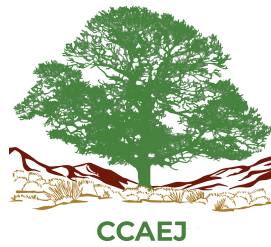




COMMUNITIES
FOR A BETTER
ENVIRONMENT
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March 9, 2023

Dear Deputy Cabinet Secretary Christine Hironaka and Senior Climate Advisor Lauren Sanchez,

CC: Dana Williamson, Chief of Staff to the Governor of California
Priscilla Cheng, Director of External Affairs
Director Dee Dee Myers, GoBiz
Secretary Wade Crowfoot, CNRA
Chair Liane Randolph, CARB
Secretary Yana Garcia, CalEPA
Chair David Hochschild, CEC
President Alice Reynolds, CPUC
Secretary Toks Omishakin, CalSTA
Vice President for Research & Innovation Theresa A. Maldonado, PhD PE, UCOP

We are writing to you on behalf of environmental justice and environmental organizations to request a meeting to discuss collaboration and consultation with ARCHES. Our organizations have a deep interest in the outcomes of the DOE's Hydrogen Hub application process and are eager to have a meaningful conversation about how to address some of our priorities and concerns.

It is essential that ARCHES incorporate the following minimum standards to ensure the production and use of hydrogen supports community and environmental health in California, rather than causing harm:

- **Community voice and governance:** Frontline, historically oppressed EJ working-class communities of color who have borne the brunt of industrial pollution must have a substantial and meaningful role in governance and oversight of California’s green hydrogen development to ensure community and air quality benefits are maximized, while risks to public health and safety are minimized. Currently proposed Governance Structure by the ARCHES Executive Team does not prioritize environmental justice, public health or community participation, and proposes a non-transparent decision-making format that discourages public participation and community engagement.
- **Community protections:** Potential harms must be proactively identified, avoided and mitigated for every aspect of hydrogen development in California (production, transportation, storage, use) to ensure that no additional burdens are experienced by any frontline communities. In addition to the limits on hydrogen production, transportation and use described below, any proposed projects must assess the impacts, such as the distributional impacts associated with the production, use, storage, transportation of green hydrogen. These analyses should be conducted with robust community engagement including a substantive opportunity for residents to decide whether they want a project sited in their community.
- **Production:**
 - Hydrogen production should be from green, electrolytic hydrogen production using new or excess renewable electricity (wind, solar, geothermal). Bioenergy feedstocks, including dairy biomethane, must be excluded.
 - If using electricity from grid, the hydrogen producer must show the following to demonstrate that uses renewable energy: (1) the producer supported additional renewable electricity on the grid (i.e., renewable electricity that would not have existed on the grid but-for the hydrogen project); (2) the renewable electricity is delivered within the same balancing authority where the electrolyzer is located; and (3) the producer uses the renewable electricity in the same hour that it’s delivered onto the grid. All renewable energy credits (RECs) associated with this electricity must be retired.
- **Transportation and Storage:**
 - All pipelines and storage should be designed to safely deliver 100% hydrogen, no blending with fossil gas.
 - Hydrogen pipelines, storage, and end use should be located safely away from neighborhoods and all pipeline buildout must involve vigorous, community-inclusive hydrogen leakage monitoring provisions consistent with the best emerging science and guidelines to avoid hydrogen leakage.
- **End Uses:**
 - Hydrogen is only directed to truly hard-to-electrify applications and to replace fossil fuel-derived hydrogen required for chemical processes that cannot be phased out. When electrification is possible, it must be prioritized. In no instance

should hydrogen be blended with fossil gas for end uses, or used in residential or commercial buildings or for light or medium duty vehicles.

- o Strict controls to avoid air pollution must be required. No projects that seek exemptions from air permit requirements should be allowed, and hydrogen use cannot increase local air pollution.

Sincerely,

Faraz Rizvi, Campaign and Policy Manager
Asian Pacific Environmental Network (APEN)

Ari Eisenstadt, Regenerate California Campaign Manager
California Environmental Justice Alliance (CEJA)

Marven Norman, Policy Coordinator
Center for Community Action & Environmental Justice (CCA EJ)

Ingrid Brostrom, Assistant Director
Center on Race, Poverty & The Environment (CRPE)

Bahram Fazeli, Director of Research & Policy
Communities for a Better Environment (CBE)

Sara Gersen, Senior Attorney
Earthjustice

Jocelyn Del Real, Energy Policy Organizer
East Yard Communities for Environmental Justice (EYCEJ)

Jamie Katz, Staff Attorney
Leadership Counsel for Justice & Accountability (LCJA)

Merrian Borgeson, California Director, Climate and Clean Energy
Natural Resource Defense Council (NRDC)

Teresa Bui, State Climate Policy Director
Pacific Environment

Peter M. Warren
San Pedro & Peninsula Homeowners Coalition

Monica Embrey, California Energy Director
Sierra Club

Ellie Cohen, Chief Executive Officer
The Climate Center