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*Comment Received From: Pacific Environment  
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**Pacific Environment Comments on Large-Scale Centralized  
Hydrogen Solicitation Concept**

*Additional submitted attachment is included below.*



To Whom it May Concern:

Pacific Environment is writing to provide comments on the California Energy Commission's (CEC) Draft Solicitation Concept for Large-Scale Centralized Hydrogen Production (Draft Solicitation).

Pacific Environment is an environmental non-profit headquartered in San Francisco dedicated to protecting communities and the environment around the Pacific Rim. We work to get ships off fossil fuels and have consultative status at the International Maritime Organization, the United Nations entity that sets global shipping laws.

Green hydrogen will be a key energy source to decarbonize hard-to-electrify sectors like shipping. The CEC's Draft Solicitation includes several core project components that applicants should demonstrate when applying for a grant, including implementation of hydrogen safety measures and community input and engagement.

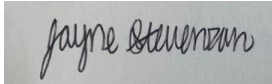
Pacific Environment supports project elements such as safety measures and community engagement that ensure the production and use of hydrogen benefits community and environmental health in California. To that end, we write to express our priorities for California's Clean Hydrogen Program and this Draft Solicitation. We urge the CEC to ensure these priorities are incorporated into the project elements of the final solicitation concept.

- **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.
- **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. Any proposed projects must assess the impacts of green hydrogen, and these analyses should be conducted with robust community engagement.
- **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.
- **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 sagely away from neighborhoods and all pipeline buildouts must involve vigorous, community-inclusive hydrogen leakage monitoring provisions consistent with the best emerging science and guidelines to avoid hydrogen leakage.

- **End uses:** Hydrogen should only be 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. 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.

Thank you for the opportunity to provide comments on this Draft Solicitation. We look forward to seeing the final solicitation and continuing to engage with the CEC's Clean Hydrogen Program.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Jayne Stevenson".

Jayne Stevenson  
Climate Policy Associate