

## Communication from Public

**Name:** Sierra Club et al Coalition Letter

**Date Submitted:** 02/27/2026 04:19 PM

**Council File No:** 25-1360

**Comments for Public Posting:** Please see attached letter from Sierra Club, Los Angeles Waterkeeper, Communities for a Better Environment, Center for Biological Diversity, Physicians for Social Responsibility Los Angeles, and Food & Water Watch re: the Scattergood EIR Appeal.



February 27, 2026

Los Angeles City Council  
Office of the City Clerk  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012

**Re: Scattergood EIR Appeal - Comments from Sierra Club, Los Angeles Waterkeeper, Communities for a Better Environment, Center for Biological Diversity, Physicians for Social Responsibility Los Angeles, and Food & Water Watch**

Dear City Councilmembers,

On behalf of the undersigned organizations, we respectfully urge the City Council to grant the appeal of the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project and remand the Environmental Impact Report (“EIR”) to the Los Angeles Department of Water and Power (“LADWP”) for further analysis.

As detailed in our November 14, 2025 appeal, the Scattergood EIR does not satisfy the fundamental requirements of the California Environmental Quality Act to provide the City with enough information to make an informed, legally defensible decision.

First, **the EIR greenwashes a near-billion-dollar fossil gas investment, and does not adequately evaluate the realistic likelihood that green hydrogen will not be available** at the scale, price, or timeline assumed, given significant feasibility and funding uncertainties in the virtually non-existent green hydrogen market. If hydrogen fuel does not materialize as projected, the facility will operate on fossil gas for much or all of its lifespan.

Second, **the EIR fails to meaningfully assess feasible carbon-free and non-emitting alternatives that could meet LADWP’s reliability needs.** With support from expert consultants, our coalition proposed a portfolio approach combining energy storage, local solar, and targeted industrial demand response, representing a clean energy pathway aligned with the City’s climate commitments, public health priorities, and ratepayer interests. LADWP has not rigorously evaluated this alternative.

Granting the appeal and remanding the EIR will not foreclose reliable power for Los Angeles. Rather, it will ensure that the City proceeds based on a legally and factually robust review that fully considers this coalition's proposed clean energy alternative. For these reasons, we ask that the City Council **grant the appeal and direct LADWP to correct the EIR's glaring deficiencies** through further analysis.

Sincerely,

David Pettit  
Senior Attorney  
**Center for Biological Diversity**

Theo Caretto  
Staff Attorney  
**Communities for a Better Environment**

Andrea Vega  
Los Angeles Organizing Manager  
**Food & Water Watch**

Benjamin Harris  
Senior Staff Attorney  
**Los Angeles Waterkeeper**

Alex Jasset  
Energy Justice Director  
**Physicians for Social Responsibility - Los Angeles**

Julia Rose Manriquez Dowell  
Senior Campaign Organizer  
**Sierra Club**

Katherine Ramsey  
Senior Attorney  
**Sierra Club**

## Communication from Public

**Name:** Keith Malone

**Date Submitted:** 02/27/2026 04:21 PM

**Council File No:** 25-1360

**Comments for Public Posting:** February 27, 2026 The Honorable Adrin Nazarian Council Member 200 North Spring Street Los Angeles, CA 90012 Attn: Michael Espinosa, Energy and Environment Committee Clerk 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 Council Member Nazarian: As a resident of the City of Los Angeles and, therefore, a customer of the Los Angeles Department of Water and Power, I support 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. I have worked in hydrogen-related activities for nearly 14 years, and have driven fuel cell electric cars for 13 of those years. As you may imagine, I am familiar with the benefits, challenges and questions about hydrogen. I have always appreciated LADWP's commitment to ensuring a reliable and resilience system. I believe the Scattergood project is part of that continued effort. Sincerely, Keith Malone Montecito Heights Keithman63@yahoo.com CC: The Honorable Eunisses Hernandez

# Keith Malone

February 27, 2026

The Honorable Adrin Nazarian  
Council Member  
200 North Spring Street  
Los Angeles, CA 90012

Attn: Michael Espinosa, Energy and Environment Committee Clerk

**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**

Council Member Nazarian:

As a resident of the City of Los Angeles and, therefore, a customer of the Los Angeles Department of Water and Power, I support 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.

I have worked in hydrogen-related activities for nearly 14 years, and have driven fuel cell electric cars for 13 of those years. As you may imagine, I am familiar with the benefits, challenges and questions about hydrogen.

I have always appreciated LADWP's commitment to ensuring a reliable and resilience system. I believe the Scattergood project is part of that continued effort.

