



November 6, 2025

Los Angeles Department of Water and Power
Corporate Environmental Affairs
Environmental Planning and Assessment
Attn: Jazmin Martin
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

Sent via email to: Scattergood_CEOA@ladwp.com

RE: Supplemental Public Comments - Scattergood Environmental Impact Report, State Clearinghouse Number 2023050366

To Ms. Martin, Ms. Rubin, Ms. Hauptman, and Ms. Parker:

Sierra Club respectfully submits this supplemental comment letter to the Los Angeles Department of Water & Power (“LADWP”) regarding the Final Environmental Impact Report (“FEIR”) for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (“Project”).

The Project seeks to replace two methane-combustion units at the Scattergood Generating Station with units that will blend a methane-hydrogen fuel mix and support the LADWP electrical power system. Hydrogen gas production, transportation, and combustion in the Los Angeles region is therefore the critical development resulting from the Project as proposed. Sierra Club signed on to a coalition comment letter for the Draft EIR, submitted on April 7, 2025.

The NGO Comment Letter expressed a number of concerns with the proposed project, including that the EIR failed to analyze a number of feasible alternatives to the Project. Along with our comments, Sierra Club and partners submitted **Exhibit 1: Assessment of LADWP’s Draft Environmental Impact Report for Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project**, an analysis by PSE Healthy Energy.

This report put forth a number of critical findings, which expose feasible alternatives to meeting the generation needs at Scattergood without combustion. First off, the report finds that the energy storage density used in the EIR is lower than necessary. The EIR claims that a BESS produces “approximately 45MWh per 1 acre per 4 hours.” However, PSE’s analysis found that “Existing installations studied in a recent article found lithium ion batteries can range as high as 62 MWh per 1 acre using Tesla Inc. Megapacks in blocks of two,” and “Even higher densities and durations will be possible by the expected

date of deployment in five years given the rapidly advancing technological improvements in the field” (page 31).

Therefore, PSE Healthy Energy finds that using 62 MWh per acre as the energy density and the 18 acres available at the Scattergood site, it is feasible to achieve a total energy storage capacity of 1,116 MWh and a total power capacity of 279 MW. These numbers do not include battery stacking technology, which PSE Healthy Energy notes “could potentially double the amount of energy storage available”.

Based on PSE Healthy Energy’s findings, Sierra Club offers three feasible alternatives to the Project that would not require additional land outside of the Scattergood site:

1. Use a high density of energy storage of about 62 MWh per acre, which is available today, and site energy storage on the 18 acres available at the Scattergood site, totalling in 279 MW of capacity. Utilize battery stacking methods to achieve the additional 67 MW of capacity, reaching the desired total of 346 MW of capacity.
2. Utilize even denser battery storage technology, like Envision Energy’s batteries, with a capacity of 8 MWh per 20 foot container. Using this technology, LADWP could achieve over 500 MW of four hour storage, which far exceeds the Project’s capacity.
3. Combine the 62 MWh per acre density of energy storage (#1) with demand response programs or local demand-side generation, like residential or commercial solar and storage. Notably, demand response from two nearby large load customers, LAX and the Hyperion Water Reclamation Plant, could help offset needed generation.

There are multiple pathways towards siting sufficient storage to meet the 346 MW capacity of the project. These include new battery packs with substantially higher capacity, stacking, more efficient usage of existing land, and leasing vacant land at adjacent parcels. Notably, it is still possible to meet the desired project capacity without leasing additional land. Moreover, each of the solutions presented above is more viable and market ready than the proposed project, and so should be considered in the alternatives study and power modeling. However, viable solutions that rely on storage were eliminated unnecessarily for all consideration leaving a significant gap in the studies shared for the DEIR.

Thank you for your time and consideration of these comments.

Respectfully,

Julia Dowell
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