Appendix A:
Notice of Preparation

City of Pittsburg
Community and Economic Development Department – Planning Division
65 Civic Avenue, Pittsburg, CA 94565 | Tel: (925) 252-4920 | Fax: (925) 252-4814

NOTICE OF PREPARATION

To: State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812

From: City of Pittsburg, Planning Division
65 Civic Avenue
Pittsburg, CA 94565

To: Interested Parties;
Responsible & Trustee
Agencies

Subject: Revised Notice of Preparation of an Environmental Impact Report for the H Cycle Pittsburg Renewable Hydrogen Project

On April 7, 2023, the City of Pittsburg (City), as lead agency under the California Environmental Quality Act (CEQA), issued a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the H Cycle Pittsburg Renewable Hydrogen Project, in accordance with Section 15082 of the State CEQA Guidelines (SCH Number 2023040173). As indicated in the NOP, HC (Contra Costa), LLC, is proposing to construct and operate a renewable hydrogen facility in the City of Pittsburg that would use sorted waste materials as feedstock in a non-combustion thermal conversion process (Project). The NOP response period ended on May 10, 2023, and a Scoping Summary was prepared (Attachment 1).

Since issuing the NOP, HC (Contra Costa), LLC, has selected an alternative Project Site/Study Area for the proposed Project (Attachment 2). This revised NOP will provide sufficient information related to the new Project Study Area and restart a 30-day public scoping period with the new Project information. The purpose of this revised NOP is to inform all responsible and trustee agencies that an EIR will be prepared and provide agencies with sufficient information describing both the Project and its potential environmental effects to enable the agencies to make a meaningful response as to the scope and content of the information to be included in the EIR. The City is also soliciting comments on the scope of the EIR from any interested persons.

Project Title: H Cycle Pittsburg Renewable Hydrogen Project

Project Applicant: HC (Contra Costa), LLC, 1320 Willow Pass Rd., Suite 600, Concord CA 94520

Date: September 14, 2023

Signature: Alison Hodgkin

Title: Associate Planner

Telephone: (925) 252-6987

Email: ahodgkin@pittsburgca.gov

Reference: California Code of Regulations, Title 14 (California Environmental Quality Act Guidelines) Sections 15082(a), 15103, 15375

PUBLIC SCOPING MEETING AND COMMENT SUBMITTAL

Two scoping meetings, open to the public, agencies, and stakeholders, will be held to receive public comments and suggestions on the project. At these meetings, staff will give a brief presentation of the EIR process and will take public comment on the proposed EIR. The scoping meetings will be open to the public and held at the following locations:

A Zoom scoping meeting will be held:

Date:	Wednesday, October 11, 2023
Time:	10:00 AM
Zoom Link:	https://us02web.zoom.us/j/87126735445?pwd=eVdpa1R0WGtmSXpkUTIia0pya3RwUT09
Meeting ID:	871 2673 5445
Passcode:	510303

Please note location change to **3rd Floor Conference Room**

An in-person scoping meeting will be held:

Date:	Thursday, October 12, 2023
Time:	6:00 PM
Location:	Pittsburg City Hall, 3rd Floor Conference Room 65 Civic Avenue, Pittsburg, California 94565

The purpose of the EIR is to provide information about potential significant environmental impacts of the H Cycle Pittsburg Renewable Hydrogen Project, to identify possible ways to minimize those significant impacts, and to describe and analyze possible alternatives to the proposed project if potential significant impacts are identified. Preparation of an NOP or EIR does not indicate a decision by the City to approve or disapprove the project. However, prior to making any such decision, the City Council must review and consider the information contained in the EIR.

Written comments on the scope of the EIR are encouraged. **Please submit comments by 5:00 PM on October 16, 2023**. Written comments should be sent to Alison Hodgkin, Associate Planner, at 65 Civic Avenue, Pittsburg, California 94565, or via email at ahodgkin@pittsburgca.gov, or via fax at (925) 252-4814. The NOP is also available on-line at Public Environmental Reviews | City of Pittsburg (pittsburgca.gov).

Questions concerning the environmental review of the proposed project should be directed to Alison Hodgkin at ahodgkin@pittsburgca.gov. To be considered during preparation of the EIR, comments must be received in writing by the deadline identified above.

PROJECT LOCATION AND SETTING

The proposed project site is located at 901 Loveridge Road, 0.9 miles northeast of the intersection of Pittsburg-Antioch Highway and Loveridge Road (See Figure 1). The project site, with laydown and staging yard, would be up to 20 acres of the approximately 24-acre Study Area, a subset of an approximately 246-acre parcel (APN: 073-220-049) zoned for General Industrial (IG) use and classified as Industrial in the City of Pittsburg's 2020 General Plan (See Figures 2 and 3). Primary access for the project site would be located off Arcy Lane. The Study Area is mostly vacant with some residual pieces of industrial equipment, a few railroad spurs, five buildings that account for

less than one acre, and includes exterior and interior access roads that would be improved and maintained for the project. There is an existing industrial tenant using one building in the Study Area that could require relocation elsewhere within the Corteva industrial park. Permanent usage of the proposed renewable hydrogen facility would be approximately 12 acres of the 24-acre Study Area (See Figure 4). The Study Area is currently graded and covered with an array of graveled ground, disturbed dirt, and concrete slabs that are primarily used for parking and storage.

The land use surrounding the project site is primarily industrial, including Calpine's Delta Energy Center (south), the Delta Diablo wastewater treatment facility (south), and Corteva Agriscience's manufacturing facility (west), of which the Study Area is a subset of the same 246-acre parcel (APN: 073-220-049). The project site and industrial facilities are all located within a contiguous 993-acre area zoned for General Industrial (IG) use in the City of Pittsburg. Several transportation facilities are also in the surrounding area, including the Burlington Northern & Santa Fe (BNSF) railroad (south), Pittsburg-Antioch Highway (south), Union Pacific Railroad (south), and State Route 4 (south). New York Slough is north of the project site. The nearest residences are south of State Route 4 approximately 0.9 miles southwest of the project site.

PROJECT COMPONENTS

The proposed project includes construction and operation of a renewable hydrogen facility that would use waste organic materials as feedstock in a non-combustion thermal conversion process.

