



June 30, 2022

Doreen Harris
President and CEO
New York State Energy Research and Development Authority

Basil Seggos
Commissioner
New York State Department of Environmental Conservation

c/o NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

RE: Climate Action Council Draft Scoping Plan

Dear Climate Action Council Co-Chairs and Council Members,

We appreciate your service to the New York State Climate Action Council in the development of the Draft Climate Action Scoping Plan. The Scoping Plan will guide New York in the implementation of the Climate Leadership and Community Protection Act, one of the most ambitious climate laws in the world.

In particular, Avfuel Corporation applauds the Climate Action Council for including a Clean Fuel Standard (CFS) in the Draft Scoping Plan as a recommended Market-Based Solution. With a CFS, New York can concurrently transition to clean fuels, improve public health, and help the state reach its ambitious climate goals. **We urge the Climate Action Council to include the CFS in the Transportation Sector Strategies of the Final Scoping Plan.**

Avfuel is a leading independent supplier of aviation fuel and services, including SAF, with a substantial jet-fuel consuming customer base in the state of New York. With a strategic supply agreement with Neste—one of the largest producers of renewable fuels—and a recent investment in Alder Fuels, Avfuel is committed to making sustainable attainable for its business aviation and general aviation customers.

Since establishing its supply agreement with Neste in January 2021, Avfuel has delivered more than 1,150,000 gallons of blended SAF to its customers, including nine consistently-supplied fixed base operator (FBO) locations and a multitude of original equipment manufacturers, such as Textron, and corporate flight departments.

For reference, 1,150,000 gallons of Avfuel's blended SAF reduces carbon emissions by 2,731 metric tons, the equivalent to the amount of carbon sequestered by 3,232 acres of U.S. forests in a year. Simply, SAF is the most effective way to reduce a flight's carbon footprint, and the CFS will support Avfuel's commitment—and our industry's commitment—to extend SAF's reach for a brighter, cleaner future.

As a technology-neutral, performance-based standard, a CFS will help New York reduce criteria and GHG emissions, and decrease dependence on petroleum in transportation. As stated by the Union of Concerned Scientists in a Clean Fuel Standards Fact Sheet, “A clean fuel standard is a proven policy approach to reducing transportation emissions that complements support for EVs and emissions standards for cars, trucks, and electricity generation.”¹

As the experience with California’s Low Carbon Fuel Standard has shown, a CFS is also a highly effective policy tool to establish supply of sustainable aviation fuel (SAF). We view SAF as a crucial GHG reduction strategy in the aviation sector. Because electrification of commercial aircraft is decades away, SAF is the solution to meaningfully reduce emissions in the aviation sector to help New York achieve its climate goals. Depending on its blend level, SAF can reduce greenhouse gas (GHG) emissions by up to 80%, SOx by nearly 100% and particulate matter by about 50%.

SAF is a drop-in fuel that can be made sustainably with a variety of feedstocks, many of which have multiple benefits beyond the significant reduction of GHG emissions in aircraft. For example, using municipal solid waste as a feedstock can reduce landfilling and methane emissions from landfill emissions.

The aviation industry is eager to utilize SAF to meet its environmental goals and reduce aviation emissions, but there is not enough supply of SAF to meet demand. In 2021, virtually the entire supply of SAF in the United States was utilized in California due to the beneficial impact of the CFS program in existence in that state.

Avfuel strongly urges the Climate Action Council to include a firm endorsement of a CFS in the Transportation Sector Strategies of the final Scoping Plan. A CFS is essential to decarbonize transportation and achieve New York’s ambitious climate goals. Thank you for your consideration of our input on this important subject.

Sincerely,



Keith Sawyer
Manager of Alternative Fuels
Avfuel Corporation

¹ Union of Concerned Scientists, “Clean Fuel Standards: A Proven Approach to Fuel a Low-Carbon Future,” at https://www.ucsusa.org/sites/default/files/2020-11/clean-fuel-standards_0.pdf (2020).