**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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* A standard by nature is supposed to be uniform. Not sure this is determined to be the case across the board for this body of work but never-the-less the word “uniform” should not be included.
* While this is a “calculation methodology” it is creating an estimate and should not lend itself to a accurate quantitative result. It is more accurate to describe this methodology as “estimating and reporting”.
* Based on knowledge of the current lack of data and data that is incomplete for the purposes of carbon accounting. AND the admission in the forward that these conditions exist the calculations (estimates) should not claim technical rigor. It is important as you do to point out current gaps in understanding and data and be completely open about it. Therefore, text has been edited to be more transparent about the current challenges and limitations of this methodology.
* I do not think there is enough information to make a claim based on the number of building elements covered that it constitutes the majority of products or emissions. It may but I don’t thing it is certain. I wonder if hardscape which is not included could make this inaccurate. I suggest a change to be more transparent and less matter of fact.
* I changed the text around decisions, given the state of data, it is better to used this methodology to learn and seek to understand where opportunities to reduce carbon exist. Not to soley focus on procurement decsions that may be based on inaccurate or incomplete information since the data has gaps and not all stages are included.

**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.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Foreword (Informative)**

This Standard provides a ~~uniform~~ methodology for ~~calculating~~ estimating and reporting the embodied carbon emissions of Dwelling Units and Sleeping Units in Residential ~~or~~ and Commercial Buildings. The methodology does not provide ranking or scoring of the results produced using the Standard. This Standard is intended to enable energy raters and other practitioners to perform embodied carbon calculations leveraging the area-based building models and data inputs they already create, minimizing the number of steps required to complete an embodied carbon report.

Several stages of life-cycle assessment are currently excluded from this Standard, including the embodied carbon emissions associated with transportation of products to the construction site, construction-related activities, maintenance, replacement, and end of life/disposal of building products. The technical working group determined that, as of the date of this draft, there was insufficient reliable data on the embodied carbon emissions associated with these stages of a residential building’s life cycle to quantify the impact to a reasonable standard of accuracy and actionability. Therefore, ~~to maintain the technical rigor of the calculations in the rest of the Standard,~~ embodied carbon emissions estimates ~~outside of the cradle-to-gate stages are~~ ~~not calculated~~ in this ~~current~~ Standard may not be accurate. The technical working group intends to include additional life-cycle stages as data availability and quality improve.

The embodied carbon emissions estimates included in the Standard consider building products used in the following building elements: structure, enclosure, partitions, mechanical, electrical, plumbing, finishes and garages. This may or may not be representative of ~~and therefore address~~ the majority of products that compose a residential building and the majority of emissions arising from homebuilding.

This Standard is intended to work alongside the Carbon Index results achieved by using RESNET Standard 301 to assess operational emissions. By considering the results of both an embodied carbon assessment and the Carbon Index, it is possible to understand a more holistic carbon footprint for an assessed home. Raters and homebuilders can use the combined results to better understand and act on opportunities ~~achieve coordinated decarbonization decisions~~ that support emission reductions of both operational and embodied emissions.

Quality Assurance (QA) measures will be an important aspect of ensuring that reports generated using this Standard are complete and trustworthy. QA guidelines and programs are not currently developed or available. Development of appropriate QA guidelines ~~will~~ may be undertaken once this Standard enters the market, and ~~users can collaborate to create such guidance and~~ may be added to the Standard under continuous maintenance.

Remaining Forward text unchanged.