

Communication from Public

Name: Climate Action California
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Comments for Public Posting: Our comment letter is attached below.



February 26, 2026

Councilmember Ysabel Jurado
200 North Spring Street, Suite #425
Los Angeles, CA 90012

Councilmember Adrin Nazarian
200 North Spring Street, Suite #435
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Councilmember Imelda Padilla
200 North Spring Street, Suite #470
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Councilmember Nithya Raman
200 North Spring Street, Suite #415
Los Angeles, CA 90012

Councilmember Katy Yaroslavsky
200 North Spring Street, Suite #440
Los Angeles, CA 90012

CF 25-1360: Request to reject LADWP Scattergood approval

Dear Chair Nazarian and Members of the Energy and Environment Committee,

We write today to request that your Committee take action to reject the Los Angeles Department of Water and Power (LADWP) Board's October 28, 2025 certification of the Final Environmental Impact Report (FEIR) for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project.

Climate Action California (CAC) is a volunteer-based organization with over 7,000 supporters that advocates for pragmatic, science-based solutions to effectively combat the climate crisis. Our volunteers possess decades of combined experience in researching energy technology and electricity markets, and we apply this expertise to our advocacy on local and state-wide policy and regulatory issues.

LADWP's proposal to convert Scattergood into a "hydrogen-ready" thermal power plant that continues to temporarily burn methane gas, or methane gas mixed with hydrogen, is informed by the Los Angeles 100% Renewable Energy Study (LA100) in 2021 and update in 2025, which both conclude that in-basin combustion generation is necessary for LADWP to maintain resilience during extreme weather events such as wildfires. We believe this conclusion is false.

The 2025 update to the LA100 study states that a 330 MW, 10-hour battery storage facility would be sufficient to replace Scattergood's baseload electrical output, and that such a facility would only require 21.1 acres of land inside the basin. However, the update vaguely concludes that battery storage is not a viable alternative due to "significant uncertainty" that exists regarding LADWP's ability to procure this new land before 2030, without going into any substantive detail.

From 2021-2025, California installed 15,181 MW of battery power capacity, with most facilities interconnecting with the grid only a few years after the permitting process initially began. Meanwhile, as the battery storage industry is booming, California's green hydrogen industry remains in a state of inertia, and the Trump Administration's decision to withdraw \$1.2 billion in federal funding from the proposed California ARCHES H2 hub (leading to the closure of the project) has caused further setbacks. Almost three years after City Council voted to approve the Scattergood project, it is still unknown where the hydrogen for the plant will be coming from, by what means of transport, how it will be generated, and at what price.

We believe that LADWP can replace Scattergood's baseload capacity with increased battery storage and transmission capacity on a shorter timeline and at a lower cost than it can with green hydrogen. LADWP's EIR inadequately evaluates these other potential transition scenarios. The Board's certification of this flawed EIR is unacceptable and warrants the City's intervention.

The Scattergood Modernization Project would prolong LADWP's reliance on methane gas, increase rates for LADWP customers, and waste billions of dollars on what is soon to be a stranded asset. City Council must appeal the LADWP Board's decision now in order to prevent the Department from making this critical mistake that will derail southern California's decarbonization progress for decades to come.

If you have any questions about the Scattergood Modernization Project or alternative LADWP energy transition scenarios, please reach out to Jonah Henry, a Los Angeles resident in CD 10 and a volunteer on the CAC Energy Team, at jonahjacobhenry@gmail.com. Thank you for considering our perspective.

Sincerely,

A handwritten signature in black ink, reading "Stephen S. Rosenblum". The signature is fluid and cursive, with the first name "Stephen" being more prominent.

Stephen S. Rosenblum
Energy Policy Team Lead
Climate Action California