

From: Joe Pratt <jpratt@ggzeromarine.com>
Sent: Monday, December 04, 2017 10:05 PM
To: ARB LCFS Workshop
Subject: Comments on Hydrogen LCFS Pathway

Dear Sir or Madam,

We understand that a consortium of hydrogen fueling station developers, suppliers, and fuel cell electric vehicle OEMs have submitted a letter recommending establishment of LCSF credits for hydrogen fueling stations based on station dispensing capacity. We support the goals of the letter in establishing a more accessible system of obtaining LCSF credits.

We believe that any establishment of LCFS credits for hydrogen refueling include not only FCEVs but also off-road transportation (e.g., rail, marine, aircraft) and industrial equipment (e.g., material handling, seaport “yard” trucks, airport ground support equipment, construction equipment etc.). These mobile sources contribute much higher levels of pollution than light duty vehicles and the use of zero emission hydrogen should be even more strongly encouraged, not left out.

In addition to including the above applications, establishment of such an LCSF pathway should not preclude mobile fueling. It is very common in the off-road and industrial equipment applications for fueling to take place via delivery truck because these applications cannot access fixed fueling facilities. Therefore we urge CARB to include the ability to obtain LCSF credits with a mobile fueling service.

Adoption of the above recommendations will in no way hinder the goals of the light duty fuel cell electric vehicle stakeholders. In fact, enabling LCSF credits for the off-road and industrial equipment in the manner outlined above will help speed acceptance of hydrogen fuel in all markets through higher volumes and resulting lower costs, especially for hydrogen with high renewable content, and through more widespread familiarity of the technology. The result will be lower well-to-wheel emissions for all of California.

Please feel free to contact me with any questions or concerns.

Sincerely,
Joseph W. Pratt, PhD
Golden Gate Zero Emission Marine