Construction

Project construction would commence with site preparation activities, including demolition and removal of existing structures and site clearing. Demolition material would be recycled or disposed of at approved facilities. Once the project site has been cleared, concrete foundations would be installed to support the buildings and equipment. Building materials and equipment modules would be delivered by truck and installed using cranes. Plant modules and systems would be connected, tested and commissioned. Construction is anticipated to last 18 to 24 months and involve 150 to 225 on-site union workers and staff. Construction laydown and staging are anticipated to be included within the Study Area. For interconnection to electricity, natural gas, water supply and wastewater sewer services, utility improvements may be completed by PG&E, Delta Diablo, Contra Costa Water District or other utility providers.

Operation

The proposed project would involve operation of a facility to convert sorted municipal solid waste (MSW) materials that are organic-rich from waste suppliers to low-carbon, renewable hydrogen. The renewable hydrogen produced by the facility is expected to be used in the production of conventional and renewable fuels and for direct use in hydrogen-fuel cell vehicles, particularly heavy-duty trucks and buses.

Facility

The proposed facility would be comprised of an approximately 8,000-square foot office and control building; two outdoor storage silos (approximately 4,000 square feet each); a 13,600-square foot substation yard with electrical switch gear; 3,500 feet of security fencing with restricted gate access; and 110,000 square feet of primary and emergency access roads (See Figure 5). The maximum structure height is not expected to exceed 100 feet.

Site Access

H Cycle would join a maintenance agreement for access rights to existing facilities and roads that are currently controlled by Corteva and Delta Diablo. Primary access would be via Arcy Lane and include an access agreement to the portion of the road owned by Delta Diablo. The existing Corteva gate-controlled access point at the northern end of Arcy Lane would be the main entrance into the project site. Secondary and emergency access would be from the western side of the project site, along Pittsburg Waterfront Road, or from the northern side of the project site, along E 3rd Street.

Truck Trips

Waste feedstock delivery to the proposed facility and return of rejected feedstock would require an average of approximately 23 truck roundtrips per day. Peak volumes may require up to approximately 44 truck roundtrips per day, depending on delivered volumes and whether delivery trucks can be used to backhaul rejected feedstock. The facility is planned to operate 24/7, however, most trucks will enter the facility between 6:00am to 10:00pm Monday to Saturday.

The proposed facility would produce renewable hydrogen and non-hazardous vitrified slag byproduct. Hydrogen produced by the proposed facility would be transported in tube trailers and would require up to approximately 30 truck roundtrips per day. Non-hazardous, vitrified slag byproduct could potentially be repurposed for beneficial use as a roadbed or concrete aggregate, or alternatively, the slag byproduct could be disposed in a landfill. Supplemental supply and disposal truck traffic, including to transport slag byproduct, would require up to approximately 10 truck roundtrips per day.

Hours of Operation

The proposed facility would operate 24 hours each day, seven days per week.

REQUIRED APPROVALS

The proposed project would require the following approvals from the City of Pittsburg:

- Approval of a Conditional Use Permit
- Design Review Approval
- Approval of a Solid Waste Facility Permit

In addition to the City's approvals, subsequent air quality permit approval from the Bay Area Air Quality Management District (BAAQMD), Contra Costa Fire Protection District, CalRecycle, California Department of Transportation, California Department of Fish and Wildlife (CDFW), and Contra Costa Department of Health Services would be required.

EIR SCOPE

In accordance with CEQA Guidelines Section 15161, the EIR will focus primarily on the changes in the environment that could result from the development of the proposed project and will examine all phases of the proposed project including planning, construction, and operation.

The City of Pittsburg has completed an initial review of the project and has determined the following topics will be discussed in the EIR to identify the probable environmental effects of the project:

- **Aesthetics:** The EIR will evaluate the potential of the proposed project to result in significant adverse effects on the existing visual character of the project site and surrounding areas.

- **Agriculture and Forestry Resources:** The EIR will evaluate the potential of the proposed project to result in significant adverse effects on agriculture, farmland, and forest resources, including timberland.

- **Air Quality:** The EIR will describe potential dust, odor, construction and operational project air emissions, resulting from the proposed project including potential for conflict with existing air quality plans, standards, and requirements; potential significant increases in criteria pollutants; and potential significant impacts on sensitive receptors.

- **Biological Resources:** The EIR will evaluate the potential of the proposed project to result in significant impacts on biological resources, including potential impacts on special status species and sensitive habitats; potential interference with wildlife migration; and potential conflicts with biological resource protection plans and policies. The EIR will also analyze the potential for the proposed project to result in impacts to jurisdictional wetlands onsite, if any.

- **Cultural Resources:** The EIR will describe and evaluate the potential of the proposed project to result in any impacts to sensitive cultural and archeological resources that may be present on the project site.

- **Energy:** The EIR will evaluate the potential of the proposed project to result in wasteful, inefficient, or unnecessary consumption of energy resources. The EIR will also include evaluation of the proposed project in light of statewide, regional and local renewable energy and energy efficiency goals and programs.

- **Geology and Soils:** The EIR will describe the potential geologic hazards relevant to the proposed project due to seismic shaking, seismic related ground instability, landslides, soil erosion, expansive soils, and unstable geology.

- **Greenhouse Gas Emissions:** The EIR will evaluate the potential of the proposed project to result in impacts related to project greenhouse gas emissions and the potential for conflict with greenhouse gas emission control plans and policies following State and regional agency guidance. Specifically, the EIR will evaluate the proposed project's compliance with BAAQMD, California Air Resources Board (CARB) and CalRecycle plans and policies.

- **Hazards and Hazardous Materials:** Existing regulations and standards will likely limit the potential for impacts from project hazards and hazardous materials. The EIR will evaluate whether there exists any evidence of a past release of hazardous materials on the project site that could create a significant hazard to the public or environment. In addition, the EIR will evaluate whether emissions from the proposed project could have a significant impact on sensitive receptors located near the project site.

- **Hydrology and Water Quality:** The EIR will evaluate whether the proposed project would: violate any water quality standards or otherwise substantially degrade surface or groundwater quality; substantially decrease groundwater supplies or substantially interfere with groundwater recharge; result in substantial erosion or changes in runoff patterns or volume; or conflict with any water quality control plan or sustainable groundwater management plan. The EIR will also evaluate impacts to drainage from the proposed project that could result in localized inundation and a potential release of pollutants.

