



August 8, 2021

Matt Botill  
California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

**Re: Blue Planet Comments on July 7, 2022 Low Carbon Fuel Standard (LCFS) workshop**

Dear Mr. Botill:

Blue Planet Systems Corporation (Blue Planet) appreciates the California Air Resources Board (CARB) hosting the July 7, 2022 public workshop on Potential Changes to the LCFS Program, and this opportunity to comment on it.

Blue Planet is a California company developing technology and products related to economically sustainable carbon capture. Our goal is to solve the carbon capture problem by converting CO<sub>2</sub> into high-value building materials. We are currently constructing and beginning operations of a plant in Pittsburg, California on the Sacramento Delta and our carbon sequestered aggregate has been utilized at a project at San Francisco International Airport.

We hope CARB will recognize the promising role that carbon capture, utilization and storage (CCUS) in aggregates and concrete can play in helping to achieve carbon neutrality and net-negative emissions in California, and take steps to advance this important strategy with revised carbon sequestration protocols and their adoption through LCFS amendments.

The LCFS is a critical program for advancing California's climate objectives, and likely the most important program currently in place anywhere in the world to advance CCUS and carbon dioxide removal, both of which will be necessary to achieve California's goals of carbon neutrality as soon as possible, and then to achieve and maintain net-negative greenhouse gas emissions. Still, the program can be updated to further accelerate these critical solutions and California's path to carbon neutrality.

Accordingly, we strongly support strengthening the program to achieve at least a 30% reduction in carbon intensity by 2030 and further strengthening the program beyond 2030 in line with California's climate goals, the 2022 Scoping Plan Update, and new goals such as the Governor's carbon dioxide removal and sustainable aviation fuel goals.

Further, while not discussed in the workshop, we hope that CARB will consider in future workshops making changes to the Carbon Capture and Sequestration protocol under the LCFS to include permanent carbon storage in aggregate and concrete through mineralization as an eligible an eligible form of sequestration. This would support the Governor's proposed industrial decarbonization program through the budget, which calls for projects that support "carbon capture for use in products, such as carbonate mineralization, and carbon curing of concrete to

reduce or eliminate emissions of greenhouse gases and not for the purposes of geologic storage.”<sup>1</sup>

We are grateful for your consideration of these comments and thank you again for hosting this important workshop. We look forward to engaging in the upcoming LCFS amendment process and with CARB and other agencies in various forums around CCUS. Please do not hesitate to reach out if you have any questions about Blue Planet, our technology, or the recommendations and comments offered in this letter.

Thank you,



Brent R. Constantz, Ph.D.  
Chief Executive Officer  
Blue Planet Systems Corporation

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<sup>1</sup> <https://esd.dof.ca.gov/trailer-bill/public/trailerBill/pdf/574>