



June 23, 2022

Chair Randolph and Members of the Board
California Air Resources Board
1001 I St.
Sacramento, CA 95814

Chair Randolph and Members of the Board,

Thank you for the opportunity to comment on ARB's 2022 Draft Scoping Plan. NSP is a trade association representing 50,000 U.S. sorghum farmers on federal and state legislative and regulatory matters. NSP also speaks for the sorghum industry as a whole, advocating on behalf of the supply chain participants that rely on sorghum for the future of their businesses.

We applaud ARB for its continued innovation and incentivization of cleaner fuels. Biofuel production remains the cornerstone of domestic demand for sorghum, with one-third of the crop being used to produce ethanol in a typical year. We also applaud ARB for its continued trend toward incentivizing climate smart farming practices, including healthy soils practices. Sorghum provides a key advantage in this area given farmers in close proximity to ethanol production facilities practice no-till or reduced tillage on 95 percent of their acres. Sorghum also has a relatively larger root system as compared to other crops, and these facts together mean the High Plains, where sorghum ethanol is produced, has distinct advantages in the areas of farming energy usage and nitrate emissions.

With this in mind, we urge ARB to begin incentivizing these practices by allowing ethanol producers to apply for tier 2 pathways based on farming practices unique to their respective regions. NSP has done significant work to make this process possible at the farmer level and even applied for a \$68.7 million grant under the USDA partnerships for climate smart agriculture and forestry program to continue honing the process, and we are confident tier 2 pathways based on farming practices are feasible today.

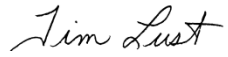
We also urge ARB to continue assigning an ILUC value for sorghum equal to that of corn. As can be seen in Figure 1, the ILUC values for the two fuels move in tandem as corn and sorghum are substitutes for one another in both ethanol production and livestock feeding. Furthermore, as can be seen in Figure 2, sorghum acres have not been significantly affected by increases in ethanol production. In fact, as ethanol production has increased, sorghum acres in Kansas and Texas, where virtually all sorghum ethanol is produced, have trended downward. ILUC is predicated on the principle that producing more sorghum in the U.S. moves acres of other crops to international locations. Clearly, this has not occurred with sorghum as acres have declined. Accordingly, we believe an ILUC value no greater for sorghum than corn is warranted.

Finally, we encourage ARB to consider the impacts of converting acres from conventional to organic farming practices. While such conversions do mean less pesticide usage, a complete conversion to full tillage (away from usage of herbicides such as atrazine), would mean almost 40 percent more carbon

emissions due to three times greater energy usage and a negative impact on soil health and soil carbon sequestration potential.

Please do not hesitate to contact me if you have additional questions.

Regards,

A handwritten signature in cursive script that reads "Tim Lust".

Tim Lust
CEO



Figure 1. Indirect Land Use Change Emissions for Corn and Sorghum Ethanol in Three Models.

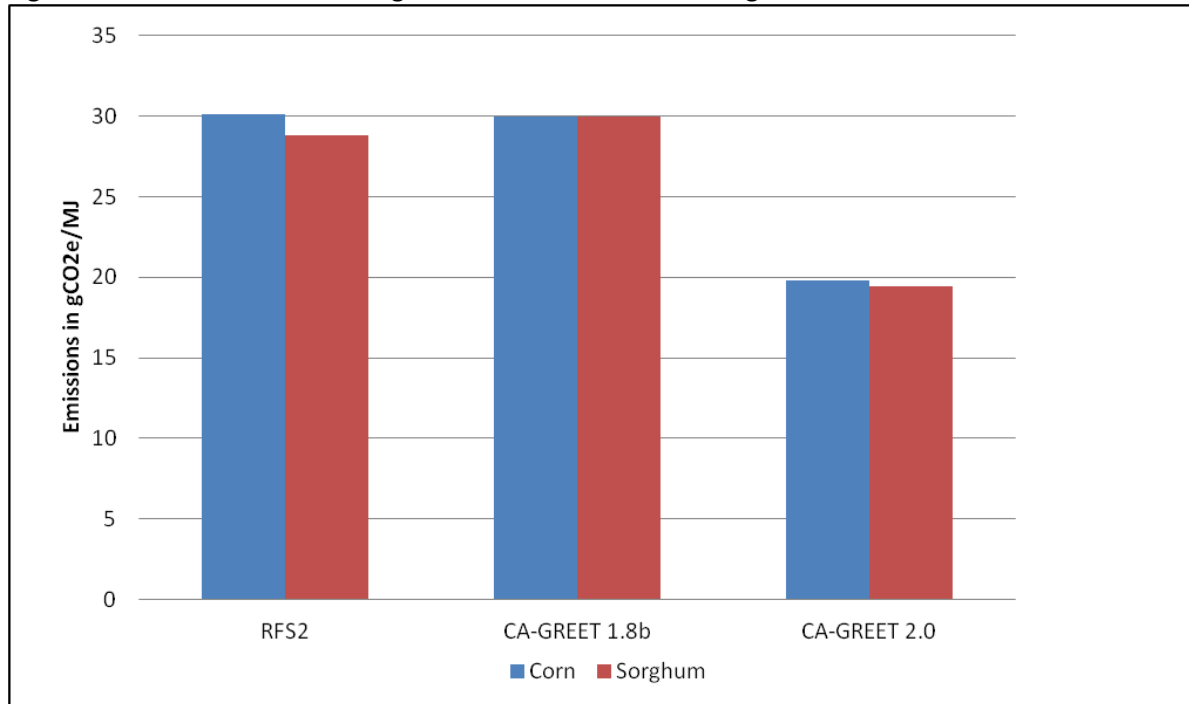


Figure 2. Kansas and Texas Sorghum Acres and U.S. Ethanol Production.

