



January 19, 2023

RE: Joint Public Hearing to Examine the Legislative and Budgetary Actions Necessary to Implement the Climate Action Council Final Scoping Plan

Dear Chairwoman Krueger, Chairman Parker, and Chairman Harckham,

The Coalition for Renewable Natural Gas (RNG Coalition), a member of Clean Fuels New York, submit this testimony in support of the inclusion of a Clean Fuel Standard (CFS) in the legislative and budgetary implementation of the Climate Action Council's (CAC) Final Scoping Plan.

The RNG Coalition represents and provides public policy advocacy and education for the RNG industry across North America. Our organization comprises over 350 members—cities, counties, airports, ports, municipalities, colleges, universities, and leading companies operating in each sector of the industry—including those who capture, clean and condition greater than 95% of all RNG in the United States and Canada.

The Scoping Plan contains several key strategies related to the use of renewable gases (e.g., biomethane and renewable hydrogen) as a climate change mitigation tool for use across all sectors, including transportation. The transportation sector is the largest greenhouse gas (GHG) contributor in New York, and while existing policies have encouraged the adoption of electric and hydrogen zero-emissions vehicles (ZEVs), combustion fuels remain a part of the transportation mix and will for the foreseeable future. Full scale decarbonization will require near- and mid-term solutions to displace fossil fuels and a CFS is the most practical solution.

We support a CFS policy like that proposed by **A. 964/S. 1292**, sponsored by Assembly Member Carrie Woerner and Senator Kevin Parker, respectively. This CFS policy paves the way for meaningful GHG emissions reductions in New York with benefits to public health through air pollutant reduction—especially in vulnerable communities—and to long-term decarbonization strategies. First, a CFS would fund the buildout of ZEV fueling infrastructure; and second, the CFS is the only mechanism to reduce emissions from heavy- and medium-duty internal combustion engine vehicles that will remain on the road even after the ban on sales of non-zero-emissions medium- and heavy-duty vehicles goes into effect in 2045. Third, if New York fosters a robust biofuels market, it will ensure that a strong market is in place to meet other transportation needs that are hard to electrify, such as jet fuel.

Jurisdictions leading on climate change—California, Oregon, Washington, British Columbia, and the Canadian Federal Government—have all implemented or are in the process of implementing a CFS as a primary means of decarbonizing their transportation sectors. Based on 2021 data, California is well on its way to meeting the established program target of a 20% carbon intensity (CI) reduction by 2030, with

a recent study from UC Davis concluding that Oregon's CFS will reduce air pollution and deaths due to reductions in particulate emissions.

New York can make similar achievements in its transportation sector, with resounding societal and environmental benefits, if the legislature commits to policies, like the CFS program under **A. 964 (Woerner)/S. 1292 (Parker)**, that provide a forward thinking decarbonization strategy that considers both near- and long-term solutions to transportation emissions. We urge the legislature to take up **A. 964 (Woerner)/S. 1292 (Parker)** to create a New York Clean Fuel Standard.

Sincerely,

/s/

Dana Adams
Legislative Policy Manager
Coalition for Renewable Natural Gas