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**Pacific Environment Comments on Draft Solicitation Attachment for H2ONSITEâ€™s Community Engagement, Benefits, and Impacts Project**

*Additional submitted attachment is included below.*

November 29, 2023

California Energy Commission
Docket No. 22-ERDD-03
715 P Street
Sacramento, CA 95814

**RE: Draft Solicitation Attachment for H2ONSITE's Community Engagement, Benefits, and Impacts Project Requirements**

To Whom it May Concern:

Pacific Environment appreciates the opportunity to submit comments on the draft solicitation attachment for H2ONSITE's community engagement, benefits, and impacts project requirements.

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.

To ensure that projects funded under the Clean Hydrogen Program H2ONSITE competitive grant solicitation prioritize community benefits and safety, Pacific Environment recommends the following revisions and additions to the draft solicitation attachment:

1. For the appropriate level of funding, the draft solicitation states that funded projects must allocate at least 3% of CEC funds to the required community engagement, benefits, and impacts task. **We recommend increasing this requirement to at least 8% of CEC funds** to ensure that sufficient resources are dedicated to this task.
2. For the criteria required to be considered a community-based organization, **we suggest including "employs staff from the communities served"** to ensure that communities are well represented within an organization's staff.
3. We support requiring funded projects to track and report on specific key indicators for community benefits and localized health impacts, including job creation and avoided air pollutants and greenhouse gas emissions, in order to have public transparency and accountability.
4. The draft solicitation attachment provides a list of information to be included in an application's Project Narrative. In addition to the included points, **we recommend that Project Narratives describe the intentional steps taken in conversation with community stakeholders to ensure that proposed project does not bring any unintended adverse effects upon local communities, including steps taken to eliminate any hydrogen leakage and to site hydrogen infrastructure away from homes, schools, parks, and hospitals.**
5. Table 1: Examples of Community Benefits, Impacts, Metrics provides examples of how to quantify community outreach and engagement. **We suggest revising the language of the first**

bullet point to say "...identify stakeholder participation and notification of how their input was *incorporated into the project.*"

6.  Lastly, in the list of objectives that a project's technical task in the Scope of Work should address, **we recommend amending the second bullet point to say: "Identify key community stakeholders and engage them in the planning process through focus groups, surveys, and other methods to gather their input and feedback *and incorporate it* on the proposed project"** to ensure that community feedback is not only gathered, but is also incorporated into the project.

Thank you for your consideration of these comments. We would be pleased to answer any questions or provide further information.


Sincerely,

Jayne Stevenson
Climate Policy Associate
Pacific Environment