October 24, 2014

California Air Resources Board

1001 I St

Sacramento, CA 95814

Mr. Ingram and Mr. Pham,

Pacific Ethanol is pleased to submit comments regarding CAGREET 2.0. We understand that the DDG displacement ratio is still in the review process. We strongly urge you not to deviate from the Argonne numbers which are based upon multiple real world studies and seem the most scientifically robust. In addition we urge to look at California displacement data as well in determining the appropriate ratio.

Pacific Ethanol has production facilities in Stockton and Madera California and is actively seeking means to increase the use of sorghum as a feedstock for production of ethanol. Sorghum has an important role to play in helping California meet the greenhouse gas reduction goals set by the LCFS and reducing water usage on irrigated acres in California.

We maintain close contact with National Sorghum Producers (NSP) and understand they are submitting comments as well. As NSP does, we strongly encourage you to consider revising the values related to sorghum yield, the sorghum N application rate and the sorghum stover N content. The sorghum stover N content figure is particularly troubling, as it is based on data not comparable to those found in modern commercial sorghum production. As an alternative, we would support NSP’s data and suggested changes.

Thank you for the opportunity to comment.

Regards,

Tom Koehler