



May 4, 2026

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

Re: Blue Planet Comments on the 15-Day Changes to 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 15-Day changes to 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 (Cap-and-Invest).

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.

We support updating the Cap-and-Invest regulation, in line with statutory changes from last year. In our comments pursuant to the 45-Day Change package, we supported changes that avoid biasing carbon capture projects toward geologic sequestration and enabling additional carbon capture, utilization and storage (CCUS) strategies and protocols. We also offered 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:

- Incorporate a broad array of CCUS protocols – including carbonate mineralization and carbon storage in concrete – into the program by reference, allowing for the use of new

CCUS strategies as soon as protocols are developed, rather than requiring further amendments to the Cap-and-Invest program before a finalized protocol can be deployed.

- Expand eligibility under the manufacturing decarbonization incentive (MDI) program to include CCUS technologies and reach all hard-to-abate sectors.

We appreciate amendments in the 15-Day Changes, which would expand eligibility under the MDI program to CCUS and to other sectors, including the refining sector. MDI is an important new element of the program, which will support accelerated action to decarbonize hard-to-abate sectors and facilities covered under the program. We appreciate staff's responsiveness to our comments and those from other stakeholders on this issue, and strongly support this proposed change. While the 15-Day changes do not directly incorporate new CCUS protocols by reference, we understand that the regulation may be amended to incorporate new protocols as part of the SB 905 implementation process, and we look forward to working with CARB to quickly finalize that process and develop new protocols that would support the use of carbon sequestered aggregate and concrete.

Thank you for your leadership in extending the Cap-and-Invest program and proposing to support decarbonization innovation through a technology neutral MDI program. We appreciate staff's ongoing work with stakeholders and responsiveness to our comments, and we support adoption of the 15-Day changes at the May 28, 2026 Board hearing. While we understand there remains more work to be done, including further amendments to incorporate CCUS and new CCUS protocols formally into program, we support the rapid adoption and implementation of the proposed amendments and look forward to continued collaboration with CARB to quickly flesh out a broader framework to support the deployment of CCUS and industrial decarbonization.

Sincerely,

Kevin Davis
Vice President of Market Development
Blue Planet Systems Corporation