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Transportation & Climate Initiative of the Northeast and Mid-Atlantic States
Georgetown Climate Center
600 New Jersey Avenue, NW
Washington, DC 20001

Dear Members of the Transportation & Climate Initiative:

Clean Energy (CE) greatly appreciates the opportunity to comment on the Transportation and Climate Initiative Program (TCI-P) Draft Framework for Public Engagement, Draft TCI-P Model Implementation Plan and the Draft Proposed Strategies for Regional Collaboration. We applaud your dedication to this long-term effort to meaningfully address transportation sector emissions and their negative effects on both air quality and climate change.

Clean Energy is North America's largest provider of renewable natural gas (RNG) transportation fuel. RNG has been deemed a carbon negative fuel by the California Air Resources Board (CARB), under the state's Low Carbon Fuel Standard program, and is increasingly utilized by the nation's leading fleets.

FOCUSING ON EMISSION REDUCTIONS BY MAINTAINING FUEL NEUTRALITY

CE is greatly concerned that the TCI-P supporting documents demonstrate a bias towards electric vehicles (EVs) rather than focusing on the goal of transportation sector emission reductions. While EVs are widely available in the light-duty market they are greatly limited in both availability and performance in the heavy-duty sector. The key to rapidly reducing emissions is through the removal of diesel vehicles from our roadways. The best method of accomplishing this goal is to provide equal support for all clean vehicle solutions, including EVs but also biofuels such as RNG. Discussion of the benefits of biofuels within the TCI-P documents, especially in regard to near-term emissions reduction, is noticeably absent.

Emissions reductions must be the sole basis for the TCI-P which thereby necessitates an all-the-above approach. The superiority of an all-the-above strategy was recently illustrated in a letter from Wayne Nastri, Executive Officer at the South Coast Air Quality Management District (AQMD), to Environmental Justice and Environmental Health Organizations which advocated for EV-only policies. The AQMD is a California environmental regulatory agency responsible for reducing emissions in one of the most challenging air basins in the state which includes the Los Angeles area. In the letter, Mr. Nastri states:

“Near-zero emission (NZE) technology has been commercially demonstrated and is available today, has sufficient fueling infrastructure that is largely funded by the private sector, and is at least 90% cleaner than new diesel trucks on NOx and 100% cleaner on cancer-causing diesel particulate matter. When fueled by renewable natural gas, these vehicles can also provide substantial greenhouse gas emission reductions. Further, these vehicles are far more cost-effective than ZE trucks, allowing limited incentive funds to stretch further. Given these benefits, it is disturbing that you advocate for investments *only* in technologies that are not yet ready for prime time, a position that would leave our residents no option but to continue to suffer the ill effects from diesel exhaust for years to come.”

In order for the TCI-P materials to present a fuel neutral and emissions focused approach, CE requests that each document incorporate the latest technical information regarding emissions reductions for all low and zero-emission vehicle options. This information can be sourced from the Argonne National Laboratory AFLEET tool and the California Air Resources Board Carbon Intensity Chart. Establishing a standard set of data in which to measure emissions reductions is imperative for tracking the effectiveness of TCI-P implementation and thereby providing a level of accountability.

CE also requests that the TCI-P materials are consistent in using both “low and zero-emission vehicles”. Given the limited availability and performance and high cost of EVs in the heavy-duty sector, all clean fuel solutions must be presented without the appearance of favoritism. Even when addressing regional state MOU electrification goals thirty years in the future, guidance on how biofuels can address climate change and air quality issues now and for the foreseeable future should be included. Overburdened communities should not have to wait potentially decades for significant air quality improvements because of a bias for EVs when near-zero technology exists today and is deployable on a large-scale.

CONCLUSION

TCI can be a great success if states implement a program which focuses on results by supporting all clean vehicle options. Electrification is a part of the solution, but electrification alone would guarantee diesel’s domination for decades along with the associated air pollution and carbon emissions. Large-scale deployments of RNG vehicles by leading national fleets provide clear evidence that to achieve significant emissions reductions now, RNG must play a significant role in the TCI-P. We look forward to continued participation in the process and request that the TCI organization place greater emphasis on the important role that renewable fuels play in our carbon free future.