

Communication from Public

Name: ENZO Daniel BAUK

Date Submitted: 02/25/2026 03:57 PM

Council File No: 25-1360

Comments for Public Posting: We support for modernizing Scattergood to strengthen reliability, protect public safety, and preserve a pathway for hydrogen-ready, clean dispatchable power in Los Angeles.



February 27, 2026

Honorable Los Angeles City Council
Attn: Michael Espinosa, Energy and Environment Committee Clerk
200 North Spring Street
Los Angeles, CA 90012

RE: Support for affirming LADWP certification of the Final Subsequent EIR and approval of the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (SCH No. 2023050366; Council File 25-1360) - Request to deny the CEQA appeal and affirm the FEIR

Chair Nazarian:

US Hybrid Corporation strongly supports LADWP's October 28, 2025 action to certify the Final Subsequent Environmental Impact Report (FEIR) and approve the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project.

We respectfully urge the Committee to deny the CEQA appeal and affirm LADWP's certification.

CEQA Appeal

In evaluating an appeal under CEQA, the Committee should focus on whether the FEIR is an adequate informational document and whether LADWP's determinations are supported by substantial evidence in the administrative record. The appeal generally asserts defects related to the baseline, cumulative impacts, alternatives, and the absence of a programmatic EIR for hydrogen-related efforts. The record, however, reflects that LADWP prepared a Final Subsequent EIR, adopted a mitigation monitoring and reporting program, and adopted findings and (where applicable) a statement of overriding considerations as part of its October 28, 2025 action.

LADWP's Board staff report identifies the project's core objectives as replacing aging in-basin generation with a dependable, rapidly dispatchable resource to maintain grid resilience and reliability in the areas served by Scattergood (including LAX, Hyperion, and the West Los Angeles service area). The City Council Update explains that absent timely replacement, outage risk would significantly increase.

The Sierra Club supplemental letter argues that higher-density battery storage and demand response could meet the project's capacity needs and should have been advanced as feasible alternatives. LADWP's staff report responds, consistent with CEQA Guidelines, by documenting

that LADWP evaluated a BESS alternative and a green hydrogen fuel cell alternative and explains why they are not adequate substitutes for the project's reliability function. Specifically:

- Battery storage alternative (BESS): LADWP found it would not provide comparable capacity for extended durations (e.g., 10+ hours for multiple days) during major interruptions, and would require substantially more real estate, potentially causing cost and schedule impacts and additional footprint-related impacts.
- Fuel cell alternative: LADWP found it is unproven at the necessary scale and could take over 10 years to implement, failing the near-term reliability objective and timeline.

These determinations are quintessentially within the agency's discretion under CEQA when supported by substantial evidence. The appeal does not demonstrate that LADWP failed to consider a reasonable range of alternatives or failed to explain its reasoning; instead, it reflects disagreement with LADWP's reliability judgments and technology readiness assessment.

Reliability and Outage Prevention

This decision is fundamentally about keeping the lights on during Los Angeles's ambitious clean-energy transition. LADWP has identified Scattergood as critical in-basin, fast-response capacity serving the West Los Angeles area, including major public-serving facilities such as LAX and the Hyperion Water Reclamation Plant. Without timely replacement of aging units, the risk of outages will significantly increase - with serious economic and public safety consequences. Wind and solar are the cornerstones of renewable energy, but Los Angeles County will need a fuel source that can complement these resources when clouds are covering the sun, or the wind is absent.

- Reduces outage risk in a constrained, high-demand area through dispatchable, fast-response local capacity.
- Supports continuity of essential services and critical facilities during emergencies and multi-day grid disruptions.
- Advances modernization while preserving the City's ability to integrate more renewable generation safely.

The administrative record emphasizes that the West Los Angeles area is vulnerable due to limited transmission capacity and that firm, dispatchable local generation functions as a backstop when renewables cannot be imported or delivered due to constraints, outages, or



emergencies. Reliability planning is not speculative here: LADWP links the project to maintaining safe, continuous service for residents, businesses, and critical public infrastructure.

