

California Air Resources Board
1001 I Street
Sacramento, CA 95814

October 29, 2021

RE: Advanced Clean Fleets Regulation Workshop

The California Hydrogen Business Council (CHBC)¹ welcomes the opportunity to comment on the California Air Resources Board (CARB) Advanced Clean Fleets Regulation Workshop. The CHBC appreciates the comment deadline extension and more detailed discussion of the Advanced Clean Fleets Regulation throughout the workshops held in October. The CHBC supports CARB's commitment to transitioning California's most carbon emitting industry, trucking (drayage and long-haul), to zero-emission.

The Advanced Clean Fleets regulation proposes bold goals that will be essential to decarbonize California's trucking industry. However, the transition to clean fleets in California will not be possible without sufficient supporting fueling infrastructure and quicker permit processing. Original Equipment Manufacturers (OEMs) stand prepared to deploy their vehicles to fleet purchasers but there is not enough infrastructure in place, or planned to be in place, to support the transitioning fleets by 2023 when the first stage of new zero emission truck purchases will begin. This is especially a concern for fleet purchasers that will be transitioning to fuel cell electric vehicles due to long-haul cycles and need for quick refueling. Lack of state funding specifically carved out for hydrogen refueling and long permitting processes (which involve five steps that can take up to one year or more each to complete) slows the hydrogen infrastructure buildout and, as a result, the transition to zero emission trucks.

The CHBC encourages CARB and the California Energy Commission (CEC) to jointly work towards identifying funding mechanisms specifically for hydrogen refueling for zero emission trucks and take steps to make the permitting process more efficient by the end of 2022. The CHBC looks

¹ The CHBC is comprised of over 135 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 help the state meet its decarbonization goals. **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/>

forward to being a resource for CARB as we all work towards decarbonizing California's trucking industry.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'S. Fitzsimon Nelson', written in a cursive style.

Sara Fitzsimon Nelson, J.D.
Policy Director
California Hydrogen Business Council