



**CALGreen Interim Code Cycle Updates:
*Implementing the new embodied carbon requirements
in nonresidential construction projects
starting July 1, 2024***

An Overview for Building Officials

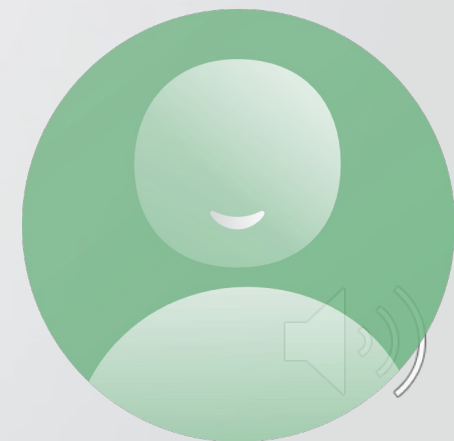
Spring 2024





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CAL Green.
2009 - 2024



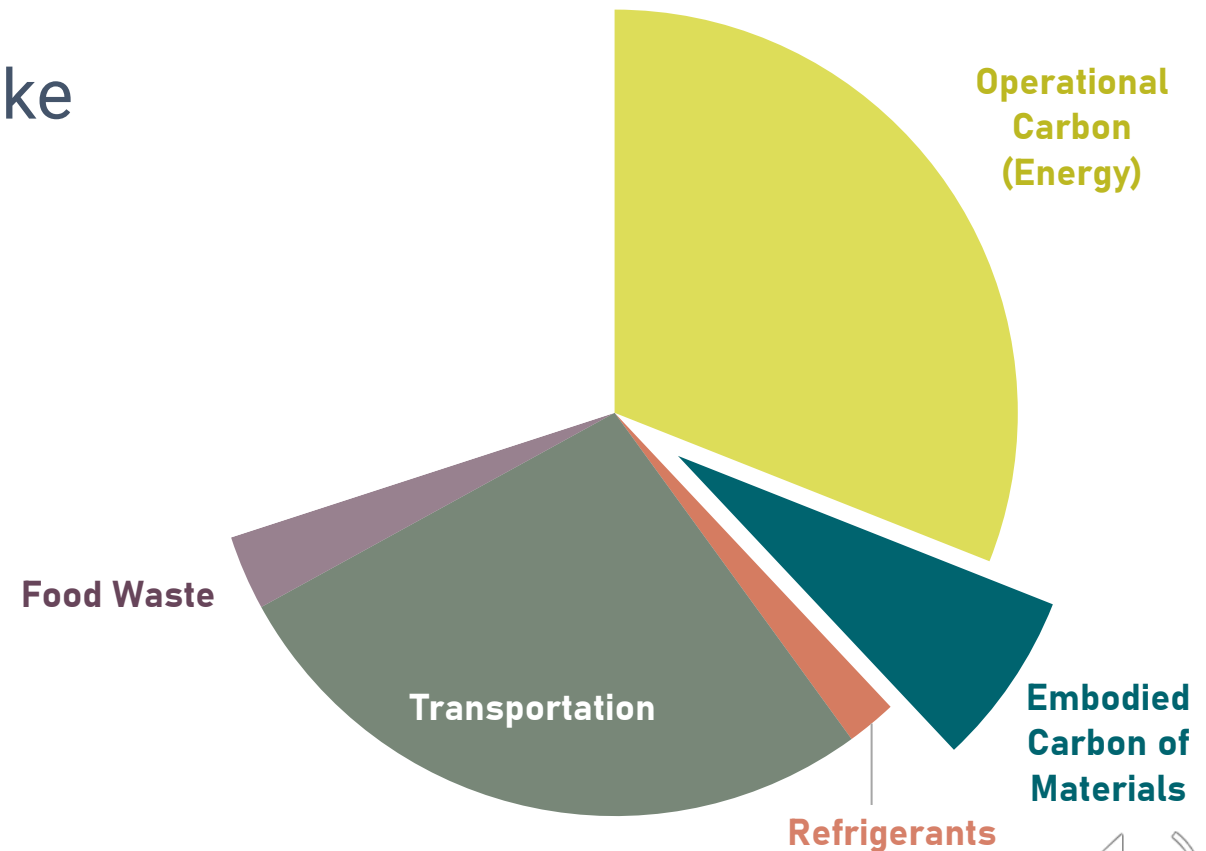
What is Embodied Carbon of Building Materials?

Embodied carbon refers to the energy and associated emissions that it takes to extract, transport, process and manufacturer the raw materials that make up building products.

