



September 16, 2026

VIA E-MAIL

California Air Resources Board
1001 'I' Street
Sacramento, CA 95814

Re: CalcIMA Comments on CARB Draft 2026 Roadmap to Reduce Air Toxics

Dear Chair Sanchez and Members of the Board,

California Construction and Industrial Materials Association (CalcIMA) appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) Draft 2026 Roadmap to Reduce Air Toxics (Draft Roadmap). CalcIMA supports CARB's objective of protecting public health and strengthening the scientific foundation of California's air toxics programs. Because the Draft Roadmap is intended to guide CARB's air toxics work for decades, it is important the framework be grounded in sound science, accurate source-specific data, meaningful stakeholder engagement, and careful consideration of how future policies will interact with existing state and local air-quality programs.

CalcIMA represents producers of construction and industrial materials throughout California, including aggregate, ready-mixed concrete, asphalt, cement, industrial minerals, and precast concrete. Our members operate hundreds of facilities throughout the state and have extensive experience working with CARB and California's local air districts to implement air-quality regulations, permitting requirements, emissions inventories, health-risk assessment programs, and emission-reduction measures.

Through these comments, CalcIMA seeks to ensure that implementation of the Draft Roadmap builds upon California's existing air toxics programs while focusing future efforts on areas where measurable additional risk reductions can be achieved. Specifically, CalcIMA encourages CARB to rely on accurate, source-specific data and rigorous scientific methods, preserve appropriate local air district flexibility, and meaningfully engage regulated industries throughout policy development and implementation. CalcIMA also encourages CARB to establish a transparent prioritization framework that directs limited resources toward pollutants, sources, and strategies capable of achieving meaningful public-health benefits.

1. Recognize the existing regulatory baseline and emissions reductions

Before establishing new regulatory priorities, CARB should clearly identify the existing regulatory baseline and emissions and risk reductions already achieved through AB 2588, AB 1807, Airborne Toxic Control Measures, local air-district regulations, permitting programs, and investments made by regulated facilities. California's air toxics programs have evolved considerably over several decades. Understanding what has already been achieved, and which sources and pollutants continue to drive meaningful risk, is necessary to

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ensure that limited public and private resources are directed toward measures capable of producing measurable additional public-health benefits.

CalCIMA also encourages CARB to provide additional context when describing “emerging” or newly identified air toxics. The identification of additional compounds through improved analytical methods, expanded emissions reporting, or evolving toxicity information does not necessarily demonstrate that the compounds are newly present in California’s air or that associated exposures or health risks have increased. The Roadmap should distinguish between newly identified compounds, newly available toxicity information, newly detected emissions, and evidence demonstrating a new or increasing public-health concern so that future priorities are based on a clear understanding of what has changed and where additional risk reduction is warranted.

2. Ensure emissions inventories and risk assessments are based on accurate, source-specific information

CalCIMA strongly supports CARB's goal of improving the accuracy of air toxics emissions inventories. These improvements are particularly important for construction and industrial materials operations. Outdated emission factors, assumptions, or speciation profiles may not accurately characterize modern equipment, materials, controls, operating practices, or actual emissions. Such assumptions can compound through emissions inventories, dispersion modeling and health-risk assessments and ultimately influence permitting and regulatory decisions. Accordingly, CARB should prioritize development and validation of representative, source-specific emissions information and provide affected industries with meaningful opportunities to review and provide technical information regarding emission factors, speciation profiles, monitoring methodologies, and modeling assumptions before those tools are relied upon for regulatory purposes. The identification or reporting of a toxic air contaminant does not, by itself, establish that a facility presents a significant health risk. CARB should clearly distinguish emissions reporting, screening-level information, modeled exposure, and scientifically supported determinations of actionable health risk.

And more specifically, CARB should also update and validate emissions factors and speciation profiles before facility-level data is incorporated into modernized public mapping or facility-search tools. In cases where underlying factors or profiles are outdated or were developed for purposes other than facility-level risk characterization, those limitations should be addressed before the information is publicly presented. Doing so will help ensure that publicly available information does not lead to inaccurate conclusions about emissions or potential risks associated with individual facilities.

3. Maintain rigorous scientific standards for monitoring, modeling and cumulative-risk evaluation

CalCIMA supports continued improvements in monitoring and modeling technology. New tools can provide valuable information, particularly for screening and identifying areas warranting further investigation. However, screening information should not automatically become the basis for facility-specific regulatory or permitting decisions without appropriate validation. The Draft Roadmap's discussion of cumulative-risk evaluation raises similar concerns. Any methodology ultimately developed must clearly distinguish between sources and emissions within an individual facility's control and broader community exposures attributable to mobile, stationary, area, and other sources. A facility should not face permit denial, operational restrictions, or other regulatory consequences based substantially on emissions or risks it does not create and cannot reasonably control. Before cumulative-risk methodologies are incorporated into regulatory decision-making, CARB should establish transparent scientific standards, conduct appropriate validation, provide opportunities for technical peer review, and engage affected stakeholders.

