



April 28, 2022

Joel Creswell
Department of Ecology
State of Washington
PO Box 47600
Olympia, WA 98504

Mr. Creswell,

Thank you for the opportunity to comment on the Clean Fuels Program. National Sorghum Producers (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.

NSP commends the Department for its commitment to cleaner fuel. We also applaud the Department for recognizing corn and sorghum indirect land usage change (ILUC) should be similar. 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. The two are used interchangeably or blended as needed, and this situation has prevailed since the ethanol industry came to the High Plains.

We also urge adoption of an ILUC value for sorghum equal to the 7.6 gCO₂e/MJ found for corn by Argonne National Laboratory and Life Cycle Associates rather than the current 19.8 gCO₂e/MJ. 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 a lower ILUC number for sorghum is warranted.

We hope the Department moves forward with its commitment to cleaner fuel while at the same time reducing the ILUC value for sorghum ethanol to a lower amount and equal with corn. Please do not hesitate to contact me if you have additional questions.

Regards,

Tim Lust
CEO

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

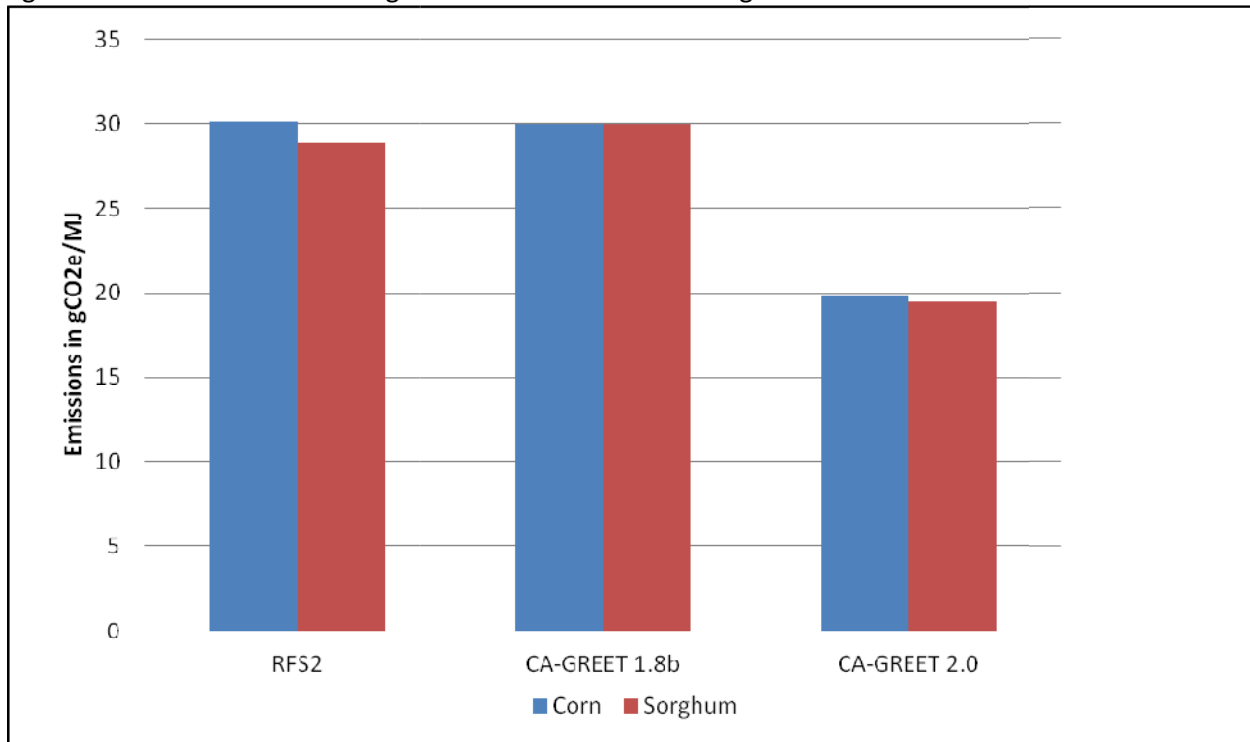


Figure 2. Kansas and Texas Sorghum Acres and U.S. Ethanol Production.

