



Collective EJ Statement on Engineered Carbon Capture, Use, and Storage (CCUS) in California

June 2022

Engineered carbon capture, use, and storage (CCUS) technology is a climate dead end on the path to decarbonizing California’s economy and generally increases net carbon emissions. CCUS is a means of delaying meaningful climate action and *increasing* our investments in fossil fuel and bioenergy infrastructure at a time when we should be phasing out these old fuels that continue to drive the climate crisis and poison frontline communities. So far, all CCUS projects worldwide have failed to live up to promised climate benefits, and the vast majority have been net carbon emitters in a lifecycle analysis that considers upstream and downstream emissions.

Most engineered carbon capture increases air pollution, water pollution, and other harms for frontline communities. The risks of transporting and storing carbon dioxide include immediate death and hospitalization, spoiling aquifers, degrading soil, pipe explosions, increased seismicity, and ecosystem impacts. Most CCUS projects in California are planned for the Central Valley, historically the state’s most polluted region and a region which the state is again assuming will continue to bear the cost of the state’s deferral of real climate action.

CCUS projects are only financially viable when funded by massive subsidies, and we urge the state to reject funding for these dead-end technologies. CCUS is expensive, a massive boondoggle without public benefit but with clear private gain. What’s more, this unwise investment would leave us with stranded assets and comes with the opportunity cost of what those taxpayer dollars could otherwise be used to fund, such as increased renewable energy and storage infrastructure, ecosystem restoration, and other proven strategies to reduce greenhouse gases. **We urge the Administration and CARB to require direct emissions reductions before and above costly, unproven, and uncertain solutions that risk prolonging extraction and combustion.**

CARB must not promote CCUS in the 2022 Scoping Plan and subsequent rulemaking and should not assume its use as a predetermined input to the models for achieving California’s carbon reduction goals. The California Air Resources Board (CARB) and Department of Energy (DOE) have declared CCUS as a predetermined solution to the climate crisis, without obtaining prior consent from environmental justice communities where the projects would be sited or the Environmental Justice Advisory Committee (EJAC). In the draft scoping plan released in May 2022, CARB relies heavily on CCUS to achieve California’s mandated 2045 carbon neutrality goal, but the State must pause to take a look at the emerging science and ensure that in our urgency to act on climate change, we are not committing further environmental injustice and harm to fenceline communities while failing to make meaningful progress on climate. CARB was formed to reduce criteria air pollution in the most polluted air basins in the nation, and yet it now plans to maintain and increase air pollution with CCUS deployed widely across the state. **As such, it is incumbent on the State to ask not just how we can mitigate harm from this dangerous technology through guardrails, but also to pose an even more important question: should this be done?**

We oppose all CCUS for fossil fuel and bioenergy infrastructure and cannot rely on climate dead ends. At the same time, we urge a least harm scenario for frontline communities through enactment of policy protections. If the State chooses to ignore our opposition and allows projects to move forward, we urge a precautionary approach to how the State assesses and evaluates carbon sequestration and storage, as well as other climate strategies. Before we start considering at-scale deployment of this technology, we would strongly suggest the State take steps to fully assess and publicly consider the health, economic, and climate implications of these applications.

The State should evaluate and invest public resources in real solutions that advance a just transition from our current extractive, fossil-fuel based economy, and move California towards a regenerative, renewable energy, and justice-based economy. Ecologically-based and community-driven solutions can both heal the land and result in significant community benefits. Such solutions include aggressive transportation and massified transit infrastructure, renewable energy, energy efficiency and conservation, as well as ecologically-based carbon sequestration strategies such as regenerative forest management, agroecological practices, composting, ecosystem restoration, and natural building materials.

We ask that space continue to be made for our organizations to collaborate with the legislature, the Governor's administration, and CARB staff and bring experts that do not have ties to the fossil fuel industry to explore the full range of impacts, benefits, and burdens of these unproven technologies. We are committed to expanding the decision-making table to center our collective community leadership in order to craft climate policies that restore environmental justice by eliminating existing environmental disparities and shift the burden away from frontline EJ and Indigenous communities.