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Governor Martin O'Malley
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Governor Deval Patrick
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Governor David A. Paterson
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Governor Edward G. Rendell
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Governor Donald L. Carcieri
Office of the Governor
State House, Room 115
Providence, RI 02903

Governor James H. Douglas
Office of the Governor
109 State Street, Pavilion
Montpelier, VT 05609-0101

October 14, 2009

Dear Governors,

As organizations and individuals concerned about the region's dependence on oil and the global warming emissions that result from our use of oil as a transportation fuel, we applaud your commitment to establishing a low carbon fuel standard ("LCFS") in the northeast and mid-Atlantic states. We urge you to press ahead with this effort as an important component of the region's strategy to address the urgent dual imperatives of energy independence and global warming and look forward to seeing you adopt a memorandum of understanding ("MOU") that sets out the core elements of the regional LCFS by the end of this December.

Transportation fuels are the chief cause of our region's dependence on oil. At the same time, the transportation sector is the fastest growing source of greenhouse gas ("GHG") emissions, making up approximately 40% of our region's total emissions. Through your leadership, we can take a significant step toward reducing oil consumption and shifting to clean energy in the region in a way that avoids greenhouse gas emissions and promotes 21st century clean technologies and more jobs in the clean energy economy. From low-carbon biofuels to more plug-in electric vehicles, from farmers to foresters to biofuel refiners to charging infrastructure developers, a regional LCFS will be an investment in our future.

To ensure that the regional LCFS provides for a meaningful reduction in carbon intensity and stimulates truly clean alternative fuel technologies, we recommend that the December 2009 MOU include a compliance timeline that achieves at least a 10 per cent reduction in carbon intensity of covered fuels by the end of 2020. Such a target is necessary to send effective market signals to encourage the development and deployment of low carbon fuel technologies.

It is essential that our region develop an LCFS that recognizes the full lifecycle greenhouse gas accounting for all fuel pathways. In addition to accurate accounting for all direct emissions associated with each element of fuel development and use, it is crucial that the GHG accounting take into account significant indirect impacts of the fuels, including the indirect land use change impacts associated with the development of land-intensive biofuels. Doing so will ensure an LCFS that leads to meaningful reductions in GHG emissions and promotes alternative fuels and technologies that are truly cleaner.

Again, we commend you for your individual and collective leadership in putting our states, our region, and our nation along a path to a cleaner transportation future. Thank you for your consideration.

Sincerely,

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President and CEO
Citizens for Pennsylvania's Future
Harrisburg, PA

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Environment America
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