Major sources of embodied carbon emissions:

- Concrete and cement
- Steel products
- Aluminum and other metals
- Glass

Annual Carbon Emissions:
US numbers from EPA



Timeline for CALGreen code updates on Embodied Carbon

2022 intervening
code cycle updates
go into effect

July 1, 2024

Embodied carbon
provisions
required for
projects over
100,000 sf

2025 Code goes
into effect

January 1, 2026

Embodied carbon
provisions now
required for
projects over
50,000 sf

2025 intervening
code cycle updates
go into effect

July 1, 2027

No anticipated
changes to
embodied carbon
provisions

2028 Code goes
into effect

January 1, 2029

- Updates expected for
embodied carbon
provisions:
- Lower embodied carbon
thresholds
 - More on building
reuse/preservation
 - More building types
covered



CALGreen Code Embodied Carbon Mandatory Measure

- *Applies to 100,000+ sq ft nonresidential and 50,000+ sq ft schools starting July 1, 2024*
- *Applies to 50,000+ sq ft nonresidential and schools starting January 1, 2026*

Pathway	Mandatory: Comply with 1 Pathway
Path 1: Building Reuse <i>(Section 5.105)</i>	45% of the structure and enclosure to be reused
Path 2: Whole Building LCA (WBLCA) <i>(Section 5.409.2)</i>	10% reduction from baseline
Path 3: Prescriptive Approach (Product Limits) <i>(Section 5.409.3)</i>	175% or less of Industry-Wide Environmental Product Declarations Global Warming Potential limits (IW-EPD GWP limits)



Covered projects: as of July 1, 2024

- **Projects covered by the new embodied carbon code sections:**
 - Nonresidential new construction under authority of the Building Standards Commission (BSC) over 100,000 square feet*
 - Nonresidential portions of mixed-use buildings (if over 100,000 sf)
 - Additions, modernizations or repurposed buildings that, in aggregate, are over 100,000 square feet*
 - School projects:
 - Schools projects under authority of the Department of the State Architect (DSA)
 - Over 50,000 square feet
 - Schools under authority of BSC*
 - Over 100,000 square feet

*Projects under authority of BSC will drop to 50,000 square feet in January, 2025



Projects that are NOT covered

- **Any residential buildings under authority of Housing & Community Development (HCD) are not required to meet these provisions**
 - Residential occupancies including single family homes, hotels, motel, etc.
 - Residential portions of multi-use buildings
 - Any residential occupancies regulated by HCD
- **DSA, OSHPD, UC and State Universities may have their own procedures for compliance**



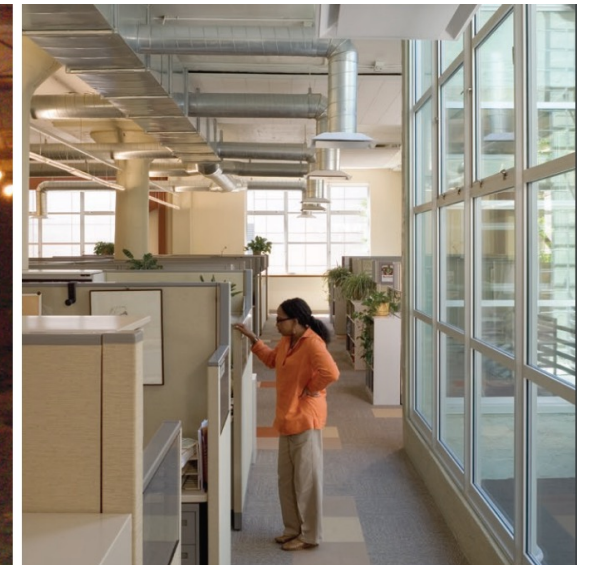
Compliance Pathway 1: Building Reuse



Path 1: Building Reuse

Demonstrate that 45% or more of the structure and enclosure are being reused

Can include rehabilitation, retrofits, and renovations that maintain the core structural elements of the building



Compliance

DOCUMENTATION OF COMPLIANCE OF EXISTING BUILDING REUSE:

Area of Existing Building 50,000 SF
 Area of Aggregate Additions 90,000 SF

5.105.2.1 Verification of compliance.

Documentation shall be provided in the construction documents to demonstrate compliance with Section 5.105.2.

Note: Sample Worksheet WS-3 in Chapter 8 may be used to assist documentation

	Existing Total Area (A)	Retained Total Area (B)	% of Retained Structure (B)/(A)
Gross floor area of Existing Building	50,000 SF	35,000 SF	70%

Total % Reuse of Required Elements = 70%

WORKSHEET (WS-3)
5.105.2 BUILDING REUSE

DOCUMENTATION OF COMPLIANCE OF EXISTING BUILDING REUSE

Area of Existing Building(s) _____ SF

Area of Aggregate Addition(s) (if applicable) _____ SF

	Existing Total Area (A)	Retained Total Area (B)	% of Retained Structure (B)/(A)
Primary Structural Elements of Existing Building(s) <small>(foundations; columns, beams, walls, and floors; and lateral elements)</small>	_____ SF	_____ SF	_____ %
Building Enclosure of Existing Building(s) <small>(roof framing, wall framing and exterior finishes only)</small>	_____ SF	_____ SF	_____ %

Total % Reuse of Required Elements ≥ 45% _____ %



Compliance Pathway 2: Whole Building Life-Cycle Assessment



Path 2: Whole Building Life-Cycle Assessment

Requirements:

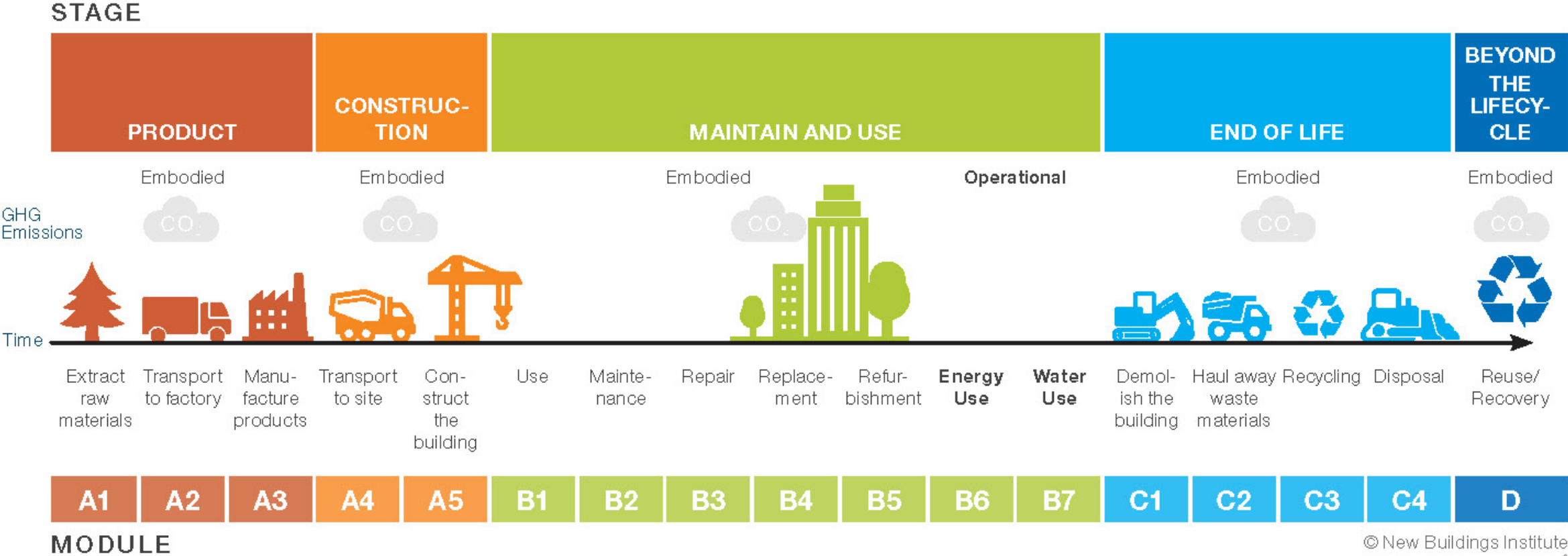
- Conduct a Whole Building Life-Cycle Assessment (WBLCA)
- Demonstrate at least 10% reduction in Global Warming Potential (GWP) compared to a baseline building
- Include these building components at a minimum:
 - Structural footings, foundations, columns, beams, walls, roofs and floors
 - Enclosure components: glazing, insulation and exterior finishes
- The WBLCA shall represent a 60-year lifespan



Life-cycle stages

FIGURE 1: LIFECYCLE STAGES

Data source: BS EN 15978:2011



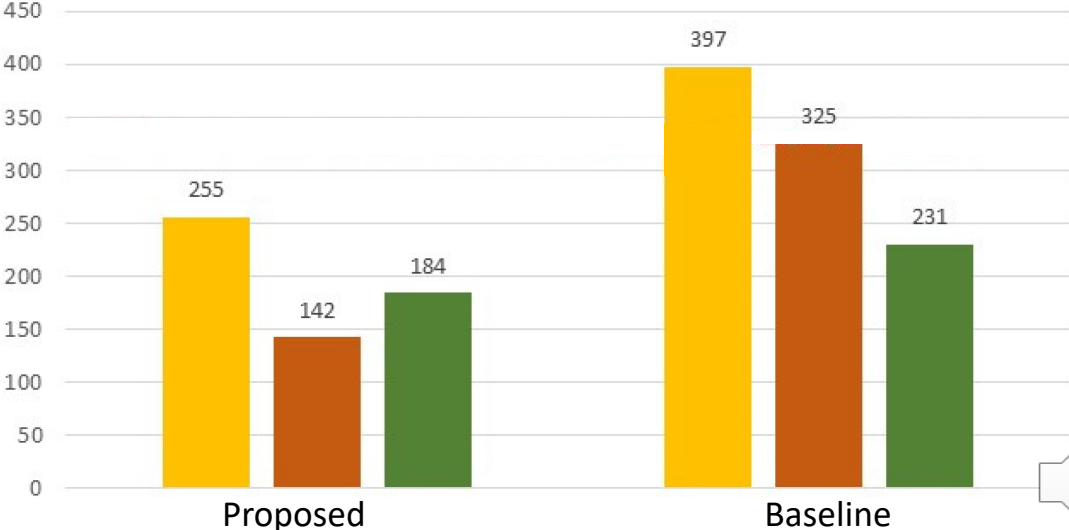
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Comparing to a baseline

