



TO: Suzanne Baker (Suzanne.Baker@hq.doe.gov), Angelique Besnard (angelique.besnard@hq.doe.gov)

Subject: It's time to honor your commitments. Appalachia deserves nothing less.

Since first issuing the Funding Opportunity Announcement for the Regional Clean Hydrogen Hubs program, the Department of Energy has stressed at every turn its commitment to the principles of equity, transparency, and environmental justice.

For example, at the national briefing held following the announcement of the seven selected hydrogen hub proposals, the Department's Director of the Office of Economic Impact and Diversity offered these words to the public:

We have the opportunity to create the blueprint for a clean energy transition that is inclusive, that is just, and that is equitable. And to do that will require the work of all of you here today, as partners and advisors holding us accountable to this extraordinary moment.

This is also going to require the agency to move in ways we've never moved before in deep, deep partnership with all of you. It won't be easy but we know it will be worth it. The cost of failure, the cost of failing to engage communities authentically and meaningfully is to cost this transition. Period.¹

Reflecting on the seven months following this announcement, the Department has failed.

Despite these and many other high-minded remarks, the Department has done little to establish the necessary conditions for "deep, deep partnership," offering scant public information about the Appalachian hydrogen hub and its untold impacts – little more than four approximate, selectively designed, preliminary maps ("subject to change") and project descriptions as short as three words – and no substantive opportunity to shape this proposal while negotiations continue behind closed doors.

If anything, the agency's own actions have demonstrated how poorly equipped it is to meet "this extraordinary moment" and has made clear that its orientation is solely to the

¹ Remarks by Shalanda Baker, Director, Office of Economic Impact and Diversity. U.S. Department of Energy. [DOE OCED National Briefing: Regional Clean Hydrogen Hubs Selections](#).

advancement of the Appalachian hydrogen hub – community concerns, pollution burdens, and environmental injustice notwithstanding.

However, nothing so grievous has been done that cannot be undone. Money has yet to flow to these projects and ground has not been broken. Should the agency care to meet its own charge – to pursue “a clean energy transition that is inclusive, that is just, and that is equitable” – the public will meet this commitment with a learned and lived experience developed over decades of working to secure a better future for the region. But first, the agency must act.

And so, on behalf of the undersigned organizations, we call on the Department of Energy to:

1. **Disclose all the information** necessary for the public to understand what the Appalachian Regional Clean Hydrogen Hub would mean for the region and its communities, including but not limited to:
 - a. a current list of proposed projects, with detailed information regarding the specific sites being considered for facility construction, including either an address or geographic coordinates and the municipality hosting the facility;
 - b. a detailed outline of the operations planned at each site, including potential health, safety, and environmental impacts and any plans to mitigate negative impacts and respond to emergencies
 - c. detailed plans regarding the extraction, storage, transportation, and related waste streams of any fossil methane feedstock designated to supply hydrogen production facilities, carbon capture technology, and other processes associated with the hub
 - d. detailed plans regarding any storage and transportation infrastructure for both hydrogen and carbon dioxide needed to support the Appalachian hydrogen hub’s operations, including proposed routes under consideration;
 - e. a list of committed or prospective customers for the hydrogen produced via the Appalachian hydrogen hub and any companies seeking to use its planned carbon dioxide storage facilities;
 - f. projections regarding the anticipated utilization of any publicly funded subsidies, including the 45V hydrogen production tax credit, the 45Q carbon sequestration tax credit, and any state-level subsidies, forgivable loans, or similar inducements;
 - g. documentation regarding the agency’s due diligence in evaluating the respective track records of each company affiliated with the Appalachian hydrogen hub, including prior regulatory compliance and history regarding transparency and community engagement;
 - h. disclosure of any hub selection criteria related to lifecycle (feedstock extraction to end use) estimates of projected air, water, and soil pollution and how these projections were considered in the selection process

- i. disclosure of any review of cumulative burdens and impacts to environmental justice communities and steps taken by the agency and developers in response to any findings;
 - j. a summary of the applicant's public engagement to date, including with public and elected officials, and any planned activities in the future;
 - k. and any other information disclosed in the community benefits plan, concept paper, and full application submitted in support of the Appalachian hydrogen hub needed for the public to engage this project on equal footing.
2. **Work with community and environmental justice stakeholders to design an engagement structure** that empowers the public to exercise real decision-making during the negotiation process and in the drafting of the cooperative agreement between the agency and the Appalachian hydrogen hub, a document that outlines requirements for the project and its affiliated companies and establishes the evaluative criteria used to determine whether and how the project advances through planning, development, construction, and operations.
3. **Suspend negotiations with the Appalachian hydrogen hub** until the first two conditions can be met and the public, as promised, is meaningfully engaged in this process.

The Department's response to these requests will demonstrate how seriously it understands its own responsibility to Appalachian communities. In closing, we remind you that,

The cost of failure, the cost of failing to engage communities authentically and meaningfully is to cost this transition.

Thank you,

Tom Torres
Hydrogen Campaign Coordinator
Ohio River Valley Institute

Supporting organizations

1. 350 Pittsburgh
2. Alliance for Appalachia
3. Appalachian Voices
4. Beaver County Marcellus Awareness Community (BCMAC)
5. Better Path Coalition
6. Between the Waters
7. Black Appalachian Coalition
8. Breathe Project
9. Buckeye Environmental Network
10. Center for Coalfield Justice
11. Center for International Environmental Law
12. Citizens for a Healthy Jessup
13. Clean Air Council
14. The Climate Reality Project
15. Concerned Health Professionals of Pennsylvania
16. CREATE Lab, Carnegie Mellon University
17. Delaware Riverkeeper Network
18. Earthworks
19. Environmental Health Project
20. Fair Shake Environmental Legal Services
21. FracTracker Alliance
22. Heartwood
23. League of Women Voters of West Virginia
24. Marcellus Outreach Butler
25. Mid-Ohio Valley Climate Action
26. Mon Valley Clean Air Coalition
27. Mountain Lakes Preservation Alliance
28. Mountain Watershed Association
29. Move Past Plastic (MPP)
30. NEPA Green Coalition
31. No False Solutions PA
32. North Braddock Residents for Our Future
33. Ohio Valley Allies
34. PCUSA
35. PennEnvironment
36. PennFuture
37. People Over Petro Coalition
38. Physicians for Social Responsibility Pennsylvania

39. Pittsburghers Against Single Use Plastics (PASUP)
40. Putting Down Roots
41. Rail Pollution Protection Pittsburgh (RP3)
42. Responsible Decarbonization Alliance (RDA)
43. Rise Up WV
44. River Valley Organizing
45. Science and Environmental Health Network
46. Three Rivers Waterkeeper
47. Vote Solar
48. Watchdogs of Beaver County
49. Watchdogs of Southeastern Pennsylvania (WaSEPA)
50. Water Is Life Church
51. West Virginia Chapter of Sierra Club
52. West Virginia Environmental Council
53. West Virginia Highlands Conservancy
54. West Virginia Rivers Coalition

The [Ohio River Valley Institute](#) (ORVI) is an independent, nonprofit research and communications center founded in 2020. We equip the region's residents and decision-makers with the policy research and practical tools they need to advance long-term solutions to some of Appalachia's most significant challenges. We believe the Ohio River Valley is a place where communities can thrive by investing in, rather than exploiting, local resources, and we work to improve the region's economic performance and standards of living by charting a course for shared prosperity, clean energy, and more equitable civic structures.