

Communication from Public

Name: Laura

Date Submitted: 03/02/2026 11:45 AM

Council File No: 25-1360

Comments for Public Posting: Hello, My name is Laura, I live in CD 1 and work in LA City/County/ and CD 15. I am a LADWP customer. My brother lives in Van Nuys near the Valley Generating Station owned by LADWP. Often times driving to Van Nuys, I have noticed bad smelling odors and smells of gas. I immediately call LADWP to report it because I worry that there may be a leak harming people's health. I 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. 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. 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. The LA Ratepayer Advocate himself notes that the project cost is likely higher than initial projections. 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. 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 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. I 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.

Communication from Public

Name: Sharon Ungersma

Date Submitted: 03/02/2026 11:59 AM

Council File No: 25-1360

Comments for Public Posting: I ask the LA City Council to reject LADWP's Scattergood EIR and grant this appeal. As chair of the San Fernando Valley chapter of the Climate Reality Project, I represent thousands of LA residents and LADWP customers who are fully committed to the green energy transition, but we cannot support LADWP's plan to convert the Scattergood facility to a methane/hydrogen-burning facility. This project has the potential to be the type of boondoggle that gives green energy a bad name with ratepayers--way too expensive, way too polluting, and way too dangerous. The current EIR does nothing to assuage our concerns; it acknowledges "significant and unavoidable impacts" regarding air quality and pollutants during construction and operations, but these impacts ARE avoidable--by not proceeding with this conversion plan! This plan will place undue pollution burdens on the frontline communities we should be most committed to protecting. Despite great strides in cleaning the air over the past several decades, the Los Angeles area still has the highest levels of ozone (smog) in the nation. Investing \$800 million in this facility will create a classic sunk-cost fallacy that we must continue to prop up this polluting facility, which will lead to decades more polluted air for the surrounding communities. While we understand the need for in-basin generation capacity to meet the goals of the LA100 plan, the data supporting transition to hydrogen is unconvincing. With no current hydrogen market, this massive investment may wind up as a stranded asset if the envisioned hydrogen market does not come to fruition. The money would be put to far better use by speeding electrification and increasing battery storage capacity; with the rapid decreases in battery costs over the past few years, ratepayers' money has far greater impact when used in that direction than in switching from methane to hydrogen for gas-burning turbines. As supporters of a rapid green energy transition that will include frontline communities in the benefits of cleaner air and keep energy affordable for all ratepayers, we oppose converting Scattergood to hydrogen, even if that means extending its use as an occasional methane-burning backup for the last 3-5% of our energy needs as we approach 100% renewable energy generation. Far better to invest in rapid electrification of the building and transportation sectors, increasing battery storage, and grid improvements, all of

which are much more low-hanging fruit and which will keep rates lower than the \$800 million (under)estimated costs of betting on hydrogen. We strongly urge you to reject this inadequate EIR and reconsider this plan before it's too late and our money is committed on a wasteful gamble rather than investing in concrete solutions that are available right now.

Communication from Public

Name: Julia Dowell

Date Submitted: 03/02/2026 04:04 PM

Council File No: 25-1360

Comments for Public Posting: Dear Los Angeles City Council, Please see the attached comment letter, submitted on behalf of Sierra Club, regarding the Scattergood appeal. Thank you. Best, Julia Dowell



March 2, 2026

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

Re: Supplemental Comments on Scattergood EIR Appeal - Council File: 25-1360

Dear Los Angeles City Council Members:

I am writing to you on behalf of the Sierra Club and our over 38,000 members and supporters in the Los Angeles area. I respectfully submit these supplemental comments in regards to the Scattergood EIR appeal made by Sierra Club, Los Angeles Waterkeeper, Communities for a Better Environment, Center for Biological Diversity, Physicians for Social Responsibility Los Angeles, and Food & Water Watch (*Council File: 25-1360*).

As part of our comments on the Scattergood Draft EIR, Sierra Club and our partners submitted an alternative clean energy proposal from PSE Healthy Energy that could meet the reliability needs of the proposed project without using combustion technology¹. We recently conducted a cost analysis of clean energy alternatives to the proposed project. As you can see in the attached report, a clean energy portfolio that meets the capacity needs of Scattergood using solar, battery storage, energy efficiency, and demand response resources costs an estimated \$956.3 million. Additionally, a clean energy portfolio that meets the proposed project needs with only solar and battery storage (no demand-side management) costs an estimated \$1,055.9 million.²

¹ Environmental & EJ Parties - Scattergood DEIR Comments Exhibit. *Assessment of LADWP's Draft Environmental Impact Report for Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project*. https://cityclerk.lacity.org/onlinedocs/2025/25-1360_misc_exhibit3_11-17-25.pdf

² These results are based on Sierra Club analysis using RMI's Clean Energy Portfolio Model (CEPM). The CEPM relies on publicly available information to construct least-cost portfolios of clean energy resources that meet or exceed the key services provided by a thermal plant. More information on the Clean Energy Portfolio Model is available online: <https://rmi-electricity.github.io/cepm/>.

