



7/20/2023

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 the undersigned 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. 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.

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.

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.

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

Sincerely,

Hafsa Burt, AIA, LEED Fellow | Principal