

October 21, 2021

The Honorable Joe Manchin
Chairman
Energy and Natural Resources Committee
Washington, D.C. 20510

The Honorable John Barrasso
Ranking Member
Energy and Natural Resources Committee
Washington, D.C. 20510

Dear Chairman Manchin and Ranking Member Barrasso:

We are writing to share the perspective of the aggregates, cement and concrete industries about the possible impacts of the America's Revegetation and Carbon Sequestration (ARC) Act. We represent more than 600,000 workers at thousands of aggregates, cement and concrete businesses across the country who manufacture and deliver critical materials for our nation's built environment. Our members collectively serve every residential, commercial, and public works project in the United States and generate more than \$100 billion in economic activity each year.

We have significant concerns with policies and programs that promote specific buildings materials. Every day, concrete construction competes with wood construction for market share in the low- and mid-rise residential and commercial construction market. Engineers and construction professionals make decisions about which materials to use to meet the codes, standards and specifications of a project. For these reasons, we are concerned with provisions of the ARC Act that promote mass timber construction. We believe that decisions about the use of construction materials should be left to the discretion of engineers and construction professionals.

There is no environmental superiority of mass timber construction over concrete construction. The embodied carbon of a mass timber building is comparable to that of a concrete building when the emissions footprint of logging, processing, and shipping are included in the calculation. Additionally, it is important to recognize the carbonation of both mass timber and concrete buildings: both materials hold the potential to sequester carbon during their useful life. However, unlike mass timber, after its service life, concrete construction can be recycled, further sequestering carbon during its exposure and subsequent useful life. Legislation looking to evaluate research and construction of buildings that offer a carbon sink opportunity must consider the full life cycle of the materials used to build the structure.

Federal policies and programs should not promote one construction material over another. For these reasons, we are concerned that provisions in Sections 302 and 303 of the ARC Act would serve to promote mass timber construction in a market place where multiple construction materials compete, including promotion of mass timber construction of buildings and bridges. Various building materials should be able to compete on their merit and engineers and construction professionals should be provided the discretion to choose the best material on a case-by-case basis. Mandates and material-specific promotional programs are bad policies as they eliminate competition in the marketplace. Such mandates on federal projects will lead to increased costs that limit taxpayer dollars.

Finally, we are concerned that the definition of carbon sequestration in the ARC Act does not recognize manufacturing processes. The cement and concrete industries have released a Roadmap to Carbon Neutrality by 2050. As part of this, the cement industry will be working to advance carbon capture and storage during the manufacturing of cement, and we seek to ensure that a definition of carbon sequestration captures both atmospheric and the manufacturing processes.

We appreciate the opportunity to share the perspective of the aggregates, cement and concrete industries on the ARC Act. We recognize that building engineers and concrete construction professional need to have the discretion to choose the best building material for each specific project. We look forward to working with you to ensure the ARC Act does this.

Sincerely,

National Ready Mixed Concrete Association
National Stone, Sand and Gravel Association
Portland Cement Association