

CALIFORNIA CARBON SOLUTIONS COALITION

Building Climate Smart Solutions for California

Jan 31, 2025

California Environmental Protection Agency
Independent Emissions Market Advisory Committee

Submitted Electronically – iemac@calepa.ca.gov

RE: Comments on 2024 IEMAC Annual Report Discussion Draft

The California Carbon Solutions Coalition (CCSC) appreciates the opportunity to provide comments on the January IEMAC Annual Report Discussion Draft. The below comments are specifically focused on the “Carbon Management in California’s Cap-and-Trade Program” chapter.

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 technologies to reduce greenhouse gas emissions and deliver high-quality jobs for Californians.

California is uniquely positioned to benefit from carbon management technologies including point source carbon capture and carbon dioxide removal across a range of industries. As noted in the IEMAC Discussion Draft, California’s 2022 Climate Change Scoping Plan identifies significant contributions from both point source carbon capture and carbon dioxide removal as part of the state’s effort to meet its 2030 and 2045 greenhouse gas emission reduction targets. Ensuring that the state’s cap-and-trade program is optimally designed to support and account for the significant climate benefits that carbon management technologies can deliver is critical to the achievement of these targets.

Point Source Carbon Capture

As part of the *Summary Recommendation*, the IEMAC Report should recommend full incorporation of point source carbon capture into the cap-and-trade program, including by providing regulatory clarity that captured emissions do not create a compliance obligation for covered entities in the program. As noted in the IEMAC Discussion Draft, this would provide a key incentive for participants in the cap-and-trade program to capture those emissions and will support ongoing investment in critical carbon management technologies and projects.



Senate Bill 905 Implementation

CCSC agrees with the Discussion Draft that implementation of Senate Bill 905 is a priority. Passed in 2022, SB 905 directs CARB to establish a Carbon Capture, Removal, Utilization and Storage Program, which will provide a regulatory framework for deployment of crucial carbon management technologies. In light of the need to rapidly deploy and scale these technologies, the *Summary Recommendation* should highlight the importance of ensuring that CARB (and other state agencies as appropriate) have sufficient resources and staffing to move quickly to implement the program.

We appreciate the opportunity to comment on the IEMAC 2024 Annual Report Discussion Draft and look forward to ongoing engagement with the Committee.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. Welch', with a horizontal line extending to the right.

Virgil Welch
Director