

## **Communication from Public**

**Name:**

**Date Submitted:** 02/13/2024 05:15 PM

**Council File No:** 23-1391

**Comments for Public Posting:** See attached letter

By post & email  
February 13, 2024

t +1 310 578 4400

[arup.com](https://arup.com)

Councilmember Nithya Raman  
200 N Spring St, Suite 415  
Los Angeles, CA 90012  
213-473-7004

Dear City of Los Angeles:

## **LA Embodied Carbon Motion**

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

I am writing in support of the proposed draft motion for embodied carbon for the City of Los Angeles. I lead the structural engineering practice within California for a global firm of building designers with a significant presence in the Los Angeles area, and we are keenly aware of the contribution that buildings we design make to climate change. 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 environment. We support addressing these embodied carbon emissions of building materials through the adoption of a reach code for City of LA.

The City has already made commitments to reduce building-associated emissions through the C40 program and the Sustainable City pLAn. The Sustainable City pLAn calls for all buildings to be net zero by 2050, while the C40 Clean Construction Declaration commits the City to reducing embodied carbon for major construction by 50% before 2030. Without implementing tangible policy to support its commitments, the City cannot meet these targets. The Los Angeles architecture, engineering, and construction (AEC) industry has recognized that to meet these targets, quantifying target embodied carbon reductions is imperative.

These recommendations would introduce a framework to set limits on building material embodied carbon by using documentation that would be completed by design professionals, including architects, manufacturers, and suppliers. In recent years, the AEC industry has seen a large push to perform more life cycle analyses with the intention to set building benchmarks and publish material Environmental Product Declarations; thousands of digital EPDs are available on open-source databases like Building Transparency's EC3 Tool. This reduces the onus of city plan checkers to verify technical specifications. As embodied carbon data and metrics are a familiar language in the AEC industry, the industry is well positioned to implement either a prescriptive or a performance-based approach to reducing embodied carbon. Furthermore, allowing building re-use in lieu of

Date

February 13, 2024

---

embodied carbon limits is a direct means to incentivize re-use without requiring excessive documentation.

We furthermore support the flexibility of the multiple compliance approaches in the proposal. Flexibility will allow project teams and building department staff to better enforce the code by allowing a range of options for compliance.

Los Angeles building codes have historically exercised outsize influence on other jurisdictions, for example LA's tall building seismic standards. These proposed code changes will be observed by other communities and states and offer an opportunity for Los Angeles to lead once again.

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

Sincerely,



Simon Rees, SE

e [simon.rees@arup.com](mailto:simon.rees@arup.com)

## Communication from Public

**Name:** Lauren Kubiak and Olivia Walker, NRDC  
**Date Submitted:** 02/13/2024 11:06 AM  
**Council File No:** 23-1391  
**Comments for Public Posting:** Please see attached letter from NRDC in support of the Los Angeles City Council adopting the Los Angeles Embodied Carbon Code.

February 13, 2024

Re: Proposed adoption of Los Angeles Embodied Carbon Motion by Los Angeles City Council.

Dear City of Los Angeles City Council:

We write to express the Natural Resources Defense Council (NRDC)'s support for the adoption of the proposed City of Los Angeles embodied carbon motion. This motion would create a framework that sets limits on the embodied carbon allowed for new construction and major additions to buildings larger than 50,000 square feet. This motion builds on the amendments to the 2022 California Green Building Standards Code, Part 11, Title 24 (CALGreen) that the California Building Standards Commission adopted in August 2023, aligns with the City's efforts to decarbonize building energy use in new construction, and would set Los Angeles on a leadership path toward addressing embodied carbon in its largest buildings.

Addressing greenhouse gas emissions from embodied carbon is crucial to meeting California's climate targets. Globally, embodied carbon emissions from construction materials comprise 8 to 11 percent of global carbon emissions but are estimated to increase as new construction is undertaken to meet the needs of growing populations. The statewide CALGreen embodied carbon requirements are a good start in tackling embodied emissions from buildings and materials, but they were designed to be readily achievable to raise the floor, rather than raise the bar. This proposed rule would raise the bar and set California's largest city on a pathway toward implementing a robust program that can tackle emissions in this sector. It also supports the commitments the City has made for reductions in buildings-related emissions through the C40 program and the Sustainable City pLan.

This proposed motion would require the Department of Building and Safety, in consultation with the City Attorney, the Los Angeles Housing Department, the Department of City Planning, the Department of Water and Power, and the Climate Emergency Mobilization Office, to prepare a report with recommendations for updating the Los Angeles Green Building Code that sets limits on the embodied carbon allowed for new construction and major additions to buildings larger than 50,000 square feet. The report would assess the impacts of requiring qualifying buildings to complete a whole building lifecycle assessment (WBLCA) and then mandating embodied carbon reductions, including staffing requirements, project costs, and emissions reductions. The report would further assess the impacts of requiring low-carbon materials to be used in projects.

Additionally, the report would assess impacts to affordable housing developers and provide financial assistance for completing WBLCA's or exempt affordable housing from the requirements. This is critical to ensure that embodied carbon reductions do not lead to an increase in affordable housing costs and therefore discourage the production of new affordable housing at a time when increasing the availability of affordable housing is an urgent priority for the city. To achieve this, we suggest the addition of this paragraph to the motion: "I FURTHER MOVE that the City Council direct the Chief Legislative Analyst (CLA), with the assistance of other relevant departments, to request input from the Southern California Association of Nonprofit Housing (SCANPH), the Los Angeles Business Council (LABC), AIA Los Angeles (AIA-LA), and the Supportive Housing Alliance (SHA) on additional policy changes that can

further enhance the City's ability to expedite the development of affordable and supportive housing.”

This motion includes considerations that will be important for embodied carbon reductions from buildings in cities across California and can serve as a model for other jurisdictions. By adopting this motion, the City would leverage the administrative capacity already being utilized to implement the CALGreen amendments to achieve deeper reductions in embodied carbon emissions. This would unlock additional savings without substantial increases in city staff time or project costs, but large potential additional emissions reductions. NRDC supports the adoption of this motion so that Los Angeles can unlock important emission reductions from embodied carbon in new buildings.

Thank you for your consideration.

Sincerely,

Lauren Kubiak  
Senior Scientist  
Natural Resources Defense Council  
111 Sutter St., 21st floor  
San Francisco, CA 94104  
Telephone: (415) 875-6100  
Email: [lkubiak@nrdc.org](mailto:lkubiak@nrdc.org)

Olivia Walker  
Equitable Building Decarbonization Advocate  
Natural Resources Defense Council  
1314 2<sup>nd</sup> Street  
Santa Monica, CA 90401  
Telephone: (805) 451-1973  
Email: [owalker@nrdc.org](mailto:owalker@nrdc.org)