

Restore the Delta  
2616 Pacific Ave #4296, Stockton, CA 95204  
**209-479-2559**  
[www.restorethedelta.org](http://www.restorethedelta.org)



April 21, 2025

The Honorable Senator Catherine Blakespear  
Chair, Senate Environmental Quality Committee  
1021 O Street, Room 3230  
Sacramento, CA 95814  
*submitted via electronic mail*

**RE: Support SB 643 (Caballero) – Carbon Dioxide Removal Purchase Pilot Program**

Dear Senator Blakespear,

Restore the Delta is writing regarding SB 643, which would establish the Carbon Dioxide Removal Purchase Program administered by the California Air Resources Board. Based in the Sacramento-San Joaquin Delta since 2006, our organization works in the areas of public education, program and policy development, and outreach so that all Californians recognize the Sacramento-San Joaquin Bay Delta as part of California's natural heritage, deserving of restoration.

With over 75,000 followers, our programs span water quality monitoring, flood and land restoration, sustainable agriculture, youth engagement, and carbon and energy policy development. Our Carbon and Energy Program evaluates emerging climate technology industries in the Delta region, with a focus on environmental and economic risks, public health implications, and community benefits. We collaborate with carbon removal and energy industries, government agencies, national labs, and community-based organizations to develop research and policy solutions grounded in environmental justice.

Restore the Delta acknowledges that carbon dioxide removal is an essential component of reaching net zero emissions, as reflected in the State Air Resources Board's 2022 Scoping Plan finding that "there is no path to carbon neutrality without carbon removal and sequestration." We also recognize that nascent technologies require thoughtful development and important environmental safeguards.

We support SB 643's intent to establish a Carbon Dioxide Removal Purchase Program that includes important safeguards such as prohibiting the use of CDR processes for enhanced oil recovery and placing restrictions on certain biomass feedstocks. The requirement that eligible carbon dioxide removal projects incorporate community benefit mechanisms represents a positive step toward ensuring that projects provide economic opportunities for local

communities. As an organization dedicated to making Delta waters fishable, drinkable, and swimmable, we believe addressing climate change through multiple pathways is crucial for protecting California's water resources, including the Delta.

The Sacramento-San Joaquin Delta is the largest freshwater tidal estuary of its kind on the west coast of the Americas, providing important habitat for birds on the Pacific Flyway and for fish that live in or pass through the Delta. The region is a world-class recreational destination that attracts about 12 million visitors per year and is home to more than 4 million people. Within the Delta, there are over 1,100 miles of waterways with a complex system of levees that need regular maintenance and upgrades.

The Delta region faces unique challenges related to water quality, endangered fisheries, flood risks, and environmental justice concerns. Eight native fish species, including the Chinook Salmon, are now threatened or endangered due to water diversions from Central Valley rivers and the Delta. Today, the vast majority of the Delta has been designated a disadvantaged community by the California EPA, with many census tracts ranking in the 90th percentile or higher for pollution burden.

Given this context, while we support SB 643, we believe that it could be enhanced to ensure that carbon removal technologies develop in ways that protect California's communities and natural resources:

First, we recommend complementing the \$50 million commitment with specific carbon removal quantity targets aligned with the state's goal of 7 million metric tons by 2030. This approach would ensure accountability for climate outcomes regardless of credit price fluctuations. The bill currently structures the program around a spending amount rather than a specific carbon removal target in tons, which may not effectively align with CARB's Scoping Plan goals if credit prices are higher than anticipated. Establishing clear metrics-based targets would create a more direct connection between program expenditures and climate outcomes.

Second, we recommend incorporating requirements for CDR projects to evaluate potential impacts on water quality, aquatic ecosystems, and fisheries. This is particularly important for marine carbon removal projects, which are included as an eligible project category. Enhanced mineralization projects often involve spreading crushed minerals on land or in water bodies, which could potentially affect water chemistry and aquatic life. Given the Delta's ecological significance and current challenges, ensuring that carbon removal projects don't adversely impact water resources is essential for protecting both the environment and the communities that depend on these resources.

Third, we suggest developing specific criteria for community benefits mechanisms that prioritize fence-line communities and areas already facing significant pollution burdens. While the bill mentions community benefits, more robust provisions are needed to ensure that CDR projects

*RE: Support SB 643 (Caballero) – Carbon Dioxide Removal Purchase Pilot Program*

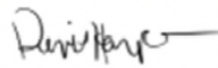
don't disproportionately impact disadvantaged communities. Restore the Delta remains committed to collaborating with policymakers to develop climate solutions that protect and benefit Delta communities, water resources, and ecosystems. We believe the recommendations outlined above would further strengthen the bill and ensure that carbon removal advances in ways that safeguard California's vital natural resources.

If these concerns cannot be addressed in the current bill, we encourage their consideration in subsequent legislation as the carbon dioxide removal field continues to evolve in California.

Sincerely,

A handwritten signature in black ink, appearing to be 'EM' followed by a long horizontal stroke.

Esther Mburu  
Carbon Policy Analyst

A handwritten signature in black ink, appearing to be 'Davis Harper'.

Davis Harper  
Carbon & Energy Program Manager