



California Construction and Industrial Materials Association

August 14, 2026

Nick Maduros
Chair, Building Standards Commission
1304 O Street, #300
Sacramento, CA 95814

Re: Green Building Code amendments – support

Dear Chair Maduros:

The California Construction and Industrial Materials Association is pleased to support the proposed embodied carbon updates to the California Green Building Code as proposed by the Building Standards Commission and the State Architect for the 2025 Intervening Code Cycle.

CalCIMA is a trade association for companies that produce and manufacture aggregates, concrete, and asphalt building materials. In all, members supply local materials through 500 production sites in California.

The similar changes by the two agencies add helpful organization and clarity to the embodied carbon provisions of the code. In particular, they organize the embodied carbon provisions into one location, retitle the section more clearly as embodied carbon, and make clear that the different ways of complying—whether performance, prescriptive, or reuse—are options. The change to add “geographic” to the whole building life cycle assessment option is important given California’s varied geography, climates, and population densities. Finally, the clarifications to the weighted average for all concrete mixes in a project should help make this a more meaningful option for builders.

Again, CalCIMA appreciates the detail to clarity and organization and supports the proposed changes.

Sincerely,

A handwritten signature in blue ink that reads "Charles L. Rea". The signature is fluid and cursive.

Charles L. Rea
Vice President, Policy & Communications

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