

# Seeking Feedback on Carbon Capture, Removal, Utilization, and Storage in the Cap-and-Invest Program



Ecology is working to provide clarity on how engineered carbon management fits within the Cap-and-Invest Program, including carbon capture, utilization, and storage, carbon dioxide transport, and technology-based carbon dioxide removal. Businesses subject to the Cap-and-Invest Program can use carbon management as a part of their decarbonization strategy by exempting some of their emissions from being covered by the program or by purchasing offset credits that are generated by carbon management projects.

Ecology is kicking off the first part of a multi-year effort related to engineered carbon management in the Cap-and-Invest Program in May 2026, including hosting two virtual public meetings on May 21 and May 28 and holding a public comment period.

More information is available on our webpage: [ecology.wa.gov/carbon-capture](https://ecology.wa.gov/carbon-capture).

We are **seeking public input between May 21 and June 26, 2026**.

We invite comments in the following way:

- Submit written comments via our [electronic comment platform](#)
- Schedule a meeting by contacting us at [CCA\\_carboncapture@ecy.wa.gov](mailto:CCA_carboncapture@ecy.wa.gov)

**Please review the questions on the following pages and respond to applicable questions. There is no obligation to respond to every question.**

## Feedback areas

Ecology is seeking feedback to inform its priorities related to engineered carbon management under the Cap-and-Invest Program. Ecology also welcomes comments that provide additional context on important issues surrounding engineered carbon management and its role in the state's efforts to reduce and remove greenhouse gas emissions.

### Feedback Area 1: Carbon management within the Cap-and-Invest Program

- 1) Which engineered carbon management pathways do you think present the greatest opportunity for Cap-and-Invest Program compliance? For example, point source carbon capture and storage, carbon capture and utilization, and technological carbon dioxide removal. Why?
- 2) What additional clarity is required for effective deployment of engineered carbon management for Cap-and-Invest Program compliance? What is the most important? What is the most pressing?
- 3) Do you have any specific questions regarding the treatment of different carbon management pathways under the Cap-and-Invest Program?

### Feedback Area 2: Carbon management in Washington

- 4) Do engineered carbon management pathways present a feasible decarbonization strategy for companies/facilities in Washington? For example, point source carbon capture and storage, carbon capture and utilization, and technological carbon dioxide removal. Why? Why not?  
**Follow-up:** What are the timelines for implementing carbon management projects in Washington?
- 5) What are the greatest obstacles to implementing engineered carbon management in Washington and how can the state remove those barriers?  
**Follow-up:** Which of these barriers is the most pressing for the state to overcome? Why?
- 6) What potential impacts or harms could engineered carbon management have on communities and Tribes in Washington? How can Washington proactively mitigate these?

### Feedback Area 3: Implementation of the CCA Program Rule

The Cap-and-Invest Program at Ecology seeks feedback related to the implementation of both the carbon sequestration emissions exemption provision and the definition of permanent sequestration as it explores providing additional clarity on how carbon sequestration can be leveraged.

Under the CCA Program Rule, sequestered carbon dioxide that is permanently sequestered is exempt from coverage under the Cap-and-Invest Program:

*(a) Covered emissions do not include the following emissions reported under chapter 173-441 WAC: ... (iii) Sequestered carbon dioxide when it can be demonstrated to ecology's satisfaction that it qualifies as permanent sequestration, as defined in WAC 173-407-110, either through long-term geologic sequestration or by conversation into long-lived mineral form. [WAC 173-446-040(2)(a)]*

Permanent sequestration is defined in rule as:

*Permanent sequestration means the retention of greenhouse gases in a containment system using a method that is in accordance with standards approved by ecology that creates a high degree of confidence that substantially ninety-nine percent of the greenhouse gases will remain contained for at least 1000-years. [WAC 173-407-110]*

#### **Permanent sequestration as defined in WAC 173-407-110**

7) Which sequestration and/or mineralization approaches might meet this definition of permanent sequestration? Why?

**Follow-up:** Are there sequestration and/or mineralization approaches that are unlikely to meet this definition? Why?

8) Does this definition create barriers to implementation of carbon sequestration methods and technologies? How and why?

#### **Models and frameworks for CCA Program Rule implementation**

9) How can and should elements such as monitoring and verification procedures and risk mitigation, compensation, financial assurance, and reversal provisions be factored into Ecology's implementation of the CCA program rule?

10) How might federal Class VI well or other applicable state or federal standards be leveraged?

**Follow-up:** Where are there potential gaps in these standards?

**Example considerations:** Gaps related to integration into a cap-and-Invest program, health and environmental impacts, permanence, risk mitigation, liability, treatment of different technologies and geologies, Washington-specific factors, etc.

11) What other methodologies or protocols related to geologic sequestration and/or mineralization should Ecology look at?

**Follow-up:** What elements of these frameworks may be particularly applicable to Washington's Cap-and-Invest Program or deserve specific attention? Why?

**Example considerations:** Approaches taken by other states or jurisdictions. Protocols from other emissions trading systems or cap-and-trade programs, voluntary carbon markets, low carbon fuel standards, etc.

### **Strategies to mitigate impacts to communities and Tribes**

12) As Ecology works to provide clarity on the CCA Program Rule implementation, what strategies could mitigate potential harms to communities and Tribes?

13) What approaches have other states or jurisdictions taken that can serve as models?