- **Land Use and Planning:** The EIR will analyze whether the proposed project could cause a significant environmental impact due to conflict with any land use plan, policy or regulation.

- **Mineral Resources:** The EIR will evaluate the potential of the proposed project to result in the loss of availability of a known mineral resource or locally important mineral resource recovery sites.

- **Noise:** The EIR will describe the potential of the proposed project to result in vibration and noise impacts on nearby sensitive uses as a result of construction and long-term operation (traffic, mechanical systems, etc.). The EIR will also describe any related mitigation needs to achieve compliance with applicable noise standards.

- **Population and Housing**: The EIR will evaluate the potential of the proposed project to result in significant impacts on population and housing due to growth in the area as a result of job creation.

- **Public Services**: The EIR will analyze the potential of the proposed project to result in significant impacts to public services including police, fire, and emergency services.

- **Recreation**: The EIR will analyze the potential of the proposed project to result in significant impacts on recreational facilities due to job creation and/or population growth.

- **Transportation:** The EIR will describe the transportation and circulation impacts of the proposed project and evaluate the potential for significant impacts. This section of the EIR will include estimates of the proposed project's vehicle trips, network impacts, evaluation of multi-modal accessibility, and vehicle miles traveled (VMT) in accordance with senate bill (SB) 743.

- **Tribal Cultural Resources:** The EIR will evaluate the potential of the proposed project to result in any impacts to sensitive cultural resources in the project vicinity, if present.

- **Utilities and Service Systems:** The EIR will identify the proposed project's infrastructure demands, including increased water demands, wastewater disposal, and management of solid waste, along with physical changes to the environment that would result from those demands and will evaluate the related potential for significant environmental impacts.

- **Wildfire:** The EIR will evaluate the potential of the proposed project to expose people or structures to significant risks from wildfire.

Statutorily Required Sections

The Statutorily Required Sections chapter of the EIR will summarize potentially significant, unavoidable, significant irreversible, growth-inducing, and cumulative impacts. CEQA Guidelines, Section 15130 requires that an EIR discuss the cumulative and long-term effects of the proposed project that would adversely affect the environment. “Cumulative impacts” are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines, Section 15355). “Individual effects may be changes resulting from a single project or a number of separate projects” (CEQA Guidelines, Section 15355, subd. [a]). “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (CEQA Guidelines, Section 15355, subd. [b]).

Alternatives to the Proposed Project

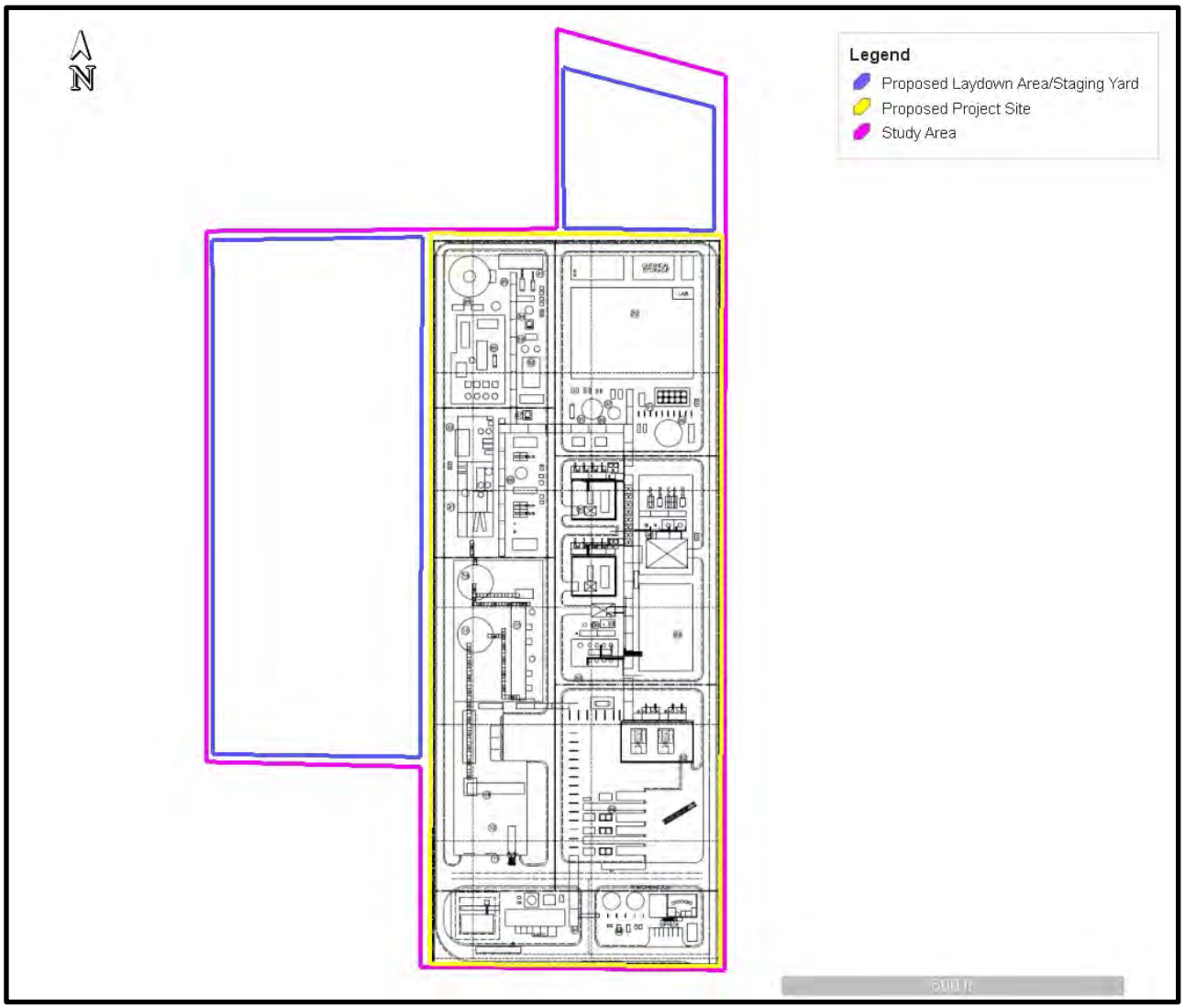
In accordance with CEQA Guidelines Section 15126(a), the EIR will include an Alternatives analysis. The alternatives chapter will evaluate, at a minimum, three alternatives, including the no-project-alternative option. Alternatives will be selected when more information related to the proposed project’s impacts is available so the alternatives can be designed to reduce significant project impacts. Additional alternatives might be developed during preparation of the EIR to respond to identified significant impacts. The Alternatives chapter will describe the alternatives and identify the environmentally superior alternative. The alternatives will be analyzed at a level of detail less than that of the proposed project; however, the analyses will include sufficient detail to allow a meaningful comparison of the impacts. The Alternatives chapter will also include a section of alternatives considered but dismissed. A matrix comparing the impacts of the proposed project to the three alternatives will also be included.

