



February 27, 2026

Chair Lauren Sanchez
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Blue Planet Comments on the Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms

Dear Chair Sanchez:

On behalf of Blue Planet Systems, we thank you for the opportunity to comment on the California Air Resources Board's (CARB) Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms (Proposed Amendments). We support updating the Cap-and-Invest regulation, in line with statutory changes from last year, and offer two specific recommendations to further strengthen the program, accelerate greenhouse gas (GHG) reductions in the state, and increase options and strategies for decarbonization in order to reduce costs and enhance affordability:

We appreciate CARB inclusion of carbon capture, utilization and sequestration (CCUS) in the Proposed Amendments, and especially support removing references that limit eligibility to "geologic" sequestration, therefore enabling a broader range of CCUS strategies. To further accelerate deployment, we encourage CARB to incorporate a wide array of CCUS protocols – including carbonate mineralization and carbon storage in concrete –by reference into the program. Doing so would allow for the use of newly developed CCUS strategies as soon as protocols are developed, rather than requiring additional amendments to the Cap-and-Invest program before they can be implemented.

We support the intent behind the new Manufacturing Decarbonization Incentive Allocation (Incentive Allocation) to both minimize emissions leakage risk and support decarbonization of the state's manufacturing industry. However, as currently designed, the program discriminates against CCUS technologies and certain sectors, like refining and power plants. We urge CARB to design the Incentive Allocation to be a technology- and sector-neutral, ensuring that CCUS solutions and all hard-to-abate industrial sectors are eligible to participate.

About Blue Planet Systems

Blue Planet is a California-based company pioneering technology and products for economically sustainable carbon management by converting captured CO₂ into high-value building materials. Our carbon mineralization process can be deployed across a wide array of difficult-to-decarbonize industries – including power plants, refineries, cement production and others – and in connection with direct air capture (DAC) projects, biomass facilities, or other carbon dioxide removal (CDR) strategies. Importantly, our technology captures not only CO₂, but also particulate matter, NO_x, SO_x and other pollutants hazardous to surrounding communities. We currently have operations at a plant in Pittsburg, California on the Sacramento Delta, and our carbon-sequestered aggregate has been utilized at San Francisco International Airport, where carbon-sequestered concrete is specified.

Blue Planet's technology produces coarse and fine limestone aggregate made from sequestered CO₂ utilizing the carbon mineralization process. It allows lower-cost carbon capture, including from direct air capture or other carbon removal pathways, by avoiding the need to purify and enrich captured CO₂ before use, reducing the cost and energy needs associated with carbon capture. It also can be deployed at scale anywhere; sources of captured or removed CO₂ do not need to be proximate to a CO₂ pipeline or geologic sequestration site to successfully manage carbon.

Carbon Mineralization and CCUS in Concrete a Permanent, Scalable Carbon Storage Solution

Carbon capture, mineralization, and utilization as aggregate in concrete offers tremendous potential not only to eliminate CO₂ emissions from point sources or advance CDR, but also to permanently sequester CO₂ as a value-added product that strengthens the economics of CDR and CCUS strategies. Recent research from UC Davis and Stanford, published in *Science*,¹ found that replacing conventional building materials with carbon storing alternatives could sequester about 17 billion tons of CO₂ per year, *or roughly half of current global CO₂ emissions*. The researchers found that carbon storage in aggregates represents the single largest opportunity within the built environment. By embedding mineralized CO₂ in aggregates, Blue Planet's technology enables the production of carbon negative concrete mixes, moving beyond incremental reductions offered through other strategies to achieve net negative outcomes at the mix level. This positions mineralization as a negative emissions solution that actively reduces CO₂ and displaces carbon-intensive materials.

¹ Van Roijen, E., Miller, S. A., & Davis, S. J. (2025). *Building materials could store more than 16 billion tonnes of CO₂ annually*. *Science*, 387(6730), 176–182. <https://doi.org/10.1126/science.adq8594>

While geological sequestration is a well-known approach, it requires access to underground storage sites, which are not always geographically available or economically feasible for many industrial emitters. Carbon mineralization provides a decentralized solution that can be implemented statewide without reliance on specific geologic formations. Other emerging CDR pathways, including DAC with utilization, biochar, and ocean-based carbon removal, also require regulatory clarity to scale.

