



# CARBON CAPTURE COALITION

October 8, 2021

Brenda Mallory, Chair  
Council on Environmental Quality  
The White House  
1600 Pennsylvania Ave NW  
Washington, DC 20500

Dear Chair Mallory:

On behalf of the Carbon Capture Coalition's over 80 energy, industrial and technology companies, energy and industrial labor unions, and conservation, environmental and clean energy NGOs, we write to thank you for the issuance of the report to Congress this summer - [Council on Environmental Quality Report to Congress on Carbon Capture, Utilization, and Sequestration](#) - as directed in Section 102 of Division S of the Consolidated Appropriations Act of 2021.

As noted in the Executive Summary of the report, to reach the president's ambitious domestic climate goal of net-zero emissions economywide by 2050, the United States will likely need to capture, transport, and permanently geologically store large quantities of carbon dioxide (CO<sub>2</sub>). For carbon management to scale more widely, technology deployment must advance in the context of a strong and efficient regulatory regime informed by both science and experience.

The Carbon Capture Coalition has long-supported rigorous safety design, inspection and maintenance protocols associated with CO<sub>2</sub> capture, transport and storage infrastructure. To that end, the Coalition supported the USE IT Act, contributing to and endorsing the legislation in 2018. The USE IT Act was enacted as part of the Consolidated Appropriations Act of 2021. Among other things, it requires CEQ to establish two regional task forces within 18 months of enactment to improve the performance of the permitting process for carbon management projects. The Coalition urges CEQ to establish these task forces in short order to ensure the regulatory framework enables efficient, orderly, and responsible deployment of carbon management projects and infrastructure.

An area of particular focus for the task forces should be CO<sub>2</sub> transport infrastructure. Multiple analyses have found that to achieve net-zero emissions, a substantial buildout of CO<sub>2</sub> pipeline infrastructure will be needed to transport large quantities of CO<sub>2</sub> from industrial facilities, power plants and direct air capture facilities to points of utilization and/or permanent storage. CO<sub>2</sub> pipelines have operated in the United States for nearly 50 years and have a strong safety record. However, in anticipation of an expanding CO<sub>2</sub> pipeline network, we must make sure the regulatory framework enables efficient

permitting while also ensuring CO<sub>2</sub> pipelines are designed, constructed, managed and maintained at standards delivering the highest levels of reliability and safety. To achieve the necessary deployment of carbon management technologies in the timeframe needed to meet climate goals, it is imperative that the public has confidence in the safety of CO<sub>2</sub> pipelines. The task forces provide a timely opportunity to address this need.

The Coalition recommends that task forces be inclusive of a broad spectrum of interests representing federal, state, local and tribal governments, affected communities, industry, NGOs, labor and other stakeholders. It is essential that task force members have diverse knowledge of pipeline infrastructure that may include regulation, operation, maintenance, safety, siting and other applicable issues. The Coalition stands ready to work with CEQ to provide resources or expertise to support the work of the task forces. Additionally, there has been a great deal of work completed at the state and regional level informing potential deployment of transport infrastructure by the Regional Carbon Capture Deployment Initiative, which also may help inform the work of the task forces.

The Coalition would like to specifically recommend that CEQ carefully assess which federal entity to charge with the implementation of these task forces. Their work will be conducted under the guidance of the Federal Advisory Committee Act (FACA), which has procedural requirements and clearly defines roles, responsibilities, and limitations of members. It is important to identify which agency is best suited to oversee and manage the work of these task forces so that the work can be completed comprehensively and expeditiously.

Thank you for your consideration of this request. The Coalition looks forward to working with CEQ and the task forces as this important work gets underway.

Sincerely,

Jessie Stolark  
Public Policy & Member Relations Manager  
The Carbon Capture Coalition