

Deborah L. Ortega
CITY COUNCIL AT-LARGE

City and County of Denver



July 30, 2019

TO: Colorado Air Quality Control Commission

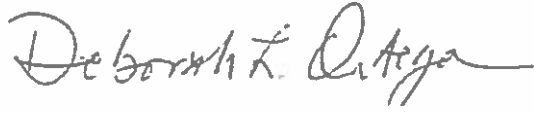
RE: Comment on proposed Regulation 20, Zero Emission Vehicles (ZEV) and hydrogen fuel cell vehicles.

Thank you to members of the Commission and all government entities and personnel for their efforts in evaluating the future of clean vehicles and advanced automotive technologies in Colorado. *If Colorado adopts the ZEV program, I urge state and local governments to support and engage with the full range of electric vehicle technologies, including hydrogen fuel cell vehicles, alongside battery electric vehicles.* Many stakeholders are involved in developing Colorado's battery electric vehicle charging networks, but only the full range of electric transportation technologies, including fuel cells, can lead to a successful ZEV program and long-term state and local climate goals. Reasons for this include:

- Colorado should avoid being a state that enlists in the ZEV program without developing suitable associated ZEV infrastructure, an issue that ZEV critics frequently point out.
- Hydrogen fuel cell vehicles refuel as fast and have similar driving range as gasoline and diesel vehicles. They offer opportunities for a greater range of zero emission transportation modes and duty cycles including larger light and medium duty vehicles, buses, heavy duty trucks and rail.
- A stated goal of the proposed ZEV rule is to bring more ZEV options to Coloradans. Hydrogen fuel cell vehicles will add to vehicle options, the diversity of available ZEV types and one fuel cell vehicle garners 4 Zero Emission Vehicle credits for compliance purposes.
- There are over 7,000 hydrogen fuel cell vehicles and 40 hydrogen fuel stations now in California because of the ZEV program, with 26 more stations underway and station buildout plans for 100, 200 and 1,000 hydrogen stations. (Visit <https://cafco.org/>). California and vehicle manufacturers are aiming at over 40,000 hydrogen fuel cell vehicles on the road before a Colorado ZEV rule would take effect in 2023. Japan has 93 hydrogen stations now and similar fueling capacities are underway in Germany and other EU countries.

Colorado should build on the work of our legislature, previous Governor and Division of Oil and Public Safety that enacted legislation and regulations governing installation and operation of retail hydrogen stations state-wide. The state should engage with Dept. of Energy and National Renewable Energy Laboratory experts operating here in the Denver area who are deeply involved in hydrogen fuel cell development in California, nationally and world-wide. State and local transportation and energy agencies should start saying and writing the words "hydrogen fuel cell vehicles", acknowledge and explore the potential roles of these technologies, and engage with Dept. of Energy and the hydrogen fuel cell vehicle industry towards successful commercialization here in Colorado.

Sincerely,

A handwritten signature in black ink that reads "Deborah K. Ortega". The signature is written in a cursive style with a long horizontal flourish extending to the right.

**Deborah "Debbie" Ortega
Councilwoman At-Large
City and County of Denver**