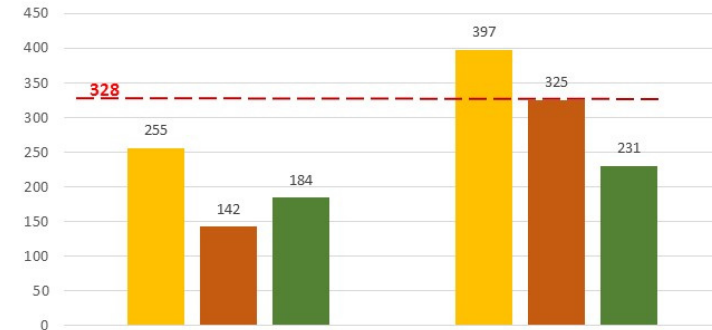
The project's design team will calculate the materials related embodied carbon impacts using software.

They will calculate the base scenario for the building project and compare their proposed project to demonstrate a 10% reduction.



Compliant WBLCA reports

- The baseline model must be project-specific
- Reductions are based on design optimizations
- Reductions based on material substitutions
- Most projects will use software tools to demonstrate compliance



Compliance steps

- **Ensure the scope of the WBLCA is cradle-to-grave**
- **Review a summary of the GWP analysis produced by the software tool used**
- **Review the worksheet WS-4 (sample found in CALGreen Chapter 8) and ensure it is signed by the design professional for accuracy and completeness**
- **Worksheet WS-9 is optional but can help in project review**



Worksheet WS-4

WORKSHEET (WS-4)
SECTION 5.409.2 WHOLE BUILDING LIFE CYCLE ASSESSMENT

Responsible Designer's Declaration Statement:
I attest that the Whole Building Life Cycle Analysis has been performed according to the requirements of Section 5.409.2 and has met the minimum 10 percent reduction in global warming potential as compared to a reference baseline building of similar size, function, complexity, type of construction, material specification, and location that meets the requirements of the California Energy Code currently in effect. Furthermore, I will ensure during construction that the material specifications will be reviewed for substantial conformance with the life cycle assessment indicated on the approved plans so at the close of construction the minimum 10 percent reduction in global warming potential is thereby secured.

Signature:	
Company:	Date:
Address:	License:
City/State/Zip:	Phone:



Optional Worksheet WS-9

WORKSHEET (WS-9) SECTION 5.409.2 AND SECTION A5.409.2 WHOLE BUILDING LIFE CYCLE ASSESSMENT

CALGreen Whole Building LCA Reporting Template						
LCA model run	<i>User input</i>	<i>Units</i>	Overall scope included (select all that apply)			
LCA Modeler (company) [private]			Structure (required)		<input type="checkbox"/>	
Date of Model Run (mm/yyyy)			Enclosure (required)		<input type="checkbox"/>	
Project Phase at Model Run			Interiors (optional)		<input type="checkbox"/>	
Reference Study Period (years)			MEP (optional)		<input type="checkbox"/>	1.0
Software and Version Used*			Site/Landscaping (optional)		<input type="checkbox"/>	1.0
Biogenic Carbon Included* (y/n)			FFE (optional)		<input type="checkbox"/>	1.0
Model Floor Area		m2				
Mandatory Scope Items						
Please break out the following in per element emissions by life cycle in kgCO2e. Leave blank any sections that were not calculated separately from Whole Building GWP						
	Upfront Carbon			Use Phase	End of Life	Total
	A1-3	A4	A5	B1-5	C1-4	
Baseline Structure GWP (kgCO2e):						
Baseline Enclosure GWP (kgCO2e):						
Baseline Whole Building GWP (kgCO2e):						
Proposed Structure GWP (kgCO2e):						
Proposed Enclosure GWP (kgCO2e):						
Proposed Whole Building GWP (kgCO2e):						
A1-A3*						
(A1) Raw Material Supply, (A2) Transport to Factory, and (A3) Manufacturing						
A4*						
(A4) Transportation to site						
A5*						
(A5) Construction Installation or "on-site energy use". Leave blank if unknown						
B1-B5*						
(B1) Use, (B2) Maintenance, (B3) Repair, (B4) Replacement, (B5) Refurbishment						
C1-C4*						
(C1) Deconstruction/Demolition, (C2) Transport to Waste Processing/Disposal, (C3) Waste Processing, (C4) Disposal of Waste						
D*						
(D) Reuse/Recovery & Recycling Potential						
Optional Items - Proposed Design ONLY						



Compliance Pathway 3: Prescriptive Approach (GWP Limits)



What is an Environmental Product Declaration?