Additionally, the cost projections of the proposed project are almost certain to be significantly higher than the initial projection of \$800 million. According to Tim O'Connor, the LA Ratepayer Advocate:

“The Scattergood Modernization Project (SMP) has already experienced, and it is highly likely the SMP will continue to confront substantial and complex cost and timeline risks. OPA market analysis finds that overall costs for both combined-cycle gas turbines and green hydrogen have risen dramatically since the project was designed – rendering the cost estimate of \$800,000,000 highly unlikely. Further, increased purchase and development timelines for power generation equipment make LADWP's December 31, 2029 regulatory deadline for Once-Through-Cooling compliance increasingly challenged” (page 1-2).³

Additionally, at the October 28, 2025 LADWP Board Meeting, Tim O'Connor stated that the costs of turbines have increased 2-3 times from just one year ago, delivery times for turbines could be anywhere from 5-8 years, and the cost of hydrogen fuel is roughly 7-10 times the prevailing costs of natural gas.⁴ Moreover, the Department of Energy funding from ARCHES no longer exists. Given these many uncertainties and price inflation from the initial estimated cost of the project, we find it imperative to re-evaluate the cost of the proposed project compared to the cost of clean energy alternatives.

Please see the attached document for more information on the cost analyses for clean energy alternatives to the Scattergood Modernization project. Thank you for your time and attention to this matter.

Sincerely,

Julia Dowell
Senior Campaign Organizer
Sierra Club

Katherine Ramsey
Senior Attorney
Sierra Club

³Office of Public Accountability, City of Los Angeles. (2025, October 22). *Interdepartmental Memorandum: Situational Review of Scattergood Modernization Project and Comment in Advance of the October 28, 2025 Board of Commissioners Meeting Related to Approval of the Project and Adoption of the Final Environmental Impact Report in Accordance with the California Environmental Quality Act* (pp. 1–8). City of Los Angeles.
https://ens.lacity.org/opa/importantdoc/opaimportantdoc3249192758_10222025.pdf

⁴Board of Commissioners' Meeting 10-28-25 [Timestamp: ~4:06:10] <https://www.youtube.com/watch?v=dZvDcLz0HoA>

Scattergood Units 1 & 2

Clean Energy Portfolio Cost Analysis - 2026

Overview: The Clean Energy Portfolios Model (CEPM) constructs least-cost portfolios of clean energy resources that would meet or exceed the key services provided by a thermal plant, meeting at least the same monthly energy output and the baseline plant's rated capacity during the 50 peak net load hours in the region. The CEP Model uses a net present value approach (including capital costs and operating costs) to minimize lifetime cost.

Clean energy resources the model allows in a CEP are solar, wind, storage and in some cases energy efficiency and demand response.

Clean Energy Portfolio Costs

The CEPM was used to model six potential replacement scenarios for Scattergood gas turbine Units 1 & 2. These included four core scenarios based on allowed Demand Side Management (DSM) and wind, and a secondary scenario assuming projects receive the IRA tax credits. Over a 20 year period (2029-2049), the core replacement portfolios for Scattergood cost between \$915M and \$1,056M. Including wind in the portfolio reduces the cost by between \$42M and \$114M, while adding up to 25% DSM reduces the cost by between \$27M and \$100M. The total net cost for each scenario is outlined in the table below.

