



July 1, 2022

New York Climate Action Council  
NYSERDA, 17 Columbia Circle  
Albany, NY 12203-6399

**Re: Renewable Fuels Association Comments on the Draft Scoping Plan**

Dear Climate Action Council Members,

The Renewable Fuels Association (RFA) thanks you for the opportunity to comment on the Climate Action Council's Draft Scoping Plan for New York.

The RFA is the leading national trade association representing U.S. fuel ethanol producers. Its mission is to advance the development, production, and use of low-carbon fuel ethanol by strengthening America's ethanol industry and raising awareness about the benefits of renewable fuels. Founded in 1981, RFA serves as the premier forum for industry leaders and supporters to discuss ethanol policy, regulation, and technical issues. RFA's 300-plus members are working daily to help America become cleaner, safer, more energy secure, and economically vibrant.

The RFA supports New York's goal to achieve carbon neutrality by 2050. The ethanol industry is doing its part by continuously reducing carbon intensities. Today, US ethanol production on average reduces GHG emissions by 50 percent compared to gasoline and all RFA member companies are committing to net zero carbon ethanol production no later than 2050 with many producers on pace to achieve this result well before 2050.

A principal focus of the Scoping Plan, and the state regulations it will influence, should be achieving the greatest reduction in GHG emissions starting as soon as possible. The most recent UN IPCC report made it alarmingly clear the imperative of further reducing GHG emissions immediately.

The cumulative impacts of not reducing GHG emissions as soon as possible can be catastrophic. For this reason, the RFA applauds the Climate Action Council for including a clean fuel standard (CFS) in the Draft Scoping Plan. The transportation sector is the second largest source of GHG emissions in New York. With a CFS, New York can accelerate the transition to carbon neutrality, while reducing petroleum use and improving public health.

The California LCFS has proven the effectiveness of a technology neutral, performance-based program. The LCFS has been so successful that the California Air Resources Board (CARB) is initiating a new rulemaking process to strengthen and extend the program beyond the current goal of a 20 percent reduction by 2030. CARB's Scoping Plan identifies the LCFS as a critically important strategy in achieving California's goal of carbon neutrality by 2045. Oregon is also in the process of strengthening its CFS program and Washington State is joining its West coast neighbors in implementing a CFS starting in 2023.

Relying on a balanced set of proven technologies, a New York CFS will both accelerate electrification and promote rapid growth in low to zero carbon liquid and gaseous biofuels. Ethanol is already reducing GHG emissions in New York, as all the state's gasoline is blended with ten percent ethanol. Higher blends of low carbon ethanol in the current and future gasoline pool represent the nearest term and most affordable path for even greater and immediate reductions of petroleum consumption and GHG emissions from the light duty fleet.

E15 and E85 reduce the cost to consumers while lowering GHG emissions and criteria pollutants. In California, E85 is selling at price over two dollars less per gallon than gasoline. Consumers have responded to this market signal with an over 50 percent increase in E85 sales in the last year. A CFS program in New York can expect similar cost advantages for New York consumers.

The RFA urges the Climate Action Council to include a CFS in the final Scoping Plan to encourage the necessary and most rapid decarbonization of the transportation sector in New York. We look forward to working with Climate Action Council and all stakeholders in helping New York achieve its ambitious climate goals.

Sincerely,

Kelly Davis  
VP of Regulatory Affairs