



February 20, 2024

California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
[submitted electronically]

RE: Charm Comments on the Proposed Amendments to the Low Carbon Fuel Standard Regulation

Charm Industrial (Charm) appreciates the opportunity to submit comments to the California Air Resources Board (CARB) on the Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation. Charm is a California-based company working in support of State efforts to rapidly drive down greenhouse gas emissions (GHGs) on the path to carbon neutrality. Our innovative negative emissions technology can play a key role in these efforts. We look forward to continuing to work with CARB, its state agency partners, and all stakeholders to deliver innovative climate solutions that will provide benefits in California and beyond.

About Our Technology

Charm has developed a proven carbon dioxide removal technology that has already removed thousands of tons of carbon from the atmosphere. Our innovative approach converts waste biomass into carbon-rich liquid that is safely and permanently stored underground. Agricultural waste and highly combustible forest residue that would otherwise burn or be left to rot spewing GHGs into the atmosphere is instead transformed into a carbon benefit. In addition to the vital climate benefits that negative emissions technologies like bio-oil sequestration provide, our approach delivers critically needed air quality, wildfire resilience, and economic benefits in parts of California that most need them like the Sierras and the Central Valley.

Charm Supports Strong Carbon Intensity (CI) Targets and a Well Designed Auto-Acceleration Mechanism

California must build on and accelerate actions to rapidly cut GHGs. These actions must include a robust policy and regulatory framework that will take advantage of the

significant benefits that innovative carbon removal and sequestration technologies can deliver, while still prioritizing direct emissions reductions.

Charm supports the LCFS proposed amendments to increase both the pre- and post-2030 stringency of the LCFS CI benchmarks to incorporate a more stringent CI reduction target of at least 30 percent by 2030 and a 90 percent reduction in fuel CI by 2045 from a 2010 baseline, as well as an initial step-down of at least 5% in 2025. The emission reductions driven by the LCFS program will be critical to ensure California remains on track to meet its climate goals. Additionally, a well-designed compliance target acceleration mechanism that functions to increase stringency based on program performance will support critically needed emissions reductions and provide market certainty for ongoing investment in low and zero-carbon technologies.

CARB Should Ensure that Additional Technologies are Rapidly Incorporated into the Existing Regulatory Framework for Carbon Removal within the LCFS

Charm can help support the success of an ambitious LCFS program through its proven carbon dioxide removal technology as one part of a suite of innovative technologies that California will need to meet our climate goals. The kinds of solutions that Charm has developed can also play a key role in supporting California's biomass and forest waste management goals, wildfire and forest resilience actions, and air quality goals. As a California-based company, we are invested in helping the state continue to be a climate leader by putting in place policies that pave the way for innovative technologies and solutions to support climate action. Policies that support emerging carbon-negative technologies will ensure continued investment, job creation, and economic growth for California.

Consistent with the necessary and ambitious goals for carbon removal technology detailed in the 2022 Scoping Plan, CARB should ensure that as new carbon dioxide removal and sequestration technologies emerge, they can be quickly incorporated into the existing regulatory framework for carbon removal technologies within the LCFS.

Conclusion

Charm is fully committed to helping California meet its climate goals. California is going to need a host of strategies to decarbonize virtually every economic sector in the state to achieve carbon neutrality. While we support ongoing efforts to secure direct emission reductions wherever possible, it is clear that innovative carbon removal and sequestration technologies are also going to be needed for California to reach its climate goals, including carbon neutrality by 2045.

Our company was founded to develop and bring technological solutions to the collective effort needed to turn the tide against climate change rapidly. We look forward to continuing to work with CARB on this challenge.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nora Cohen Brown', with a stylized, cursive script.

Nora Cohen Brown
Head of Market Development and Policy