December 26, 2015

California Air Resources Board

1001 I Street

Sacramento, CA 95812

**RE: New Pathway Applications for Aemetis Keyes**

National Sorghum Producers (NSP) is a trade association representing the interests of over 50,000 sorghum producers on issues related to legislative and regulatory policy in Washington as well as various state capitals. NSP led efforts to secure an advanced biofuel pathway for sorghum under the RFS2 and has performed extensive analysis on several models and datasets over the last five years, including several datasets similar to those used by the Argonne National Laboratory as well as the ARB in modeling the CI of sorghum ethanol.

NSP supports the application of Aemetis Keyes for sorghum-based pathways under Method 2. The continued usage of sorghum by ethanol producers is of utmost importance to the sorghum industry and the farmers that comprise it, and we feel these pathways are a positive step in the right direction. NSP also urges the ARB to address several issues, including those related to sorghum’s ability to act as a carbon sink and sorghum’s iLUC score.

NSP strongly recommends 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. We feel sorghum’s ability to act as a carbon sink is currently underestimated, and NSP looks forward to working with the ARB to remedy this through more accurate root:shoot ratios.

NSP believes sorghum’s iLUC score is currently overestimated. With less than 9 million acres in the U.S.—and much of these in areas with few cropping choices other than sorghum, we do not feel increased demand for the crop from ethanol producers has an almost 20 g impact on land use change emissions internationally. NSP strongly urges the ARB to revisit this issue for sorghum soon.

Thank you for the opportunity to provide feedback. We feel with these pathways and considerations, sorghum ethanol can play an even larger role in helping California meet the greenhouse gas reduction goals set by the LCFS while at the same time promoting the use of water-sipping crops like sorghum.

Please do not hesitate to let me know if you have any questions.

Regards,



Tim Lust

CEO

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