

Communication from Public

Name: robyn eason

Date Submitted: 02/14/2024 07:23 PM

Council File No: 23-1391

Comments for Public Posting: Hello LA City Committees - USGBC-Los Angeles is in strong support of the Embodied Carbon motion introduced last year and are reattaching our letter of support to advocate for its approval by all relevant bodies at the City of Los Angeles. This motion is historic & pioneering, aligns with the recent changes by CalGreen, and is an important step in decarbonizing the region. Thank you!!



U.S. GREEN BUILDING COUNCIL LOS ANGELES

525 S. Hewitt St.
Los Angeles, CA 90013
(213) 689-9707 usgbc-la.org

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EXECUTIVE STAFF

Ben Stapleton, Executive Director

August 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 City of Los Angeles:

The U.S. Green Building Council-Los Angeles (USGBC-LA) strongly supports the proposed draft motion for embodied carbon for the City of Los Angeles (City of LA). If the City hopes to meet our GHG 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, and we support addressing these “embodied carbon emissions” of building materials through the adoption of a reach code for City of LA.

USGBC-LA’s more than 3,000 members are sustainability and green building professionals with a deep commitment to addressing climate change and other local, state, and international environmental issues. Our members are designers, engineers, public agency and utility staff, consultants, product manufacturers, and service providers. Founded in 2002, our mission is to accelerate all aspects of sustainability in the built environment to create a more sustainable region for all.

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 will not meet these targets.

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 (LCA’s and EPD’s) that would be completed by design professionals, including architects, manufacturers, and suppliers. This reduces the onus of city plan checkers verifying technical specifications. The proposed requirements are also not expected to add significant burden or additional cost for new affordable housing projects.



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Ben Stapleton, Executive Director

We furthermore support the flexibility of the multiple compliance approaches in the proposal. The industry responds better to having both a prescriptive and performance-based approach, and one that also recognizes the embodied carbon benefits of building reuse without requiring excessive documentation. Flexibility will allow project teams and building department staff to better enforce the code by allowing a range of options for compliance.

We suggest one amendment to the motion, which is to shift the timeline to coincide with the statewide implementation of Calgreen mid-cycle code adoption, effective July 2024. This integrated approach would further streamline the implementation process and allow for an easeful transition by the Building & Safety Department and those required to abide by the code.

For these reasons, USGBC-LA is pleased to support this motion and request that it be advanced with the suggested amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Stapleton", with a horizontal line extending to the right.

Ben Stapleton
Executive Director, USGBC-LA

Communication from Public

Name: Maya White-Turre
Date Submitted: 02/14/2024 10:16 AM
Council File No: 23-1391

Comments for Public Posting: Dear Council Members: I am write in support of the proposed draft motion for embodied carbon for the City of Los Angeles. If the City hopes to meet our GHG emission reduction targets, it is imperative to address carbon emissions from building materials. 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, and I 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 will not meet these targets. 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, the recommendations are designed to minimize technical burden at plan check. They address building material embodied carbon by using documentation (LCA’s and EPD’s) that would be completed by design professionals, including architects, manufacturers, and suppliers. This reduces the onus of city plan checkers verifying technical specifications. The proposed requirements are also not expected to add significant burden or additional cost for new affordable housing projects. I furthermore support the flexibility of the multiple compliance approaches in the proposal. The industry responds better to having both a prescriptive and performance-based approach, and one that also recognizes the embodied carbon benefits of building reuse without requiring excessive documentation. Flexibility will allow project teams and building department staff to better enforce the code by allowing a range of options for compliance. For all these reasons, I fully support this motion and ask that it be approved. Sincerely, Maya White-Turre AIA