Incorporate New CCUS Protocols into the Program by Reference

In addition to advancing the objectives of the Cap-and-Invest program, storing carbon in concrete supports California’s efforts to reduce embodied carbon and leverages the built environment as a durable carbon sink, furthering the state’s broader carbon neutrality goals. These technologies create a pathway to dramatically reduce emissions from hard-to-abate sectors and scale CDR. However, bringing these solutions to market requires significant private-sector investment, which depends on CARB and other state agencies putting in place long-lasting policies and frameworks to deploy projects – including incorporating CCUS into Cap-and-Invest and developing new protocols to support carbonate mineralization and other CCUS technologies.

We support the inclusion of CCUS formally into the program through the Proposed Amendments, and the removal of reference to “geologic” sequestration, which appropriately expands eligibility to a broader range of CCUS technologies. However, we urge CARB to avoid requiring future amendments to the program each time a new protocol is developed. Instead, CARB should incorporate CCUS protocols by reference, so that newly finalized CCUS strategies can be deployed under the Cap-and-Invest program without unnecessary delay. Simultaneously, we encourage CARB to begin work through the SB 905 process to expeditiously develop and finalize additional CCUS protocols, including for carbonate mineralization. We look forward to continued participation in that forum and supporting CARB’s efforts.

Expanding Incentive Allocation Eligibility

California’s manufacturing sector plays a key role in the state’s economy and climate strategy. As recognized in the Initial Statement of Reasons (ISOR), the costs of some decarbonization technologies continue to be greater than allowance prices, which contributes to emissions leakage from the manufacturing sector and limits the pace of deployment.² To that end, Blue Planet strongly supports the establishment of the Incentive Allocation to support the industrial sector and urges CARB to consider expanding the program to include all industrial sources of emissions, including refineries and power plants. Expanding eligibility to include a wide range of energy-intensive sectors would provide a clear and consistent market signal to support long-term investment and technology deployment in this area.

² California Air Resources Board. (2026, January 20). *Staff report: Initial statement of reasons: Public hearing to consider the proposed amendments to the regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms*. <https://ww2.arb.ca.gov/>

Blue Planet similarly urges CARB to expand the list of eligible decarbonization strategies to explicitly include CCUS strategies. The Proposed Amendments currently focus on electrification, renewable energy, hydrogen, and low-carbon fuels, all of which are essential pathways, but supporting CCUS technologies will be essential to achieve significant emissions reductions in sectors with process emissions, such as cement. Indeed, CARB’s 2022 Climate Change Scoping Plan highlights CCUS as a necessary technology that advances the objectives of the Incentive Allocation, stating, “Carbon capture and sequestration (CCS) will be a necessary tool to reduce GHG emissions and mitigate climate change while minimizing leakage and minimizing emissions where no technological alternatives may exist.”³

Adopting a technology-neutral framework that supports a broad portfolio of decarbonization solutions will help reduce overall compliance costs, improve program equity, and help the state reach its 2045 carbon neutrality goals. Including CCUS as an eligible technology will complement electrification and fuel-switching strategies while providing a more scalable solution to support in-state emissions reductions and avoid emissions leakage.

Blue Planet thanks CARB for their leadership in extending the Cap-and-Invest program and its commitment to supporting decarbonization innovation. Directly incorporating CCUS into the program and expanding the Incentive Allocation to include additional sectors and technologies like carbonate mineralization and other CCUS technologies, will strengthen the program’s effectiveness and accelerate GHG reductions. We look forward to continued collaboration with CARB on the deployment of CCUS and industrial decarbonization.

Sincerely,

Kevin Davis
Vice President of Market Development
Blue Planet Systems Corporation

³ California Air Resources Board. (2022). *2022 Scoping Plan for Achieving Carbon Neutrality* (p. 84). <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>