architects, structural engineers, general contractors, and representatives from each of the major construction materials.
- That targets for WBLCA are vetted by the advisory committee to ensure that the goals are achievable at scale by the materials providers.

CalPortland appreciates this opportunity to comment on this rule making and as a company we stand ready to help the City with the implementation, rollout, and maintenance of this program.

Sincerely,



02/19/2024

Matthew Hinck
Vice President State Government Affairs
CalPortland Company