



September 22, 2014

Mr. Michael S. Waugh  
Chief, Transportation Fuels Branch  
1001 I Street  
California Air Resources Board  
Sacramento, CA 95814

**RE: Low Carbon Fuel Standard – Proposed Updates to the GREET 2.0 Model**

Ryder System, Inc. respectfully submits the following comments related to the proposed changes to the GREET 2.0 Model. Ryder has 58 locations, 11,534 vehicles, and 1,898 employees in California and is dedicated to creating a profitable, sustainable and growing market for compressed natural gas and liquefied natural gas powered vehicles. Ryder partners with vehicle manufacturers; natural gas vehicle component manufacturers; natural gas distribution, transmission, and production companies; natural gas development organizations; non-profit advocacy organizations; state and local government agencies; and fleet operators to support California based businesses.

The California Air Resources Board (CARB) is currently considering changes to the model it uses to assess the carbon intensity of transportation fuels. This effort is intended to support the state's low-carbon fuel standard but likely will also impact other regulatory programs in the state and possibly other states (as many states follow California's lead on environmental issues). Based on a review of presentations given by CARB staff, it appears that some of the proposed changes will drastically alter the carbon intensity assigned to some fuels. However, the information used to support these changes has not been made fully available to those impacted by the changes and, therefore, a full vetting of potential issues and impacts has not yet been completed. We are concerned about the uncertainty this creates for businesses and industries impacted by the LCFS rules as well as the broader impact this could have on creating a negative impression to other important stakeholders with respect to the benefits of using natural gas.

The natural gas industry has made great strides in the past several years to improve air quality, increasing NG fueling infrastructure, advancing the development of new vehicle platforms, and transitioning more fleets to natural gas. While economics has played a large role in the interest and development of natural gas as a transportation fuel, there has also been a strong environment justification for using natural gas and this benefit continues to influence demand and support for natural gas vehicles.

Given the significant impact these changes could have on the market for natural gas and other transportation fuels, we believe there must be a full vetting of the data being used to support these changes. Moreover, given that there are numerous studies underway to assess the emissions from the natural gas industry and the fact that there are new regulatory and voluntary programs, underway or planned, to address natural gas emissions, it is premature to lock in changes to the CA LCFS until a more comprehensive review of the underlying data can be completed.

Ryder respectfully urges the Air Resources Board to refrain from making additional changes to the GREET 2.0 model at this time.

Sincerely,

A handwritten signature in black ink that reads "Nanci Tellam".

Nanci Tellam  
Group Director  
Environmental Services & Sustainability

cc: Wes Ingram  
Katrina Sideco  
Hafizur Chowdhury

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