



August 30, 2018

Ms. Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Ms. Nichols,

Thank you for the opportunity to comment on the proposed amendments to the LCFS regulation and to the regulation on commercialization of alternative diesel fuels. In particular, NSP is pleased with ARB's modifications to the CCS protocol, the inclusion of grain sorghum fiber as a cellulosic feedstock and the change in the sorghum farming input data underlying CA-GREET 3.0.

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.

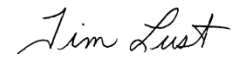
As proposed, the CCS pathway will enable ethanol plants to become carbon neutral or even carbon sinks. A biological process used to produce energy—like that employed in ethanol plants—has a significant positive impact on carbon sequestration as it actually removes carbon from the atmosphere. Contrast this with CCS associated with fossil fuel production, which sequesters methane that had already been sequestered, and couple that with added food production, and the benefits of ethanol on the carbon cycle are clear.

We are also hopeful ARB will continue moving toward allowing grain sorghum fiber to be used as a feedstock to produce cellulosic biofuels. The feedstock is approved under RFS2, and many ethanol plants are considering this option. For this reason, it is important for market liquidity and fungibility any of these gallons that move into California have a ready market. Like corn fiber, grain sorghum fiber is almost exclusively cellulose, and it is found in similar quantities in grain sorghum. For this reason, there will be no practical differences between the two feedstocks from a GHG perspective.

Finally, we are grateful ARB updated the sorghum farming input values in CA-GREET 3.0. The dataset used in CA-GREET 2.0 was based on USDA surveys in which 75 percent of the years surveyed were severe drought years. This high inclusion of drought years greatly impacted the quality and representativeness of the data and biased the inputs to the high side of reality. In contrast, the updated values currently in CA-GREET 3.0 are based on data from a statistically significant subset of U.S. sorghum farmers and reflect agronomic recommendations at land grant universities.

We hope ARB moves forward with swift adoption of these proposed changes. 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

National Sorghum Producers