- "Nutrition Label" for products
- Information = Impact
- Cradle-to-gate or Cradle-to-grave
- Reports lifecycle impacts:
 - Global Warming Potential (embodied carbon)
 - Eutrophication (excessive nutrients in waterways)
 - Depletion of the stratospheric ozone layer
 - Acidification (acid rain)
 - Tropospheric ozone formation (smog)
 - Depletion of nonrenewable energy resources
 - Ecotoxicity
 - And more!

EPD "Nutrition" Label

Your Building Product

Amount per Unit

LCA IMPACT MEASURES	TOTAL
Primary Energy (MJ)	12.4
Global Warming Potential (kg CO ₂ eq)	0.96
Ozone Depletion (kg CFC-11 eq)	1.80E-08
Acidification Potential (mol H ⁺ eq)	0.93
Eutrophication Potential (kg N eq)	6.43E-04
Photo-Oxidant Creation Potential (kg O ₃ eq)	0.121

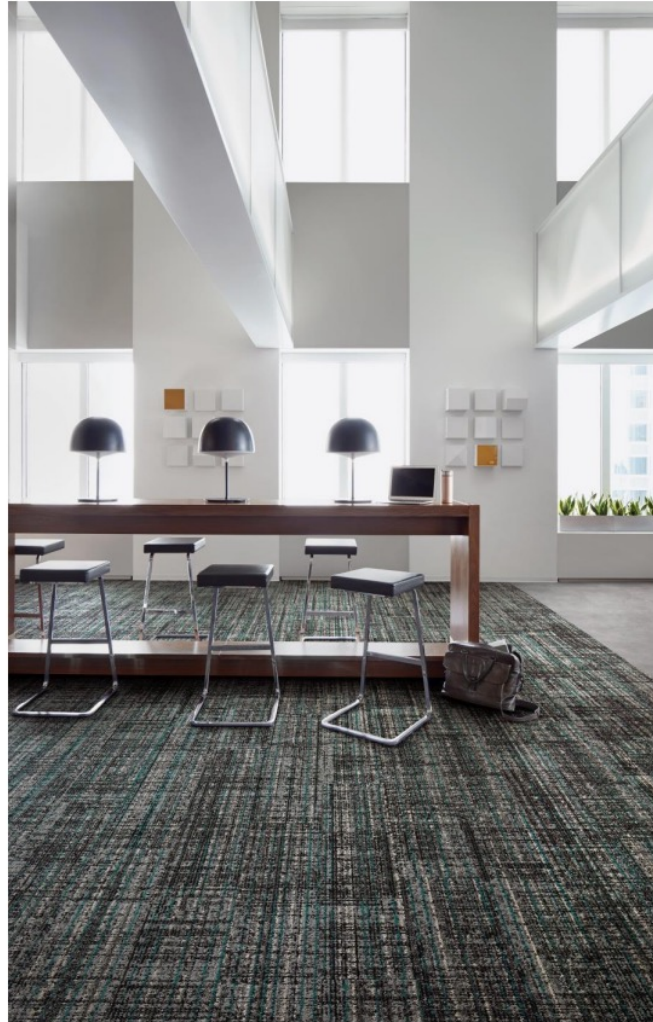
Your Product's Ingredients: Listed Here



ENVIRONMENTAL PRODUCT DECLARATION

MODULAR CARPET

INTERFACE, INC AMERICAS
GLASBAC®, NYLON



GlasBac®
Modular Nylon Carpet

Interface®

For more than four decades, Interface has consistently led the industry through design and innovation and is a world leader in environmental sustainability. We are committed to transparency and will continue to share our progress as we work to become a carbon negative company by 2040.

At Interface, we believe Life Cycle Assessment is critical for evaluating the environmental impacts of our products. The LCA-based Environmental Product Declaration is the best way to provide full disclosure of those impacts to our customers.

Interface was one of the first companies to develop EPDs for all of our products manufactured globally, and we are committed to providing this level of transparency to our customers, partners and the industry.

For more information visit www.interface.com



ENVIRONMENTAL PRODUCT DECLARATION

Interface®

Interface, Inc Americas
Modular Carpet on GlasBac®
Nylon



According to ISO 14025,
EN 15804 and ISO 21930:2017

Results of the LCA – Product stage A1-A3 TRACI Global Warming Potential (GWP) measured in kg CO₂-e for additional product yarn weights (ounces per square yard / grams per square meter)

YARN WEIGHT (oz./YD ²) AND (GM/M ²)	GWP MEASURED IN KG CO ₂ -E
12 oz. 407 gr.	4.14
13 oz. 441 gr.	4.22
14 oz. 475 gr.	4.30
15 oz. 509 gr.	4.38
16 oz. 542 gr.	4.46
17 oz. 575 gr.	4.54
18 oz. 610 gr.	4.62
19 oz. 644 gr.	4.70
20 oz. 678 gr.	4.78
21 oz. 712 gr.	4.85
22 oz. 746 gr.	4.93
23 oz. 780 gr.	5.01
24 oz. 814 gr.	5.09
25 oz. 848 gr.	5.17
26 oz. 881 gr.	5.25
27 oz. 915 gr.	5.33
28 oz. 949 gr.	5.41
29 oz. 983 gr.	5.49
30 oz. 1017 gr.	5.56
31 oz. 1051 gr.	5.64
32 oz. 1085 gr.	5.72
33 oz. 1119 gr.	5.80
34 oz. 1153 gr.	5.88
35 oz. 1187 gr.	5.96
36 oz. 1220 gr.	6.04
37 oz. 1254 gr.	6.12
38 oz. 1288 gr.	6.20
39 oz. 1322 gr.	6.27
40 oz. 1356 gr.	6.35
41 oz. 1390 gr.	6.43
42 oz. 1424 gr.	6.51

