

May 3, 2021

Dear Climate Action Council Member,

On behalf of the Clean Fuels NY Coalition, the signatories listed below respectfully ask you to include a Clean Fuel Standard (CFS), also known as a Low Carbon Fuel Standard, in the list of policy tools recommended to be included in the Climate Action Plan to meet the Climate Leadership and Community Protection Act's (CLCPA) emission reduction requirements as they relate to transportation.

A CFS is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the carbon intensity of their fuels by a set amount, which in New York could be scaled to an aggressive enough target to help achieve the CLCPA's statutory requirements. California and Oregon's CFS has successfully reduced transportation emissions at negligible cost to consumers and no cost to the State government other than administering the program. In 2019 alone, the California CFS resulted in the reduction of 2.5 billion gallons of fossil fuels with 20 percent of the credits awarded to the electric sector despite accounting for a small share of transportation fuels.¹

Transportation is the number one source of greenhouse gas (GHG) emissions in New York. Achieving the CLCPA mandate of reducing GHG emissions by 85% by 2050 will require eliminating almost all transportation emissions. Indeed, the pathways analysis presented to the Climate Action Council and Transportation Advisory Panel indicates that we must reduce transportation emissions by 31-33% by 2030 and 86-97% by 2050 in order to comply with the CLCPA. If we are to meet this target, we must begin reducing transportation emissions as soon as possible. However, it seems unlikely given the COVID-19 recession that the State will be able to allocate much, if any, new funding for clean transportation in the near term; even with the

¹ <https://ww3.arb.ca.gov/fuels/lcfs/lrtqsummaries.htm>. "LCFS Quarterly Data Spreadsheet (updated January 29, 2021)"



funding made available to the state pursuant to the American Recovery Act, the recent state budget included only \$20 million for electrifying mass transit bus fleets and \$3 million for municipal EVs and EVSE – nowhere near the investment needed to move the needle on cleaning New York’s transportation sector. A CFS can accelerate the transition off fossil fuels and ensure that we remain on track even without new budgetary programs. Based on the value of credits in California and fuel use in New York, we project the CFS would generate \$1-\$1.4 billion annually for clean transportation, paid for by fossil fuel providers.²

The New York CFS, modeled on current legislation sponsored by Assemblywoman Carrie Woerner and Senator Kevin Parker (A. 862-A/S. 2952-A), would require manufacturers and importers of high-carbon intensity fuels like fossil gasoline and diesel to either reduce the carbon intensity of their fuels or purchase credits from low-carbon intensity fuel manufacturers and importers, such as operators of electric bus fleets like public transit agencies. The CFS provides meaningful support, paid by polluters, for public transit agencies, school busses, delivery vans, and for-hire vehicle fleet operators to switch to electric vehicles.

We expect electrification to be the primary beneficiary of a CFS, especially as the cap on carbon intensity is ratcheted down over time and as the grid gets greener. However, technology is not currently available or cost-prohibitive for the widespread transition of medium- and heavy-duty fleets, such as sanitation trucks and tractor-trailers, to electric engines. The elegance of a CFS as a performance-based standard is that it would still produce immediate and significant emission and air pollution reductions from these vehicles by providing them with an incentive to switch to renewable alternatives that can be readily dropped into existing engines to replace harmful fossil fuels. As the CFS carbon intensity cap is lowered over the duration of the program, these vehicle types would be provided with an economic incentive to switch to fully zero emission ahead of CLCPA mandates that they do so.

² <https://www.nyscrda.ny.gov/about/publications/ea-reports-and-studies/patterns-and-trends>



A Clean Fuel Standard would reduce transportation emissions by at least 20% over the next decade at no cost to the State of New York. This would mean significant progress toward meeting our obligations under the CLCPA, helping mass transit agencies across the state switch 100% of their bus fleets to zero emission by 2040, and reducing air pollution. This is an ambitious but achievable program that will reduce emissions, improve air quality, and create new jobs at no cost to the State.

Thank you,

Julie Tighe
President
New York League of Conservation Voters

Richard DiGia
President & CEO
Aria Energy

Ryan Gallentine
Policy Director, Electrifying Transportation
Advanced Energy Economy

W. Spencer Reeder
Director, Government Affairs &
Sustainability
Audi of America

Dan Bowerson
Senior Director, Energy & Environment
Alliance for Automotive Innovation

John Hroncich
Regional Sales Manager
BAE Systems

Anne Reynolds
Executive Director
Alliance for Clean Energy New York

Martin Ryan
President
BerQ RNG USA, Inc.

