**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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(Pg.20)

## **Total Embodied Carbon Emissions Results**

b) Threshold Method: summation of the total gross *embodied carbon* emissions, total gross carbon storage, and total net *embodied carbon* emissions according to Section 6.3 according to the *threshold specifications* for each unique *dwelling unit* type resulting from the *worst-case analysis* for the *Minimum Assessed Products* according to Section 5.4 of that *dwelling unit* type and multiplied by the number of *dwelling units* per unique *dwelling unit* type.[[1]](#footnote-1) This result is summed with the total gross *embodied carbon* emissions, total gross carbon storage, and total net *embodied carbon* emissions according to Section 6.3 for the *Minimum Assessed Products* for the foundation system, roof system, and common areas for the total *embodied carbon* results representative of the *assessed home*.

When the threshold method is used for a multifamily building, and the residential program only starts on the second floor, located over a slab on grade common space, the concrete associated with the slab would not be included in the embodied carbon calculation. As concrete is most likely the strongest contributor to embodied carbon, this would result in the worst-case dwelling unit being an inaccurate representation of the building.

**Proposed Change to the Draft Standard\***  
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*

*Use a color other than red to indicate proposed changes to the draft.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Identify if the threshold method is to be used on multifamily projects. If it is, then add clearer guidelines on how to include common and amenity spaces.

1. [↑](#footnote-ref-1)