

March 31, 2021

Liane M. Randolph
Chair
California Air Resources Board
1001 I St
Sacramento, CA, 95814

Re: Comments of the California Hydrogen Business Council on the proposed Advanced Clean Fleets Regulation

Dear Chair Randolph,

The California Hydrogen Business Council (CHBC)ⁱ appreciates the opportunity to submit these comments on the Air Resources Board's (ARB's) Public Workshop to Discuss the Proposed Advanced Clean Fleets Regulation on March 2 and March 4 2021. In California, 40 percent of greenhouse gas emissions are sourced from the transportation sector, and heavy-duty trucking makes up 21% of these emissions and 26% of statewide emissions of oxides of nitrogen(NOx). Converting fleets to use zero-emission technology will significantly help reduce these emissions. The CHBC would like to offer the following points for further refining the Advanced Clean Fleet Regulation development.

Funding for fuel cell electric trucks (FCETs) is critical at this early stage of market development. The CHBC, therefore, urges a focus on funding be made available for early adopters to help scale up production and commercialization of FCETs in California.

Furthermore, the CHBC urges ARB to prioritize FCET technology as it holds the best long-term prospects for the commercial trucking sector in terms of weight, range, and duty cycle.ⁱⁱ In addition, the private sector has demonstrated a willingness to increasingly finance the development of hydrogen refueling infrastructure, reducing the cost to taxpayers. The industry is transitioning from a government-subsidized model for financing the deployment of a hydrogen refueling infrastructure to a sustainable private market, sooner and at a far lower cost to the state than any competing zero-emission technologies.

Finally, the CHBC sees a strong need for additional public engagement and additional workshops to fine-tune the proposal and address questions and concerns raised at the workshops.

Thank you for considering CHBC's comments, and we look forward to engaging ARB in the continued development of the Advanced Clean Fleets Regulation.

Sincerely,



William "Bill" Zobel
Executive Director
California Hydrogen Business Council



ⁱ The CHBC is comprised of over 120 companies and agencies involved in the business of hydrogen. Our mission is to advance the commercialization of hydrogen in the energy sector, including transportation, goods movement, and stationary power systems to reduce emissions and dependence on oil. **The views expressed in these comments are those of the CHBC, and do not necessarily reflect the views of all of the individual CHBC member companies.** CHBC Members are listed here:

<https://www.californiahydrogen.org/aboutus/chbc-members/>

ⁱⁱ CHBC's Zero Emission Goods Movement Class 8 Fuel Cell Electric Truck Fact Sheet: https://www.californiahydrogen.org/wp-content/uploads/2017/10/CHBC-FCET-Fact-Sheet_Final-1.pdf