



Liane Randolph
Chair, California Air Resources Board
California Air Resources Board
1001 I St
Sacramento
CA 95814

Dear Chair Randolph,

These comments are being provided as supplementary to those provided by White Energy Holding Company, LLC during the public hearing for the 2022 Scoping Plan held on June 24th 2022. As stated during the hearing White Energy supports the including of Carbon Capture in the scoping plan.

Since the 2018 adoption of the CCS Protocol White Energy has invested millions of dollars into research and development and thousands of man hours. Projects such as the US Department of Energy/ADM Decatur, IL project has shown that the technology is commercially scalable for ethanol biorefineries.

California currently has approximately 1.5 billion gallons of ethanol demand. The scoping plan has laid out a framework through which with a combination of carbon capture, renewable energy and innovative farming practices; that ethanol can become carbon neutral or even negative while maintaining a sustainable food and fuel supply. If California were able to source all of the current ethanol demand from biorefineries with carbon capture then it would support approximately 4.3 million metric tons of CO₂ to be captured and sequestered. This is the equivalent of approximately 937,000¹ (EPA, 2021) annual vehicle emissions the equivalent amount of carbon stored by 197² (Androff, 2021) million trees.

Carbon Capture technology is poised to be deployed across the ethanol facility thanks in no small part to California's leadership in the space. Multibillion dollar projects such as that of Summit Carbon Solutions, LLC and Navigator CO₂ Ventures LLC will safely capture and store millions of metric tons of CO₂ annually from ethanol biorefineries. If the entire US ethanol industry were to adopt carbon capture it would be capable of capturing and sequestering upwards of 43 million metric tons a year or more.

Finally, we would like to thank Richard Corey for his leadership and Rajinder Sahota and her staff for the tremendous effort and care taken in producing the Draft of the 2022 Scoping Plan. It is through their tireless efforts and California's continued commitment to GHG mitigation that will allow us all to tackle the environmental issues that face us now.

Regards,

Kim Do
Director of Finance
White Energy Holding Company, LLC

¹ Greenhouse Gas Emissions from a Typical Passenger Vehicle
(<https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle#:~:text=A%20typical%20passenger%20vehicle%20emits,of%20miles%20driven%20per%20year.>)

² Trees Are Climate Change, Carbon Storage Heroes
(<https://www.fs.usda.gov/features/trees-are-climate-change-carbon-storage-heroes#:~:text=In%20one%20year%2C%20a%20mature,atmosphere%2C%20like%20fire%20or%20decomposition.>)