

August 1, 2025

ZEV Forward Public Dialogue  
California Air Resources Board  
Sacramento, CA 95814

**RE: Comments on Gov. Newsom Executive Order N-27-25**

Dear Air Resources Board staff:

Please accept these comments from the California Hydrogen Business Council (“CHBC”) to the California Air Resources Board (CARB) regarding Gov. Newsom’s Executive Order N-27-25 (“Executive Order”). CHBC represents over 100 businesses and organizations involved in the production, distribution, and use of hydrogen.

The Governor's Executive Order gives the state a chance to look anew at technologies that can help California meet its decarbonization goals. CHBC wishes to focus on one such technology - Hydrogen Internal Combustion Engines (H2ICE).

H2ICE products have launched elsewhere in the world, including in India. They have not been deployed in the U.S. due to lack of policy support. H2ICE powered vehicles are a decarbonized clean air technology being produced and available today. If given credit under CARB’s regulations, they could be adopted in the near term across California and the U.S.

With the U.S. Environmental Protection Agency proposing to eliminate greenhouse gas requirements for vehicles, it is timely for California to support H2ICE technology. This is in line with the CARB Board’s recent direction to reevaluate including low NOx/low Carbon technologies, such as renewable natural gas, under the Advanced Clean Trucks regulation. H2ICE falls into the same category of technologies that are near-zero emissions (there is a small amount of NOx emitted) such as natural gas, hybrid, and “Near Zero Emission Vehicles” that receive partial credit in other CARB programs.

We encourage CARB to not view technologies as exclusive of each other - battery or fuel cell or H2ICE. If CARB promotes H2ICE **and** fuel cells, it can help bring up hydrogen production volumes and bring down the cost, which in turn can unlock hydrogen as a solution across sectors. The 2022 Scoping Plan calls for 1,700 times the amount of renewable

hydrogen to be deployed to meet California's greenhouse gas goals – the main barrier to doing so is the fuel cost. By giving H2ICE vehicles credit under CARB regulations, they will spur additional hydrogen demand, thus becoming part of the answer to address this ongoing problem.

H2ICE is a solution that works today. California should be looking at all decarbonization solutions in the wake of federal actions against previous California regulations as it reaffirms its commitment to decarbonization under N-27-25.

Best regards,

A handwritten signature in black ink, appearing to read 'Tim McRae' in a stylized, cursive script.

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