



CALIFORNIA CARBON SOLUTIONS COALITION

Building Climate Smart Solutions for California

November 12, 2025

California Air Resources Board
1001 I Street
Sacramento, California 95814

Submitted Electronically

RE: Comments in Response to October 29, 2025 Cap-and-Invest Program Workshop

The California Carbon Solutions Coalition and undersigned labor organizations and businesses appreciate the opportunity to provide comments in response to the October 29, 2025 Cap-and-Invest Program Workshop.

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 cap-and-invest program is a key component of the state's strategy to cost-effectively cut greenhouse gas emissions. Assembly Bill 1207 (Irwin, 2025) extended the program to 2045, ensuring that it will play an increasingly meaningful role to support achievement of California's carbon neutrality target.¹ As detailed in California's 2022 Climate Change Scoping Plan (Scoping Plan), CCUS technologies must be an essential part of this effort.

As part of the 2026 cap-and-invest program update, CARB should ensure that the regulation is updated to fully account for the significant GHG emission reduction benefits that CCUS technologies can deliver.

CCUS and Carbon Removal are Key Decarbonization Technologies Necessary to Achieve State Climate Goals

¹ [See Assembly Bill 1207 \(2025\)](#)

California's 2022 Climate Change Scoping Plan identifies carbon capture and removal technologies as key strategies to support achievement of state climate goals, including the establishment of a 20MMT target for 2030 and a 100MMT target for 2045.² Senate Bill 905 (Caballero, 2022) requires CARB to develop a Carbon Capture, Removal, Utilization and Storage Program in recognition of the need to move expeditiously to bring critically needed projects on-line to capture, remove and permanently and safely sequester greenhouse gas emissions.³ SB 614 (Stern, 2025) directs the Office of the State Fire Marshal (OSFM) to adopt a comprehensive regulatory framework to ensure the safe and secure transport of captured CO₂ emissions via pipeline from their source to permanent storage locations.⁴ A number of projects to capture, remove and permanently sequester greenhouse gas emissions are underway in California and poised to begin delivering critically needed climate benefits.

Regulatory Certainty is Necessary to Support CCUS Project Deployment

We appreciate CARB's recognition at the workshop that a key goal of the cap-and-invest program update is to "provide regulatory certainty as soon as possible" to "inform near and long-term planning by regulated entities" and to "maintain momentum in clean energy and technology."⁵ Full accounting for emission reductions achieved via CCUS for compliance under the cap-and-invest program will provide critical regulatory certainty to support the ongoing investments that many California companies are making to deploy these technologies.

California has a multitude of industrial, fuel and power generating facilities that can deploy CCUS to deliver up to 60MMT/year in GHG reductions – nearly twice as much as the entire buildings sector in the state.⁶ A number of these facilities, including many that participate in the state's cap-and-invest program, are actively investing in CCUS projects and technologies. These investments are occurring as a direct result of the clear policy direction and incentives that California has provided to support deployment of greenhouse gas eliminating technologies like CCUS. However, ongoing action to build out and further the regulatory framework for deployment of CCUS in California is needed to ensure that project investments and project deployment continue to proceed.

The Cap-and-Invest Program Should be Updated Now to Fully Account for CCUS & Carbon Removal as Emissions Reduction and Compliance Strategies

As detailed at the workshop, a major focus of this cap-and-invest program update will be the adjustment of allowance budgets to align the program with California's increasingly stringent GHG emission reduction targets, while also minimizing emissions leakage and accounting for affordability. CARB has consistently recognized the role that CCUS technologies can play to enable entities that participate in the program to meet increasingly stringent emission reduction goals.⁷ While we appreciate and support the ongoing work that CARB and other state agencies will continue to undertake to develop a robust CCUS program pursuant to Senate Bill 905, it is essential to ensure that CCUS is accounted for as an emission reduction strategy that entities in the cap-and-invest program can begin utilize as soon as possible. Therefore, we respectfully

² [See 2022 California Climate Change Scoping Plan](#)

³ [See Senate Bill 905 \(2022\)](#)

⁴ [See Senate Bill 614 \(2025\)](#)

⁵ [See Cap-and-Invest Program Workshop, October 29, 2025, pg. 56](#)

⁶ [See Stanford University/Energy Futures Initiative](#)

⁷ [June 14, 2023 Joint Cap and Trade Workshop](#)

request that CARB undertake the necessary regulatory modifications to include CCUS as a fully accounted for compliance strategy in the cap-and-invest program as part of this rulemaking.

We look forward to ongoing engagement with CARB and all stakeholders as part of this process.

Respectfully,

Calpine
Carbon Terravault
California Carbon Solutions Coalition
California State Pipe Trades Council
California & Nevada State Association of Electrical Workers
Clean Energy Systems
Coalition of California Utility Workers
IBEW 1245
Pacific Gas & Electric Company
UA Local 250, Los Angeles
UA Local 342, Oakland