CalCIMA encourages CARB to use precise terminology when characterizing the relationship among emissions, exposure, dose, and health risk. Statements suggesting that toxic air contaminants generally have no level of emissions below which harmful impacts are expected should recognize the distinctions between cancer and noncancer risk assessment and the role of exposure and dose in determining potential health effects. Clear communication of these distinctions will improve public understanding of the information generated through California's air toxics programs and provide appropriate context for future regulatory decisions.

Health-risk assessments are important risk-management tools, but their results should also be communicated with appropriate context regarding the assumptions and uncertainties inherent in the underlying methodologies. Health values, emissions estimates, exposure assumptions, dispersion modeling, and other components of an HRA may incorporate health-protective assumptions intended to address scientific uncertainty and sensitive populations. CARB should clearly distinguish estimates of potential risk used for regulatory decision-making from observed health outcomes and ensure that cumulative application of conservative assumptions does not unintentionally distort facility-specific risk characterization.

4. Promote statewide consistency

The Draft Roadmap discusses potential statewide baselines for air toxics programs. CalCIMA supports greater statewide consistency where it can provide regulated facilities with predictable and equitable treatment while preserving appropriate local air district flexibility. California's existing CARB/CAPCOA risk-management framework provides a substantial foundation for statewide consistency. Accordingly, as CARB considers modernization of the Hot Spots program, statewide baselines should be evaluated in a manner that ensures regulatory certainty among the treatment of comparable facilities.

5. Include industry as an essential partner and prioritize voluntary incentive-based approaches

CalCIMA strongly supports the Draft Roadmap's commitment to stakeholder engagement and CARB's stated goal of working with industry to develop practical strategies that protect public health while recognizing real-world costs and implementation needs. That commitment should be reflected expressly throughout implementation of the Draft Roadmap. In particular, the Draft Roadmap's early action item concerning 'Partner Engagement' identifies community groups, air districts and other partner agencies but does not similarly identify affected businesses and industries. Industry should be expressly included.

Regulated businesses possess operational, emissions, equipment, technology, and implementation information that will be essential to determining whether proposed strategies are technically feasible and capable of producing meaningful emissions reductions. Engagement should occur early, during problem definition, data development and evaluation of alternatives, rather than after a preferred regulatory approach has already been established. CalCIMA therefore recommends that CARB establish formal opportunities for the regulated community and technical experts to participate in development of the proposed Toxics Decision Framework, emissions-inventory improvements, cumulative-risk methodologies, monitoring and modeling protocols, and any modernization of programs implemented under AB 2588 and AB 1807.

As CARB evaluates potential strategies under the Draft Roadmap, CalCIMA encourages the use of voluntary and incentive-based approaches as primary implementation tools where they can achieve meaningful and measurable emissions reductions. Such approaches can promote earlier adoption of cleaner technologies

and operational improvements while allowing regulated entities to identify practical, cost-effective solutions suited to individual facilities and operations. Regulatory requirements should be considered in conjunction with these approaches.

6. Prioritize measurable risk reduction and regulatory predictability

CalCIMA supports development of a transparent Toxics Decision Framework that enables CARB, air districts, communities, and regulated entities to understand how the State will prioritize limited resources. That framework should prioritize pollutants and sources based on reliable evidence of exposure and risk, the availability and quality of underlying data, the magnitude of potential additional risk reduction, technical feasibility, and the effectiveness and cost of available mitigation measures. The construction and industrial materials facilities provide the essential materials necessary to build and maintain the State's housing, transportation, water, energy, and other critical infrastructure. Protecting public health and maintaining the ability to produce these essential materials are not mutually exclusive objectives. A transparent, science-based and collaborative approach can advance both.

Consistent with the Draft Roadmap's feasibility and cost language within the Roadmap's mission statement, CalCIMA recommends that it should be carried into the Toxics Decision Framework in conjunction with any cumulative-risk permitting guidance. These considerations should be applied as substantive components of CARB's prioritization and policy-development process.

To the extent available and scientifically appropriate, CARB should also consider empirical exposure and public-health information when establishing priorities and evaluating the need for additional measures. Modeled risk estimates are important tools for identifying and comparing potential concerns, but they should be evaluated together with monitoring data, exposure information, existing controls, relevant health information, and other available lines of evidence. A weight-of-evidence approach would help ensure that resources are directed toward pollutants and sources for which additional action is most likely to produce meaningful public-health benefits.

Finally, CalCIMA also encourages CARB to consider regulatory predictability when new health values or risk-assessment methodologies are incorporated into existing programs. Changes in toxicity values, exposure assumptions, or assessment methodologies can materially change a facility's calculated risk even when the facility's emissions and operations have not changed. Where such changes may affect permitting, risk-management thresholds, or existing operations, CARB should provide transparent notice, appropriate stakeholder engagement, and reasonable implementation or transition mechanisms so regulated entities can understand and plan for the consequences of those changes.

CalCIMA appreciates CARB's consideration of these comments and looks forward to continued engagement in the development and implementation of the Roadmap. Please feel free to contact me with any comments or questions at (951) 941-7981 or sseivright@calcima.org.

Sincerely,



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California Construction and Industrial Materials Association