

Specific Requests of ARCHES

General

1. Waive the NDA or provide an NDA or MOC that our nonprofit legal advisors will allow us to sign and that doesn't commit the signing orgs to publicly "support" ARCHES.
2. Provide a clear diagram and description of the current governance board and advisory boards, if any, of ARCHES and who holds existing roles, if filled.
3. Provide a list and description of all the existing "committees" (which we have heard exist but don't have any information about) for ARCHES and specific responsibilities and any deadlines for these committees.
4. Provide a full description of all criteria, requirements and controls that currently exist to protect local communities and also to provide benefits from potential proposed projects. Share how, when, and by whom these protections will be overseen and enforced.
5. We would like to set, or at least be actively consulted on, the agenda and structure for any meetings. Past meetings have not provided the structure or content to enable real engagement and feedback on ARCHES.

Governance

6. Respond directly to the requests outlined in the [Jan 30 letter](#), and identify meaningful ways that EJ, health, and environmental orgs can provide feedback and oversight of ARCHES policies and projects. The Jan 30 requests included:
 - Institute open meetings with access to information and specific decision-making processes for the board structure development, and overall process and project selection transparency.
 - Expand the Board to add two or more EJ/CBO seats and one or more Public Health experts/representatives.
 - Consolidate the three Hydrogen industry sectors to one seat.
 - California state seat to be rotated with different agencies (i.e. CEC, CPUC, etc.)
 - Appropriate compensation for advisory group members and EJ/CBO board members.

Community Protections and Benefits

7. Building on the basic understanding provided by #4 above, we would like to help design and give feedback on a framework for community protections and benefits. For example, this should include:
 - [Potential harms must be identified and mitigated for every aspect of ARCHES proposal \(production, transportation, storage, use\) to ensure that no additional burdens are experienced by any frontline communities. These analyses must be required before final project commitment and funding, and a transparent process for review and accountability must be outlined in the project funding criteria.](#)

- The hub must assess the impacts of the proposed projects (such as the distributional impacts associated with the production, use, storage, transportation of green hydrogen). This should include:
 - A location analysis to avoid placement of these projects (production, storage, transportation and end use) in vulnerable communities, and cumulative impacts must be robustly considered. This should include analysis of local zoning laws that create unjust patterns of industrial location in communities of color. Metrics should be developed in close collaboration with communities to identify overburdened communities, for example, by setting a threshold based on CalEnviroScreen data that incorporates more localized neighborhood-level data and information provided by impacted residents.
 - An evaluation of potential health and safety risks and a clear outline of top tier safety protocols and technologies that will be implemented to ensure the safety of local communities and workers.
 - Analysis of air pollution impacts.
 - Analysis of water pollution and supply impacts.
 - Analysis to quantify, as much as possible, the economic benefits that will accrue to the communities affected by the hub proposal, such as:
 - The anticipated number, duration, and pay level of jobs that will be hired from affected communities
 - Community benefits agreements
 - Revenue sharing agreements
 - Training / workforce development programs
- These analyses should be conducted with robust community engagement.
 - The analysis must show that the hub and associated projects either have no negative impacts, and to the maximum extent possible also provide direct *benefits* by reducing or eliminating existing harmful non-GHG co-pollutants and other community benefits. For example the analysis must show that air pollution will not increase, and that it will be reduced to the maximum extent possible over every time period, at the community level in areas currently suffering from pollution burdens. Analysis and implementation of hydrogen projects must include and demonstrate reductions or elimination of potentially harmful co-pollutants.

Production, storage and use of hydrogen

8. We request a written response to the priorities identified in the [March 9 letter](#), including explicitly what is included or not included in the ARCHES application in relation to these priorities. Some or partial answers are on the ARCHES FAQs, but a complete response has not been provided. Identifying where there is total or partial alignment, or where there is disagreement or more discussion is needed would provide an important foundation of understanding for discussions moving forward.

9. Identify a process for meaningful feedback and oversight of the ARCHES projects for community members and EJ, health, and environmental organizations - both in the next 3 weeks, and after the application is submitted.