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August 27, 2024

Ms. Liane Randolph  
Chairman, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: Low Carbon Fuel Standard (LCFS) Comments

Dear Chair Randolph:

The [California Hydrogen Car Owners Association](http://www.h2tonps.org) (CHCOA) is a group of hydrogen car drivers who believe in the positive role that these cars can play in California's green energy future. Our Association, which started a year and a half ago, has grown to 197 members and includes current and former lawmakers, hydrogen industry and agency representatives, research scientists and many folks who have driven these cars for as long as they have been around.

In our charter documents, CHCOA stated that the lack of reliable hydrogen refueling infrastructure is single-handedly thwarting the success of these cars in the United States. We now believe that the unabated high prices of hydrogen at the dispenser is having an equally chilling effect on the success of light-duty FCEVs. It is incumbent on the California Air Resources Board to take such actions, within their purview, to reduce this cost. At a minimum, we believe that CARB should retain the Light-Duty HRI program and do what it can to increase LCFS credit prices.

CHCOA believes that hydrogen produced for use in transportation should have a carbon intensity of zero as soon as reasonably possible, taking into consideration the need for increasing volumes of hydrogen to supply a growing industry. Our *Green Before the Grid* campaign reflects our commitment to this essential goal.

Sincerely,

Gregory R. Cane  
President

