

December 8, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Embodied Carbon Reporting Technical Meeting October 30th, 2025

To Whom It May Concern,

The California State University (CSU) continues to appreciate and support the efforts of the California Air Resources Board (CARB) to reduce emissions in the building and construction sector in support of AB 2446 and AB 43.

Regarding the latest iteration of CARB's proposed Covered Project Reporting Requirements, the CSU respectfully submits the following for consideration:

- **User-Friendly Basic Reporting:** The CSU appreciates the depth and detail of the sample spreadsheet reporting tool and its accompanying guidance; however, the spreadsheet tool in its current form seems to present a significant challenge for campus project teams to complete in a timely, reliable, and cost-effective manner. Instead, a CARB-developed or third-party software solution that supports data collection and/or reporting through automatic scraping and direct upload of documents would greatly reduce administrative burden on project owners, limit errors and omissions, and support higher rates of compliance. A tool tailored to extract and report as-designed/as-built data from various construction documents in a standard format would be a marked improvement compared with the currently proposed flat-file spreadsheet.
- **Voluntary WBLCA Option for Basic Reporting:** The CSU proposes an optional Whole Building Lifecycle Assessment (WBLCA) compliance pathway for covered residential and covered non-residential projects below the 50,000 square foot threshold. As expressed above, the Basic Reporting spreadsheet tool creates a costly and novel data collection framework, particularly for our relatively smaller projects. Although the WBLCA approach is currently proposed solely for larger-scale non-residential projects, providing this as an additional and voluntary compliance option to all covered projects could greatly simplify and standardize CSU reporting expectations and processes across CALGreen and CARB frameworks.

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Humboldt
Long Beach
Los Angeles
Maritime Academy

Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego

San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus

- **Estimated Cost Impacts:** The CSU anticipates that the proposed reporting requirements could increase project costs by up to 10%, particularly if reporting relies on flat-file spreadsheets and manual data entry. As both the project owner and the permitting authority, CSU does not currently have the staffing capacity or technical expertise to absorb these additional regulatory responsibilities. Compliance would likely require engaging third-party consultants or shifting substantial reporting workloads to design and construction teams, placing further pressure on project budgets and delivery timelines.
- **Reporting and Code Cycle Timing:** Teams working on projects to be permitted under newly effective building codes often require additional lead time to evaluate and integrate new code changes into project design. Project design development can be impacted or delayed as teams evaluate and adapt to major code changes, such as the 2025 Code Cycle going into effect on January 1, 2026. The CSU encourages CARB to align the proposed reporting cadence and deadlines with the timing major code cycle changes.

Thank you for the opportunity to comment on the proposed embodied carbon regulations. The CSU looks forward to continuing to be active partners in the ongoing development of these requirements and their implementation so that they are readily achievable for project owners.

Should you have questions, please do not hesitate to call me at (562) 951-4297 or reach me via e-mail at hkaplan@calstate.edu.

Sincerely,



Hank Kaplan
Scope 3 Emissions Manager
CSU Office of the Chancellor