Figure 1 – Regional Location Map

Figure 2 – Project Location and Surrounding Land Uses

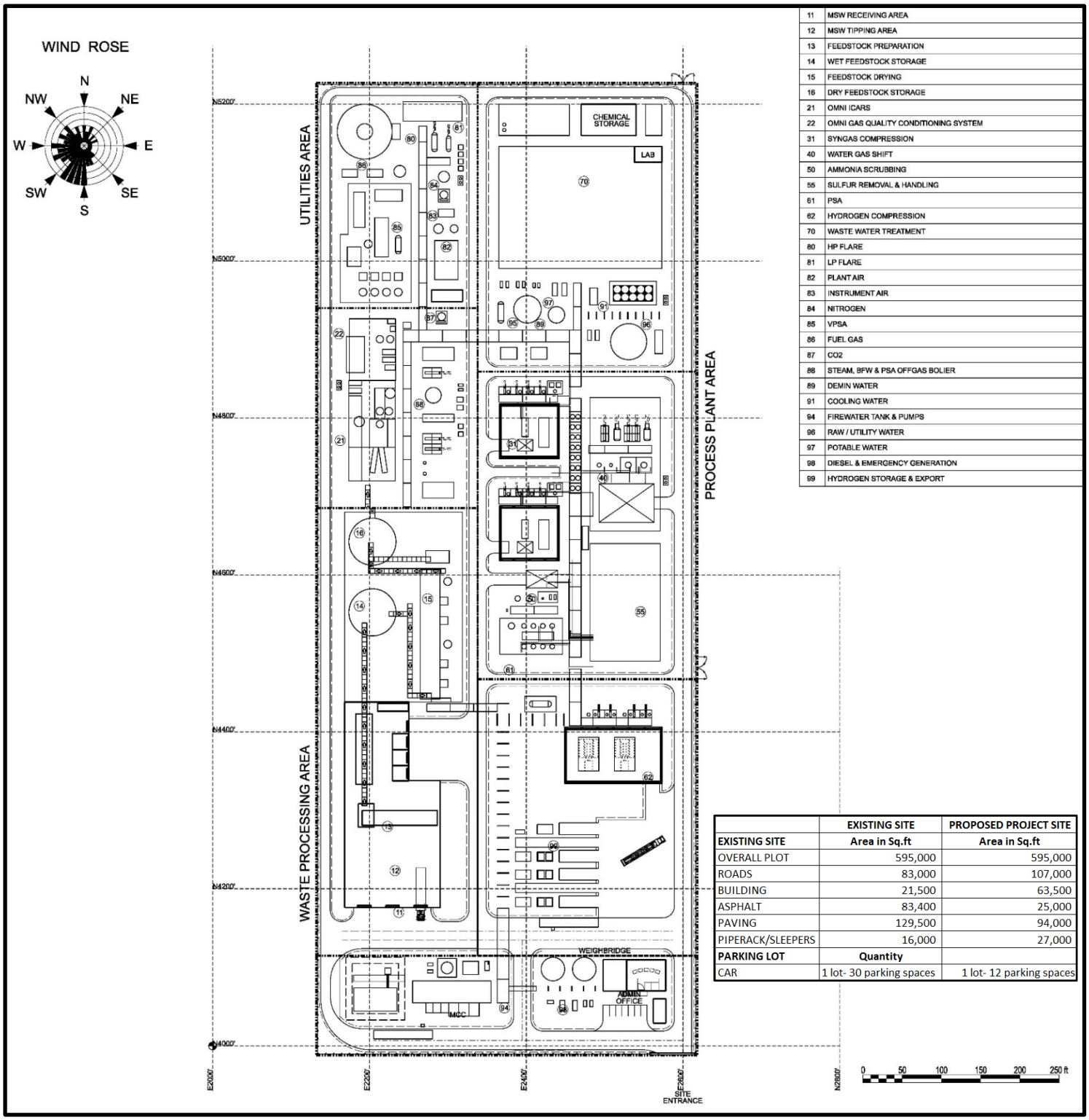
Figure 3 – Project Site Boundary

Figure 4 – Project Site Plan



*The Project Site Plan above shows one possible facility layout that is under consideration for siting within the defined Study Area.

Figure 5 – Project Site Plan Detail



11	MSW RECEIVING AREA
12	MSW TIPPING AREA
13	FEEDSTOCK PREPARATION
14	WET FEEDSTOCK STORAGE
15	FEEDSTOCK DRYING
16	DRY FEEDSTOCK STORAGE
21	OMNI ICARS
22	OMNI GAS QUALITY CONDITIONING SYSTEM
31	SYNGAS COMPRESSION
40	WATER GAS SHIFT
50	AMMONIA SCRUBBING
55	SULFUR REMOVAL & HANDLING
61	PSA
62	HYDROGEN COMPRESSION
70	WASTE WATER TREATMENT
80	HP FLARE
81	LP FLARE
82	PLANT AIR
83	INSTRUMENT AIR
84	NITROGEN
85	VPSA
86	FUEL GAS
87	CO2
88	STEAM, BFW & PSA OFFGAS BOLIER
89	DEMIN WATER
91	COOLING WATER
94	FIREWATER TANK & PUMPS
96	RAW / UTILITY WATER
97	POTABLE WATER
98	DIESEL & EMERGENCY GENERATION
99	HYDROGEN STORAGE & EXPORT

	EXISTING SITE	PROPOSED PROJECT SITE
EXISTING SITE	**Area in Sq.ft**	**Area in Sq.ft**
OVERALL PLOT	595,000	595,000
ROADS	83,000	107,000
BUILDING	21,500	63,500
ASPHALT	83,400	25,000
PAVING	129,500	94,000
PIPERACK/SLEEPERS	16,000	27,000
PARKING LOT	**Quantity**	
CAR	1 lot- 30 parking spaces	1 lot- 12 parking spaces

*Please Note: Facility Designs and Numerical Estimates included above are approximations.

