September 24, 2019

Ben Grumbles, Secretary
Maryland Department of the Environment
1800 West Washington Boulevard
Baltimore, Maryland 21230

Dear Secretary Grumbles:

As the Maryland Commission on Climate Change works to finalize its Draft Greenhouse Gas Reduction Plan (Plan), it is imperative that sustainable biofuels and low carbon transportation fuels be leveraged as a viable tool to reduce emissions in Maryland's transportation sector.

Signatories to this letter, including stakeholders from the non-profit and private sector with a vested interest in Maryland's bioenergy economy, call on the MCCC to include the use and future production of sustainable biofuels and low carbon transportation fuels (SLCFs) in the Plan.

SLCFs include renewable natural gas (RNG), biodiesel and renewable diesel, ethanol and cellulosic ethanol, sustainable aviation fuel, and other sustainable fuels. A number of SLCFs technologies for the transportation sector are commercially available and have been vetted for their sustainability, economics, and science-based carbon reduction benefits. Independent analysis recognizing the emissions reductions benefits of SLCFs includes the IPCC,[1] the United States Midcentury Strategy for Deep Decarbonization,[2] and programs such as California's Low Carbon Fuel Standard (CA-LCFS).[3] In light of the real and material potential that SLCFs have in helping decarbonize Maryland's economy, the MCCC can enable innovation and responsible market opportunities by including the following statement in the Plan:

"The Maryland Commission on Climate Change recognizes that use and future production of

[1] "Bioenergy use is substantial in 1.5°C-consistent pathways with or without BECCS due to its multiple roles in decarbonizing energy use." (BECCS is bioenergy with carbon capture / sequestration). https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15_Chapter2_Low_Res.pdf. Page2-6
[2] United States Midcentury Strategy for Deep Decarbonization: https://unfccc.int/files/focus/long-term_strategies/application/pdf/mid_century_strategy_report-final_red.pdf#page=55
[3] See Exhibit 1

sustainable biofuels/low carbon transportation fuels (SLCFs) can play a beneficial role in Maryland's low carbon future. SLCFs include renewable natural gas (RNG), biodiesel and renewable diesel, ethanol and cellulosic ethanol, sustainable aviation fuel, and other sustainable fuels. SLCF related climate change mitigation interventions can make contributions to Maryland's transportation greenhouse gas emission reduction efforts and are therefore included in Maryland's Draft Greenhouse Gas Reduction Plan. SLCF programs and projects can be engines for economic growth, employment, and revenue for the agricultural sector, local governments, innovators, Maryland universities, and businesses."

We urge the MCCC to include a statement in the Plan that recognizes the climate change mitigation potential of SLCFs. We believe that omitting SLCFs from the Plan is premature[4] and its exclusion would only hurt the potential contribution to emissions reductions and the resulting economic benefits for Maryland's agricultural sector, local governments, entrepreneurs, innovators, universities, and businesses. Should the Plan fail to reference the emissions reduction benefits of SLCFs, this omission will send an untimely and negative policy signal to SLCF stakeholders.

We look forward to continue supporting the MCCC in its efforts to mitigate climate change in Maryland.

Sincerely,

John A Mosheim, P.E., CEM, Principal
GHG Engineering, LLC
Rockville, MD

Joanne Ivancic, Executive Director
Advanced Biofuels USA
Frederick, MD

Colby Ferguson, Director of Government Relations
Maryland Farm Bureau, Inc.
Annapolis, MD

William Brandon, President, CTO
Industrial Ecosystem Partners, LLC
Arlington, VA

[4] No assessment of SFLCs –carbon reductions benefits was found for MD. However, in 2007-2010 the Chesapeake Bay Commission performed a series of studies that assessed biofuels development initiatives in Maryland and the Chesapeake Bay area, not only for their carbon benefits but also for their potential benefits in reducing nutrient loads to the Chesapeake Bay.

Floyd DesChamps, President
The Desner Group, LLC
Gaithersburg, MD

Keith Maxey Jr.
Dynamhx
Kansas City, MO

Scott Sklar, President
The Stella Group, Ltd.
Arlington, VA

Graham Noyes, Executive Director
Low Carbon Fuels Coalition
Sacramento, CA

Michael Martin, Senior Scientist
Lanza Tech
Chicago, IL

Andrew T. Fielding, Managing Partner
GT Environmental Finance
Austin, TX

Keith Derrington, CEO
Recurrent Innovative Solutions LLC
Rockville, MD

Matt Topaz, President
Atlantic Biofuels
Baltimore, MD

Dan Burciaga, President and CEO
ThermoChem Recovery International, Inc.
Baltimore, MD

