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Cheryl Laskowski
Branch Chief
Transportation Fuels
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
[submitted electronically]

RE: Comments On July 7, 2022 LCFS Workshop

Remora appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) July 7, 2022 Low Carbon Fuel Standard (LCFS) Workshop. Remora is committed to working with CARB, its State agency partners, and all stakeholders to deliver innovative climate solutions that will provide benefits in California and beyond.

About Remora & Mobile Carbon Capture Technology

Remora designs and manufactures an **innovative engine exhaust after-treatment technology that captures carbon dioxide (CO_2) directly from heavy, hard-to-decarbonize mobile sources**, including Class 8 heavy-duty vehicles ("semi-trucks"). The captured CO_2 is compressed, stored onboard, and then offloaded at designated sites that are co-located at refueling or cargo loading infrastructure sites. All captured CO_2 can be safely and permanently disposed of via underground sequestration. Remora's technology also significantly reduces tailpipe nitrogen oxide (NO_x) emissions. Remora has **on-road partnerships with Pepsi, Procter & Gamble, Unilever, Ryder**, and numerous other nationally-significant trucking fleets.

Remora's technology has been **under development for a decade** and is **based on existing, proven carbon capture methods**. The technology retrofits onto semi-trucks, is easy to install and operate and weighs significantly less than earlier prototypes ensuring that semi-trucks maintain a significant payload. Remora's device and other mobile carbon capture technologies can *quickly* address the most difficult sectors to decarbonize, including heavy-duty trucking, vessel shipping, and rail. Remora's technology is a critical near-term solution that can deliver significant climate benefits and support and complement efforts toward achieving zero-

emission transportation in California. When paired with vehicles that run on synthetic or renewable fuels, Remora's innovative technology can **make transportation carbon negative** (in what is known as a bioenergy with carbon capture and storage or "BECCS" carbon removal pathway).

July 7, 2022 LCFS Workshop Comments

Remora supports actions to decarbonize the transportation sector as soon as possible. California's transportation sector is the State's largest source of both greenhouse gas (GHG) emissions 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 the Governor rightly recognized in his recent letter to CARB Chair Randolph on the 2022 Climate Change Scoping Plan Update, innovative carbon removal and sequestration technologies will be necessary for California to reach its climate goals, including carbon neutrality by 2045.Solutions that can significantly reduce—and even fully eliminate—greenhouse gas emissions from California's transportation sector will be key.

Remora supports CARB's more ambitious carbon intensity (CI) reduction targets presented on July 7, 2022 at the LCFS Workshop. LCFS CI targets can be made more ambitious by the inclusion of a suite of transportation decarbonization technologies. Remora can support California's ambitious CI targets and efforts to decarbonize the transportation sector through its technology. Mobile carbon capture technologies that can be rapidly scaled to deliver significant climate, air quality, and public health benefits in California provide a critical tool that the State can take advantage of.

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,

Alexandra Frumar

Alexandra Frumar
Chief Legal Officer

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