ATTACHMENT 1

SCOPING SUMMARY

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE H CYCLE PITTSBURG RENEWABLE HYDROGEN PROJECT (SCH Number 2023040173)

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15082, a Notice of Preparation (NOP) for the H Cycle Pittsburg Renewable Hydrogen Project (Project) was circulated to the public, local, State and federal agencies, and other known interested parties for a 30-day public and agency review period from April 10, 2023, to May 10, 2023. The purpose of the NOP was to provide notification that an Environmental Impact Report (EIR) for the Project was being prepared and to solicit public input on the scope and content of the document.

In addition, pursuant to CEQA Guidelines Section 15082, the City held an NOP in-person scoping meeting at 6:00 PM on April 18, 2023, at City Hall located at 65 Civic Avenue in Pittsburg and held an online scoping meeting using Zoom at 11:00 AM on April 19, 2023, for the purpose of receiving comments on the scope of the environmental analysis to be prepared for the Project. Agencies and members of the public were invited to attend and provide input on the scope of the EIR. All comments have been taken into consideration during preparation of the EIR. A summary of the NOP comments received is below.

COMMENTS RECEIVED ON THE NOTICE OF PREPARATION (SCH Number 2023040173)

During the NOP public review period, the City received the following comments:

Three email responses received during the NOP public review period were authored by:

1. COMCAST – Eli Wright
2. Department of Toxic Substances Control – Dave Kereazis
3. Federal Aviation Administration – Christopher D. Jones

Two comment letters received during the NOP public review period were authored by:

1. Delta Diablo – Sean Williams
2. Sierra Club San Francisco – Paul Seger

Three verbal comments received during the online scoping meeting on April 19, 2023, were received by:

1. Bay Area Air Quality Management District – Barry Young
2. Bay Area Air Quality Management District – Brenda Cabral
3. Delta Diablo – Sean Williams

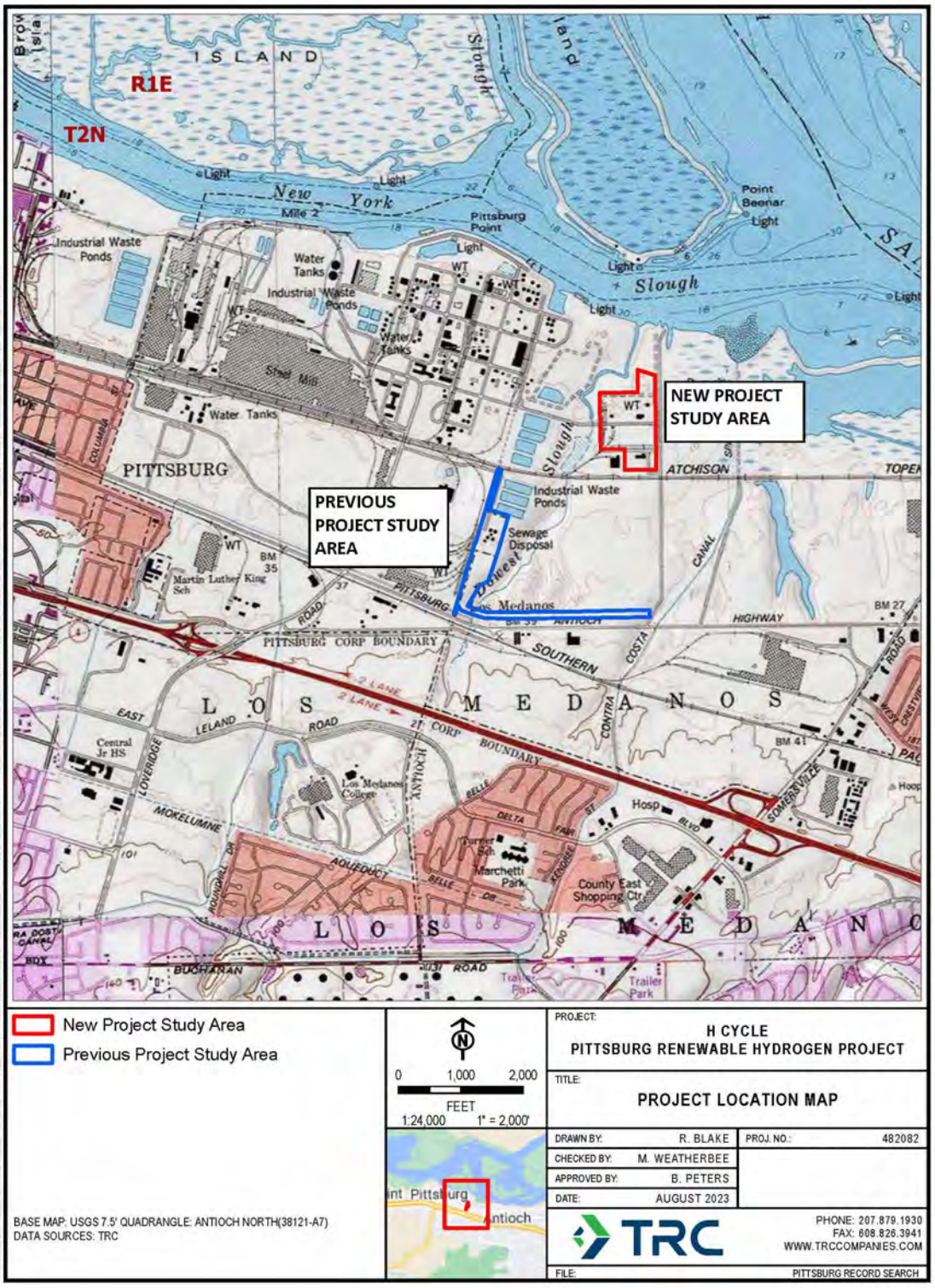
The following list, categorized by issue, summarizes the comments received on the scope of the EIR:

- The Hydrogen production process;
- Feedstocks used in the production of hydrogen;
- Maximum height of the production facility;
- Potential health impacts to nearby residences and disadvantaged communities;
- Transportation associated with Project operations;
- Air emissions associated with the Project;
- Safety of hydrogen production and transportation;
- Electrolysis of water to produce hydrogen;
- Odor associated with the Project;
- Fractions of the Municipal Solid Waste (MSW);
- Waste streams and methods of separation; and
- Water waste discharge.

