



MIKE BONIN

City of Los Angeles
Councilmember, Eleventh District

September 13, 2022

Councilmember Mitch O'Farrell
Los Angeles City Hall
200 N Spring St,
Los Angeles, CA 90012
213-473-7013

Dear Councilmember O'Farrell and Members of the Energy, Climate Change, Environmental Justice, and River Committee:

As representative of the council district that includes the Scattergood Generating Station, and as co-author with Councilmember Krekorian of the legislation that created the LA100 process that put the city on path to 100% renewable energy, I write to express concerns with Item #5 (CF 22-0932) on the September 15, 2022 Energy, Climate Change, Environmental Justice, and River Committee agenda, and to propose several changes that I believe will make the legislation stronger and more aligned with established environmental priorities.

As you have no doubt heard from the Sierra Club, Food & Water Watch and other organizations crucial to the creation of the LA100 process, the full environmental impact of "green hydrogen" is unclear. Hydrogen energy production requires raw energy materials as inputs, and we need clear guarantees that all raw materials used at Scattergood will be from 100% renewable energy sources. If we are not careful, a large investment in hydrogen energy could have that effect. Additionally, hydrogen energy production requires tremendous amounts of water. Any investment in hydrogen energy must grapple seriously with water usage. These issues must be addressed and resolved.

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Given that the process is still preliminary, I suggest two amendments for the committee's consideration:

- (1) Require a narrow definition of green hydrogen in the request for proposals (RFP) that excludes hydrogen blending and combustion, and:**
- (2) Require all bidders to substantively and comprehensively detail the environmental justice impacts of the project.**

Green hydrogen is produced from electrolysis of excess *renewable* energy, which is clean and sustainable. However, it is not green when the energy source for electrolysis blends fossil fuels and renewable energy (sometimes called "blue hydrogen"). In order for this project to be clean and consistent with the city's climate goals, RFPs should exclude hydrogen produced from any methods of reforming or refining fossil fuels, biogas, biomass, biomethane, or purposely grown feedstocks. These fuel sources would increase greenhouse gas emissions associated with the project and impose additional environmental injustices on our communities. While LADWP has indicated it will only consider green hydrogen derived exclusively from renewable energy, it is important to reiterate this in RFP evaluation.

Furthermore, proposals ought to substantively engage with and address environmental justice concerns in **at least three ways: how a project will impact air and water quality, mitigate hydrogen leakage, and minimize impact on communities of color, who have historically endured the brunt of energy ramifications.**

To begin, hydrogen combustion energy may require an increase in local NO_x emissions, which cause smog. This is not an acceptable tradeoff to achieve carbon reductions. Any project that purports to make climate gains must do so without further worsening air quality and the devastating health burdens it creates within impacted communities. Additionally, Green hydrogen production relies on freshwater as a feedstock, so plans for water procurement must be detailed in any bid. Our City is in a near-permanent state of drought; our entire approach to water consumption and regulation must change accordingly. We must be careful in adopting and promoting energy technologies that demand such serious water usage.

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Furthermore, without adequate safeguards in place, even small leaks of hydrogen can produce more harmful emissions than current fossil fuels do. A greenhouse gas itself, the planet-warming effects of hydrogen are severely under-studied, and it is believed to be up to 20 times more potent than CO₂. Measures to prevent leaks should be a major consideration of this RFP selection process. And lastly, any proposal must be required to engage with the impacts on affected communities, particularly communities of color. The development of any infrastructure associated with this project could mean even less space is available for public parks, tree canopy, and other community spaces that are desperately needed to reduce the racially disparate impacts of climate change. This is especially concerning to the CD 11 communities surrounding the site. Bids should specify what contractors will do to prevent racially disparate land use impacts.

Oil and gas companies are supporting hydrogen projects across the country, and there are serious concerns that this support is based upon their belief that they will be able to blend hydrogen into their current operations or transition their combustion plants from methane to hydrogen, thereby continuing the legacy of harm in the communities where those operations are located today. We must combat this troubling trend, and ensure robust regulatory procedures are in place for the Scattergood site.

Thank you in advance for considering these changes, and for your continued work in helping move Los Angeles toward its green energy goals.

Regards,

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