For the reasons listed above, US Hybrid Corp requests denial of the CEQA appeal (Council File 25-1360) and affirmation of the FEIR to avoid any reliability gaps. Thank you for the opportunity to submit comments. We appreciate the Committee's focus on a clean-energy transition that also delivers reliability, resilience, and public safety.

Sincerely,

A handwritten signature in blue ink that reads 'Enzo Bauk'.

Enzo Bauk
SVP Integration & Development
US Hybrid Corp.
Enzo@ushybrid.com
P: 1 877-888-7492
C: 562-254-3877
www.us-hybrid.com

CC: Members, Energy & Environmental Committee
Members, Los Angeles City Council

Communication from Public

Name: Carter Moon

Date Submitted: 02/25/2026 02:20 PM

Council File No: 25-1360

Comments for Public Posting: I am extremely opposed to the Scattergood modernization project and I demand the city council to reject LADWP's EIR and grant the appeal. So-called "green" hydrogen is an unproven technology that will be highly expensive to install, has never been tried at the scale proposed here, and risks polluting our already smog-ridden city further with NOx. There are cleaner and ultimately more cost effective alternatives available, particularly long duration energy storage battery systems. Other countries around the world are rapidly adopting solar as it becomes increasingly clear that it is the most important renewable technology of the future, it is highly cost effective, it provides stability and autonomy that gas based energy systems do not, and it is increasingly becoming clear that the minerals in solar panels and batteries can be recycled much more efficiently than previously imagined. There is no viable reason to continue pursuing the combustion of dangerous gases when we can be a city leading the transition to truly stable, clean energy sources.

Communication from Public

Name: Janice Lin

Date Submitted: 02/25/2026 12:28 PM

Council File No: 25-1360

Comments for Public Posting: The Green Hydrogen Coalition (GHC) strongly supports LADWP's October 28, 2025 action to certify the Final Subsequent Environmental Impact Report (FEIR) and approve the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project. GHC's mission is to facilitate policies and practices that advance green hydrogen production and use in all sectors of the economy to accelerate a carbon-free energy future and a just energy transition. Our donors include charitable foundations, renewable energy users and developers, utilities, academics, and more. We respectfully urge the Committee to deny the CEQA appeal and affirm LADWP's certification. CEQA Appeal In evaluating an appeal under CEQA, the Committee should focus on whether the FEIR is an adequate informational document and whether LADWP's determinations are supported by substantial evidence in the administrative record. The appeal generally asserts defects related to the baseline, cumulative impacts, alternatives, and the absence of a programmatic EIR for hydrogen-related efforts. The record, however, reflects that LADWP prepared a Final Subsequent EIR, adopted a mitigation monitoring and reporting program, and adopted findings and (where applicable) a statement of overriding considerations as part of its October 28, 2025 action. LADWP's Board staff report identifies the project's core objectives as replacing aging in-basin generation with a dependable, rapidly dispatchable resource to maintain grid resilience and reliability in the area served by Scattergood (including LAX, Hyperion, and the West Los Angeles service area). The City Council Update explains that absent timely replacement, outage risk would significantly increase. Opponents argue that higher-density battery storage and demand response could meet the project's capacity needs and should have been advanced as feasible alternatives. LADWP's staff report responds, consistent with CEQA Guidelines, by documenting that LADWP evaluated a BESS alternative and a green hydrogen fuel cell alternative and explains why they are not adequate substitutes for the project's reliability function. The appeal does not demonstrate that LADWP failed to consider a reasonable range of alternatives or failed to explain its reasoning; instead, it reflects disagreement with LADWP's reliability judgments and technology readiness assessment.