These topics will be included and analyzed in the Project EIR.

ATTACHMENT 2

REVISED PROJECT STUDY AREA MAP



H-Cycle NOP Scoping Meetings

October 11, 2023 at 10 AM via Zoom for Agencies

Attendees (from City Zoom list):

- Alison Hodgkin
- Kelsey Gunter, City
- Eric Zell, H Cycle
- Ariana Ruiz, City
- Peter Masson, TRC
- BMontague, Delta Stewardship Council
- Megan Good, H Cycle
- Quentin Foster, H Cycle
- John Funderburg, City,
- Alfredo Artedondo, HCycle
- Peter Brydon, HCycle
- Iphone, edgar
- Ryan Atterbury, BAAQMD
- Barry Young, BAAQMD
- Erychel, ?
- Sara Bellefronte, City

1. **Project Review**

   Alison delivered a PowerPoint presentation to review the project, change in project site and history of NOP's for the project.

2. **Scoping Comments**

   Alison noted that the goal of the meeting was to receive comments on the scoping process for the EIR, not on the merits of the project.

   Commenters:

   - Delta Stewardship Council: Just sitting in and curious about the project.
   - Barry Young, BAAQMD: Still in the process of review and will submit comments.

October 12, 2023 at 6 PM

City of Pittsburg City Hall, 3rd Floor Conference Room

Attendees: *Sign in Sheet Attached*

1. **Project Review**

   Alison delivered a PowerPoint presentation to review the project, change in project site and history of NOP's for the project.

2. **Scoping Comments**

   Alison noted that the goal of the meeting was to receive comments on the scoping process for the EIR, not on the merits of the project.

   Commenters:

   - Tom Hansen, IBEW Local 302: Supporting the project and would like to see it move forward.
   - Jamie Gonzalez, Operating Engineers Local 3: Also would like to see the project move forward.
   - Andrew Hayes and Angel Greer, Boilermakers Local 549: Support and like to see the green tech coming to the area.
   - Filipe Hernandez, UA Local 355: Supporting the project.

   Meeting adjourned at approximately 6:30 PM.

SIGN-IN SHEET

H Cycle NOP Scoping Meeting (In-Person)

October 12, 2023, 6:00pm

65 Civic Avenue, Pittsburg CA

1. JAIME GONZALEZ (OPERATING ENGINEERS LOCAL 3) (510) 871-7248
2. Felipe Hernandez UA Local 355 Landscape/Underground (707) 644-0355 fhernandezrras@net.org
3. TOM HANSEN IBEW 302 tomhaibew302.com 925 228 2302
4. Eric Zell, Zell & Associates, ericezellandassociates.com 510-414-8071
5. Andrew Hayes (Boilermakers Local 549) ~(707)246-0663 - ahayes@BMLocal549.org
6. ALFREDO AZPEITIA (805) 598-9350 – H CYCLE
7. Quentin Foster (916) 936-6677 – H Cycle
8. EVAN EDGAR – EDGAR & ASSOCIATES – 916-444-5345
9. Peter Masson, TRC, pmasson@trcompanies, 925 220 7510
10. Angel Greer Boilermakers Local 549 AngelGreer23@gmail.com
11. Megan Good

From:	PGE Plan Review
To:	Alison Hodgkin
Subject:	RE: Revised Notice of Preparation for H Cycle Pittsburg Renewable Hydrogen Project AP-22-0078
Date:	Monday, October 16, 2023 12:47:38 PM
Attachments:	image002.png image003.jpg No_Impact_Response_10-16-2023.pdf

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External Sender: Use caution before opening links or attachments

Classification: Public

Dear Alison Hodgkin,

Attached is our response to your proposed project.

Thank you,

Pacific Gas and Electric Company
Plan Review Team
Email: pgeplanreview@pge.com

From: Alison Hodgkin <AHodgkin@pittsburgca.gov>
Sent: Thursday, September 14, 2023 4:28 PM
To: Alison Hodgkin <AHodgkin@pittsburgca.gov>
Subject: Revised Notice of Preparation for H Cycle Pittsburg Renewable Hydrogen Project AP-22-0078

Hello Responsible & Trustee Agencies; Interested Parties,

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Since issuing the NOP, HC (Contra Costa), LLC, has selected an alternative Project Site/Study Area for the proposed Project.

The attached revised NOP provides sufficient information related to the new Project Study Area and restarts a 30-day public scoping period with the new Project information. The purpose of the revised NOP is

to inform all responsible and trustee agencies that an EIR will be prepared and provide agencies with sufficient information describing both the Project and its potential environmental effects to enable the agencies to make a meaningful response as to the scope and content of the information to be included in the EIR. The City is also soliciting comments on the scope of the EIR from any interested persons.

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Time: 10:00 AM
Zoom Link: https://us02web.zoom.us/j/87126735445?pwd=eVdpa1R0WGtmSXpkUTlia0pya3RwUT09
Meeting ID: 871 2673 5445
Passcode: 510303

An in-person scoping meeting will be held:
Date: Thursday, October 12, 2023
Time: 6:00 PM
Location: Pittsburg City Hall, 1st Floor Conference Room, 65 Civic Avenue, Pittsburg, California 94565

The purpose of the EIR is to provide information about potential significant physical environmental impacts of the H Cycle Renewable Hydrogen Project (proposed project), to identify possible ways to minimize those significant impacts, and to describe and analyze possible alternatives to the proposed project if potential significant impacts are identified.

Preparation of an NOP or EIR does not indicate a decision by the City to approve or disapprove the project. However, prior to making any such decision, the City Council must review and consider the information contained in the EIR. Written comments on the scope of the EIR are encouraged.

Please submit comments by **5:00 PM on October 16, 2023.** Written comments should be sent to Alison Hodgkin, Associate Planner, at 65 Civic Avenue, Pittsburg, California 94565, or via email at ahodgkin@pittsburgca.gov, or via fax at (925) 252-4814.

