



February 6, 2023

RE: 2023 Joint Legislative Budget Hearing on Transportation

The Coalition for Renewable Natural Gas (RNG Coalition) submit this testimony in support a Clean Fuel Standard (CFS) as a part of the State budget.

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 New York 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, cost-effective 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 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, with no cost to the State, thus decreasing the total cost of CLCPA implementation. First, it would fund the buildout of ZEV fueling infrastructure; and second, a 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.

These points are underscored by the Scoping Plan, which states that “[s]ubstituting sustainable renewable fuels for a portion of this remaining fossil fuel combustion will reduce GHGs and other emissions” and that, “[f]or harder to electrify vehicles and equipment, the scenarios identified for

meeting the Climate Act GHG emission reduction requirements rely, in part, on the increased use of lower carbon renewable fuels, including renewable diesel, renewable jet fuel, and/or green hydrogen.”<sup>1</sup>

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 deaths due to reductions in particulate emissions and avoid up to \$87.7 billion in healthcare costs per year, compared to a business-as-usual scenario.<sup>2</sup>

New York can make similar achievements in its transportation sector, with resounding societal and environmental benefits, if the legislature commits 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 consider a CFS program as a part of the state budget.

Sincerely,

/s/

Dana Adams  
Legislative Policy Manager  
Coalition for Renewable Natural Gas

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<sup>1</sup> New York Scoping Plan Full Report at pg. 172. <https://climate.ny.gov/-/media/project/climate/files/NYS-Climate-Action-Council-Final-Scoping-Plan-2022.pdf>

<sup>2</sup> Murphy et. Al, *Modeling Expected Air Quality Impacts of Oregon’s Proposed Expanded Clean Fuels Program*. [https://escholarship.org/content/qt6pz348mc/qt6pz348mc\\_noSplash\\_35bd521866d4290a1a8755f4af0d281a.pdf](https://escholarship.org/content/qt6pz348mc/qt6pz348mc_noSplash_35bd521866d4290a1a8755f4af0d281a.pdf)