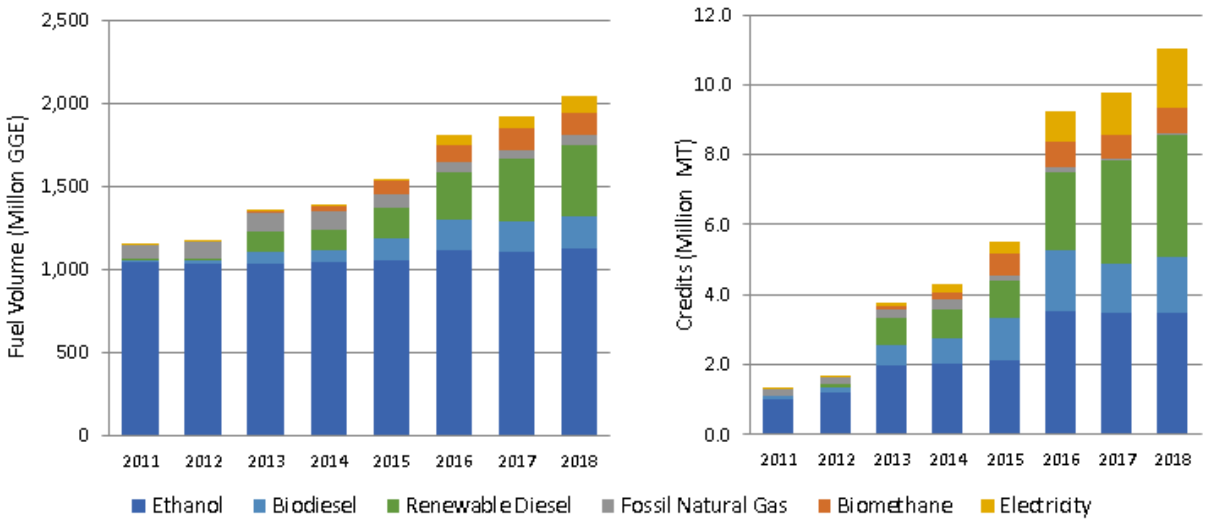
cc: Maryland Commission on Climate Change
Maryland Department of Transportation

Attachment

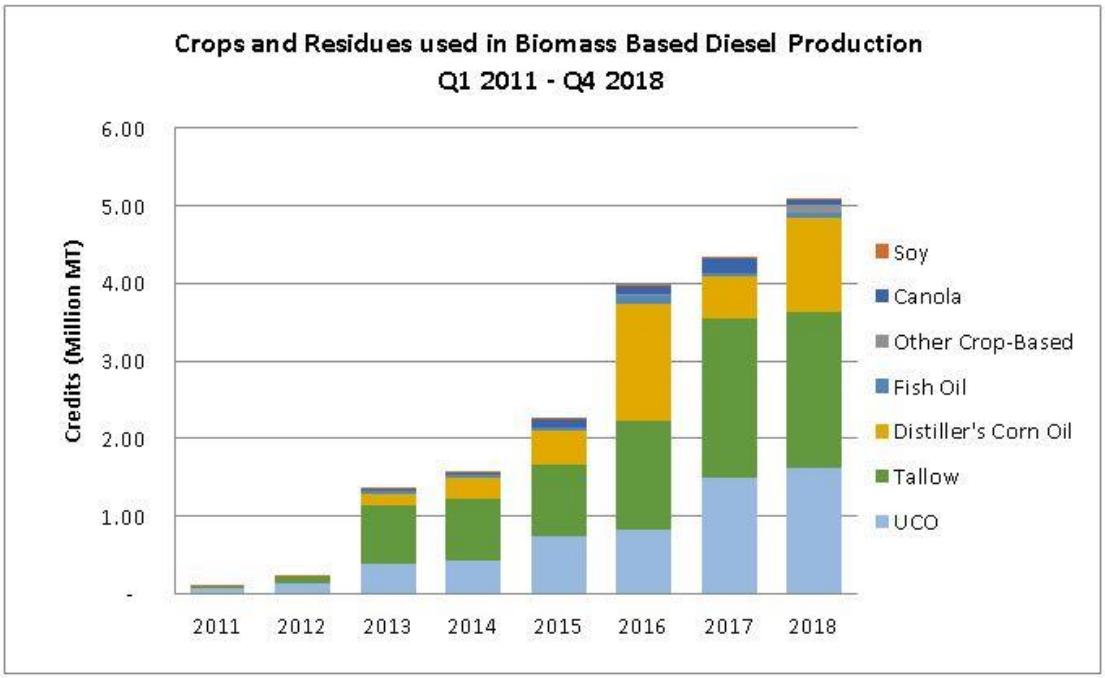
EXHIBIT -1

California Low Carbon Fuel Standard – Alternative Fuel Volumes and Credit Generation

(One Credit is equivalent to 1,000 kg of CO_2e reductions)



California Low Carbon Fuel Standard – Biomass-based Diesel Feedstocks



UCO= Used cooking oil
Source: https://ww3.arb.ca.gov/fuels/lcfs/dashboard/dashboard.htm.