



**RE: Appalachian Hydrogen Hub – Phase 1 Virtual NEPA Scoping Meeting**  
**AGENCY: Department of Energy**  
**Docket No. DOE-HQ-2024-0082**

This is a summary of the oral remarks presented by Blueprint 2025 at the above referenced scoping conference:

The two main conclusions were:

- Available digital and analytical technologies clearly can expedite and radically improve the environmental review process, and the Congress has directed consideration of their use. There is no excuse for failure to fully utilize this “best available technology” in the environmental review of this critically important series of projects
- It is wasteful and inefficient, particularly in the context of an ongoing program which will involve multiple specific projects, to focus the review as a snapshot at a particular point in time. The review must evolve and update to address developments as they occur. Digital technology and analytics will enable this progress.

The points advanced in support of these conclusions were:

1. There must be something more than a “by the numbers” approach to environmental review for this important initiative. Consider the approach taken years ago for the Louisiana Offshore Oil Port—one of the first major projects undertaken after enactment of NEPA. This review was conducted pursuant to a statute prescribing specific protocols for environmental review based on the Congress’ interpretation of the law it had so recently enacted. The review was completed in 356 days and was more than a snapshot of the project at its inception. It provided a process for continuous review and updating by cognizant federal and state agencies. As a result, the environmental review has been a living, evolutionary process enabling project additions and improvements through a continuous and transparent process without the need for additional procedures addressing specific events. This is particularly important in the context of this program—which is expected to continuously evolve and encompass additional specific elements.
2. There is a critical need to utilize modern digital technology and analytics to manage this environmental review process. As we have consistently pointed out over the last several years, it is inexplicable that government is clinging to the technologies of the seventies, eighties and perhaps early nineties to manage the critical decision-making processes of the 21<sup>st</sup> century. It has been suggested that the failure to digitize governmental processes is a critical failure of the current Administration. This is particularly the case in the environmental review context.
3. As several of the commenters suggested, the materials presented provided little focus for discussion. As a result, it is difficult to see how this meeting can provide a basis for meaningful dialog unless it can be put into a proper digital framework and addressed through up-to-date analytics. A continuing dialog a la the Deepwater Port Act precedent and

supported by digitalization and automation should go far to demonstrate constructive response to comments presented.

The conventional comment and response approach seems ill adapted to efficient resolution of the numerous and complex issues that will arise in the context of this controversial project --which involves new and relatively untested technologies and scientific issues which continue to be subjects of discussion and debate. Continued reliance on the old models will inevitably result in unnecessary delays and eventual litigation. Please consider a more up to date approach.

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