



March 18, 2024

Debbie-Anne A. Reese
Acting Secretary, Federal Energy
Regulatory Commission
888 First Street
NE, Room 1A, Washington, DC 20426

Re: EPA–HQ–OPPT–2024–0038

Dear Acting Secretary Reese,

The American Society of Landscape Architects (ASLA) applauds the development of the EPA Label Program for Low Embodied Carbon Construction Materials, a significant step forward in the evolution of the environmental product declaration (EPD) industry. ASLA stands firmly behind the overarching objective to enable consumers and specifiers to understand the impacts of products and materials purchased and specified.

Founded in 1899, ASLA is the professional association for landscape architects in the United States, with 49 chapters representing the 50 states and U.S. territories. Landscape architects, using their STEM-focused education and training, plan and design all outdoor spaces, including community master plans, multimodal transportation networks, transit-oriented development projects, outdoor parks and recreation spaces, water management projects, and more. In designing these community infrastructure projects, landscape architects routinely use nature-based solutions to mitigate the impacts of climate change, manage stormwater, reduce the heat island effect, protect coastal communities, and more.

The landscape architecture profession offers a unique perspective regarding EPDs that is different from peers in the engineering and architecture professions. The nature of our work requires constant interdisciplinary collaboration; landscape architects are often the facilitator between the ecological sciences and the construction industry.

In 2023, ASLA joined the [Embodied Carbon Harmonization and Optimization \(ECHO\) Project](#), a coalition of built environment industry groups focused on rapidly reducing embodied carbon in the built environment. The goal of the project is to ensure all embodied carbon reporting at the whole building and whole project scale in the U.S. — including landscapes and infrastructure — follow the same clear definitions and scopes of included impacts. Standardized reporting is critical to advancing the industry’s understanding of embodied carbon emissions and its ability to measure meaningful reductions, as well as providing a mechanism to reliably compare emissions reporting between projects.

On behalf of ASLA, we respectfully submit the following comments on the Draft Label Program Approach:



Data Quality Improvements

Through tools like the [Climate Positive Design Pathfinder tool](#) and the [Carbon Conscience tool](#), landscape architects are measuring the carbon footprints of projects to improve the impact of built landscapes while increasing carbon sequestration. These tools integrate data sourced from manufacturer-provided EPDs found through databases such as Building Transparency’s EC3 tool.

ASLA underscores the need for future labeling programs to be easily compatible with existing tools and workflows through Application Programming Interfaces (APIs), to ensure a harmonious integration without duplication. The goal is to maintain synchronization with other databases for optimal efficiency and collaboration within the industry.

The landscape architecture industry applauds the rigor behind many of the EPD methodologies falling under the current ISO standards 14040/14025. However, we encounter a gap in existing datasets, specifically the lack of clear PCRs for living materials¹. For example, there is a huge gap in verifiable product information for trees procured from landscape nurseries. We recommend a PCR for living horticultural materials, which would be transformative and better support this industry’s ability to improve and maximize the impacts of their products. We suggest that a living material EPD would also need to discount the global warming potential (GWP) of a given product for the amount of carbon that the product sequesters during its cultivation.

In addition to living materials, there needs to be an easier way to access EPDs for raw materials. The landscape architecture and civil engineering professions specify vast volumes of raw materials – from blended soils to crushed road base. Those industries largely do not have clear PCRs¹, and there is little interest for suppliers to certify due to the wholesale bulk nature of the product. Regional industry-level EPDs would be greatly helpful for those materials.

Material Threshold Setting

Regarding material threshold setting, we highly recommend a geographic designation based on assemblies of adjacent states – such as “New England” – as this designation will work best with existing procurement processes and municipal regulatory mindsets, such as “Buy New England” to reduce carbon transportation costs.

