July 9, 2021

California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Public Workshop Series to Commence Development of the 2022 Scoping Plan Update

The California Carbon Capture Coalition (Coalition) appreciates the opportunity to submit comments to the California Air Resources Board (CARB) Public Workshop Series to Commence Development of the 2022 Scoping Plan Update. The Coalition is committed to supporting California's efforts to reduce greenhouse gas (GHG) emissions in line with scientifically-based targets in cost-effective ways that drive technology and create and maintain high quality jobs and robust economic growth in the state. The Coalition includes a number of leading industries and hundreds of thousands of workers in the state that are critical to successful climate action in California. The Coalition looks forward to working with the California Air Resources Board, other state agencies and stakeholders throughout the Climate Change Scoping Plan process to ensure that carbon capture utilization and sequestration (CCUS) technology can play a significant role in enabling the state to achieve its climate goals, including the 2030 GHG emission reduction target and the 2045 carbon net-neutrality goal. Without CCUS technology, California will not achieve its goals.

There is clear consensus that meeting the world's climate goals will require significant and rapid deployment of CCUS. Numerous reports from leading experts have consistently identified CCUS as a critical component of climate action strategies, including analyses from the Intergovernmental Panel on Climate Change, the International Energy Agency, and Energy Futures Initiative.

In its recent June 2021 report to Congress, the United States Council on Environmental Quality stated "*To reach the President's ambitious domestic climate goal of net-zero emissions economy-wide by 2050, the United States will likely have to capture, transport, and permanently sequester significant quantities of carbon dioxide (CO_2)… The Administration is therefore committed to accelerating the responsible development and deployment of CCUS to make it a widely available, increasingly cost-effective, and rapidly scalable climate solution across all industrial sectors.*"

California has long been at the forefront of global actions to address climate change. The state has consistently recognized the role that CCUS technologies must play in these efforts. California's 2008 Climate Change Scoping Plan, and subsequent 2013 and 2017 plan updates, recognized the importance of CCUS in the state's comprehensive climate strategy. CARB has developed a CCS protocol under the state's Low Carbon Fuel Standard. A number of California-focused expert analyses have identified CCUS as a necessary component of the state's climate strategy, including E3's 2020 report "Achieving Carbon Neutrality in California" developed for

the Air Resources Board, Lawrence Livermore National Laboratory's report "Permitting Carbon Capture and Storage Projects in California," and "An Action Plan for Carbon Capture and Storage in California" by Energy Futures Initiative and Stanford University.

Cost-effective CCUS technologies are available today and have successfully been demonstrated at numerous sites across the United States and the world. CCUS provides significant job creation benefits and economic development opportunities. Now is the time for California to take action to enable the rapid deployment of these technologies in our state. California policymakers need to actively partner with committed industries and stakeholders to bring projects on-line as quickly as possible. The 2022 Climate Change Scoping Plan will play a pivotal role in setting the state's approach to climate policy for the next several decades. The plan must lay out a clear and comprehensive policy, regulatory and economic framework for CCUS in California to maximize the benefits these technologies can deliver to state climate efforts.

Industries in California have a wealth of experience and expertise that can inform the development of a robust and effective CCUS policy regime in the state. A number of expert analyses have detailed the factors necessary to successfully enable CCUS technology to quickly, safely, and meaningfully contribute to California's GHG reduction efforts. These include the establishment of a unified, coordinated and streamlined permitting process; additional legal clarity on geologic pore space ownership; an integrated plan for the development of CCUS infrastructure tailored to California's uniquely well-suited geologic conditions; and additional policy and economic incentives for CCUS, including incorporation of an accounting framework that addresses negative C02 emissions.

The Biden Administration is demonstrating clear and actionable leadership at the federal level to make CCUS a significant component of the US climate strategy. There has never been a more opportune – or critical – time for California to take the necessary actions to ensure that CCUS is a key component of our state climate strategy.

The Coalition looks forward to working with CARB, the Newsom Administration and policy leaders in the legislature and stakeholder community to ensure that California takes advantage of the full range of climate and economic benefits that CCUS technology can deliver.

Sincerely,

Peter C Montgomery

Pete Montgomery
Vice Chair
California Carbon Capture Coalition