ENVIRONMENTAL PRODUCT DECLARATION

Interface®

Interface, Inc Americas
Modular Carpet on GlasBac®
Nylon



According to ISO 14025,
EN 15804, and ISO 21930:2017

EPD PROGRAM AND PROGRAM OPERATOR NAME, ADDRESS, LOGO, AND WEBSITE	UL Environment 333 Pfingsten Road Northbrook, IL 600611 https://www.ul.com https://spot.ul.com
GENERAL PROGRAM INSTRUCTIONS AND VERSION NUMBER	General Program Instructions v.2.5 March 2020
MANUFACTURER NAME AND ADDRESS	Interface, Inc.; Troup County, Georgia, USA
DECLARATION NUMBER	4789956802.106.1
DECLARED PRODUCT & FUNCTIONAL UNIT OR DECLARED UNIT	One square meter functional floor covering
REFERENCE PCR AND VERSION NUMBER	PCR Guidance for Building-Related Products and Services Part A: Life Cycle Assessment Calculation Rules and Report Requirements. 10010 Version 3.2. UL Environment. December 2018 PCR Guidance for Building-Related Products and Services Part B: Flooring EPD Requirements. 10010-7 Version 2. UL Environment. September 2018.
DESCRIPTION OF PRODUCT APPLICATION/USE	Modular flooring
PRODUCT RSL DESCRIPTION (IF APPL.)	15 years
MARKETS OF APPLICABILITY	Americas
DATE OF ISSUE	October 1, 2021
PERIOD OF VALIDITY	5 Years
EPD TYPE	Product Specific
RANGE OF DATASET VARIABILITY	Industry average
EPD SCOPE	Cradle to gate with options
YEAR(S) OF REPORTED PRIMARY DATA	2020
LCA SOFTWARE & VERSION NUMBER	GaBi v. 9
LCI DATABASE(S) & VERSION NUMBER	GaBi v. 9.2.169
LCIA METHODOLOGY & VERSION NUMBER	TRACI 2.1/ CML 4.2

This PCR review was conducted by:

This declaration was independently verified in accordance with ISO 14025: 2006.
 INTERNAL EXTERNAL

This life cycle assessment was independently verified in accordance with ISO 14044 and the reference PCR by:

UL Environment
PCR Review Panel
epd@ulenvironment.com

Thomas P. Gloria, Industrial Ecology Consultants

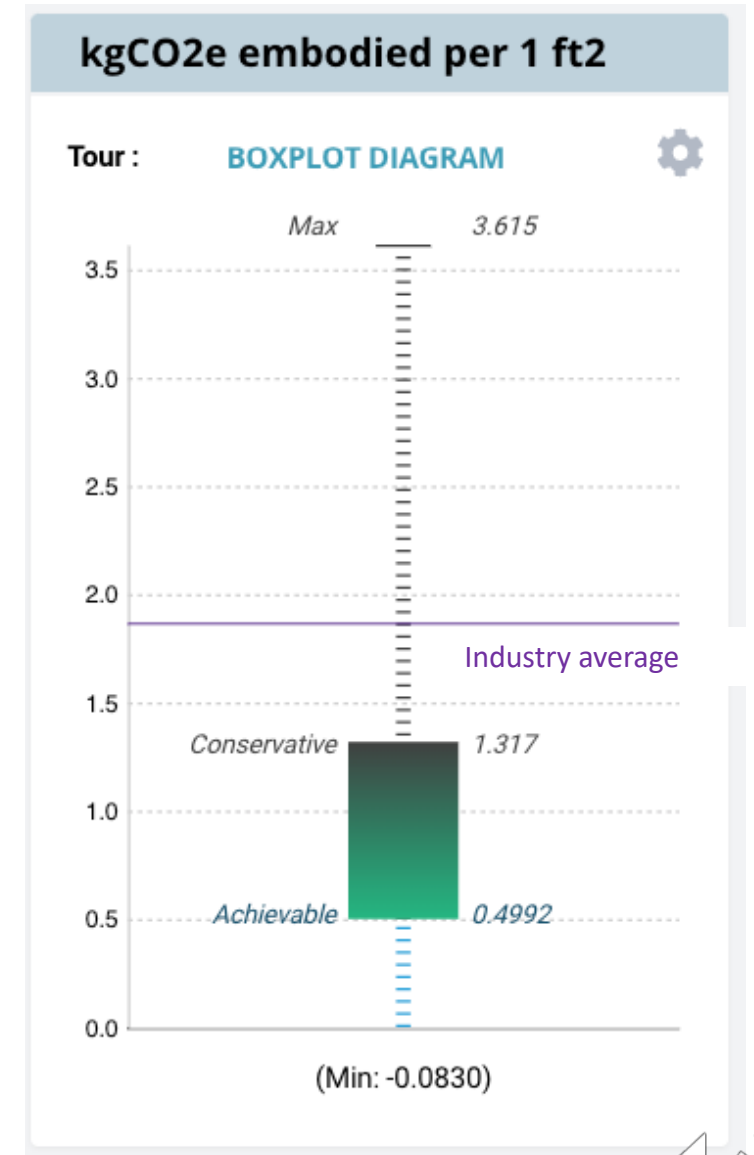
Thomas P. Gloria, Industrial Ecology Consultants

