



GREATER NEW HAVEN CLEAN CITIES COALITION, INC.



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SUBJECT: Response to “Replacement Fuel Goal, Notice of Proposed Rulemaking”

Date: November 13, 2006

Dear Sir:

I am submitting the following comments in responses to the EPO Act “Replacement Fuel Goal, Notice of Proposed Rulemaking”.

On behalf of the Greater New Haven Clean Cities Coalition, Inc. I am expressing our serious concerns regarding the economic, public health, and energy security implications of the proposed 20-year extension of the 30 percent US replacement fuel goal in the Energy Policy Act of 1992. The U.S. Department of Energy's (DOE) proposed date extension from year 2010 to 2030 is, in effect, a "do nothing" approach to one of the most menacing threats facing our nation – US dependence on oil. All of our fellow coalitions have a unified mission to move the U.S. toward clean, alternative fuels and away from our *addiction to oil*, strongly protest this wait and see approach by DOE.

The environmental degradation and adverse public health effects of our nation using oil as a primary source of its motor fuel has been well documented by DOE, the US Environmental Protection Agency, respected institutions, colleges, municipalities and universities across our nation and world. Each year, the US spends billions of dollars “fixing” environmental and health related deaths and damages.

It is our belief that the DOE would be negligent to its duty by not taking a more proactive approach to the overwhelming evidence that the use of gasoline and diesel as a motor fuel pollutes our air, water, and land, and sickens our people. DOE is in the position to recommend programs and policies that utilize and enhance proven alternative fuels of natural gas, propane, biofuels, and electricity, which are available today. Through the combined efforts of Clean Cities Coalitions nationwide, DOE has sent this message out across the United States since 1992, and now is the time to take a firm stand on that position, and access Clean Cities networks to move this effort forward.

President Bush stated that our nation must turn away from its addiction to oil. We want DOE to position itself to state the risks of eminent economic disaster should our country continue to depend on fossil fuels and not meet set EPO Act goals. The enormous risks must be obvious to the department assigned to, and to whose duty it is to, provide, protect, and insure our nation's energy security.

We regret there is no mention of these grave risks in DOE's NOPR. As stated, DOE proposes to modify the goal apparently because it is the least it must do to satisfy the rule. Delaying important goals for replacing oil with currently available alternative fuels increases security risks to the US each day this action is delayed.



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Clean Cities is a DOE program born through the Energy Policy Act of 1992. This grass roots effort has built and broadened the alternative fuel platform in this country, assisting mandated and other fleets to diversify their fuel program and decrease our dependence on foreign oil. Coalitions across the US understand what is at stake. Together, we propose the following:

We believe DOE should emphasize that US domestic oil production peaked years ago and has been in a steady decline. We want the DOE to focus its efforts on the overwhelming energy security risks of the US consuming 21 million barrels of oil per day but only producing 5.4 million barrels of oil per day. The DOE must do more to emphasize the overwhelming energy security risks of the US importing and *relying on* oil from unstable countries and regions of the world. Mandated fleets must be supported with funding for infrastructure development where it is necessary for compliance and scrutinize “waivers” more closely. Based on our experience and ability nationwide it would be prudent for the DOE to increase financial support to the growing Clean Cities program and use this resource as a conduit to gain our nation’s energy independence. Based on the mission of the DOE it would seem the DOE should take the lead in this nation’s effort to decrease our dependence on foreign oil with real solutions.

We strongly disagree with DOE's view that natural gas and electric use as alternative fuels are "not projected to increase significantly during the period reviewed...". We take offense that DOE would take this position regarding a proven performer such as natural gas in particular, and by doing so calls into question DOE's actual motives.

Our coalition shares common goals with DOE to protect the economic, health and energy security of the American public. We understand the importance of research and development of alternative fuels that have potential use in the future. We call upon DOE to fully engage itself and not turn away from these responsibilities. America can not afford delayed advancements of alternative fuels Coalitions have worked so diligently to promote.

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