



April 20, 2022

Honorable Robert Rivas  
Assemblymember, 30<sup>th</sup> District  
State Capitol, P.O. Box 942849  
Sacramento, CA 95814

**RE: GHC Comments on AB 1322 – Support if Amended**

Dear Assemblymember Rivas:

The Green Hydrogen Coalition (GHC)<sup>1</sup> expresses a “Support if Amended” position on Assembly Bill (AB) 1322, which would establish a framework for the aviation industry to reduce its carbon footprint by creating a plan to incentivize the use of sustainable aviation fuel (SAF). GHC is deeply supportive of decarbonizing hard-to-abate sectors, including aviation using 100% Sustainable Aviation Fuel. GHC supports the spirit of AB 1322 and believes the inclusion of green hydrogen<sup>2</sup> and its derivatives will enhance the bill overall since aviation decarbonization options remain limited (e.g., batteries and electrification are currently impractical in aviation).

Due to the shortage of decarbonization options, the focus of this bill must encompass a portfolio of alternative sustainable fuels, such as green hydrogen, as substitutes for highly refined, fossil-fuel-intensive jet fuel. Limiting sustainable aviation fuel feedstocks will only slow California’s decarbonization goals and should be avoided. Therefore, we encourage the inclusion of green hydrogen and fuels derived from green hydrogen, such as synthetic aviation fuels made from green hydrogen and carbon dioxide (e.g., syngas). For your consideration, the GHC proposes specific AB 1322 amendments below:

- 1) Include language in SEC. 1. that states, “Sustainable aviation fuels also include green hydrogen or fuels derived from green hydrogen, such as synthetic aviation fuels made from green synthesis gas derived from green hydrogen and carbon dioxide.”
- 2) Modify the first paragraph after SEC. 2. to include the added text in red, so it reads, “38561.3. As part of the next update to the scoping plan prepared pursuant to Section 38561, the state board shall develop a plan, consistent with federal law, to use sustainable aviation fuels, including green hydrogen and green hydrogen derivatives, to reduce greenhouse gas emissions from aircraft in the state by 40 percent below 1990 levels by 2030 and to achieve net-zero greenhouse gas emissions by 2045. In developing the plan required by this section, no later than January 1, 2023, the state board shall do all of the following....”

Overall, GHC believes that green hydrogen will play an essential role in combatting climate change and reducing dependence on fossil fuels in the aviation sector. In recognition of this potential, we ask that this bill is amended to include green hydrogen as an eligible feedstock. To

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<sup>1</sup> <https://www.ghcoalition.org/>

<sup>2</sup> GHC defines green hydrogen as hydrogen produced from non-fossil fuel resources and has climate integrity – emits zero or de minimis greenhouse gases on a well-to-gate life cycle basis.



create the value proposition for transitioning to SAF, we must work together to ensure green hydrogen is included and recognized for its benefits as a critical solution in our clean energy transition. Strategic implementation of AB1322 will be essential to continuing to scale the green hydrogen economy.

We look forward to helping the state transition to 100 percent clean energy and achieve carbon neutrality and net-negative emissions as soon as possible.

Respectfully submitted,

**/s/ Janice Lin**

Janice Lin

Founder and President

**GREEN HYDROGEN COALITION**

Cc:

Senate Environmental Quality Committee Members:

Senator Benjamin Allen (Chair)

Senator Patricia C. Bates (Vice-Chair)

Senator Brian Dahle

Senator Lena A. Gonzalez

Senator Nancy Skinner

Senator Henry I. Stern

Senator Bob Wieckowski