

July 1st, 2022

New York State Climate Action Council
Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Dear Climate Action Council Member,

Highland Electric Fleets applauds the Climate Action Council for including a clean fuel standard (CFS) in the draft scoping plan. We strongly urge the Council to include the CFS in its final scoping plan later this year.

The transportation sector is the second-largest source of greenhouse gas emissions in New York State. With a clean fuel standard, New York can build a market to aid the transition to clean fuels, reduce reliance on fossil fuels, improve public health, and help the State reach its climate goals without state tax funding.

A CFS is a technology-neutral, performance-based standard that will help New York reduce emissions from the transportation sector and reach the State's aggressive climate goals. Currently, New York remains 95+% reliant on petroleum in transportation, consuming 6.78 billion gallons of diesel and gasoline in 2019. The State needs to adopt policies that will speed up the transition to electric vehicles, cleaner fuels, and, ultimately, cleaner air.

California offers a great example of how a CFS can accelerate vehicle electrification – and provide near-term health benefits for Disadvantaged Communities in the short-term. In 2019, California's Low-Carbon Fuel Standard (LCFS) credits earned by electric vehicles had more than half a billion dollars in market value, which helps explain why California leads the nation in vehicle electrification. California's latest Draft Scoping Plan Update underscored that communities of color and Disadvantaged Communities have been the biggest beneficiaries of reduced heavy-duty diesel vehicle emissions that have accompanied the introduction of the LCFS and other programs to reduce diesel emissions in California. The Draft Scoping Plan cited a 2022 report from the California Office of Environmental Health Hazard Assessment (OEHHA), which clearly stated that "diesel particulate matter (DPM) concentrations have decreased across California for the last 20 years, with the greatest benefits accruing to high-scoring communities identified by CES as having high levels of both pollution and vulnerability to its effects. DPM has decreased in these communities three times more than it has in low-scoring communities."

As of this past legislative session, New York also has a plan to make the state's nearly 50,000 school buses 100% electric by 2035, making the state the first in the country to commit to fully electrifying its school bus fleet. To meet this goal, various types of funding will need to be made available to school districts—the CFS being one of those. As we have seen in Oregon, where they have had a CFS in place since 2016, schools can generate credits through the CFS by installing chargers for fueling electric buses. These credits can be used to help drive down the upfront purchase price of both the electric school bus itself and the needed charging infrastructure, thereby accelerating the transition to electric school buses overall.

Highland Electric Fleets urges the Climate Action Council to include a clean fuel standard in the final climate action plan to drive New York's transition to electric vehicles, provide incentives for EV charging infrastructure, and reduce reliance on harmful fossil fuels.

Thank you,



Claire Alford
Associate, Market Development