



Ready Mixed Concrete, Asphalt, & Aggregates

Serving Counties of San Bernardino, Los Angeles, Riverside,
Orange, Kern, Ventura, Santa Barbara, & San Luis Obispo

December 8, 2025

California Air Resources Board
Industrial Strategies Division
1001 I Street
Sacramento, CA 95814

RE: Comments on CARB's Embodied Carbon Reporting Framework for Covered Building Materials and Covered Projects (AB 2446 / AB 43)

To the California Air Resources Board Staff,

Thank you for the opportunity to provide written comments on the October 30 technical workshops covering the development of California's embodied carbon reporting framework for covered building materials and covered projects. Holliday Rock appreciates CARB's continued engagement with industry and the effort to develop a statewide program that is practical, data driven, and designed for long term implementation.

As one of California's largest ready mix concrete producers, we support the goals of AB 2446 and the broader efforts to reduce embodied greenhouse gas emissions statewide. We offer the following comments in response to CARB's discussion questions and the two draft reporting tools released for feedback.

Streamlining Reporting and Tool Structure

We encourage CARB to structure the reporting tools so that producers can submit facility-level annual data covering production volumes, energy use, fuels, SCM inputs, and other required parameters. This structure aligns directly with Method 2 and is the most realistic way for ready-mix operations to report consistent, verifiable information each year.

Because ready-mix concrete companies may generate thousands of individual EPDs annually, a mix-by-mix reporting model is not feasible and would impose unnecessary administrative and economic burden.



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Anticipated Barriers to Implementation

The primary barriers to implementation are:

- The extraordinary number of mix designs produced across multiple plants
- The cost and time associated with preparing, updating, managing, and uploading thousands of EPDs each year
- Data integration challenges between plant systems and third-party EPD software
- Confidentiality concerns around sensitive business data
- Variable availability of upstream EPDs from cement and SCM suppliers

A streamlined, facility based reporting model would mitigate many of these obstacles.

Alternative Approaches to Facility or Product Data

Holliday Rock strongly advocates that Method 2 should remain a permanent compliance pathway. This approach ensures:

- A workable, consistent, and scalable process for all ready-mix producers;
- Continued ability for CARB to track annual emissions and material data;
- No forced reliance on thousands of EPD uploads;
- Cost protection for producers of all sizes;
- Alignment with existing regulatory reporting structures.

Even as EPD adoption grows, Method 2 is the most realistic ongoing pathway for California's ready-mix producers.

Concerns About Submitting Quantity Data From Importers

Yes, there are concerns with importers submitting quantity data. Importers often lack full visibility into upstream manufacturing, which makes it difficult to verify production volumes or emissions. Documentation is inconsistent, and many international suppliers do not follow the same reporting standards used in the U.S. These issues are most common with imported cement, clinker, steel, and certain SCMs.

To address this, CARB could consider:

- Requiring importers to provide third-party verified EPDs or equivalent documentation before materials



enter the California market.

- Establishing minimum data disclosure standards for imported materials to ensure comparable reporting boundaries.
- Using conservative default emission factors when importers cannot provide adequate data.
- Requiring brokered or traded imports to maintain traceability back to the original manufacturer.

These steps would help improve accuracy, create consistency across domestic and international materials, and protect data integrity in the reporting program.

Method 2 Sunset Timeline

We do not support the proposed 2030 sunset of Method 2. Retaining Method 2 permanently allows:

- Consistent long-term reporting;
- Flexibility for small and mid-sized producers;
- Stability across changing PCRs and EPD methodologies;
- Avoidance of extreme administrative costs associated with mass EPD uploads.

Importantly, CARB will still receive mix-specific EPD data through the **Covered Projects reporting program**, which requires project owners to submit material quantities and EPDs. This provides CARB with the granular emissions data it seeks at the project level, without imposing mix-specific reporting requirements on each ready-mix plant.

