

April 8, 2025

Ms. Pamela Gupta, Branch Chief
Building Decarbonization and Innovative Strategies Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Public Comment on March 13, 2025 CARB Workshop on Embodied Carbon

Dear Ms. Gupta,

On behalf of the California Nevada Cement Association (CNCA), we wish to express our thanks for the opportunity to comment on the California Air Resources Board's (CARB) ongoing efforts to develop a regulatory program attendant to the carbon intensity in reducing the carbon intensity of building materials used in the construction of new buildings, including those for residential uses, as required by Assembly Bill AB 2446 (Holden) signed by Governor Newsom in September 2022 and AB 43 (Holden), which was signed by the Governor in October 2023.

We would also like to express our appreciation to CARB staff who participated in our recent meeting and explained in detail their current understanding of the program in its current draft form. During that meeting, it was stated that CARB did *not* intend to include "subcomponents of a construction material" and, as we recall, provided the example of aluminum used in the manufacture of window frames.

On behalf of CNCA, we applaud that approach. As such, cement is not a "stand alone building material." It is a subcomponent of concrete, which is the building material. Based on the above, we believe that we should not be subjected to the provisions of this new regulation.

Additionally, CNCA member companies are currently regulated under CARB's mandatory reporting of greenhouse gas emissions (MRR) requirements. As such, CARB is well aware of the emissions associated with our member's cement manufacturing facilities in California.

Again, thank you for the opportunity to comment and your staff's time to explain the program in detail to us, which clarified the point that CARB does not intend to include subcomponents of a construction material, such as cement, as indicated above.

Ms. Pamela Gupta, Branch Chief

April 9, 2025

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If you and your staff would like to discuss this issue further, we are more than happy to accommodate that request.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas R. Tietz", with a long horizontal flourish extending to the right.

Thomas R. Tietz
Executive Director

CC:

Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Mark Sippola, Chief, California Air Resources Board

Rachel Gold, Esq., Supervisor, California Air Resources Board

Alexander "Lex" Mitchell, Supervisor, California Air Resources Board

Liang Liu, Supervisor, California Air Resources Board