

December 9, 2019

Mr. Richard Corey
Executive Officer
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Support for Fuel Cell Net Energy Metering GHG Standard

Dear Mr. Corey:

On behalf of BREATHE California of Los Angeles County (BREATHE LA), I appreciate the opportunity to comment on the Fuel Cell Net Energy Metering GHG Standard.

For over 115 years, BREATHE LA has addressed Southern California's serious air quality and lung-related public health challenges. We strongly support the need to move to zero-emission technologies to both reduce the significant public health harm caused by diesel emissions, and so that the South Coast Air Basin can achieve national ambient air quality standards. As such, we support ARB's proposed greenhouse gas (GHG) standard for fuel cell net energy metering (FC NEM) projects. This standard will reduce GHGs, improve air quality, and provide unparalleled resiliency through the use of fuel cells.

In recent years, California has taken major policy steps toward improving air quality and reducing public health disparities in disadvantaged areas. The extension of FC NEM and the passage of AB 617 demonstrate California's commitment to combating emissions of criteria air pollutants through the deployment of new energy technologies such as fuel cells. These policies reinforce California's status as the global leader in developing and deploying distributed generation fuel cells.

Unfortunately, these efforts could all be threatened by ongoing consequences of the Climate Crisis: extreme heat, an increase in the quantity and severity of wildfires, and the resultant public safety power shutoffs. Recent power shutoffs caused significant economic losses for businesses and lost wages for workers. To withstand losing power, many businesses utilized back-up diesel generators, which only created more diesel exhaust pollution, thereby adding to the state's climate and air quality challenges.

A major source of air pollution, greenhouse gases, and diesel particulate matter, diesel exhaust includes more than 40 substances listed as hazardous air pollutants by the U.S. Environmental Protection Agency and the Air Resources Board. In 1990, diesel exhaust was declared a carcinogen, and in 1998, ARB identified diesel particulate matter as a toxic air contaminant based on published evidence of a relationship between diesel exhaust exposure and lung cancer.

Air pollution and associated illnesses are particularly prevalent in disadvantaged communities, which experience a disproportionate amount of air pollution from diesel sources. Zero-emission technologies reduce toxic air pollutants by over 90 percent, helping to clean our air and dramatically reduce health impacts, like asthma, in children and adults.

Non-combustion fuel cells are a perfect zero-emission solution to move beyond traditional diesel generators to reduce GHGs, reduce public health impacts, and improve air quality. We commend ARB for developing continually improving GHG standard that will promote the use of cleaner technologies, reduce criteria pollution, and move our state toward climate resiliency.

Should you have any questions, please feel free to contact me at (323) 935-8050 x250 or at MCarrel@breathela.org. Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'M. Carrel', is written over a light gray rectangular background.

Marc Carrel
President & CEO
BREATHE California of Los Angeles County