



## Re: Testimony Regarding the Climate Action Council Final Scoping Plan

New York State Senate  
198 State Street  
Albany, NY 12210

January 19, 2023

Dear Senator Krueger, Senator Parker, and Senator Harckham,

On behalf of the U.S. Department of Energy designated Clean Cities Coalitions of New York, we are writing to express our support for a Clean Fuels Standard (CFS), and the legislation sponsored by Senator Parker and Assemblywoman Woerner A.964/S.1292, “The Clean Fuel Standard of 2023.” Our coalition, representing stakeholders including fleets, manufacturers, and community partners from across the state are confident that a CFS will accelerate the transition to electric and alternative fuel vehicles, reduce CO2 emissions, and improve air quality in all of our communities, especially in disadvantaged communities that have been most harmed by toxic emissions. We hope the following factors will be considered in the Climate Action Council’s Scoping Plan hearing.

What is a Clean Fuel Standard?

- A clean fuel standard (CFS) is a proven, efficient and cost-effective way to reduce CO2 emissions and pollution from the transportation sector. A CFS effectively makes polluters pay for the development and deployment of cleaner fuels, including electricity, through a credit-trading system based on total life-cycle emissions.
- Under a CFS, all fuels produced in or imported to a state are assessed on a carbon intensity (CI) scale that measures the full life-cycle emissions of each fuel, including extracting and refining oil, growing crops and producing biofuels, or generating electricity. **Fuels more polluting than the standard generate deficits, and fuels cleaner than the standard generate credits.** The pollution standard is reduced steadily each year, which creates a growing market for clean fuels.
- The CFS is NOT a tax. Resources generated by a CFS don’t go to the State. They stay in the private transportation market. Those fuels with a “CI” below the benchmark generate credits for the producer/ importer; the further below the benchmark their CI score, the more credits they generate. Very low/negative CI and highly efficient fuels like electricity generate the most credits, where fuels with a CI above the benchmark, like all fossil fuels, generate deficits, which must be matched with clean fuel credits.

A CFS will create market incentives to reduce carbon intensity:

- Emissions Reductions for a Range of Vehicle Types: The CFS funds near-term transitions to zero-emission vehicles and the fueling infrastructure necessary to support them, but it also reduces emissions from vehicle types that have fewer zero-emission options on the market right now by reducing carbon intensity of fossil fuels and incentivizing the use of biofuels.
- Emission Reductions for Trucks: The Advanced Clean Trucks Rule does not ban the sale of non-zero-emission medium- and heavy-duty vehicles until 2045. This means that many thousands of internal combustion engine (ICE) vehicles will still be on the road post-2050. The CFS is the only practical mechanism available to the State to reduce emissions from those vehicles.
- Market benefits: Fostering the biofuels market now will ensure that a mature market is in place for very difficult to electrify sectors such as jet fuel in the later years of CLCPA implementation. Diversification of low-carbon and zero-carbon will benefit agricultural communities in New York, including soybean producers.
- An analysis (which we can share with interested Senators and staff) of what a New York CFS could accomplish over 10 years found it would lead to:
  - A reduction of 1,300 metric tons of NOx (a public health benefit of around \$11 million) and a reduction of 800 metric tons of PM2.5 (a public health benefit of around \$500 million) from biodiesel and renewable diesel displacing fossil diesel
  - A reduction of 2,300 metric tons of NOx (a public health benefit of around \$25 million) and a reduction of 500 metric tons of PM2.5 (a public health benefit of around \$350 million) from the electrification of medium- and heavy-duty vehicles
  - A reduction of 1,400 metric tons of NOx (a public health benefit of around \$14 million) and a reduction of 100 metric tons of PM2.5 (a public health benefit of around \$60 million) from the electrification of light-duty vehicles

Additionally, we want to highlight the need for electrification incentives for for-hire drivers. Empire Clean Cities has worked closely with the New York City Taxi and Limousine Commission (NYC TLC) to support for-hire vehicle drivers and fleets in their transition to zero-emission vehicles. Incentives, including rebates, targeted incentives for fleets, and charging stations can have a multiplier effect in emissions reductions.

- Incentives for For-Hire Drivers: An electrification report, “Charged Up,” published in December 2022 by NYC TLC estimates that the “emissions reduction impacts of electrifying one rideshare vehicle is akin to electrifying three personal vehicles.” Incentives for vehicle and fleet electrification will reduce upfront costs for-hire drivers and accelerate adoption.

Thank you for considering our comments. We applaud the Senate's leadership and strongly encourage you to act now and implement a Clean Fuel Standard to immediately start reducing pollution from fossil fuels, encourage decarbonization, and chart the course for a clean transportation sector in New York.

Sincerely,

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Jacob Beeman, Coalition Director, Capital District Clean Communities  
Craig Jackson, Coalition Director, Clean Cities of Western New York  
Barry Carr, Coalition Director, Clean Communities of Central New York  
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