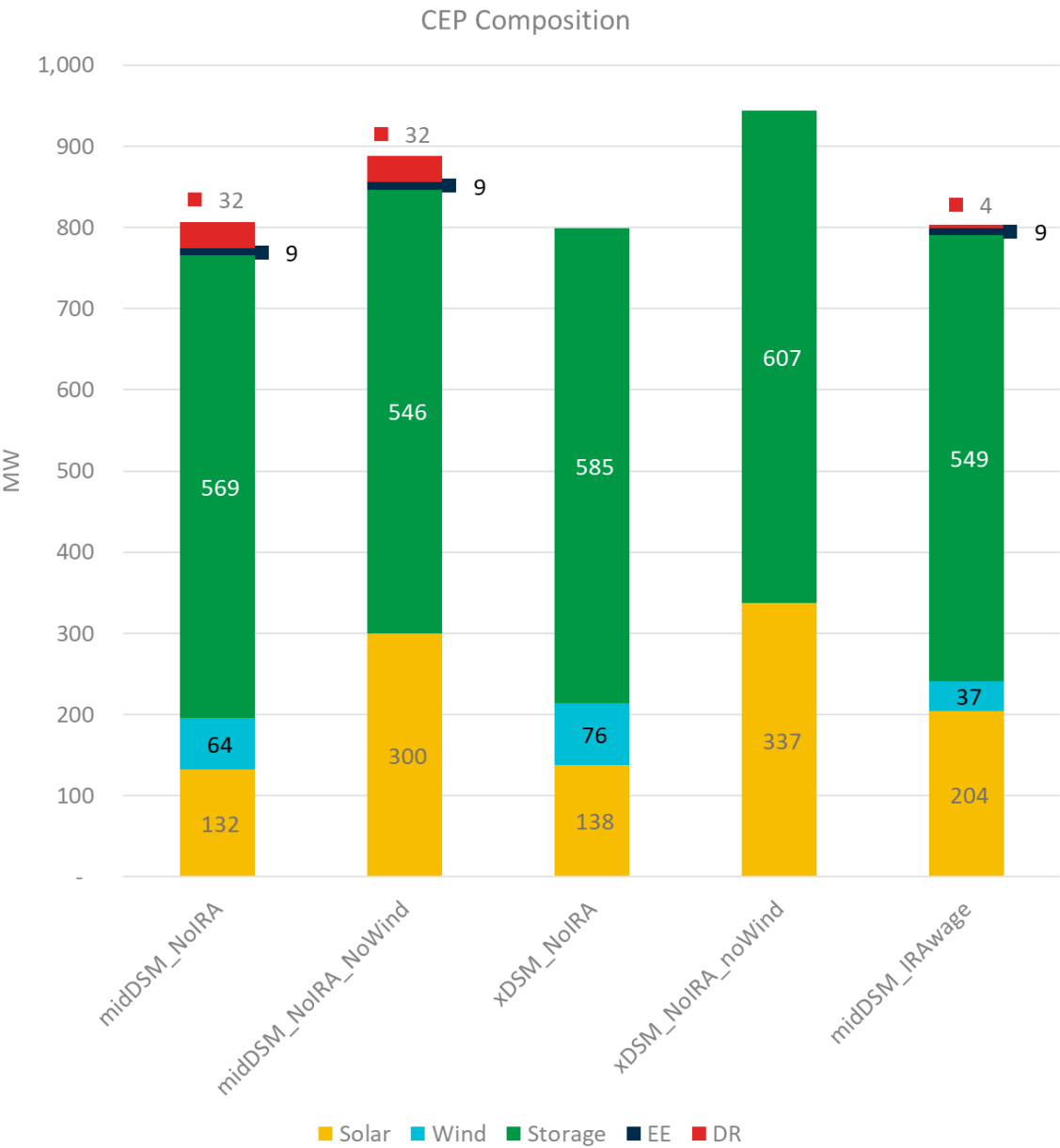
These CEPs represent scenarios in which no IRA tax credits are applied and reflect current federal legislation. The xDSM CEP is more conservative with no demand side management, compared to midDSM_NoIRA that includes demand side management resources to meet 25% of the original gas units' energy contributions.

The least cost option (midDSM_IRAwage) applies IRA benefits, and is included to represent the application of other similar legislation to reduce clean energy costs in the future. This CEP would be about \$200 million less expensive than the estimate of the cost of the Scattergood Project converting to hydrogen, estimated to cost \$800 million in 2024. If that cost has risen due to supply chain issues, the costs of hydrogen, etc. the other scenarios may also be cost competitive.

Clean Energy Portfolio Composition				CEP Net Cost (\$M)
Portfolio Name	IRA Credits	Allowed DSM	Wind Allowed?	
midDSM_NoIRA	None	25%	Yes	\$914.6
midDSM_NoIRA_NoWind	None	25%	No	\$956.3
xDSM_NoIRA	None	0%	Yes	\$941.8
xDSM_NoIRA_noWind	None	0%	No	\$1,055.9
midDSM_IRAwage	Wage Requirement (30% ITC/ \$27.50 PTC)	25%	Yes	\$599.3