Prescriptive Pathway: EPDs

Targets specific high-embodied carbon materials for structure & enclosures

Project teams select low-embodied carbon products that have EPDs

Teams then compile results and compare against industry average values published in the code



Path 3: EPDs

Each product category must meet GWP limits that are 175% of industry average values

**TABLE 5.409.3
PRODUCT GWP LIMITS**

Buy Clean California Materials Product Category ¹	Maximum acceptable GWP value (unfabricated) (GWP _{allowed})	Unit of Measurement
Hot-rolled structural steel sections	1.77	MT CO _{2e} /MT
Hollow structural sections	3.00	MT CO _{2e} /MT
Steel plate	2.61	MT CO _{2e} /MT
Concrete reinforcing steel	1.56	MT CO _{2e} /MT
Flat glass	2.50	kg CO _{2e} /MT
Light-density mineral wool board insulation	5.83	kg CO _{2e} /1 m ²
Heavy-density mineral wool board insulation	14.28	kg CO _{2e} /1 m ²

Concrete, Ready-Mixed ^{2,3}

Concrete Product Category	Maximum GWP allowed value (GWP _{allowed})	Unit of Measurement
up to 2499 psi	450	kg CO _{2e} /m ³
2500-3499 psi	489	kg CO _{2e} /m ³
3500-4499 psi	566	kg CO _{2e} /m ³
4500-5499 psi	661	kg CO _{2e} /m ³
5500-6499 psi	701	kg CO _{2e} /m ³
6500 psi and greater	799	kg CO _{2e} /m ³

Concrete, Lightweight Ready-Mixed ²

Concrete Product Category	Maximum GWP allowed value (GWP _{allowed})	Unit of Measurement
up to 2499 psi	875	kg CO _{2e} /m ³
2500-3499 psi	956	kg CO _{2e} /m ³
3500-4499 psi	1,039	kg CO _{2e} /m ³



Prescriptive Concrete Exception

Concrete may be considered one product category to meet compliance with this section.

A weighted average of the maximum GWP for all concrete mixes installed in the project shall be less than the weighted average maximum GWP.

Verification of compliance.

- Calculations to demonstrate compliance
- Type III EPDs for products required to comply
- Worksheet WS-5 signed by the design professional of record
- EPDs to be provided to the owner at the close of construction and to the enforcement entity upon request.



WORKSHEET (WS-5)
SECTION 5.409.3 PRODUCT GWP COMPLIANCE - PRESCRIPTIVE PATH

Responsible Designer's Declaration Statement:

I attest that prescriptive compliance has been performed according to the requirements of Section 5.409.3 and products have met the minimum 10 percent reduction in global warming potential as specified in Table 5.409.3. Furthermore, I will ensure during construction that the material specifications will be reviewed for substantial conformance with the global warming potential limits indicated on the approved plans so at the close of construction the minimum 10 percent reduction in global warming potential is thereby secured.

Signature:	
Company:	Date:
Address:	License:
City/State/Zip:	Phone:



Conclusion & Resources

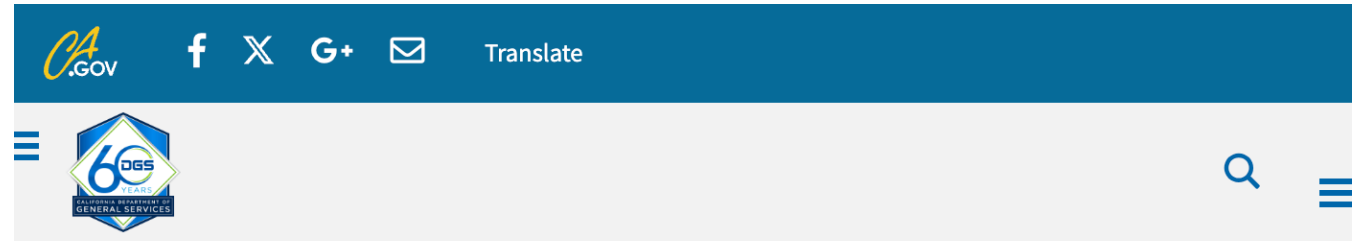


State and Federal action on embodied carbon

Buy Clean California Act

Federal Buy Clean Federal

US Gov't spending \$400 million on embodied carbon data for manufacturers



HOME » PROCUREMENT DIVISION » RESOURCES » BUY CLEAN CALIFORNIA ACT

Buy Clean California Act

State agencies, the University of California and California State University Systems, construction materials industries, and other interested parties can learn more about the limits placed on the embodied carbon of construction materials used in public works projects.

