



AEMETIS

February 17, 2015

Hon. Mary Nichols
Chairman, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chairman Nichols,

Aemetis, Inc., a California-based company, owns and operates California's largest ethanol production facility located in Keyes. We believe grain sorghum has an essential role to play in helping California meet the greenhouse gas reduction goals set by the LCFS, and to reduce water usage on water-stressed farm acres in California.

To date, Aemetis has processed approximately 50,000 tons of lower-carbon grain sorghum into liquid transportation fuel, and going forward, we intend to continue processing sorghum. As you know, along with the other California ethanol producers, Aemetis has been awarded a CEC matching grant (#ARV-14-027) to develop the California In-State Sorghum (CISS) program that combines research, market development, and education to support the development of sorghum as a reliable and robust feedstock for the state's low carbon ethanol industry. Under the grant, each of the three California ethanol companies will process approximately 82,000 tons of grain sorghum (~7.9 million gallons of ethanol), eliminating over 15,500 MT of CO₂. In short, we are committed to the development and use of grain sorghum as a lower-carbon feedstock as we work to support the LCFS.

As a larger part of our sorghum initiative, we maintain close contact with National Sorghum Producers (NSP) and understand they are submitting comments as well. Along with NSP, we applaud the California Air Resources Board for its update of the LCFS and appreciate special attention given to sorghum ILUC, sorghum fertilizer requirements, and N₂O emissions from sorghum stover. We also recommend that the ARB focus attention on information related to sorghum root-shoot ratios, and as it becomes available, incorporate this information into future versions of CA-GREET.

Thank you for the opportunity to comment, and for your strong leadership at the ARB.

Sincerely,

Andrew B. Foster
President

Aemetis Advanced Fuels Keyes, Inc.

andy.foster@aemetis.com

(650) 799-6358