

Communication from Public

Name: Ann Dorsey

Date Submitted: 03/01/2026 10:52 AM

Council File No: 25-1360

Comments for Public Posting: Councilmembers, I urge you to stop LADWP from using the Scattergood Gas Plant to burn a mix of methane gas and hydrogen by rejecting the EIR (council file number 25-1360) for the following reasons: -The EIR does not include any discussion of the details of the green hydrogen system in terms of the production, delivery, and storage infrastructure because they are currently unknown. Since completion of the project is completely reliant on this information, stating that it is beyond the scope of this project is unacceptable. -The project baseline does not provide a detailed analysis or assurance that the project will operate at reduced capacity. LADWP has made contradicting statements about how the plant will operate. Despite LADWP's representations in past meetings that the plant would operate only in true emergency situations, the EIR states it will be available as a peaker plant, as well as in emergency situations. -Units 1 and 2, currently reliant on once-through cooling, are mandated to be retired in 2029 and the EIR does not properly incorporate this retirement into their assessment of the project baseline. -The EIR does not incorporate any impacts from the production and transportation of hydrogen, which could be significant. A recent analysis shows hydrogen gas production for plants including Scattergood could account for 1% of our entire statewide water demand by 2045. Failing to look at the impact of the project from production to end use, including water and energy use to create hydrogen gas and impacts from constructing massive hydrogen gas transportation infrastructure, makes the EIR's analysis incomplete. -Los Angeles is already in extreme nonattainment for critical pollutants, including ozone. NOx emissions from hydrogen combustion lead to ozone and smog. These impacts will exacerbate already poor air quality and disproportionately impact the health of frontline communities living near the plant. -The environmental impacts of the project extend beyond the Scattergood gas plant, as hydrogen will need to be made and transported to the facility. Additionally, LADWP is actively evaluating the transition of other in-basin gas plants to hydrogen, which will expand the impacts of hydrogen combustion. -Hydrogen is an unproven technology and burning 100% hydrogen fuel in a power plant has never been done before at this scale. -According to a presentation to the City Council, this

project alone is estimated to cost \$800 million. The LA Ratepayer Advocate himself notes that the project cost is likely higher than initial projections. ---The cost of new turbines has gone up 2-3x in the last year alone and costs are not anticipated to decline in the foreseeable future. Time delays for getting new turbines could be up to 6-8 years. ---The cost of hydrogen is estimated to be 7-10x the current cost of natural gas. ---The total cost of this project could end up being as much as double what was estimated. -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. -It is more energy and cost efficient to use the renewable energy directly than to convert it to hydrogen. There are alternatives to a hydrogen plant that would not use fossil fuels that need to be seriously considered before considering hydrogen. ---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 was not fairly considered in either the EIR or the NREL study. -CSU, Northridge had hydrogen fuel cells generating energy for part of the campus for years. The fuel cells never generated as much energy as promised and when the contract ended, it was not renewed. We must transition away from fossil fuel energy use, not increase it. Please keep the LADWP from using costly, unproven, fossil fuel using hydrogen technology by rejecting the Scattergood EIR. Thank you