



A Chapter of
Precast/Prestressed
Concrete Institute

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April 14, 2025

To the California Air Resources Board:

PCI West, a chapter of the Precast/Prestressed Concrete Institute (PCI), appreciates the opportunity to comment on the California Air Resources Board's (CARB's) Building Embodied Carbon workshop held March 13, 2025, in support of the implementation of AB 2446 and AB 23. We agree that such legislation is needed and is helpful for advancing the cause of sustainable construction.

Prestressed Concrete Manufacturers Association of California, Inc. (dba PCI West) is a California incorporated non-profit organization since 1958. PCI West represents 12 Producer Members whose 17 plants service projects in California. PCI West members comprise the majority of structural and architectural precast concrete manufacturers in California. All PCI West members are participants in the PCI's Plant Certification Program. PCI's Plant Certification Program ensures that each plant has developed and documented an in-depth, in-house quality system based on time-tested, national industry standards.

The comments proposed herein were developed by the precast concrete manufacturers located in California that belong to the regional association PCI West. PCI West members have extensive experience in addressing the use of their products in a sustainable manner and the development of specification language appropriate to encourage their sustainable use. Precast concrete manufacturers developed its first North American product category rule (PCR) for precast concrete and generated their first industry-average environmental product declarations (EPDs) in 2015. The third generation of those industry-average EPDs are currently being finalized and are expected to be published next month. As a side-benefit of the latest industry-average EPD effort, any PCI member that participated is able to generate EPDs on demand using an online tool. Among these precast concrete manufacturers, there is a common commitment and willingness to engage with CARB on a continuing basis.

Slide 33, Request for Feedback, Question 2 Feedback on the LCA scope and system boundary

- **Slide 26:**
 - Initial Staff Thinking: proposed scope includes A1-A5 life cycle emissions.
- **Comments:**
 - Scopes for life-cycles stages that are required to be reported in EPDs are set by relevant-industry PCRs and ISO standards.
 - For example, the precast concrete PCR, which is different than the ready-mixed concrete PCR, is beginning revision and is exploring expanding its scope to A1-A5.

- Current minimum scopes set by North American PCRs are only A1-A3.
- Very few EPDs on the market include a A1-A5 scope.
- PCRs are continually maintained, however, may be valid for 5 years.
- Any currently valid EPDs that have been published only report A1-A3 life cycle modules.
- Updates to PCRs to require reporting A1-A5 life cycle modules would take a couple of years, and any subsequent EPDs that meet those updated PCRs would follow thereafter.

- **Suggestion:**

- Allow EPDs to be submitted that report A1-A3 life cycle modules for a set time period (perhaps 5 years).

Slide 46, Request for Feedback, Question 3 Feedback on concepts for data reporting regulations

- **Slide 40:**

- Initial Staff Thinking: Building material manufacturers submit product quantities and revenue quarterly.

- **Comments:**

- Quarterly reporting seems overly burdensome.
- Concerns with reporting of confidential business information, including revenue.

- **Suggestion:**

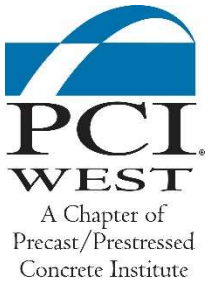
- Allow annual submission of product quantities.
- Do not require revenue reporting.

- **Slide 43:**

- Initial Staff Thinking: primary and background data needs to be less than 2 years old.

- **Comments:**

- Data quality requirements for EPDs are set by PCRs and ISO standards.
- Current practice allows for background data to be 5 years old.
- Background data is developed by federal agencies and NGOs; manufacturers have little to no influence on the speed of background dataset updates.
- Current federal policies have cut funding to federal workforce that maintains and updates background data.
- Any currently valid EPDs that have been published may use background or primary data that is 5 years old.
- Updates to PCRs to require primary and background data to be less than 2 years old would take a couple of years, and any



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subsequent EPDs that meet those updated PCRs would follow thereafter.

- **Suggestion:**
 - Allow background data to be 5 years old.

In closing, thank you for the opportunity to provide comments on these draft concepts presented at the workshop. PCI-West precast concrete manufacturers are committed to assisting the CARB office in improving these concepts. It is our hope that we will be able to engage and collaborate on a continuing basis.

Sincerely,

PCI West

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Executive Director

Cc: Jon Clausen – General Manager – Coreslab Structures, LA, Inc. (PCI West President)

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