Honorable Chair Liane Randolph
Honorable Board Members
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: 2022 Scoping Plan Update - Engineered Carbon Removal Technical Workshop

Thank you for the opportunity to comment on engineered carbon removal technologies as presented at the August 2nd Scoping Plan update workshop. The U.N.'s Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report has sent a strong message that we must urgently transition away from fossil fuels in order to reduce further catastrophic impacts. Frontline communities are the most at risk for the most dangerous climate change impacts. Communities in the San Joaquin Valley and the East Coachella Valley already face unjust climate impacts such as extreme heat events, harmful air quality impacts, drought, and more. Engineered carbon removal through Carbon Capture, Utilization and Storage (CCUS) technologies that further incentivize polluting industries and do nothing to reduce pollution in environmental justice communities are false solutions. We call on CARB to reject CCUS in the Scoping Plan and engage further with frontline communities to collaboratively implement solutions that shift away from fossil fuel industries and harmful industrial practices in order to address the climate emergency.

Carbon removal policy that justifies continued polluting activities is yet another mechanism of the extractive economy and not a solution to the climate emergency.

CARB must ensure that any carbon removal policies and subsequent public funding does not continue to negatively impact frontline communities and prolong the fossil fuel industry. CCUS companies and technologies are backed by the same fossil fuel companies that play a large part in the creation of the climate crisis. Championing their technologies in lieu of community-led solutions will allow for the continuation of the oil and gas industry through enhanced oil recovery processes, instead of completely terminating extractive practices like fracking, drilling and mining. Instead, CARB must pursue policies and investments in clean energy efficiency, energy conservation and a renewable energy system that thousands of scientists say we need now to meet the climate emergency and assure young people of a livable future. These are the same energy systems that frontline communities have been advocating for, instead of continuing extractive and polluting activities in their communities.

Furthemore, land-based carbon sequestration, such as agroecological practices that are not dependent on fossil-fuel based fertilizers, pesticides, or herbicides, can be viable and just solutions. However, CCUS as it is currently being pursued, allows for ongoing pollution from large-scale intensive industrial agriculture and oil and gas production, and perpetuates harm to communities and workers. Some of the CCUS

technologies presented in the August 2nd workshop will rely on nut shells for their carbon capture process. This allows for the most harmful and resource extractive agricultural practices like large-scale, resource-intensive, industrial almond growing to continue to thrive despite the many health and environmental impacts it has on communities. Incentivizing harmful extractive-based practices that are prominent in the San Joaquin Valley is allowing for the continuation of rampant pollution and GHG emissions, making CCUS processes 'false solutions'. Any approach to agricultural carbon sequestration should prioritize agroecology and soil health, while can both reduce climate impacts of agriculture and make farms more resilient, and these solutions should not be used as carbon offsets that justify more fossil fuel production and use.

Environmental and social impacts of carbon removal technologies must be known to the public and must be a foremost decision making factor for policymakers.

CARB must require a strong analysis of the social and health impacts of CCUS before adopting formal policies and incentives for these technologies. CARB must pay special attention to the existing inequalities and impacts faced by communities of color, particularly those in the San Joaquin Valley and East Coachella Valley. Existing impacts such as exposure to air pollution, lack of access to safe and clean water, and more will continue to worsen if CCUS is pursued as-is, with fossil fuel industries centered on the solution instead of frontline communities. We urge CARB to center BIPOC and lower-income impacted communities and create the space so that they can shape climate solutions instead of pursuing these unvetted alternative technologies. CARB must do this if it is to live up to its environmental justice commitments.

CARB must analyze the environmental and social impacts of carbon removal technologies given that carbon removal should at most be a supplement to a climate strategy founded on significant and direct emissions reductions. These impacts must also be made transparent to the public and be wholly and considerably considered in decision-making. We are concerned about these processes, especially the unknowns including other potential GHGs emitted through these processes, the large amounts of energy and water required for CCS processes and more. Furthermore, the transportation of carbon dioxide will contribute to the compounding effects of emissions. Carbon would have to be transported through underground pipelines which will run through neighborhoods, increasing the risk of the leaks, groundwater contamination[1], and serious potential human health impacts. We urge for a thorough analysis that is not only available to the public and impacted communities, but one that engages with those communities in a meaningful manner.

Community participation in the origination and development of carbon removal technologies is non-negotiable.

[1] https://www.sciencedirect.com/science/article/abs/pii/S0309170810002149?via%3Dihub

One of our fundamental concerns with CCUS stems more generally from the process of technological advancement in society. Every technological advance is made according to the values of those who create it. There is no such thing as value-free technology. Because of this, the importance for potential technological solutions--including CCUS--to be developed alongside community members is unequivocal. It has become evident that many CCUS technologies have originated and have now been advanced in policy without being grounded in the fundamental principles of social and environmental justice, scientific objectivity, and environmental integrity. They are instead directed explicitly by the interests of the fossil fuel industries that have caused the problem in the first place. It should come as no surprise now that many CCUS technologies are met by many valid concerns around community awareness and inclusion, community participation in the development and application of these technologies, and the ecological and social impacts of these technologies.

CCUS seems to already be pursued by the federal and state governments as a viable solution. However, the environmental justice (EJ) and climate justice community members and advocates have not been meaningfully looped into discussions, nor have their concerns been taken seriously, instead the fossil fuel industry has been centered around decision-making and leading these efforts. We urge CARB to require a robust public process from impacted communities and CBOs so that they are fully aware and understand the impacts of CCUS technologies. We recommend CARB to conduct workshops and feedback sessions during accessible times of the days with sufficient notification. We also recommend for public comments to be allowed and to be meaningfully considered and for CARB to consult with communities long before CCUS projects are approved.

Sincerely,

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