Heidi Sickler
Director of Policy
AMPLY Power

Peter Ettinger
Chief Development Officer
Bioenergy Devco



Gene Harrington
 Director, State Government Affairs, Food &
 Agriculture
 Biotechnology Innovation Organization

Frank Girardot
 Sr. Director Communications
 BYD

Eileen Wenger Tutt
 Executive Director
 California Electric Transportation Coalition

Benjamin Mandel
 Northeast Regional Director
 CALSTART

Rob Niven
 CEO
 CarbonCure

Kevin George Miller
 Director, Public Policy
 ChargePoint

Barry Carr
 Executive Director
 Clean Communities of CNY

Brett Barry
 Senior Policy Advisor
 Clean Energy

Dan Goldman
 Managing Director
 Clean Energy Ventures

BJ Johnson
 CEO
 ClearFlame Engine Technologies

Sam Wade
 Director, State Regulatory Affairs
 Coalition for Renewable Natural Gas

Shelby Neal
 Vice President - Renewables and Energy
 Policy
 Darling Ingredients

Eric Cerretani
 Environmental Specialist
 Disney Television Studios

Uchenna Bright
 Northeast Advocate
 E2 (Environmental Entrepreneurs)



Andrew E. Dick
State Government Affairs Manager
Electrify America, LLC

Angela Schwarz
Co-President and Chief Executive Officer
Element Markets

Joy Gardner
Executive Director
Empire Clean Cities

John K. Bartow, Jr.
Executive Director
Empire State Forest Products Association

Joel Harrington
Director of Public Policy & Institutional
Affairs - Eastern U.S. Region
Enel X North America

Matthew P. Tomich
President
Energy Vision

Patrick Macdonald-King
Chief Operations Officer
EV Connect, Inc.

Carine Dumit
Director, Market Development & Public
Policy
EVgo

Peter Olmsted
Director of Regulatory Affairs
FreeWire Technologies

Chris Grimaldi Regional
Director, State Government Relations
General Motors

John Dannon
Principal
Generate Capital

Erik Neandross
Chief Executive Officer
Gladstein, Neandross & Associates (GNA)

Graham Noyes
Executive Director
Low Carbon Fuels Coalition

Daniel Witt
Head of Public Policy
Lucid Motors



Sam Arons
Director, Sustainability
Lyft, Inc.

Elizabeth Wolters
Deputy Director of Public Policy
New York Farm Bureau

Paul Greene
Director of Projects
Montrose Environmental

Daniel J. Gage
President
NGVAmerica

Floyd V. Vergara
Director of State Governmental Affairs
National Biodiesel Board

Steve Ripp
COO/CFO
NIC Holding Corp.

Dr. Jack Brouwer
Director
National Fuel Cell Research Center

Alana Langdon
Senior Manager, External Affairs and Public
Policy
Nikola Corporation

Echo Cartwright
Director Climate Mitigation
Nature Conservancy NY

Christopher Noble
Manager
Noblehurst Green Energy

Dayne Delahoussaye
Senior Advisor Public Affairs
Neste

John Dickinson
Chair
Northeast Dairy Producers Association

Colleen Klein
Executive Director
New York Corn & Soybean Growers
Association

Gene M. Bernstein
Chairman
Northville Industries



Luke Tonachel
 Director, Clean Vehicles and Fuels Group
 NRDC (Natural Resources Defense Council)

Chelsea Jenkins
 VP of Government Affairs and Industry
 ROUSH CleanTech

Christopher Neidl
 Advocacy Director
 OpenAir

Randy Delbert Letang
 President and CEO
 S.G. Preston Company

Jonathan T Patterson
 Owner
 Patterson Farms Inc

Doug Young
 Owner
 Spruce Haven Farms

Gerry Conway
 General counsel
 Plug Power Inc

Evan Rosenberg
 Senior Manager, Client Development &
 Policy
 SRECTrade

Scott Hedderich
 Exec Dir. Corporate Affairs
 Renewable Energy Group

Katrina M. Fritz
 Executive Director
 Stationary Fuel Cell Collaborative

Geoff Cooper
 President & CEO
 Renewable Fuels Association

Zachary Kahn
 Senior Policy Advisor, Northeast
 Tesla

Chris Nevers
 Senior Director, Environmental Policy
 Rivian

Orville Thomas
 Director of Government Relations
 The Lion Electric Company



Ryan Lamberg
Principal
Tied Branch Consulting

Andrew Miller
Director of Project Finance
Velocys Inc.

Scott Mercer
Founder & CEO
Volta Charging

Nicole Barranco
Sr. Director Government Relations
Volkswagen Group of America

Timothy Winters
President & CEO
Western New York Energy, LLC

