



August 27, 2024

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

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

Charm Industrial (Charm) appreciates the opportunity to submit comments to the California Air Resources Board (CARB) on the 15-day changes to the Low Carbon Fuel Standard (LCFS) Proposed Regulation Order. 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 biomass residues into a carbon-rich liquid that is safely and permanently stored underground. Agricultural waste and highly combustible forest residues that would otherwise burn or be left to rot, emitting GHGs into the atmosphere, are 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 The CARB's Near-term Increase In Carbon Intensity (CI) Stringency

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 CARB's near-term increase in carbon intensity (CI) stringency to a 9% CI reduction in 2025 in its 15-Day Changes. However, to ensure that the program is moving towards maximizing emission reductions to help achieve California's GHG reduction goals, the increased step down should be advanced through the stringency curve to guarantee stronger reduction targets year after year through 2030.

CARB Can Strengthen The LCFS by Ensuring That Additional Technologies Are Quickly Incorporated Into The Existing Regulatory Framework for Carbon Removal.

Stronger benefits from the LCFS program could be realized if CARB swiftly establishes pathways within the current regulatory framework for additional carbon removal technologies. 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 its 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 can strengthen the LCFS by, as expeditiously as possible, ensuring that as new carbon dioxide removal and sequestration technologies emerge, they can be quickly incorporated into the existing regulatory framework.

Conclusion

Charm is fully committed to helping California meet its climate goals. California needs 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,



Nora Cohen Brown

Head of Market Development and Policy