

Communication from Public

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Comments for Public Posting: I wholeheartedly support this piece of legislation. My primary amendments would be to focus on GWP (global warming potential), rather than requiring all other impact categories associated with a Whole Building LCA, and to primarily focus on A1-A5 impact categories, otherwise referred to as “upfront embodied carbon.” This is accepted as the scope of impact that is in the control of commercial real estate developers and is significantly more accurate. As for scope of inclusion, for most large-scale commercial development, finishes account for roughly 15% of upfront embodied carbon, so it is my suggestion to focus requirements on the primary structural elements and enclosures of the buildings. This allows developers to focus on the “big ticket items” and minimize reporting burden.