



February 26, 2018

TO: California Air Resources Board  
FROM: Morry Markowitz, President, Fuel Cell and Hydrogen Energy Association  
SUBJECT: Oral Comments Regarding Environmental Mitigation Plan

The Fuel Cell and Hydrogen Energy Association (FCHEA) urges the Board to develop a Mitigation Plan focused on building a balanced portfolio of NO<sub>x</sub> emissions reduction solutions. Fuel cell technologies have the scope and demonstrated capabilities to mitigate diesel emissions in each of the application categories described in Appendix D-2.

Volkswagen's announced National ZEV Investment Plan (Cycle 1) seeks to increase access to Battery Electric Vehicle (BEV) recharging infrastructure; the Plan specifies a portion of investment for California.<sup>1</sup> Significantly, the Plan makes no investment in hydrogen fueling stations (HFS).

Recognizing this, FCHEA urges the Mitigation Plan allocate no less than 80 percent of the ZEV EVSE funds provided by the Environmental Mitigation Trust (EMT) for FCEV refueling infrastructure.<sup>2</sup> Doing so will build on the successful efforts of the Board and the California Energy Commission (CEC) to establish an HRS network in California.

However, while the increase in the pace of network growth is a welcome development, the Board has reported on the need to sustain momentum and further accelerate the overall rate of network growth.<sup>3</sup> Allocating no less than 80 percent of the EVSE funds to HRS network can help fulfill this need.

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*FCHEA is the trade association dedicated to the commercialization of fuel cells and hydrogen energy technologies. FCHEA member organizations represent the full global supply chain for hydrogen and fuel cells, including automakers; material, component, fuel cell stack and system manufacturers; hydrogen producers and energy companies; utilities; and end users.*

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<sup>1</sup> "National ZEV Investment Plan," April, 2017, Page 5.

<https://www.electrifyamerica.com/downloads/get/38726>

<sup>2</sup> "Appendix D-2, Eligible Mitigation Actions and Mitigation Action Expenditures," Page 8.

<https://www.vwcourtsettlement.com/en/docs/DOJ/Approved%20Appendix%20D-2.pdf>

<sup>3</sup> "2017 Evaluation of Fuel Cell Electric Vehicle Deployment and Hydrogen Fueling Station Network Development," California Air Resources Board, August, 2017, Page 4.

[https://www.arb.ca.gov/msprog/zevprog/ab8/ab8\\_report\\_2017.pdf](https://www.arb.ca.gov/msprog/zevprog/ab8/ab8_report_2017.pdf)