Reliability and Outage Prevention This decision is fundamentally about keeping the lights on during Los Angeles's ambitious clean-energy transition. LADWP has identified Scattergood as critical in-basin, fast-response capacity serving the West Los Angeles area, including major public-serving facilities such as LAX and the Hyperion Water Reclamation Plant. Without timely replacement of aging units, the risk of outages will significantly increase - with serious economic and public safety consequences. Wind and solar are the cornerstones of renewable energy, but Los Angeles County will need a fuel source that can complement these resources when clouds are covering the sun, or the wind is absent.

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The West Los Angeles area is vulnerable due to limited transmission capacity; dispatchable local generation can function as a backstop when renewables cannot be imported or delivered due to constraints, outages, or emergencies. Reliability planning is not speculative here: LADWP links the project to maintaining safe, continuous service for residents, businesses, and critical public infrastructure. For the reasons listed above, the Green Hydrogen Coalition requests denial of the CEQA appeal (Council File 25-1360) and affirmation of the FEIR to avoid any reliability gaps. Thank you for the opportunity to submit comments. We appreciate the Committee's focus on a clean-energy transition that also delivers reliability, resilience, and public safety. Sincerely, Janice Lin Executive Director/Founder Green Hydrogen Coalition



February 25, 2026

Honorable Los Angeles City Council
Attn: Michael Espinosa, Energy and Environment Committee Clerk
200 North Spring Street
Los Angeles, CA 90012

RE: Support for affirming LADWP certification of the Final Subsequent EIR and approval of the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (SCH No. 2023050366; Council File 25-1360) - Request to deny the CEQA appeal and affirm the FEIR

Chair Nazarian:

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We respectfully urge the Committee to deny the CEQA appeal and affirm LADWP's certification.

CEQA Appeal

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Opponents argue that higher-density battery storage and demand response could meet the project's capacity needs and should have been advanced as feasible alternatives. LADWP's staff report responds, consistent with CEQA Guidelines, by documenting that LADWP evaluated a BESS alternative and a green hydrogen fuel cell alternative and explains why they are not adequate substitutes for the project's reliability function. The appeal does not demonstrate that LADWP failed to consider a reasonable range



of alternatives or failed to explain its reasoning; instead, it reflects disagreement with LADWP's reliability judgments and technology readiness assessment.

Reliability and Outage Prevention

This decision is fundamentally about keeping the lights on during Los Angeles's ambitious clean-energy transition. LADWP has identified Scattergood as critical in-basin, fast-response capacity serving the West Los Angeles area, including major public-serving facilities such as LAX and the Hyperion Water Reclamation Plant. Without timely replacement of aging units, the risk of outages will significantly increase - with serious economic and public safety consequences. Wind and solar are the cornerstones of renewable energy, but Los Angeles County will need a fuel source that can complement these resources when clouds are covering the sun, or the wind is absent.

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- Supports continuity of essential services and critical facilities during emergencies and multi-day grid disruptions.
- Advances modernization while preserving the City's ability to integrate more renewable generation safely.

The West Los Angeles area is vulnerable due to limited transmission capacity; dispatchable local generation can function as a backstop when renewables cannot be imported or delivered due to constraints, outages, or emergencies. Reliability planning is not speculative here: LADWP links the project to maintaining safe, continuous service for residents, businesses, and critical public infrastructure.

For the reasons listed above, the Green Hydrogen Coalition requests denial of the CEQA appeal (Council File 25-1360) and affirmation of the FEIR to avoid any reliability gaps. Thank you for the opportunity to submit comments. We appreciate the Committee's focus on a clean-energy transition that also delivers reliability, resilience, and public safety.

Sincerely,

A handwritten signature in black ink, appearing to read 'Janice Lin'.

