



March 28, 2025

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

RE: Remora's Comments on the Public Workshop on Carbon Capture, Removal, Utilization, and Storage Program (SB 905)

Dear California Air Resources Board,

Remora¹ appreciates the opportunity to provide comments following the California Air Resources Board's (CARB) Public Workshop on the Carbon Capture, Removal, Utilization, and Storage Program (SB 905), held on February 27, 2025.

First and foremost, we commend CARB staff for hosting this important workshop and for advancing the SB 905 process. For years, we have been dedicated to developing and deploying technology that aligns with this initiative, and we are eager to contribute to its ongoing discussions and implementation. Therefore, we look forward to actively participating in the program's development.

We fully support the workshop's emphasis on the critical role of carbon capture, removal and storage technologies in achieving the state's goal of carbon neutrality by 2045. However, as detailed in the workshop, California needs to make near-term progress to enable carbon capture, removal and storage technologies to contribute to the state's carbon neutrality goals as detailed in the 2022 Scoping Plan. To this end, we look forward to working with CARB to develop a regulatory framework under SB 905 that includes mobile carbon capture. Additionally, Remora is fully committed to CARB's efforts to ensure that it has sufficient resources and personnel to support the development and implementation of SB 905 as soon as possible.

About Remora & Mobile Carbon Capture Technology

Remora's carbon capture technology extracts and purifies carbon dioxide (CO₂) from the exhaust of heavy-duty vehicles, including Class 8 trucks (semi-trucks) and locomotives. Remora retrofits vehicles with its zero-backpressure carbon capture systems, which liquefy and store the captured CO₂ onboard the vehicle. The CO₂ is offloaded while the vehicle refuels, and then safely and permanently sequestered underground or utilized in various industries.

¹ <https://remoracarbon.com/>

REMORA

In addition to reducing greenhouse gases (GHGs), our technology improves air quality, cutting particulate matter and NOx emissions by 85%. Since the technology is modular, it can be applied beyond trucks and trains to diesel generators, container ships, and other emissions sources. We have already collaborated with experts to develop a rigorous protocol—modeled after CARB’s CCS protocol—to quantify the greenhouse gas benefits delivered by mobile carbon capture.

As a result, our technology aligns with SB 905’s objectives and supports California’s broader goal of achieving net-zero greenhouse gas emissions by 2045, while also advancing CARB’s mandate to improve air quality. Mobile carbon capture technologies are uniquely positioned to deliver substantial decarbonization benefits while improving air quality, particularly in heavily impacted communities.

Remora Supports the Development of a Regulatory Framework Inclusive of Mobile Carbon Capture

SB 905 mandates that CARB create a program evaluating the efficacy, safety, and viability of carbon capture and carbon removal technologies. Throughout the workshop, CARB staff, panelists, and attendees underscored the need for a comprehensive regulatory framework for carbon capture and removal technologies in California. We support this request and recommend that CARB recognize mobile carbon capture as a relevant technology within SB 905. Establishing a structured, efficient, and predictable pathway for development, deployment, and commercialization is crucial to supporting the success of Remora’s cutting-edge technology in the state.

More broadly, a regulatory framework can accelerate the scaling of carbon capture and carbon removal technologies, which are essential for achieving the state’s climate goals, while also establishing safety standards to build public trust. For these reasons, we support the development of a carbon capture and removal regulatory framework, as it can help de-risk the industry and provide much-needed certainty and clarity for both industry and stakeholders.

Remora Supports CARB’s Request for Additional Resources and Personnel Support for SB 905

As stated by CARB staff at the outset of the workshop, the SB 905 process is in need of greater resources and personnel to ensure continued progress. Remora fully supports this request, noting that the process has been behind schedule to date. As highlighted in the 2022 Scoping Plan, “there is no path to carbon neutrality without carbon removal and sequestration.”² Therefore, it is imperative to ensure that the SB 905 process is properly resourced in order to not only keep the process on track, but also to ensure that the state can achieve its broader climate goals. Therefore, we wish to emphasize the need for greater resource allocation in support of this process.

² [2022 Scoping Plan](#) at 84.

process.

Conclusion

We are appreciative of this opportunity to submit comments on the SB 905 workshop and wish to express our gratitude and appreciation for the work of CARB staff on this critical effort. We are ready to collaborate with CARB and the state to help California achieve its emissions reduction goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Gross", written in a cursive style.

Paul Gross
CEO
Remora