

September 24, 2024

The Honorable Joe Manchin
Chairman
Committee on Energy and Natural Resources
US Senate
Washington, DC 20510

The Honorable John Barrasso
Ranking Member
Committee on Energy and Natural Resources
US Senate
Washington, DC 20510

Dear Chairman Manchin and Ranking Member Barrasso,

On behalf of the aggregates, cement and concrete industries, we are writing with concerns about S. 2991, America's Revegetation and Carbon Sequestration Act of 2023.

The aggregates, cement and concrete industries supply crucial building materials to every construction project in America, including residential, commercial and public works projects. Our industries have a substantial presence in every state and congressional district in the United States, including 9,500 aggregates facilities, 7,500 ready mixed concrete plants and 95 cement plants cement terminals. Our industries employ more than a quarter million American workers and generate hundreds of billions in economic activity.

While the goal of S. 2991 is laudable, we have significant concerns with Title III – Mass Timber and Title IV - Research. These titles include provisions intended to promote the use of mass timber as a preferred building material, including directives that federal funding be dedicated to purchasing mass timber buildings (Sec. 303).

Our industries compete in the private and public sectors with mass timber as a building solution. Taxpayer support for mass timber is taxpayer support for our competitor's materials and effectively an effort to legislate market share. Consequently, we have significant concerns with provisions promoting mass timber use.

Furthermore, the softwood lumber industry has a well-funded checkoff program that can meet many of these functions without additional taxpayer funds being utilized to promote a competitive building material.

In addition to the provisions that promote the use of mass timber as a building material, we have concerns with the carbon accounting provisions in Sec. 303 and Sec. 401. While our industries strongly advocate for measuring the embodied carbon and global warming potential of our products, we believe that any carbon accounting should be based on full lifecycle thinking and include end-of-life emissions. The carbon accounting provisions in Sec. 303 and Sec. 401 are not based on full lifecycle thinking and do not include end-of-life expected emissions.

Our industries maintain that Congress should approach construction materials neutrally and avoid policies that tend to promote or prefer specific materials. Research and development is an important function of the federal government, but the provisions in this legislation go far beyond R&D and extend to the promotion of a specific construction material to the exclusion of others.

We appreciate your consideration of our concerns and look forward to working with you on these policies. Should you have any questions, please contact Adam Pugh at National Stone, Sand & Gravel Association (apugh@nssga.org), Andrew Tyrrell at National Ready Mixed Concrete Association (atyrrell@nrmca.org), or Katy Hartnett at Portland Cement Association (khartnett@cement.org).

Sincerely,

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