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27 Appalachian Groups Call on Feds to Assess Full Impact of Appalachian Hydrogen Hub Suspending ARCH2's funding is the only way to avoid the worst of the hub's impacts

JOHNSTOWN, Pa. – The Ohio River Valley Institute, Buckeye Environmental Network, and 25 other community and environmental groups are calling on the Department of Energy (DOE) to fully assess the impacts of the Appalachian hydrogen hub, also known as ARCH2. The groups are also asking the agency to take meaningful action to mitigate these harms by eliminating all future funding for the project, according to a comment submitted by the groups.

These comments, prepared by attorneys at Earthjustice, provide guidance to the DOE on the scope of potential impacts that must be accounted for in the preparation of the hub's Environmental Impact Statement, a critical part of the hub's review under the National Environmental Policy Act (NEPA).

The Department of Energy's plans for how it will evaluate the impact of the Appalachian hydrogen hub are overly vague, and don't actually consider how the hub's individual projects will directly or indirectly affect human health and the environment. In this way, the Department fails to account for the full breadth of the hub's impact when deciding whether to award the hub the rest of its \$925M allocation.

The review also comes at a time of transition for the hub. Recent executive actions have <u>called its funding</u> into question and <u>signal disruptions</u> to long-standing NEPA precedent. The hub is also in the process of addressing <u>several vacancies</u> in its slate of projects after the departure of multiple development partners. This uncertainty makes it even harder for the public to know how they could be impacted by this proposal.

"NEPA is intended to assess the likely environmental, social, and economic impacts of major federal decisions. By divorcing the decision to continue funding the Appalachian hydrogen hub from the impacts we can expect from its projects, the Department of Energy fails to follow the spirit and the letter of long-standing NEPA policy. Federal officials must suspend this review until the full scope of impacts from the hydrogen hub can be determined as required by NEPA," said **Tom Torres, Hydrogen Program Director with the Ohio River Valley Institute.**

"DOE must seriously consider the full impacts from the hydrogen hub's reliance on fossil fuels, including upstream and downstream activities," said Becca Pollard, Interim Executive Director of the Buckeye Environmental Network. "For decades Ohioans have suffered environmental and economic devastation from the oil and gas industry. Our communities deserve better."

"My region deserves better than a fast-tracked process that won't even look at how these projects could poison the air we breathe and the water we drink. ARCH2 is a risky, expensive venture that will not bring low-emissions power, affordable electricity, or economic growth to Appalachia. What the hub will bring is increased methane emissions and hazardous pollution. The only reasonable outcome of this environmental review is to stop this project in its tracks," said Morgan King at West Virginia Citizen Action.

"It's absurd to expect the public to comment on a project proposal that doesn't even exist. Many critical details about the hub's plans have not been shared and it's clear that the companies behind ARCH2 are still deciding what the hub will look like," said Eric Engle, Board President of Mid-Ohio Valley Climate Action. "Without this information, how will communities even know that they may be impacted by these projects? It's an impossible task and one unlikely to address the harms we can expect from this project."

"The Department of Energy's first mistake was awarding \$30 million to ARCH2 before conducting the legally-required review," said Jason Capello, Community Advocate at Center for Coalfield Justice. "Federal officials must take urgent action and either suspend this review until it can be conducted appropriately or make the responsible decision and eliminate all future funding for the hub before Appalachian communities experience the harms that are likely to occur."

Groups also implore DOE to consider reasonable alternatives, such as narrowing the hub's scope to zero-emissions "green" hydrogen production for use in sectors where direct electrification and/or increased efficiency cannot decarbonize more safely and economically.

Additional aspects of the project would use technologies that are untested in our region, and could threaten nearby communities, including hydrogen production from natural gas, carbon capture and storage, blending hydrogen for residential use, and the production of ammonia.

View and download the comments here.

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