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October 16, 2014

Katrina Sideco
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Via email to: ksideco@arb.ca.gov

RE: Low Carbon Intensity Fuel Availability

Dear Ms. Sideco:

This letter is submitted on behalf of our company, New Leaf Biofuel, to provide input regarding the availability of low carbon intensity fuels to supply the California market. The availability of low carbon fuels is an important issue under consideration by the Air Resources Board ("ARB") as it will likely impact the determination of the carbon intensity compliance curve. The issue was discussed in the Low Carbon Fuel Standard ("LCFS") workshop held on September 25, 2014.

Availability of Five to Ten Million Gallons in San Diego

New Leaf Biofuel is in San Diego, California, and currently has the capacity to produce about six million gallons per year of ultra-low carbon biodiesel to the California market. The investors in New Leaf Biofuel have been ready, willing and able to expand production at the plant as the local and national support for biodiesel continues to grow. Our fuel is made from recycled cooking oils collected from the Southern California region and has a CI score of 11.76. We have a strong brand, a growing sales team, and have been successful in expanding production at the plant each year since 2008 (we began producing 250,000 per year the first year). We anticipate that we will add another 4 million gallons of biodiesel capacity over the next few years, and the intention would be to sell 100% of this product in to the California market.

Importance of the LCFS

I would like to emphasize the importance of California's LCFS program to low carbon fuel producers and suppliers. The LCFS has sent a strong market signal that there is a reliable demand center for low carbon

fuels. In addition, the carbon intensity structure of the LCFS program has provided a premium value based on the precise carbon intensity of the particular fuel. This has incentivized producers to find ways to more efficiently produce fuel regardless of the type of low carbon fuel produced.

Conclusion

We appreciate this opportunity to submit a comment to the Air Resources Board. We recognize the leadership that California has shown in reducing the carbon intensity of transportation fuels. Please let me know if any clarification of this comment would be helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Case", is centered on the page. The signature is written in a cursive, flowing style.

Jennifer Case