

May 1, 2023

The Honorable Michael S. Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20004



*Re: EPA-HQ-OPPT-2022-0924, Request for Information (RFI) to Support New Inflation Reduction Act Programs to Lower Embodied Greenhouse Gas Emissions Associated with Construction Materials and Products*

Dear Administrator Regan:

The American Society of Landscape Architects (ASLA) applauds your actions to address carbon emissions in the built environment, including recent programs outlined in the Inflation Reduction Act such as the Federal Buy Clean Initiative.

ASLA shares your concern for identifying and utilizing construction materials that help achieve climate and resilience goals. In fact, ASLA's recently adopted [Climate Action Plan](#) calls for all landscape architecture projects to achieve zero emissions by 2040 by significantly reducing the embodied carbon in projects. As you know, embodied carbon is the greenhouse gas emissions that come from extracting, manufacturing, transporting, installing, maintaining, and disposing of materials. Reducing embodied carbon is recognized as a key action area for landscape architecture and other built environment industries — including design, real estate, and construction — to address climate change.

The landscape architecture profession is at a critical moment where reducing the carbon footprint of the built environment is possible today. But collaboration among industry leaders is necessary to enable a rapid market transformation toward regenerative carbon strategies in the coming years and decades. As such, ASLA is collaborating with the Carbon Leadership Forum, New Buildings Institute, American Council for an Energy-Efficient Economy (ACEEE), Building Transparency, and RMI to achieve these goals and supports the comments submitted by these groups in response to this request for information (RFI - EPA-HQ-OPPT-2022-0924).

To further prioritize the work and key design elements of new Inflation Reduction Act programs to lower embodied greenhouse gas emissions associated with construction materials and products, ASLA also recommends:

- The term “landscape architects” and/or “landscape architecture” be used in any reference to relevant disciplines, such as architecture, engineering, etc.
- The term “whole project” carbon assessments be used instead of “whole building.”
- The scope of embodied carbon efforts relate to the “entire built environment” inclusive of buildings, infrastructure, and sites.

- Support for Environmental Product Declaration (EPDs) be extended to product manufacturers that develop products used in the exterior built environment, inclusive of landscapes and infrastructure, supporting whole project approaches in EPD development.
- The material list be expanded to include exterior site elements, including stone, aggregates, timber, and nursery-grown materials.
- The Federal Life Cycle Assessment (LCA) Commons commit to a common set of methodologies and reporting standards, as a wide range of EPD and LCA typologies of varying levels of rigor are cataloged there.

Climate and other environmental concerns are increasing the demand for sustainably designed infrastructure projects and addressing embodied carbon emissions is becoming increasingly critical to achieving our nation's climate goals. As your agency continues to work on this issue, ASLA urges you to look beyond buildings and to include the entire built environment in your analysis and solutions. ASLA and our member landscape architects would be pleased to work with you on expanding the scope to include landscapes and other built environments.

Once again, thank you for your efforts to promote the use of construction materials and products that produce substantially lower levels of greenhouse gas emissions as a viable policy option to address some of our nation's pressing issues. If you have questions or need additional information, please contact me or ASLA Federal Government Affairs Director Roxanne Blackwell, Hon. ASLA, at [rblackwell@asla.org](mailto:rblackwell@asla.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Torey Carter-Conneen', with a long, sweeping horizontal line extending to the right.

Torey Carter-Conneen  
Chief Executive Officer