October 22, 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,

On behalf of Landi Renzo, USA ; we appreciate 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.

Landi Renzo USA, based in Torrance, California is the world wide leader in the development, marketing, and sale of natural gas and lpg operating systems; working with Ford, GM, Isuzu, and Freightliner to engineer operating systems that lower the emissions of their engines. We employ over thirty people in the US; and work with forty installation partners nationwide, along with local, regional, and fleet managers. It is imperative that any proposed changes to the CA-GREET model be sufficiently reviewed, and if necessary, modified to make certain that we can continue our production of emission lowering operating systems.

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. *<Organization A*> 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,



Barry P. Carr, Director of Business Development

Landi Renzo, USA