Understanding the importance of regional designations in reducing carbon footprints, it is crucial to recognize the significant role plants play in sequestering carbon dioxide from the atmosphere. Plants sequester carbon dioxide from the air through the process of photosynthesis, during which CO₂ is converted to cellulose, sugars and other materials in a chemical reaction catalyzed by sunlight. These are then mostly stored as biomass – wood, roots, and leaves, while some CO₂ is respired back.

¹ EPD International. (n.d.) *EPD Portal*. The International EPD System. <https://www.environdec.com/product-category-rules-pcr/find-your-pcr>



The amount and rate of CO₂ storage is directly related to how big and how fast a plant is growing. This in turn depends on species, geographic location, which can affect length of growing season, and age of the plant. Warmer regions with more sun exposure have longer growing seasons and thus trees/shrubs in those regions sequester more CO₂². These values can vary greatly, and this is an area where standardization in reporting is greatly needed.

Certifying and Labeling Materials and Products

A low carbon or similar label for a product, curated with the same rigor as the ENERGY STAR program, would be transformative, and highly desirable for the construction industry, especially for more complex products, such as light fixtures or furnishings. ASLA supports using Type III, Product-Specific, third party-verified EPDs' reported environmental data to inform GWP thresholds, as noted in the draft approach. This ensures the data captures the whole product life of carbon impacts to support low-embodied carbon labeling.

Overall Approach

The current mix of proposed materials for early focus – steel, asphalt, concrete, etc. – rightly focuses on the highest emissions materials. But this focus overlooks the potential of biogenic materials. ASLA suggests giving the same weight of scrutiny to wood, bamboo, and natural fiber-based products. At this stage, it is critical to support these industries in maximizing their positive environmental impacts³. If these additional products can be included, there is an opportunity to better define how those products are sustainably managed, fabricated, and tracked.

Standardizing the calculations for biogenic materials would enable the reporting of carbon stored within the material—carbon that is sequestered in the environment—as a negative emission, in accordance with the convention on biogenic neutrality within whole-site Life Cycle Analysis standards, provided that sustainable sourcing criteria are satisfied. This would create incentives for American timber and agricultural industries to participate in this standardization effort.

Research, Technical Assistance, and other Resources

To achieve this holistic reporting for EPDs, we emphasize the need for the EPA to continue to provide grants, technical assistance, and tools to measure, report, and substantially lower the levels of embodied carbon and other greenhouse gas emissions associated with the production, use, and disposal of construction materials and products. This support would prove vital, especially for small manufacturing companies, to participate in comprehensive environmental reporting without facing prohibitive costs.

² McPherson, EG.; Simpson, JR. (1999). *Carbon dioxide reduction through urban forestry: Guidelines for professional and volunteer tree planters*. Gen. Tech. Rep. PSWGTR-171. Albany, CA: Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture

³ University of Kentucky. (2024) *Life Cycle Assessment*. Kentucky Cooperative Extension Service: Nursery Crop Extension Research. https://nursery-crop-extension.ca.uky.edu/current_research_LCA



Conclusion

In 2022, ASLA announced a new focus on scaling up equitable, nature-based solutions to the climate and biodiversity crises. The [ASLA Climate Action Plan](#) charts a pathway for landscape architects to achieve zero greenhouse gas emissions in their projects and operations and increase carbon sequestration by 2040.

ASLA applauds the EPA's efforts in the development of the EPA Label Program for Low Embodied Carbon Construction Materials, which would provide accountability and transparency. EPDs will be an important part of reducing climate impacts of landscape architecture projects. We envision a future where EPDs become as prevalent and universally recognized as nutrition labels, exhibiting a comparable level of thoroughness and widespread acceptance in the years ahead.

Thank you for considering our organization's input. We look forward to future collaboration and progress in advancing sustainable practices within the built environment. If you have questions or need additional information, please contact me or ASLA Climate Action Senior Manager, Jared Green, Hon. ASLA, at jgreen@asla.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Torey Carter-Conneen". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Torey Carter-Conneen
Chief Executive Office