

Coalition for Sustainable Cement Manufacturing & Environment (Steve Coppinger)

Please see the attached comments from the Coalition for Sustainable Cement Manufacturing & Environment urgin adoption of the Cap and Invest Regulations.

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Mr. John Eisenhut
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Eisenhut:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Copping
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

The Honorable Corey A. Jackson, DSW
Assemblymember, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Assemblymember Jackson:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Mr. Cliff Rechtschaffen
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Rechtschaffen:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Mr. David Silva
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Silva:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Ms. Diane Takvorian
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Takvorian:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Mr. Eric Guerra
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Guerra:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Copping
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Mr. John R. Balmes, MD
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Balmes:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Ms. Lynda Hopkins
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Hopkins:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Mr. Miguel Santiago
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Santiago:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Copping
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Ms. Patricia Lock Dawson
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Lock Dawson:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Ms. Paula Stigler Granados, Ph.D.
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Stigler Granados:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

The Honorable Henry Stern
Senator, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Senator Stern:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Ms. Susan Shaheen, Ph.D.
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Shaheen:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Copping
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Coalition for Sustainable Cement Manufacturing & Environment

1107 9th Street, Suite 1011 | Sacramento, CA 95814 | (916) 447-9884

May 26, 2026

Ms. Tania Pacheco-Werner, Ph.D.
Board Member, California Air Resources Board
1001 "I" Street
Post Office Box 2815
Sacramento, California 95812

Subject: Urge Adoption of the Cap and Invest Regulations

Dear Board Member Pacheco-Werner:

The Coalition for Sustainable Cement Manufacturing & Environment ("CSCME") appreciates CARB's continued efforts to refine the C&I program to meet the state's climate objectives while remaining responsive to changing economic conditions, shifts in federal policy, and the evolving needs of hard-to-decarbonize industries. We recognize that CARB must balance competing objectives, including the difficult task of allocating scarce allowance value in a manner that advances climate goals while mitigating adverse economic impacts on California consumers and businesses.

From a cement industry perspective, the Proposed Amendments must be viewed against a backdrop of declining production, increasing imports, elevated energy prices, and escalating compliance costs. Economic and emissions leakage is happening today, and further delay will only exacerbate it. We believe the Proposed Amendments meaningfully move the needle in a positive direction for the cement industry, especially the updated definition of cement output and the creation of the Manufacturing Decarbonization Incentive ("MDI"). **Accordingly, CSCME supports timely adoption and urges the Board to approve the amended C&I and MRR regulations at its next meeting.**

CSCME remains committed to working constructively with CARB to advance California's climate goals while maintaining a viable and competitive cement industry. These changes are essential to fostering the regulatory environment needed to support the long-term capital investment required for deep decarbonization.

If you have any questions regarding our position, please contact Bruce A. Magnani at bruce@houstonmagnani.com or at 916-447-9884.

Sincerely,



Steve Coppinger
Chair, Executive Committee
Coalition for Sustainable Cement Manufacturing & Environment

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board

Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board