The revised NOP is also available on-line at:
NOTICE OF PREPARATION (pittsburgca.gov)

Please direct any questions concerning the environmental review of the proposed project to me at ahodgkin@pittsburgca.gov

Thank you,

Alison Hodgkin, AICP
Associate Planner

City of Pittsburg
Community and Economic Development - Planning Division
65 Civic Avenue, Pittsburg, CA 94565
Tel: 925.252.6987 | Fax: 925.252.4814
https://www.pittsburgca.gov/services/community-development/planning
Pittsburg Open Counter | eNews Sign Up | Facebook
Make us the home of your next business opportunity: www.thinkpittsburg.com

You can read about PG&E's data privacy practices at PGE.com/privacy.

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

October 16, 2023

Alison Hodgkin
City of Pittsburg
65 Civic Ave
Pittsburg, CA 94565

Re: AP-22-0078
H Cycle Pittsburg Renewable Hydrogen Project

Dear Alison Hodgkin,

Thank you for providing PG&E the opportunity to review the proposed plans for the AP-22-0078 dated 9/14/2023. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: https://www.pge.com/cco/.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Sincerely,

PG&E Plan Review Team
Land Management

From:	Jacob Klein
To:	Alison Hodgkin
Cc:	Paul Seger
Subject:	Sierra Club Comments on Revised NOP for H Cycle
Date:	Monday, October 16, 2023 11:39:01 AM
Attachments:	Sierra Club Comments on Revised NOP H Cycle.pdf

External Sender: Use caution before opening links or attachments

Dear Ms. Hodgkin.

I am submitting Sierra Club's comment on the H Cycle Project on behalf of Paul Seger. Please find our letter attached.

Best,
Jacob

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Pronouns: they/them
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SIERRA CLUB
SAN FRANCISCO BAY
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Alison Hodgkin
65 Civic Avenue
Pittsburg, CA 94565

10/16/23

Sent via electronic mail to: ahodgkin@pittsburgca.gov

Dear Ms. Hodgkin,

The Sierra Club appreciates the opportunity to comment on the Revised Notice of Preparation of an Environmental Impact Report for the H Cycle Pittsburg Renewable Hydrogen Project. Since there seems to be little substantive change to the project beyond a new location, many of our concerns remain the same. Therefore we're resubmitting our previous letter—included below—along with some additional concerns, particularly on air quality and water quality/wastewater.

Air Quality and "Renewability"

Considering that there appears to be little change to the project—including the hydrogen production process and the transport of feedstocks and final products—beyond the relocation of the facility to a site that is further from nearby residential neighborhoods, the implication seems to be that the facility will produce emissions that are harmful to human health. While increased buffer zones can help alleviate the burden, relocation *does not directly address the issue of emissions*. Not only will emissions contribute to the overall cumulative impact of poor air quality in an area with a CalEnviroScreen score of 93, it also contravenes the "renewable" moniker used to describe this hydrogen.

The DEIR must study the emissions from this project and rely on mitigations that reduce said emissions rather than offset. If reductions are not possible, then this project should not be considered a renewable energy project. Additionally, modeling the wind patterns will help reveal where the emissions, including criteria pollutants and toxic particulate matter, will go and who will be impacted by said emissions.

Wastewater Discharge

The DEIR must analyze the potential wastewater discharges from the facility. Municipal solid waste (MSW), due to its nitrogen and phosphorous components, is the leading cause for harmful algae blooms (HABs) in the San Francisco Bay. The HABs in the summers of 2022 and 2023 were enabled by wastewater discharge. Whether in the form of wastewater from the process itself or from the vitrified slag byproduct, any components that could get into water systems and wastewater systems must be

adequately studied to identify appropriate alternatives or mitigations in order to protect the health of the Bay.

Letter sent 5/10/2023

Dear Ms. Hodgkin,

The Sierra Club appreciates this opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the H Cycle Pittsburg Renewable Hydrogen Project. We have several areas that we would like to be included in the scope of the EIR for analysis in a Draft EIR. Since this area is already a highly impacted area, we hope that a detailed analysis will be undertaken so that the community is not further burdened by environmental impacts.

A hydrogen facility of this kind raises many concerns, particularly since it is being touted as "renewable hydrogen" when there seems to be little basis for said renewability. Bioenergy-based hydrogen production, while relying on organic waste, can still lead to dangerous emissions. Moreover, this hydrogen facility seems to be intended, at least in part, to support the refining of fossil fuels which is extremely harmful to local health and the environment. The Sierra Club only considers renewable hydrogen to be green hydrogen produced through electrolysis of water powered by renewable electricity from wind and solar. Additionally, hydrogen should be reserved for the hardest to electrify sectors with evaluation on a case-by-case basis.

Hydrogen Production

The process of hydrogen production is described as relying on a non-combustion thermal conversion, which we hope will be detailed in the EIR. In other projects that have described their process similarly, that process ultimately bears resemblance to steam-methane reforming, the predominant form of producing hydrogen, otherwise called gray hydrogen on its own or blue hydrogen when accompanied with CCS technology. There are many emissions from this process that can be harmful to public health and the environment, so we request these be fully cataloged and analyzed. Steam methane reformation emits health-harming pollution such as nitrogen oxides, fine particulate matter, and carbon monoxide and these facilities are primarily located in disadvantaged communities already overburdened by air pollution. In nearly all of current hydrogen production, methane gas is used as a feedstock. Methane leakage from producing hydrogen using gas and CCS technologies is of significant concern. The climate effects of methane leakage are often underestimated in hydrogen and methane is a greenhouse gas with a shorter lifetime cycle than carbon dioxide causing an 86 times higher global warming potential over a 20-year period. This is especially concerning in

light of the IPCC Report calling for a curtailment of greenhouse gas emissions to stave off the worst impacts of climate change by 2030.

Hydrogen itself is an indirect greenhouse gas and thus its impacts need to be considered as well. While it doesn't trap heat, hydrogen, through a series of chemical reactions, increases the concentration of other greenhouse gasses like methane that accelerate the rate of warming. This means that hydrogen itself has a short-lived but powerful impact on the climate, even when produced with renewable energy-powered electrolysis. These are especially important due to any planned or unplanned venting or flaring events that the process may require, a common approach to issues arising in the process or actions taken during startups and shutdowns.

Additionally, more information is required on the feedstocks for this process. Organic waste is a broad category. What kinds of organic waste will be used? Where will it be procured from? How will it be transported? All of these questions, and their potential impacts, need to be addressed. In the calculations for emissions, please include the transportation emissions and compare to organic waste disposal options like composting which are beneficial to air quality and agriculture–and sometimes can be used to support community farm programs.