Clean Energy Portfolio Composition

CEP Composition (MW)	Solar	Wind	Storage	EE	DR	Storage Breakdown (MW)	4h	6h	8h
midDSM_NoIRA	132	64	569	9	32	midDSM_NoIRA	-	-	285
midDSM_NoIRA_NoWind	300	-	546	9	32	midDSM_NoIRA_NoWind	-	89	207
xDSM_NoIRA	138	\$76	585	-	-	xDSM_NoIRA	-	-	293
xDSM_NoIRA_noWind	337	-	607	-	-	xDSM_NoIRA_noWind	95	-	256
midDSM_IRAwage	204	\$37	549	9	4	midDSM_IRAwage	4	81	212



Scattergood Units 1 & 2 Info

Technology Type: Gas Turbine

Combined Nameplate Capacity: 326.4 MW

Location: California (Lat: 33.917796, Long: -118.427383)

Operator: LADWP

Retirement Year: 2029 (i.e., the year the model assumes the clean energy portfolio would come online)

Term Descriptions

xDSM_NoIRA

This scenario represents a no demand side management (DSM) and no IRA tax credits for clean energy scenario

xDSM_NoIRA_noWind

This scenario represents a no demand side management (DSM), no IRA credits, and no wind resources are allowed to be built.

midDSM_NoIRA

This scenario allows DSM to meet up to 25% of Gas Plant capacity and energy contributions.

midDSM_NoIRA_noWind

This scenario allows DSM to meet up to 25% of Gas Plant capacity and energy contributions, but does not allow any wind resources.

midDSM_IRAwage

This represents a scenario where DSM meets 25% of Gas Plant capacity and energy contributions, and the IRA ITC is applied at 30% and PTC is applied at \$27.50/MWh to clean energy.

CEP Total Cost

In present value terms (present value of all annual costs for CEP Life years (20 yrs) in which all resources' capital costs are adjusted and the period over which all operation and maintenance costs are calculated), discounted from the in-service year to the analysis year (2026).

CEP Net Cost

Calculated as the difference between CEP Total and the lifetime value of all CEP additional energy valued at the additional energy price, still in present value terms.

EE - Energy efficiency resource

DR - Demand response resource

Information on model

Clean Energy Portfolio Model (CEPM) <https://rmi-electricity.github.io/cepm/introduction.html>

Communication from Public

Name: Vanessa Vasquez

Date Submitted: 03/02/2026 04:38 PM

Council File No: 25-1360

Comments for Public Posting: Hello, My name is Vanessa Vasquez. I am commenting on behalf of Communities for a Better Environment 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 will cause impacts to environmental justice communities. Los Angeles is already in extreme nonattainment for critical pollutants. The environmental impacts associated with hydrogen combustion will exacerbate already poor air quality and disproportionately impact the health of frontline communities living near the plant. Moreover, the infrastructure required to support hydrogen will continue the cycle of harm to frontline communities by prolonging gas retirement. Communities do not want this project. I hope you will listen to community and reject this EIR.

Communication from Public

Name: Leah Garland

Date Submitted: 03/02/2026 08:02 PM

Council File No: 25-1360

Comments for Public Posting: Dear Councilmembers, My name is Dr. Leah Garland. I live in Council District 11, and I writing to you, not just as a constituent, but as a parent of a seven-year-old. When you vote on this project, you are not just voting on megawatts and modeling assumptions. You are voting on the kind of air my child will breathe and the bills my family — and thousands of others — will pay for decades. The report before you acknowledges significant and unavoidable impacts to air quality and cumulative pollution. Those are not abstract words. They translate into asthma inhalers, missed school days, emergency room visits, and long-term health risks. Children are more vulnerable to air pollution. Their lungs are still developing. They do not get a vote in this room, but they will live with the consequences. And then there is the cost. We are being asked to approve a 346-megawatt combustion plant that may or may not run on hydrogen someday, without clarity on fuel costs, water use, or long-term rate impacts. As parents, you know what it feels like when household expenses go up and there is no room left in the budget. Higher electric and water rates hit families first. They hit working families hardest. This decision will shape our city's infrastructure for decades. Once this plant is built, it will not quietly disappear if hydrogen turns out to be expensive or scarce. It will continue to run — and my daughter's generation will pay. I understand reliability matters. No parent wants blackouts. But reliability should not mean locking in costly infrastructure with unavoidable pollution when cleaner alternatives deserve a full and transparent comparison. I am asking you, as parents and as leaders, to pause and ensure this is truly the least-cost, least-harm path forward. When Vivien is my age, I want her to be able to say that the adults in this room made careful, courageous decisions — not rushed ones. Please put children, health, and affordability first. Thank you.

