



August 3, 2023

Councilmember Nithya Raman  
200 N Spring St, Suite 415  
Los Angeles, CA 90012

RE: Support for City of Los Angeles Draft Motion to Address Embodied Carbon

Dear Councilmember Raman:

We, ZGF Architects, write in support of the proposed draft motion for embodied carbon for the City of Los Angeles. If the City hopes to meet our greenhouse gas emission reduction targets, it is imperative to address carbon emissions from building materials. We believe that the City of LA has the opportunity to influence significant reductions of greenhouse gas emissions related to the production of materials that make up our built environments. We support addressing these “embodied carbon emissions” of building materials through the adoption of a reach code for the City of LA.

We design hundreds of commercial buildings every year, many of them in the City of Los Angeles. We are familiar with the city’s Green Building Code and thus its shortcomings in addressing embodied emissions of building materials. Most of our projects achieve whole building embodied carbon emissions reductions without additional cost or schedule impacts. Our clients are asking for low-carbon buildings, and we, along with our peer design professionals, already have the tools and training necessary to deliver these types of buildings. Furthermore, the State of California requires all Licensed Architects to complete training in “Zero Net Carbon” design, ensuring that all Architects have the necessary knowledge and tools to design low carbon buildings.

We believe it is due time for City of Los Angeles to demonstrate leadership in following through with the C40 program commitments to reduce embodied carbon for major construction by 50% before 2030.

We believe the draft motion to reduce embodied carbon emissions of building materials will not burden city staff. While any new requirement added to LA Green Building Code potentially adds complexity to code enforcement, we recognize that these recommendations are designed to minimize technical burden at plan check. They address building material embodied carbon by using documentation (Whole Building Life Cycle Assessments and Environmental Product Declarations) that would be completed by design professionals like us. This reduces the onus of city plan checkers when verifying technical specifications.

For all these reasons, we fully support this motion and ask that it be approved.

Sincerely,  
ZGF Architects LLP

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