

# CALIFORNIA CARBON SOLUTIONS COALITION

Building Climate Smart Solutions for California

February 20, 2024

California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812  
*[submitted electronically]*

## **RE: Comments on the Proposed Amendments to the Low Carbon Fuel Standard Regulation**

The California Carbon Solutions Coalition appreciates the opportunity to provide comments on the Proposed Amendments to the Low Carbon Fuel Standard.

The California Carbon Solutions Coalition is the state's leading business and labor organization working to support the rapid deployment of carbon capture, removal, utilization and sequestration (CCUS) technologies to reduce greenhouse gas emissions and deliver high-quality jobs for Californians.

California's 2022 Climate Change Scoping Plan identifies CCUS and direct air capture (DAC) technologies as critically needed tools to support achievement of California's climate goals. A number of industries across California are actively investing in CCUS and DAC projects and technologies. As recognized in the December 19, 2023 Initial Statement of Reasons, the LCFS is a key policy driver for the rapid deployment of these technologies.<sup>1</sup> As CARB proceeds with implementation of an updated LCFS program it is crucial to ensure the timely review and approval of applications submitted pursuant to the "Carbon Capture and Sequestration Protocol (CCS Protocol) under the Low Carbon Fuel Standard."

Additionally, the Coalition supports the proposal in § 95490 (a)(2)(A) of the proposed regulation that direct air capture projects must be physically located in the United States to be eligible under the CCS Protocol.<sup>2</sup> This proposal will effectively align the LCFS with national efforts currently underway, including major federal incentive funds, to capture the climate, economic and jobs benefits that these projects can deliver.

The Coalition appreciates the opportunity to comment on the Proposed Amendments to the Low Carbon Fuel Standard and looks forward to continuing to work with CARB to ensure that CCUS technologies can meaningfully contribute to the achievement of California's climate goals.

Sincerely,



Virgil Welch  
Director

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<sup>1</sup> See December 19, 2023 ISOR, pg. 16.

<sup>2</sup> See Proposed Regulation Order, pg. 217.

