Tara Gray

Tara Gray Solano County Black Chamber of Commerce Statement to California Air Resources Board January 26, 2012

My name is Tara Gray, and I'm with the Solano County Black Chamber of Commerce.

We find it troubling that this will not be a voluntary program. Gas stations will be required to install hydrogen fueling equipment whether they want to or not, whether they can afford it or not. Even if the rule shifts that investment to major refiners, the cost will still be passed along to consumers.

We support the goal of reducing vehicle emissions. But we firmly believe that policies to do this must be cost-effective and provide the greatest reductions possible.

This regulation fails those two tests.

First: Cost effectiveness. Your staff has estimated each hydrogen fuel outlet will cost up to \$2.4 million. For 100 stations that works out to almost quarter of a billion dollars. They also project that by 2017 market penetration of hydrogen vehicles will be less than 2% of all the cars on the road in California. But there's no guarantee that even that many vehicles will be produced, let alone sold. We could easily wind up with lots of hydrogen stations gathering dust and longer lines and higher prices at the regular gas pumps.

Second: Emissions reductions. Considering this will have no impact whatsoever on global warming, and taking into account continuously decreasing smog-forming emissions from conventional vehicles thanks to other regulations, it's doubtful we'll see meaningful net reductions.

The Legislature has directed that emissions reduction programs provide maximum benefit at the least possible cost. This regulation does just the opposite, promising minimum benefits as maximum cost.

Hydrogen fuel outlets are better left to voluntary development by those who actually want to be in that business. It's time to seriously consider repealing this regulation altogether.

Thank you.