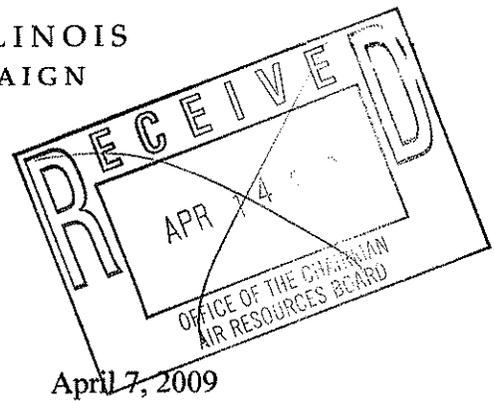


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Mary D. Nichols, Chairwoman  
c/o Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

ORIGINAL: Board Clerk  
Copies: Executive Officer  
Chair

Chairwoman Nichols:

I am writing to express my concern with the inaccuracies regarding the assessment of the fuel ethanol co-product, Distiller's Dried Grain with Solubles (DDGS) presented in the California Air Resource Board's (CARB) proposed rule for the development of a Low Carbon Fuel Standard (LCFS).

I provide these comments as an animal nutritionist with 28 years of internationally recognized research and extension work in the field of poultry nutrition as a faculty member in the Department of Animal Sciences at the University of Illinois. A significant area of focus of my research has been in the area of protein quality and amino acid availability.

My concerns arise from the lack of accurate information, and thus conclusions drawn from that information, on the treatment of DDGS provided in Appendix C11 of the proposed rule. These inaccuracies are as follows:

1. CARB suggest that "livestock are only able to digest and metabolize 16.8-28.8 percent of the DDGS protein fraction.

Comments: This statement is grossly incorrect. Typical DDGS protein and amino acid digestibility for poultry and swine range from 70-80%. CARB did not utilize the bulk of the data available from conventional DDGS studies on protein and amino acid digestibility.

2. CARB suggests that "High phosphorous levels in DDGS also lead to increased excretory phosphorous, a likely manure management issue for the livestock farmer."

Comments: A benefit of DDGS over conventional corn is the presence of phosphorous in a form that is more digestible in the poultry and swine diet. Because of this, there is less

of a requirement for adding additional phosphorous to these diets. Environmentally phosphorous would be present whether provided from the feed or as an added nutrient and can be effectively managed. Phosphorous is a very expensive nutrient, its available in DDGS at the 65-75% level, versus at the 25-30% level in corn. This minimizes the requirements and cost for adding phosphorous to the diet.

3. CARB Staff summarizes that "From the analysis presented, it is evident that significant barriers to the widespread adoption of DDGS as a livestock feed exist."

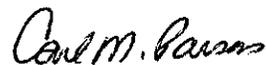
Comments: Again, this statement is grossly incorrect and has no basis. DDGS has been used for over a century, first in the form of brewers' grains, and more recently, from ethanol plants. There is now broad spread adoption and broad use. The product provides a value added option for nutritionists in ration development.

4. CARB Staff summarizes that, "One factor not discussed to this point is the price of DDGS. With rising corn prices from increased demand for ethanol, prices are likely to rise for DDGS. Higher prices render DDGS less cost-effective as a replacement feed, particularly where soybean meal is to be replaced.

Comments: This comment again makes no sense. DDGS is used broadly because it is cost effective. Nutritionists wouldn't use it if it were not. Market values for animal feed products compete based on the nutritional value they provide. DDGS competes in this market with corn, soybean meal and other products.

Animal nutritionists, agricultural extension agents and livestock managers have spent decades studying, incorporating, and optimizing DDGS in the animal feed. It is disappointing, at best, that CARB has not utilized the expertise and knowledge of the scientific community in their recommendations for the appropriate treatment of corn based ethanol in its LCFS determinations. With the consequences of inaccurate analysis leading to conclusions that could harm, rather than help our environment, I would consider it prudent to ensure appropriate expertise and knowledge are brought to bear for the benefit of us all.

Sincerely,



Dr. Carl Parsons  
Professor