Communication from Public

Name: Brittany Rivas

Date Submitted: 03/02/2026 05:38 PM

Council File No: 25-1360

Comments for Public Posting: Hello my name is Brittany Rivas. I am writing you today as the climate adaptation and resilience enhancement coordinator at Communities for a Better Environment. Thank you for the opportunity to comment. I am writing you 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. Recognizing the cumulative impacts that neighborhoods like Wilmington already endure daily as a sacrifice zone by the gas and oil industry. We cannot have another industrial project like Scattergood move forward without current/future considerations of the health and safety of frontline communities. Gas retirement is long overdue and transitioning to hydrogen is shaping up to be a natural gas repowering project disguised as "clean" energy, which will have tremendous impacts on low income communities of color. Furthermore, this project will continue the cycle of harm to frontline communities. LADWP's gas plants need to be retired! Communities have been clear in public comments and public meetings that they do not want this project. This project will prolong the use of gas for an undisclosed period, as the future of hydrogen remains highly uncertain. Thank you for your time. I hope you will listen to the community that are sharing comments and reject this EIR. Please prioritize environmental justice, climate, and health by pursuing cleaner alternatives, over another risky combustion technology. Sincerely, Brittany Rivas

Communication from Public

Name: Faith Myhra

Date Submitted: 03/02/2026 07:19 PM

Council File No: 25-1360

Comments for Public Posting: Hello, my name is Faith Myhra, I am writing today on behalf of Protect Playa Now and I am a resident of CD11 where Scattergood sits. I want to thank you for hearing the voices of over 50 people who emailed your offices requesting this appeal be agendized. Let me make it clear, my community doesn't want this project. But today's vote is not about approving or rejecting this project. It is about whether or not this committee is going to condone a faulty EIR that is pushed by SoCalGas and a PG&E compromised DWP CEO. This EIR: - does not incorporate any impacts from the production and transportation of hydrogen. - does not evaluate other non-emitting long duration energy storage (LDES) technology with longer battery lifespan and charging capacity. - does not consider the uncertainties around hydrogen, this project is absolutely reliant on hydrogen gas availability. - does not address hydrogen production or transportation, which is entirely speculative. - does not look at the water impact of the project from production to end use. - does not properly incorporate the current 2029 retirement of the facility into the assessment of the project baseline. - does not fairly consider the combination of battery storage, demand response, and distributed energy resources This EIR is negligent. I ask that the committee members not be complicit. Please vote to grant the appeal so we can have a genuine EIR. Stand with my community NOT fossil fuel interests. Thank you! CALL TO ACTION: Please submit a written comment to LACity Council on the Scattergood Appeal TONIGHT!

Communication from Public

Name: Kevin Weir

Date Submitted: 03/02/2026 07:23 PM

Council File No: 25-1360

Comments for Public Posting: Hello my name is Kevin Weir. I live in CD11 near the Scattergood facility. Thank you for giving my community the opportunity to advocate for our health and safety. I am writing today 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 like mine don't want it. The EIR: - does not incorporate any impacts from the production and transportation of hydrogen. - does not evaluate other non-emitting long duration energy storage (LDES) technology with longer battery lifespan and charging capacity. - does not consider the uncertainties around hydrogen, this project is absolutely reliant on hydrogen gas availability. - does not address hydrogen production or transportation, which is entirely speculative. - does not look at the water impact of the project from production to end use. - does not properly incorporate the current 2029 retirement of the facility into the assessment of the project baseline. - does not fairly consider the combination of battery storage, demand response, and distributed energy resources Thank you for your time. I hope you will listen my community and reject this EIR. Please prioritize environmental justice, climate, and health by pursuing cleaner alternatives, over another risky combustion technology.

Communication from Public

Name:

Date Submitted: 03/02/2026 07:39 PM

Council File No: 25-1360

Comments for Public Posting: Thank you for the opportunity to comment. I live in CD11 near the Scattergood facility. I am writing today 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. The EIR: - does not incorporate any impacts from the production and transportation of hydrogen. - does not evaluate other non-emitting long duration energy storage (LDES) technology with longer battery lifespan and charging capacity. - does not consider the uncertainties around hydrogen, this project is absolutely reliant on hydrogen gas availability. - does not address hydrogen production or transportation, which is entirely speculative. - does not look at the water impact of the project from production to end use. - does not properly incorporate the current 2029 retirement of the facility into the assessment of the project baseline. - does not fairly consider the combination of battery storage, demand response, and distributed energy resources Thank you for your time. I hope you will listen to the community and reject this EIR. Please prioritize environmental justice, climate, and health by pursuing cleaner alternatives, over another risky combustion technology.