August 16, 2021

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

RE: Comments on Scoping Plan Workshop – Engineered Carbon Removal Technical Workshop on August 2, 2021

Dear Chair Randolph and Members of the Board:

350 Bay Area Action strongly supports the comments presented by the Sierra Club California on the California Air Resources Board's (CARB) Scoping Plan Technical Workshop on Engineered Carbon Removal.

350 Bay Area Action is a climate education and advocacy organization that works with communities through the 9 Bay Area county region to build action on clean energy, energy efficiency, sustainable transportation, land use policies, while transitioning away from fossil fuels and more. We are concerned that CARB is moving forward on advancing carbon capture, utilization, and storage (CCUS) technologies at a pace that fails to adequately consider input from environmental and environmental justice organizations. CARB is required to work with Environmental Justice Advisory Council (EJAC) and seriously consider their input.[1]

Along with the Sierra Club, 350BAA urges CARB to consider the following in their Scoping Plan:

I. Climate change strategies should prioritize the health and safety of environmental justice communities.

CCUS technologies will not reduce air pollutants aside fromCO2 and will not address the harms of fossil fuel pollution that are felt by nearby vulnerable communities. *Any* increase in air pollutants in environmental justice communities is unacceptable, and these technologies increase co-pollutants at the source.[2]

II. The risks associated with these technologies must be balanced against the cost.

Many CCUS technologies have not been proven to be feasible because their performance was below expectation and would not be economic at scale.[3] Reports demonstrate that the 28 existing CCUS facilities currently operating have a capacity to capture 0.1 percent of fossil fuel emissions, and the vast majority of the captured carbon is being used to produce more oil.[4] CARB's own presentation showed how expensive these technologies will be ($190/200 per ton) as compared to natural and working land strategies ($11 per ton).

[1] The California Global Warming Solutions Act of 2006 (AB 32; Stats. 2006, ch. 488).

[2] Jacobson, Mark Z., The health and climate impacts of carbon capture and direct air capture, Energy Environ. Sci. (2019), available at https://web.stanford.edu/group/efmh/jacobson/Articles/Others/19-CCS-DAC.pdf

[3] Id.

[4] Drugmand, D. & Muffett, C., Confronting the Myth of Carbon-Free Fossil Fuels: Why Carbon Capture is Not a Climate Solution, CIEL (2021), available at https://www.ciel.org/wp-content/uploads/2021/07/Confronting-the-Myth-of-Carbon-Free-Fossil-Fuels.pdf

Removing a year's worth of carbon (37 B tons of CO2 in 2018) using these technologies would cost a $7.4 trillion dollars.[5]

III. The state must focus on reducing anthropogenic emissions including phasing out fossil fuel production and reaching 100% clean, renewable energy resources.

Transitioning to clean, renewable alternatives seems the most efficient pathway for achieving reductions. Clean energy resources have additional benefits that these technologies do not have such as reducing non-CO2 air pollutants caused by fossil combustion as well as eliminating the risks of oil spills, oil fires, gas leaks or gas explosions.[6]

Considering the risks, costs, and negative impact on environmental justice communities, we urge CARB to slow down on its rush to advance carbon capture, utilization and storage technologies. Technologies like CCUS that allow the fossil fuel industry to continue business as usual should not be permitted. In summary, it is healthier, cheaper, and safer to limit pollution at the source, transition to clean, renewable energy sources, and enhance nature based solutions. We urge CARB to make these a central focus in their scoping plan.

Sincerely,

Kathy Dervin and Clair Brown, Co-chairs, 350 Bay Area Action Legislative Committee

[5] CIEL, Ibid, note 2.
[6] Jacobson, supra note 1.