Janice Lin
Executive Director/Founder



Green Hydrogen Coalition

CC: Members, Energy & Environmental Committee
Members, Los Angeles City Council

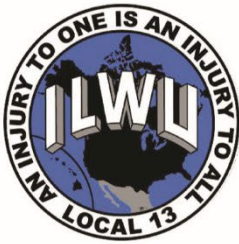
Communication from Public

Name: INTERNATIONAL LONGSHORE & WAREHOUSE UNION
LOCALS 13, 63 AND 94

Date Submitted: 02/25/2026 12:30 PM

Council File No: 25-1360

Comments for Public Posting: ILWU Local's 13, 63 and 94 Support for Affirming LADWP Certification of the Final Subsequent EIR and Approval of the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (SCH No. 2023050366; Council File 25-1360) - Request to Deny the CEQA Appeal and Affirm the FEIR



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February 27, 2026

Honorable Los Angeles City Council
Attn: Michael Espinosa, Energy and Environment Committee Clerk
200 North Spring Street
Los Angeles, CA 90012

RE: Support for Affirming LADWP Certification of the Final Subsequent EIR and Approval of the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (SCH No. 2023050366; Council File 25-1360) - Request to Deny the CEQA Appeal and Affirm the FEIR

Dear President Harris-Dawson and Chair Nazarian:

International Longshore and Warehouse Union (ILWU), Locals 13, 63 and 94, strongly supports Los Angeles Department of Water and Power (LADWP)'s October 28, 2025, action to certify the Final Subsequent Environmental Impact Report (FEIR) and approve the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project. **We respectfully urge the Energy and Environment Committee and City Council to deny the CEQA appeal and affirm LADWP's certification.**

The appeal principally challenges the FEIR's baseline, cumulative impacts, and alternatives analysis. But LADWP's administrative record demonstrates that the FEIR evaluated a reasonable range of alternatives and explains, with substantial evidence, why storage-only and fuel-cell options do not satisfy the project's reliability objectives for extended, multi-day emergency conditions on the required schedule. CEQA requires disclosure, analysis, and reasoned decision-making based on substantial evidence – which the FEIR provides.

Reliability and Outage Prevention

This decision is fundamentally about keeping the lights on during Los Angeles and California's ambitious clean-energy transition. LADWP has identified Scattergood as critical in-basin, fast-response capacity serving the West Los Angeles area, including major public-serving facilities such as LAX and the Hyperion Water Reclamation Plant. Without timely replacement of aging units, the risk of outages will significantly increase - with serious economic and public safety consequences. Wind and solar are the cornerstones of renewable energy, but the Greater Los Angeles area will need a fuel source that can complement these resources when clouds are covering the sun, or the wind is absent.

Thus, we respectfully urge the Energy and Environment Committee and City Council to deny the CEQA appeal and affirm LADWP's certification.

Thank you for your consideration and for prioritizing reliability, resilience, and public safety while Los Angeles advances toward a cleaner grid.

Sincerely,



Gary Herrera
President
ILWU Local 13



Joe Gasperov
President
ILWU Local 63



Daniel G. Miranda
President
ILWU Local 94

cc: Members, Energy & Environmental Committee
Members, Los Angeles City Council

opeiu#537/ih



Communication from Public

Name: Jonah Henry

Date Submitted: 02/25/2026 11:13 AM

Council File No: 25-1360

Comments for Public Posting: My name is Jonah Henry. I am a CD 10 resident and a volunteer organizer with Sunrise Movement Los Angeles, a youth-led organization fighting to stop the climate crisis and develop a more equitable economy. I strongly believe that utility-scale battery storage, rather than green hydrogen, is the technology that will allow LADWP to phase out fossil fuels and improve grid reliability at the fastest pace and for the lowest cost, and I am concerned that Scattergood will soon become a stranded asset in our region's ongoing energy transition. After several years of studying, designing, discussing, and preparing and approving the environmental impact report for the Scattergood green hydrogen plan, LADWP has a clear bureaucratic incentive to continue to move forward with this flawed plan even when the rest of the utilities in our state are rapidly reducing their reliance on fossil fuel plants with utility-scale battery storage. City Council must have the foresight and courage to disagree with LADWP, reverse the approval of the Scattergood EIR, and push LADWP to invest the capital that otherwise would have been spent on Scattergood into utility-scale battery storage facilities and transmission line expansions.

