



August 1, 2025

Adam Saul
Department of Ecology
Climate Pollution Reduction Program
300 Desmond Drive SE
Lacey, WA 98503
adam.saul@ecy.wa.gov

RE: Comments on Proposed Revisions to Chapter 173-424 WAC (Clean Fuels Program Rule)

Dear Mr. Saul,

On behalf of the Hydrogen Fuel Cell Partnership (H2FCP), thank you for the opportunity to provide input on Washington's proposed revisions to the Clean Fuels Program Rule. This rulemaking represents an exciting step in Washington's journey toward a cleaner, more resilient transportation future. We appreciate the leadership your team continues to bring to this important effort.

Founded in 1999 as the California Fuel Cell Partnership, H2FCP is a unique public-private collaboration committed to expanding the market for fuel cell-electric vehicles (FCEVs) powered by hydrogen. Together with our members, we work to advance zero-emission mobility through real-world deployments, public education, and practical tools to accelerate market readiness. While we are rooted in California, our work increasingly spans the western United States. We view the Pacific Northwest as a critical region in building a seamless, hydrogen-powered corridor that connects communities, economies, and clean air goals across the I-5 spine and into Canada.

We are encouraged to see hydrogen refueling infrastructure recognized in Washington's Clean Fuel Standard, and we commend the Department for this inclusion. Given our history of hydrogen transportation in California, we submit that infrastructure serving **light-, medium-, and heavy-duty (L/MD/HD)** FCEVs should all be eligible for credit under the rule. Station developers have indicated that their business models increasingly depend on designing sites that include at least one fueling island for light- and medium-duty vehicles alongside heavy-duty service. Limiting credits to HD-only configurations

risks undercutting this integrated approach, especially as Washington lays the groundwork for broader ZEV adoption across multiple sectors.

California's Low Carbon Fuel Standard (LCFS) may offer a helpful precedent here. There, the program supports hydrogen infrastructure serving all vehicle classes, which has helped encourage private investment, accelerate early station development, and unlock economies of scale. California also hosts the only current open market for light-duty FCEVs, and we're seeing growing public and private interest in expanding this market up the I-5 corridor into Oregon, Washington, and beyond. Your leadership now can help enable that continuity.

To support this vision, we've included with this letter our *California Hydrogen Mobility Vision & Roadmap*. This white paper outlines deployment targets across four market development phases: Demonstration, Launch, Scale, and ZEV Success and is being leveraged to guide stakeholders along the path to a 100% ZEV transition. The roadmap reflects years of real-world learning, agency collaboration, and cross-sector dialogue, including alignment with federal hydrogen hub planning and broader ZEV transition initiatives. It's intended as a resource within California and for partners like Washington who are designing future-ready programs rooted in practical experience.

As we look ahead, we'd welcome the opportunity to collaborate with you on our shared goals of decarbonization, clean air, and economic opportunity. H2FCP is committed to supporting efforts beyond California by sharing knowledge, lessons learned, and technical guidance to help make the hydrogen transition faster, smarter, and more successful for everyone.

Thank you again for your leadership, and for the chance to be part of this important moment in Washington's clean transportation journey.

Warm regards,

A handwritten signature in blue ink, appearing to read "David Park", with a stylized, cursive script.

David Park
Director of Industry Affairs