



October 24, 2014

California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

ATTN: Mr. Wes Ingram, Manager, Fuels and Evaluation Section
Mr. Chan Phan, Air Resources Engineer

RE: LCFS Program - Comments on Proposed Changes to California GREET Model

Dear Mr. Ingram and Mr. Phan,

I-5 Clean Fuels appreciates the opportunity to comment on CARB staff's proposed changes for the California GREET Model under efforts to reauthorize the Low Carbon Fuel Standard (LCFS) regulation.

I-5 Clean Fuels is developing a natural gas liquefaction processing facility and public serving L/CNG station in Fresno County, California. The liquefied natural gas will displace diesel fuel used for long haul trucks, agricultural operations and other high-horsepower engine applications in Fresno County and throughout Northern California. This project represents a \$300 million dollar private investment and will create over 120 jobs in Fresno County's west side, where unemployment is over 25%.

We are writing to indicate our overall support for reauthorization of the LCFS. However, we urgently **request that CARB allow additional time for review of, and potential modifications to, its proposed changes to the CA-GREET model.** As CARB staff have made clear, methane leakage is very complex, and there is much uncertainty with existing data. Significant new data on this and other related issues should be available in the next six to twelve months. It is premature to change the carbon intensity values for natural gas (or any other fuel pathways) before that information becomes available. We, therefore, urge CARB to hold off on updating the CA GREET model in order to allow sufficient time to obtain, review and incorporate emerging, peer-reviewed information about methane leakage (roughly, six to 12 months). As we understand it, CARB can reauthorize the LCFS legislation in February 2015 without rushing to update the CA-GREET model.

The LCFS has been a positive force for alternative fuels. I-5 Clean Fuels strongly believes that it is critically important to improve the science on which this program is based. We therefore respectfully ask CARB to separate out reauthorization of the LCFS from adoption of new CI values in CA-GREET at least until the peer-reviewed data on methane leakage is available and can be fully considered.

Sincerely,

Nick Rajkovich
Development Manager
I-5 Clean Fuels