

## Communication from Public

**Name:** Will Layden

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**Council File No:** 23-1391

**Comments for Public Posting:** On behalf of the American Wood Council, please see the attached letter for comments regarding Council File 23-1391. Thank you for the opportunity to comment.



February 28, 2024

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

Dear Distinguished Councilmembers:

The American Wood Council (AWC) appreciates the opportunity to provide the following comments in response to Council File 23-1391, which establishes embodied carbon policy in the City of Los Angeles. AWC writes in support of this proposed motion.

AWC is the voice of North American wood products manufacturing, an industry that provides over 450,000 men and women in the United States with family-wage jobs. AWC represents 87 percent of the structural wood products industry, and our members make products that are essential to everyday life that are derived from a renewable resource that absorbs and sequesters carbon for many decades. Our staff experts develop state-of-the-art engineering data, technology, and standards for wood products to ensure their safe and efficient design, as well as provide information on wood design, green building, and environmental regulations.

With buildings contributing approximately 39 percent of the United States' annual carbon dioxide emissions<sup>1</sup>, and building materials contributing approximately 11% to these emissions, it is imperative that steps be taken to address the climate impacts of the built environment, particularly embodied carbon emissions. In November of 2023, AWC had the privilege to partake in the World Economic Forum's Los Angeles City Sprint which was convened to discuss policy recommendations to address this challenge.

During the discussions at the City Sprint, AWC was a strong advocate of a whole building life cycle assessment (WBLCA) approach to effectively design embodied carbon out of buildings. This approach allows for carbon to be designed out at building design, allowing architects, building owners, and designers to construct buildings in a manner that best meets the project goals.<sup>2</sup> The result is a building that has a lower embodied carbon footprint compared to a similar, baseline building and an architect and building community which retains the freedom and flexibility to choose the best materials and systems for their own projects.

AWC commends the City of Los Angeles for advancing embodied carbon emissions reductions policy based on recommendations from the Los Angeles City Sprint work group as well as provisions in the existing California Green Building Standards code. We

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<sup>1</sup> Environmental and Energy Study Institute, "Buildings & Built Infrastructure," <https://www.eesi.org/topics/built-infrastructure/description>

<sup>2</sup> For example, this study demonstrates how WBLCA provided for significant carbon reductions of building with mass timber in an office building in Denver, Colorado while still meeting project goals: KL&A Engineers and Builders and Adolfson & Peterson, [Platte Fifteen 2021 Life Cycle Assessment](https://www.nordic.ca/data/files/publication/multilang_file/Platte15LCACaseStudy_July2021_KLA.pdf), (July 2021), p. 5. {HYPERLINK: [https://www.nordic.ca/data/files/publication/multilang\\_file/Platte15LCACaseStudy\\_July2021\\_KLA.pdf](https://www.nordic.ca/data/files/publication/multilang_file/Platte15LCACaseStudy_July2021_KLA.pdf) }



write to express our support for Council File 23-1391 and its recognition of WBLCA as a compliance pathway.

AWC appreciates the opportunity to weigh in on this policy and the overall embodied carbon emissions reduction goals in the City of Los Angeles. We would be happy to assist on any technical advisory committees established to help guide the implementation of policies with regards to structural wood products. We also welcome any questions you may have and would appreciate the opportunity to continue these important climate conversations.

Again, we thank you for the work you are doing in Los Angeles to help address climate change and embodied carbon in the built environment. If you have any questions, please feel free to contact me at the number below. Thank you for your consideration.

Sincerely,

*Will Layden*  
Will Layden

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