The **Buy Clean California Act (BCCA)** ([Public Contract Code Sections 3500-3505](#)), states the Department of General Services (DGS), in consultation with the California Air Resources Board (CARB), is required to establish and publish the maximum acceptable Global Warming Potential (GWP) limit for four eligible materials. The BCCA targets carbon emissions associated with the production of **structural steel** (hot-rolled sections, hollow structural sections, and plate).



Local Governments Acting on their Own

**Marin County (and Palo Alto)
Low Carbon Concrete Code**



**Emeryville
Mass Timber Bonus Points**



Embodied Carbon in Bay Area Climate Action Plans

Albany

Contra Costa County

Dublin

Fremont

Livermore

Oakland

Marin County

Pleasanton

San Francisco

San Leandro

 **Responsible Productions & Consumption**
RPC.1

STRATEGY
Achieve total carbon balance across the buildings and infrastructure sectors.

emissions from the embodied GHG emissions...
...e or other GHGs...
...ing in approximately...
...th alternatives such...
...by up to 50%.²
...maintaining required...
...addressing lifecycle...
...hough this measure...
...cluded in the State
GHG inventory. Therefore, this measure is considered supportive.
¹ <http://www.caaboutleadershipforum.org/about/what-embodied-carbon/>
² <https://materialspalette.org/soconcrete/>

Key Target Metrics
Adopt an ordinance mandating low carbon concrete for all new development projects by 2023
GHG Reduction Potential
Supportive

Approach: Reduce emissions embodied in goods and materials.

3.2.5 Partner with regional entities to encourage carbon-smart building materials. This includes educating architects, designers, and contractors. This action would enable and promote carbon-sequestering building materials in new construction and renovations. Ultimately, this action could lead to requirements for the disclosure and/or limit the embodied carbon emissions of buildings through whole-building or material-specific policies.

Measure MM-2: Reduce the Embodied GHG Emissions Associated with Building Materials
The City of Dublin will require the use of low carbon concrete in new construction projects to reduce lifecycle GHG emissions and the embodied carbon associated with construction projects.

BUILDINGS

B-4

Reduce Lifecycle Emissions from Building Materials

Lead Agency	Climate Benefit	Cost	Benefits
PBD		\$\$\$\$	

By 2023, adopt a concrete code for new construction that limits embodied carbon emissions. In subsequent building code updates, implement improved embodied carbon performance standards including additional materials and material-efficient building practices, with exemptions for cost barriers as needed to prevent these changes from directly increasing housing or rent costs. Ensure requirements are at least as stringent as the State of California procurement standards in effect at the time of the building code adoption. Explore ways of supporting local market development for low-lifecycle-emission and carbon-storing biogenic building materials.

Going Deeper

Building materials have significant GHG emissions associated with their procurement, manufacturing, and transportation, collectively known as embodied carbon or upstream emissions. As buildings get more energy efficient and are powered by low-carbon sources, embodied emissions become a larger portion of the lifecycle emissions for which they are responsible. These emissions have not historically been the focus of reducing GHG emissions in buildings, but they are an important part of the City's strategy to make our buildings cleaner, safer, and more resilient.

contribute to new green job pathways, which the City can support by promoting local training programs.

As the City identifies strategies for reducing embodied carbon in building construction and renovations, including through building code requirements, care must be taken to ensure that new requirements do not increase construction costs, and that the overall building stock can remain affordable for existing Oaklanders. Green building techniques include minimizing embodied carbon, increasing the use of natural materials, and moving towards more regenerative processes and materials. These are often pathways to affordability because lifetime operating costs – including utility bills – are minimized through space and appliance efficiency, healthier indoor air, and reduced need for heating and cooling. The City will work with partners such as StopWaste to identify best practices for reducing embodied carbon while maximizing affordability. This Action also has strong potential to



Resources

- View the CALGreen code online:
<https://codes.iccsafe.org/content/CAGBC2022P1>
- Official Guide to CALGreen (supplement) available on BSC website:
www.dgs.ca.gov/BSC/CALGreen
- Third party resources
 - Carbon Leadership Forum website: <https://carbonleadershipforum.org/resource-library>
 - American Institute of Architects (AIA) website: www.aia.org/landing-pages/6456754-zero-carbon
- More online resources coming soon





Please contact us for questions or comments on the embodied carbon code measures in CALGreen

Maria Hart mhart@stopwaste.org

Miya Kitahara miya@stopwaste.org