Encouraging EPD Development

CARB can encourage EPD adoption by:

- Recognizing NRMCA and ASTM verified EPDs as fully compliant.
- Allowing representative EPDs for grouped mix categories.
- Establishing state level technical assistance or grant programs for small producers.
- Coordinating with trade associations on shared data resources and templates.

In addition, CARB is proposing that primary data used in EPDs be less than two years old. While we support the goal of using current data, we recommend a three or four year primary data window instead of two. This still represents a significant tightening compared to existing PCR practice, which typically allows up to five years, and it better reflects the realities of EPD development cycles, plant data collection, and verifier capacity. A three year window would maintain data quality and trend sensitivity while avoiding unnecessary rework and cost for producers, particularly small and mid sized companies.

Revenue and Volume Exemptions

We support the proposed revenue thresholds for manufacturer and importer reporting but suggest consideration of production volume thresholds as well. Smaller plants producing limited annual volume should have a simplified or exempt pathway to maintain equity among producers of different sizes.

For example, CARB could establish one of the following production-based thresholds to ensure equitable treatment across the industry:

- **Example 1: Annual Volume Exemption**

Producers manufacturing less than 50,000 cubic yards of ready-mix concrete per year could be exempt from reporting or allowed to submit a simplified annual summary. This threshold aligns with the operational scale of many single-plant or seasonal rural producers.

- **Example 2: Tiered Reporting Structure**

CARB could create a tiered system such as:

- **Tier 1:** < 25,000 cubic yards per year, exempt or simplified 1-page annual declaration.
- **Tier 2:** 25,000 to 75,000 cubic yards per year, facility-level Method 2 reporting only, no EPD uploads.
- **Tier 3:** > 75,000 cubic yards per year, full facility reporting using Method 1 or Method 2.
This structure ensures proportional effort based on true environmental-scale impact.

- **Example 3: Seasonal or Remote Plants**

Plants that operate on a seasonal basis or supply remote or low-density markets could qualify for a reduced reporting pathway since their total carbon footprint is significantly lower compared to high-volume metropolitan plants.

- **Example 4: Aggregate Corporate Volume Threshold**

Small companies with total enterprise output below 100,000 cubic yards annually (across all owned plants) could be eligible for simplified reporting. This prevents the regulation from disproportionately burdening independent operators.

- **Example 5: Project-based Producer Exclusion**

Batch plants created solely for temporary project locations could have an exemption pathway because they do not represent long-term operational emissions typically addressed in statewide regulatory programs.



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Estimated Cost and Staff Time

For multi plant producers, compliance in the current structure could require significant staff time and system investments. Based on industry estimates, producers may need multiple full time employees to manage data collection, verification, and annual reporting.

Internal vs External Reporting Capacity

Holliday Rock intends to manage reporting internally through our sustainability and technical services teams, while continuing to use third party verified EPD Company. Integration between CARB's tools and existing EPD software platforms will be essential to avoid duplicative work.

Additional Questions for CARB to Address:

We also request clarification on the following items critical to program workability for ready mix producers:

1. Data confidentiality:

How will CARB protect sensitive financial and operational data submitted through the reporting tools?

2. Supplier alignment:

What pathway will CARB use to ensure cement, SCM, and admixture suppliers provide EPDs or upstream data compatible with CARB's templates?

3. Grouped mix categories:

Will CARB allow representative EPDs for mix groups (e.g., strength class plus SCM ratio) rather than individual mix EPDs?

4. System integration:

Will CARB provide an interface or API allowing direct data upload from NRMCA, WAP, Climate Earth, or Pathway EPD databases?



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Holliday Rock supports the State of California's goals to reduce embodied carbon in building materials. We appreciate CARB's willingness to engage industry early in the rulemaking process and look forward to continuing to collaborate as these regulations develop. A framework that reflects operational realities will support accurate, transparent reporting while enabling ongoing innovation in low-carbon concrete.

Please feel free to contact me with any questions.

Sincerely,

Ignacio Valdivia

Sustainability Manager

Holliday Rock

ivaldivia@hollidayrock.com