



February 27, 2026

Honorable Los Angeles City Council  
Attn: Michael Espinosa, Energy and Environment Committee Clerk  
200 North Spring Street  
Los Angeles, CA 90012

**RE: Support for affirming LADWP certification of the Final Subsequent EIR and approval of the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (SCH No. 2023050366; Council File 25-1360) - Request to deny the CEQA appeal and affirm the FEIR**

Chair Nazarian:

The California Hydrogen Business Council expresses strong support for LADWP's October 28, 2025 decision to certify the Final Subsequent Environmental Impact Report and advance the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project. We respectfully ask the Committee to reject the CEQA appeal and uphold LADWP's certification.

The appeal focuses on disputing the FEIR's treatment of the environmental baseline, its cumulative impacts assessment, and its evaluation of project alternatives. However, LADWP's administrative record shows that the FEIR considered a reasonable set of alternatives and provides substantial evidence explaining why storage-only and fuel-cell scenarios cannot meet the project's reliability requirements during prolonged, multi-day emergency events within the necessary timeframe. CEQA calls for transparent disclosure, thorough analysis, and decisions grounded in substantial evidence, all of which the FEIR delivers.

The California Hydrogen Business Council supports the modernization of Scattergood Generating Station Units 1 and 2 to make them green-hydrogen-ready. Upgrading these units is essential for helping Los Angeles achieve its LA100 commitments while ensuring residents have access to reliable, resilient clean energy, which is especially important as the region faces more frequent outages and wildfire-driven disruptions.

Modernizing Scattergood will strengthen grid reliability and enable the use of hydrogen as a firm, zero-carbon fuel. This firm power capability will reduce economic losses from outages and advance the city toward its goal of 100% renewable electricity by 2035. As clean fuels scale across California, Scattergood provides a critical early anchor for hydrogen offtake and supports continued state leadership in clean energy deployment, even amid shifting federal priorities.

The project also positions hydrogen to expand into the Los Angeles air and seaports, where replacing diesel in equipment, trucks, transit, rail, and maritime applications would deliver significant air-quality benefits for communities across the L.A. Basin.

For these reasons, we strongly support upholding LADWP's certification of the Scattergood Modernization Project and urge the affirmation of the FEIR and denial of the CEQA appeal.

Sincerely,

A handwritten signature in blue ink that reads "Katrina M. Fritz". The signature is written in a cursive, flowing style.

Katrina M. Fritz  
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