Communication from Public

Name: Isabella Potenzini

Date Submitted: 02/25/2026 11:03 AM

Council File No: 25-1360

Comments for Public Posting: Hello my name is Isabella Potenzini. I am writing as a member of Sunrise Movement LA and as a concerned citizen of LA. I am writing to urge the LA City Council to reject LADWP's Scattergood EIR and grant the appeal. The EIR is faulty and this project is dangerous, expensive, polluting, and communities don't want it. This project is extremely expensive and is only the first phase to get to 100% hydrogen. According to a presentation to the City Council, this project alone is estimated to cost \$800 million. This cost does not include the cost of hydrogen fuel itself, the hydrogen production and transportation infrastructure, or the skyrocketing costs of new combustion turbines due to supply chain issues. A new GridLab study has found that the prices of gas turbines are continuing to increase and not anticipated to decline in the foreseeable future. The cost of this project could end up being as much as double what was estimated. While S&P estimates that wait times for new gas turbines could be up to 7 years. Due to AQMD Rule 317.1 the "Clean Air Act Nonattainment fees for 8- Hour Ozone Standard" LADWP will have to pay an additional fee for the NOx emissions from these plants, which will only increase the cost of hydrogen. The DOE has cut federal funding for the ARCHES Hydrogen Hub, meaning that there will not be any federal funding given to Scattergood. This means that ratepayers will be stuck bearing the cost of this expensive and risky project. The money being spent on this risky project, which prolongs reliance on fossil fuels, should be invested in truly clean noncombustion technology that will ensure LA will meet its 2035 clean energy goals. There is great uncertainty around the availability of green hydrogen fuel. Burning 100% hydrogen fuel in a power plant has never been done before at this scale. LADWP is banking on and investing in a technology that is risky and not proven and uses the LA community as a testing ground. LADWP does not address hydrogen production or transportation in their EIR, which is entirely speculative. Given the great uncertainties with hydrogen coming to fruition, this project risks prolonging reliance on gas plants in LA or utilizing grey hydrogen made from fossil fuels – which is not a climate-friendly solution. The EIR does not consider the uncertainties around hydrogen, stating that it is beyond the scope of this project. However, this project is

absolutely reliant on hydrogen gas availability and ignoring this uncertainty is a grave oversight. In response to comments about the uncertainty of hydrogen, LADWP says: “LADWP would not implement or operate the infrastructure that supplies hydrogen to Scattergood and would instead be a purchaser of hydrogen for the project... The details of the green hydrogen system in terms of the production, delivery, and storage infrastructure are currently unknown. As such, the EIR does not address green hydrogen infrastructure, including the transport to Scattergood because details related to the infrastructure needed to support the proposed project do not currently exist and any such analysis would be speculative and of little informational value.” There are feasible alternatives to hydrogen combustion that have not been fairly considered. Two of the alternatives listed are stated to have reduced environmental impacts: Energy Storage and Green Hydrogen Powered Fuel Cells. Energy Storage: The EIR should have evaluated other non-emitting long duration energy storage (LDES) technology with longer battery lifespan and charging capacity that would decrease acreage needed for the project and vertical stacking of batteries. Battery storage technologies are rapidly developing to provide longer durations on less acreage. Combinations: A proposed alternative recommended by Sierra Club and partners was not fairly considered. This proposed combination of battery storage, demand response, and distributed energy resources is not fairly considered in either the EIR or the NREL study. LADWP adopted a very narrow project description in the EIR that unfairly favors combustion generation, when in fact the same goal could be met through non-combustion alternatives. Thank you for your time. I hope you will listen to the community here today and reject this EIR. Please prioritize environmental justice, climate, and health by pursuing cleaner alternatives, over another risky combustion technology.