

January 30, 2023

Scott A. Brandt, Ph. D.
Associate Vice President, Research & Innovation
Office of Research and Innovation
scott.brandt@ucop.edu

Tyson Eckerle
Senior Advisor for Clean Infrastructure & Mobility
California Governor's Office of Business and Economic Development
tyson.eckerle@gobiz.ca.gov

Dear Scott, Tyson and members of the ARCHES executive team:

We submit this letter on behalf of a wide range of prominent environmental justice, environmental and community groups in California to raise serious concerns about some of the proposals we have seen for the ARCHES governing structure. We appreciate the past correspondence about the draft governance structure for the DOE Hydrogen Hub application through ARCHES LLC. We believe the proposed structure of Governance for ARCHES does not balance the needs of environmental and economic justice with conservation stewardship - in line with California's climate and air pollution emission reduction goals and legal requirements.¹

Here are our recommendations:

1. Institute open meetings with access to information and specific decision-making processes for the board structure development, and overall process and project selection transparency.
2. Expand the Board to add two or more EJ/CBO seats and one or more Public Health experts/representatives, these seats should represent the geographic diversity of the state of California. For example, if one EJ/Local CBO seat is held by a representative from an urban community, another should be held by a EJ/Local CBO representative from a rural community.
3. Consolidate the three Hydrogen industry sectors to one seat.
4. California state seat to be rotated with different agencies (i.e. CEC, CPUC, etc.)
5. Appropriate compensation for advisory group members and EJ/CBO board members.

¹ AB 32, SB 350, SB 100, AB 617, 2022 CARB scoping plan

ARCHES BOARD - Recommendation



It is important to note that adopting our suggested changes to ARCHES's governance structure would be the first step in demonstrating a good faith effort to address community concerns. Our endorsement of or participation in ARCHES, however, would depend on ongoing accountability to the communities the project is intended to serve. We are developing a set of priorities and criteria for the production, transportation, and use of hydrogen for the ARCHES projects, along with a community impact assessment that should be conducted before final approval of any projects, which we will share in the coming week.

We look forward to discussing our recommendations with you in the next few days given the urgency of the issue and the upcoming proposal deadline.

Sincerely,

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

Monica Embrey, California Director of Energy Campaigns
Sierra Club

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

Sara Gersen, Senior Attorney, Clean Energy
Earthjustice

Ana Gonzalez, Executive Director
Center for Community Action and Environmental Justice (CCA EJ)

Jamie Katz, Staff Attorney
Leadership Counsel for Justice and Accountability

Dawny'all Heydari, Climate Campaigner for Clean Ports Southern California
Pacific Environment

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

Annakaren Ramirez, Policy Director
Pacoima Beautiful

Alexis Sutterman, Energy Equity Program Manager
California Environmental Justice Alliance (CEJA)

Joseph K. Lyou, Ph.D., Executive Director
Coalition for Clean Air

Peter M. Warren, spokesperson
San Pedro & Peninsula Homeowners Coalition

Jan Victor Andasan, Community Organizer
Jocelyn Del Real, Energy Policy Organizer
East Yard Communities for Environmental Justice

Jesse N Marquez, Executive Director
Coalition For A Safe Environment

CC:
Speaker of the California Assembly
President Pro tempore of the California Senate
California Energy Commission
Office of Mayor Karen Bass
Members of California legislature