# Renewable Hydrogen Alliance

Attn: Diane Butorac
Section Manager
Clean Energy Coordination
Department of Ecology
PO Box 47709
Olympia, WA 98504-7709

RE: Public Comment Period for Draft Green Hydrogen Programmatic Environmental Impact Statements

Dear Diane:

Thank you for the opportunity to provide comments on the Draft Programmatic Environmental Impact Statement for Green Hydrogen Facilities in Washington State (PEIS).

The Renewable Hydrogen Alliance (RHA) appreciates the thoughtful approach to the development of this PEIS, and the hard work put into the draft by Ecology staff. The draft appropriately acknowledges the important role that green hydrogen will play in Washington's economy and clean energy transition, and the real-world experience that early-stage producers in the state are already having regarding safety, benign environmental effects and positive community impacts.

RHA supports the high-level findings of the PEIS.

RHA supports the findings that impacts to water availability and resources, electric and RNG availability, and hazardous exposures will be less than significant, with the appropriate caveat that this is the case if all compliance, mitigation and required conditions have been met in the SEPA permitting process.

RHA also supports the finding that GHG emissions from non-fossil sources will have less than significant impacts on lifecycle GHG emissions. With that noted, RHA would encourage narrow use of lifecycle GHG emissions so as not to overcount upstream or downstream emissions in ways that are inconsistent with emissions accounting for other clean energy technologies such as wind and solar. Hydrogen emissions are appropriately accounted through well-to-gate emissions for hydrogen production facilities and well-to-wheel emissions for road transportation applications such as LCFS.

RHA appreciates the attention by Ecology for safety considerations in "remote locations with limited response capabilities". By their nature, many hydrogen projects are located in rural, industrial, or remote areas, and RHA would encourage state and local governments to continue to coordinate to ensure sufficient support and resources for the communities that will be hosting the first round of hydrogen projects.

RHA appreciates the considerations by Ecology to understand and mitigate impacts to communities located in and around hydrogen projects. RHA encourages Ecology to continue to clarify potential

compliance and mitigation activities for developers, especially for developers who have established "community benefit plans" or similar community due diligence activities. Especially, RHA would encourage clarity on how the Hydrogen EJ Toolkit under development by Commerce would align with the program of mitigations outlined by Ecology.

RHA encourages the PEIS to consider a wider range of potential green hydrogen projects.

Given that this PEIS is a high level, guidance document meant to inform the individual project permitting process, RHA believes that it appears to treat the green hydrogen industry fairly relative to other industrial development in the state. However, RHA would encourage Ecology and this PEIS to broaden the established project parameters to encompass a wider spectrum of projects. More specifically, RHA members recommend that Ecology consider a wider range of potential hydrogen projects and environmental impacts, including expanding the expected footprint, range of water outcomes, employment numbers, electricity requirement and construction timeline.

The PEIS assumes a range of 1-10 acres of land use for hydrogen. However, there is a national trend towards larger hydrogen production facilities to achieve economies of scale and drive down the $/kg price. RHA would recommend that the PEIS consider projects of up to 100 acres to be consistent with trends expected by local developers.

The PEIS assumes a range of 1-3 years for project construction. However, hydrogen production facilities can come in a variety of sizes, and some of the smaller near-term projects under development may be able to complete construction in as little as 6 months. RHA would recommend that the PEIS consider construction ranges accordingly to be consistent with trends expected by local developers.

The PEIS identifies approximately 200 siting, design, and mitigation considerations. Many of these considerations are discretionary and may not be fully achievable depending on the project. If a project was to 'Tier' off the PEIS as is the intent, the need for discretionary review by the lead agency could extend the environmental review process. Therefore, RHA would recommend that the PEIS establish mechanisms that clarify guidelines for agency review to ensure applications are processed efficiently within a reasonable timeframe.

Thank you again for your work on this and the opportunity to comment. If you or other Department of Ecology staff have any questions, please do not hesitate to reach out to us.

Regards

Erin Childs
Executive Director
Renewable Hydrogen Alliance

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