



February 14, 2025

Office of Wetlands, Oceans and Watersheds
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Docket ID EPA-HQ-OW-2024-0189 Tentative MPRSA Permits for LOC-NESS Phase 2
Submitted via Federal eRulemaking Portal: www.regulations.gov

To Whom It May Concern:

The [Carbon Business Council](#) (CO2BC) is a coalition of more than 100 innovative carbon management companies with over \$16.5 billion in combined assets working across six continents. We appreciate this opportunity to submit comments on Docket ID EPA-HQ-OW-2024-0189 regarding Tentative MPRSA Permits for LOC-NESS Phase 2.

In January 2024, the CO2BC published an [Issue Brief](#), developed with a working group of CO2BC member companies and ecosystem partners, highlighting the significant economic opportunity that marine carbon dioxide removal (mCDR) represents for the United States. To realize this opportunity will require responsible research, development, and deployment (RD&D) such as Woods Hole Oceanographic Institute's (WHOI) Wilkinson Bay Study.

The Carbon Business Council – including our mCDR Coalition, which represents over 40 U.S. commercial mCDR companies and civil society organizations – strongly supports the expeditious final approval of Tentative Research Permit No. EPA-HQ-MPRSA-2024-002. Many thanks for the work that you do, and we and our membership would be pleased to answer any questions you have about the commercial potential of mCDR in the U.S.

Sincerely,

Benjamin Rubin

Ben Rubin
Executive Director, Carbon Business Council

Isabella Corpora

Isabella Corpora
Director, Carbon Business Council