Another component of production to be addressed is the energy source. If production relies on on-site production, and the system consists of combustion of any fossil fuel, biogas, or biomass, the emissions must be calculated from that. Moreover, what percentage of energy would on-site production provide? If production relies on energy from gas-fired power plants, untracked electricity from the electrical grid, or other non-renewable sources that should preclude the hydrogen's renewability moniker.

The threat of increased pollution is particularly acute when hydrogen producers use electricity from the grid. A hydrogen producer that relies on grid electricity cannot meaningfully claim to use renewable power unless it meets the following conditions: (1) it must support additional renewable electricity on the grid (i.e., renewable electricity that would not have existed on the grid but for the electrolyzer's demand), (2) the renewable electricity must be deliverable to the same balancing authority where the electrolyzer is located, (3) the producer must use the renewable electricity in the same hour that it's delivered onto the grid, and (4) it retires all renewable energy credits (RECs) associated with this electricity. Without all of these guardrails, fossil-fuel power generators will likely ramp up and spew more health-harming pollution into neighboring communities to serve hydrogen producers. About half of the state's gas-fired power plants are located in CalEnviroScreen defined disadvantaged communities. Therefore, any use of grid energy should come from a 100% wind or solar electricity service such as the Community Choice Aggregation (such as MCE'S Deep Green or Local Sol) for renewable energy, with the proper tracking of electricity both in geography and time to

ensure corresponding renewable energy credits are properly retired. Any use of grid energy should not interfere with the grid's reliability to provide power for the community.

It should also be noted that hydrogen production is, ultimately, an inefficient use of energy when taking the energy lifecycle into account.

In the NOP, there is mention of a vitrified slag byproduct which the DEIR should explore the composition of and potential impacts. Byproducts from oil refining processes, like petroleum coke, can have properties similar to coal and emit dust composed of particulate matter 2.5 and toxic chemicals, both of which are incredibly harmful to public health. Moreover, these particles can get into waterways and cause environmental harm as well. This site is close to multiple sloughs that connect to the San Francisco Bay, which is a sensitive and critically important ecosystem.

Transportation

The DEIR must include analysis of the transportation of feedstocks (mentioned above), the production (hydrogen, or whatever transportation-safe version), and byproducts. The NOP describes at least 44 truck trips per day. The emissions from vehicles must be taken into account as diesel-powered trucks in particular emit harmful diesel particulate matter. Trucking hydrogen also represents a safety risk to communities and roadways because tube trailers would contain a highly flammable and explosive material.

Pipelines also represent a significant challenge for transporting hydrogen since hydrogen should not be blended into existing gas pipeline infrastructure in order to prevent embrittlement of the steel pipes. With 96% of existing gas transmission pipelines being steel, they are susceptible to hydrogen embrittlement which could lead to leakages. Hydrogen could escape into the atmosphere to act as an indirect greenhouse gas, or catch fire and cause danger. New pipeline construction can also pose many challenges and harm communities so would require its own siting and community engagement processes. As hydrogen is also a very small and slippery molecule and leaks easily into the atmosphere. Any rapid expansion of hydrogen infrastructure (pipelines, trucks, storage tanks, etc.) would increase the opportunity for hydrogen to leak. Because of the inherent climate risk posed by hydrogen use, this analysis must include plans for robust leak detection and monitoring to prevent or swiftly repair leaks of any size.

Hydrogen Usage

The NOP points to a few different end-uses. If all of them are possible, they must all be studied. Any information that can confirm the end-use of the hydrogen should be shared with the community as part of the CEQA process as well.

Hydrogen that gets used for fossil fuel refining should be considered along with refinery emissions as comprehensive emissions, rather than fully separate projects. Hydrogen that continues the life of fossil fuel refining does not represent renewable energy and thus further harm to the environment and to public health.

If the hydrogen is intended for use in transportation, the priority should be for the hardest to electrify sectors such as maritime and long-haul trucking (over 250 miles per day) rather than for passenger vehicles or short-haul trucking (e.g. drayage trucks) which are already being electrified.

Under no circumstances should hydrogen be considered for use in buildings.

Environmental Justice

The proposed site is barely 1000 feet away from residences, so the local community must be engaged and informed on the impacts from this project. This community is already overburdened with a CalEnviroScreen score of 93. The project could compound already high rates of pollution burden (ozone, DPM, toxic releases), groundwater threats (particularly as sea level rise can lead to groundwater intrusions), and health impacts (high asthma rates, low birth rate, high rates of cardiovascular disease) especially on the low-income communities and communities of color. All of these impacts must be taken into account and adequate plans to successfully mitigate these risks must be developed.

Project Alternatives

The CEQA process requires project alternatives as part of the review process. A project alternative that should be considered both for CEQA analysis comparison and as a legitimate option would be to produce hydrogen through electrolysis of water using renewable energy sources such as wind and solar. This site has nearby open space that could potentially be used for photovoltaic solar panels. There is also a nearby water sanitation district and the Bay itself. Research shows the potential use of wastewater and salt water as the water feedstock for electrolytic hydrogen, to alleviate concerns about fresh, potable water use. Due to this emerging research, we also request a water risk assessment for the area and the production site for any version of the project going forward.

While some hydrogen producers claim that electrolytic hydrogen is too expensive or too difficult to scale, if this site is receiving public funding, those funds should be used to explore cleaner, greener hydrogen rather than perpetuating the reliance on fossil fuel-

based energy. Communities like Oakland[1] and Los Angeles,[2] both of which are members of the ARCHES program, have committed to support only green electrolytic hydrogen.

Conclusion

Thank you again for the opportunity to comment on the Notice of Preparation. We have many concerns about this project and its potential impacts. We hope you will take them into consideration as you draft the Environmental Impact Report.

Sincerely,

Paul Seger, Chair
Sierra Club, Delta Group

[1] Oakland resolution: https://oakland.legistar.com/LegislationDetail.aspx?ID=5959035&GUID=74C69641-8832-4E17-ADE7-FEF91A234FD1&Options=&Search=
[2] Los Angeles resolution: https://clkrep.lacity.org/onlinedocs/2022/22-0255_mot_03-04-22.pdf