

January 17, 2024

Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Information Solicitation to Inform Implementation of California Climate- Disclosure  
Legislation: Senate Bills 253 and 261, as amended by SB 219**

Dear Chair Randolph:

Thank you for the opportunity to comment on SB 253 and SB 261, laws enacted in 2023 that require California businesses to report specified greenhouse gas (GHG) emissions and climate related financial risks. Both of these pieces of legislation are intended to support transparency in private-sector activities to address climate change, in line with California's ambitious climate goals. As you know, reaching our climate goals, including carbon neutrality by 2045, is going to require rapid and broadscale deployment of a host of innovative zero and negative carbon technologies. Private sector investments, facilitated by thoughtful state policy, are critical to scaling these technologies. This is particularly true for processes and end uses that cannot be feasibly served by non-emitting alternatives. The 2022 Scoping Plan notes that "carbon removal and sequestration will be an essential tool to achieve carbon neutrality, and the modeling shows that there is no path to carbon neutrality without carbon removal and sequestration."

The Carbon Removal Alliance is a coalition made up of technology developers, leading buyers, and investors in carbon removal, all of whom are focused on CDR that demonstrably result in net new carbon being permanently removed from the atmosphere. Together, our members represent billions of dollars of investment in California and are fully committed to addressing climate change. CDR represents a major opportunity for California to continue to play a global climate leadership role while also supporting state-based investments in clean technologies, creating jobs and delivering a host of other environmental and community-based benefits, including improving air quality, forest fuels reduction and natural and working lands resilience.

To capture the critical benefits that CDR can provide, we believe that climate policies broadly, including the disclosure requirements established in SB 253 and SB 261, must consider the important role of carbon removal. The 2022 Scoping Plan notes that Governor Newsom called for 20MMT in 2030 and 100MMT in 2045 of carbon removal - reaching these levels of deployment requires consideration of the role of carbon removal across a range of policies. Importantly, both private sector and public sector investment will be needed.

Just as we have done to successfully scale other low carbon technologies in California, we need a policy framework that supports and rewards investment in CDR. This will ensure that the state can take full advantage of the climate benefits that carbon removal technologies can provide as we transition as rapidly as we can away from fossil fuels. California is uniquely positioned to play

a globally leading role in pioneering the technology solutions that are needed to turn the tide against climate change in ways that fully protect and benefit all communities in California. Thoughtful approaches to transparency and disclosure are one way to support meaningful private-sector investment in high-quality removals.

We strongly encourage CARB to consider the important role that CDR can play in the implementation of SB 253 and SB 261. We are committed to partnering with you to deploy the safest, most scientifically-rigorous approaches to removing carbon emissions from the atmosphere as part of California's ongoing climate action leadership.

Sincerely,

The Carbon Removal Alliance