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

RE: Comments On 15-Day Changes to the Low Carbon Fuel Standard Proposed Regulation Order

Remora values the chance to share input on the 15-day changes to the Low Carbon Fuel Standard (LCFS) Proposed Regulation Order. We are eager to collaborate with CARB, its State agency partners, and all stakeholders to contribute innovative climate solutions with broad-reaching benefits in California and beyond. We submit these comments in support of a more stringent LCFS program and the swift inclusion of Mobile Carbon Capture Technologies within that program.

About Remora & Mobile Carbon Capture Technology

[Remora](#) designs and manufactures an **innovative engine exhaust technology that captures carbon dioxide (CO₂) directly from hard-to-decarbonize mobile sources**, including Class 8 heavy-duty trucks (semi-trucks), line-haul locomotives, and cargo ships. Using Remora's mobile carbon capture and storage (MCCS) technology, exhaust is diverted to a carbon capture unit, which captures CO₂ emissions, before the exhaust is released into the atmosphere. The captured CO₂ is compressed, stored onboard, and then offloaded at designated sites that are co-located at refueling or cargo-loading infrastructure sites. All captured CO₂ can be safely and permanently disposed of via underground sequestration or utilized within other products and industries.

Mobile carbon capture technologies are uniquely poised to provide major decarbonization benefits while also supporting critical air quality benefits, particularly in heavily impacted communities.

Remora Supports a Strong LCFS

California's transportation sector is the State's largest source of both greenhouse gas emissions (GHG) and air pollution, accounting for more than half of statewide GHG emissions.¹ Rapidly driving down these emissions is a critical element of California's strategy to achieve carbon neutrality. As described in the 2022 Scoping Plan Update, the transition to zero-emission technology will take time as internal combustion vehicles will remain on the roads and in service in California for decades to come. The modeling for the Scoping Plan indicates that even in 2045, significant volumes of liquid fuels, including fossil fuels, are likely to remain in California's transportation fuel mix.² Solutions that can significantly reduce—and even fully eliminate—greenhouse gas emissions from California's transportation sector will be key.

Remora supports CARB's near-term increase in carbon intensity (CI) stringency to a 9% CI reduction in 2025, which is included in the 15-day changes. CARB should also consider that the increased step down should be advanced through the stringency curve to guarantee stronger reduction targets year after year through 2030. Both of these changes will support the program's efforts to maximize emission reductions and drive California towards its climate goals.

The LCFS Can Be More Effective By Positioning it To Incorporate Mobile Carbon Capture Technologies

Given the scale and scope of the challenge to meet California's GHG reduction targets, the State cannot afford to limit any approaches that can contribute to this effort. As CARB works to refine LCFS, **Remora urges CARB to ensure that it optimally positions California to reap the benefits that innovative and proven technologies like MCCS can provide.**

Swiftly incorporating additional technologies into the existing CCS Protocol within the LCFS Regulation will recognize the role CCS can play in decarbonizing the production of transportation fuels and will be key in meeting California's climate goals.

By incorporating MCCS into the LCFS, California can work towards even more ambitious transportation decarbonization targets, which will provide climate, air quality, and public health benefits to Californians.

¹ See Draft 2022 Scoping Plan Update, pg. 147.

² See Draft 2022 Scoping Plan Update, pg. 153.

Remora appreciates the opportunity to submit comments, and we look forward to continuing to work with you and all stakeholders in California on this critically important effort.

Sincerely,

DocuSigned by:

Paul Gross

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Paul Gross

CEO