Sincerely,  
Keith Malone  
Montecito Heights  
[Keithman63@yahoo.com](mailto:Keithman63@yahoo.com)

**CC:** The Honorable Eunisses Hernandez

## Communication from Public

**Name:** Katrina M. Fritz  
**Date Submitted:** 02/27/2026 10:58 AM  
**Council File No:** 25-1360  
**Comments for Public Posting:** Please accept the attached comments from the California Hydrogen Business Council on File Number 25-1360. Thank you.

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:

The California Hydrogen Business Council expresses strong support for LADWP's October 28, 2025 decision to certify the Final Subsequent Environmental Impact Report and advance the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project. We respectfully ask the Committee to reject the CEQA appeal and uphold LADWP's certification.

The appeal focuses on disputing the FEIR's treatment of the environmental baseline, its cumulative impacts assessment, and its evaluation of project alternatives. However, LADWP's administrative record shows that the FEIR considered a reasonable set of alternatives and provides substantial evidence explaining why storage-only and fuel-cell scenarios cannot meet the project's reliability requirements during prolonged, multi-day emergency events within the necessary timeframe. CEQA calls for transparent disclosure, thorough analysis, and decisions grounded in substantial evidence, all of which the FEIR delivers.

The California Hydrogen Business Council supports the modernization of Scattergood Generating Station Units 1 and 2 to make them green-hydrogen-ready. Upgrading these units is essential for helping Los Angeles achieve its LA100 commitments while ensuring residents have access to reliable, resilient clean energy, which is especially important as the region faces more frequent outages and wildfire-driven disruptions.

Modernizing Scattergood will strengthen grid reliability and enable the use of hydrogen as a firm, zero-carbon fuel. This firm power capability will reduce economic losses from outages and advance the city toward its goal of 100% renewable electricity by 2035. As clean fuels scale across California, Scattergood provides a critical early anchor for hydrogen offtake and supports continued state leadership in clean energy deployment, even amid shifting federal priorities.

The project also positions hydrogen to expand into the Los Angeles air and seaports, where replacing diesel in equipment, trucks, transit, rail, and maritime applications would deliver significant air-quality benefits for communities across the L.A. Basin.

For these reasons, we strongly support upholding LADWP's certification of the Scattergood Modernization Project and urge the affirmation of the FEIR and denial of the CEQA appeal.

Sincerely,

A handwritten signature in blue ink, reading "Katrina M. Fritz". The signature is fluid and cursive, with the first name "Katrina" being more prominent than the last name "Fritz".

Katrina M. Fritz  
President and Chief Executive Officer  
California Hydrogen Business Council  
Email: [kmfritz@californiahydrogen.org](mailto:kmfritz@californiahydrogen.org)  
Phone: 860-338-1303

## Communication from Public

**Name:** Lawrence Nelson

**Date Submitted:** 02/27/2026 01:35 PM

**Council File No:** 25-1360

**Comments for Public Posting:** Please see the letter attached on behalf from the Clean Energy Institute at the University of California, Irvine.



CLEAN ENERGY INSTITUTE  
Irvine, CA 92697-3550

Phone: (949) 338-5953  
E-mail: [jbrouwer@uci.edu](mailto:jbrouwer@uci.edu)

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 Chair Nazarian:

The Clean Energy Institute 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. 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.

Although we believe that the green hydrogen fuel cell generation alternative should be the end goal for Scattergood, we agree with NREL's Scattergood alternatives report that fuel cells would not be economically viable at the scale required before 2029 and would introduce technical/operational difficulties when made to run on natural gas/hydrogen fuel blends. We believe that the current modernization of Scattergood can lay down a solid foundation for using hydrogen as a clean alternative to fossil fuels for power generation in our basin. When the proposed Scattergood units reach their end-of-life, we believe that fuel cells will be more economical and can replace the gas turbines at Scattergood while running on 100% green hydrogen so that the plant can be renewable, sustainable, and zero-emissions.

**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.

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

Sincerely,



Lawrence Nelson  
Graduate Student Researcher  
Clean Energy Institute  
[llnelso1@uci.edu](mailto:llnelso1@uci.edu)

Sincerely,



Jacob (Jack) Brouwer, Ph.D.  
*Professor, Chancellor's Fellow:* Mechanical and Aerospace Engineering, Civil and  
Environmental Engineering, Chemical and Biomolecular Engineering  
*Director:* Clean Energy Institute  
University of California Irvine  
949-338-5953  
[jbrouwer@uci.edu](mailto:jbrouwer@uci.edu)

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