
Appendix J

Environmental Justice Report



June 2022

Proposed Goldendale Energy Storage Project

Environmental Justice Report

Prepared for



Prepared by

Anchor QEA, LLC
1201 3rd Avenue, Suite 2600
Seattle, WA 98101

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Acronyms and Abbreviations

ACS	American Community Survey
DOH	Washington Department of Health
Ecology	Washington Department of Ecology
EHD	environmental health disparities
EIS	Environmental Impact Statement
LEP	Limited English Proficiency
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
TBIP	Transitional Bilingual Instruction Program

Summary

This *Environmental Justice Report* provides a demographic analysis of the population in the study area, as identified for this report, and describes potential project impacts to communities of color and low-income populations. Environmental justice is defined in Washington as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, rules, and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules, and policies with environmental impacts by prioritizing overburdened populations, the equitable distribution of resources and benefits, and eliminating harm (Revised Code of Washington [RCW] Chapter 70A.02).

This report discusses environmental justice relative to communities of color and low-income populations, and discusses other population demographic characteristics as they relate to public outreach (such as age, educational attainment, and Limited English Proficiency). Impacts to potentially affected Tribal communities are discussed in the *Tribal Resources Analysis Report* (Appendix H of the EIS; Ecology et al. 2022) and Section 4.9, Cultural and Tribal Resources, of the EIS. As determined by this analysis, construction and operation of the proposed project would not result in significant adverse impacts or have a disproportionate impact on communities of color or low-income populations. The findings of the analysis showed no significant and unavoidable adverse impact. Based on this, no mitigation is proposed for project construction or operations. Environmental justice impacts are summarized in Table 1.

Table 1
Environmental Justice Impact Summary

TYPE OF IMPACT ¹	SIGNIFICANT ADVERSE IMPACT FINDING	MITIGATION PROPOSED	SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACT
Proposed Project: Construction			
Direct impacts from construction	No	None	No
Indirect impacts from construction	No	None	No
Proposed Project: Operations			
Direct impacts from operation	No	None	No
Indirect impacts from operation	No	None	No
No Action Alternative			
No Action Alternative	No	None	No

Note:

1. Potential disproportionate impacts from the proposed project on communities of color and low-income populations were evaluated using findings from the EIS resource analyses.

1 Introduction

Free Flow Power Project 101, LLC (the Applicant) proposes to build a pumped-water energy storage system that is capable of generating energy through release of water from an upper reservoir downhill to a lower reservoir. This will be referred to as the “proposed project.” This report provides an environmental justice analysis of the proposed project and assesses probable significant adverse impacts associated with the proposed project and a No Action Alternative. Chapter 2 of the State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS) includes a detailed description of the proposed project and No Action Alternative.

1.1 Environmental Justice Description

Environmental justice is defined in Washington as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, rules, and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules, and policies with environmental impacts by prioritizing overburdened populations, the equitable distribution of resources and benefits, and eliminating harm (RCW Chapter 70A.02). This report discusses potential impacts the proposed project may have on communities of color and low-income populations. Impacts to potentially affected Tribal communities are analyzed in the *Tribal Resources Analysis Report* (Appendix H of the EIS) and Section 4.9, Cultural and Tribal Resources, of the EIS. Community characteristics, including Limited English Proficiency (LEP), educational attainment, and age, will be used to inform the outreach approach for this EIS.

1.2 Regulatory Context

Table 2 provides a list of regulations relevant to this *Environmental Justice Report*.

Table 2
Applicable Laws, Plans, and Policies

REGULATION, STATUTE, GUIDELINE	DESCRIPTION
Federal	
Title VI of the Civil Rights Act of 1964 (U.S. Code 42.2000d), as amended by the Civil Rights Restoration Act of 1987	Prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.
Executive Order 12898, Environmental Justice	Directs federal agencies to make achieving environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.
Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP)	Requires federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

REGULATION, STATUTE, GUIDELINE	DESCRIPTION
State	
Washington State Office of the Chief Information Officer Policy 188	Intended to assist the State of Washington in meeting its obligations under state and federal law to provide reasonable accommodation to employees and provide persons with disabilities an equal opportunity to participate in, and enjoy the benefits of, services, programs, or activities conducted by the state.
Executive Order 05-03	Directs all state agencies to adopt the principles and practices of Plain Talk (i.e., reader-friendly language).
Environmental Justice (RCW 70A.02)	Covered agencies must incorporate environmental justice into agency strategic plans and budget development processes, conduct environmental justice assessments, and report on environmental justice implementation.

2 Methodology

2.1 Study Area

The study area for this environmental justice analysis includes all potentially affected populations residing in areas that could be directly or indirectly affected by construction or operation of the proposed project or No Action Alternative. The study area has been defined as the area within 2 miles of the project footprint within Washington. This area was chosen because it captures any populations that would be most likely to be impacted by construction and operation of the proposed project. The study area intersects U.S. Census Bureau Block Group 3 in Census Tract 9501 (Figure 1).

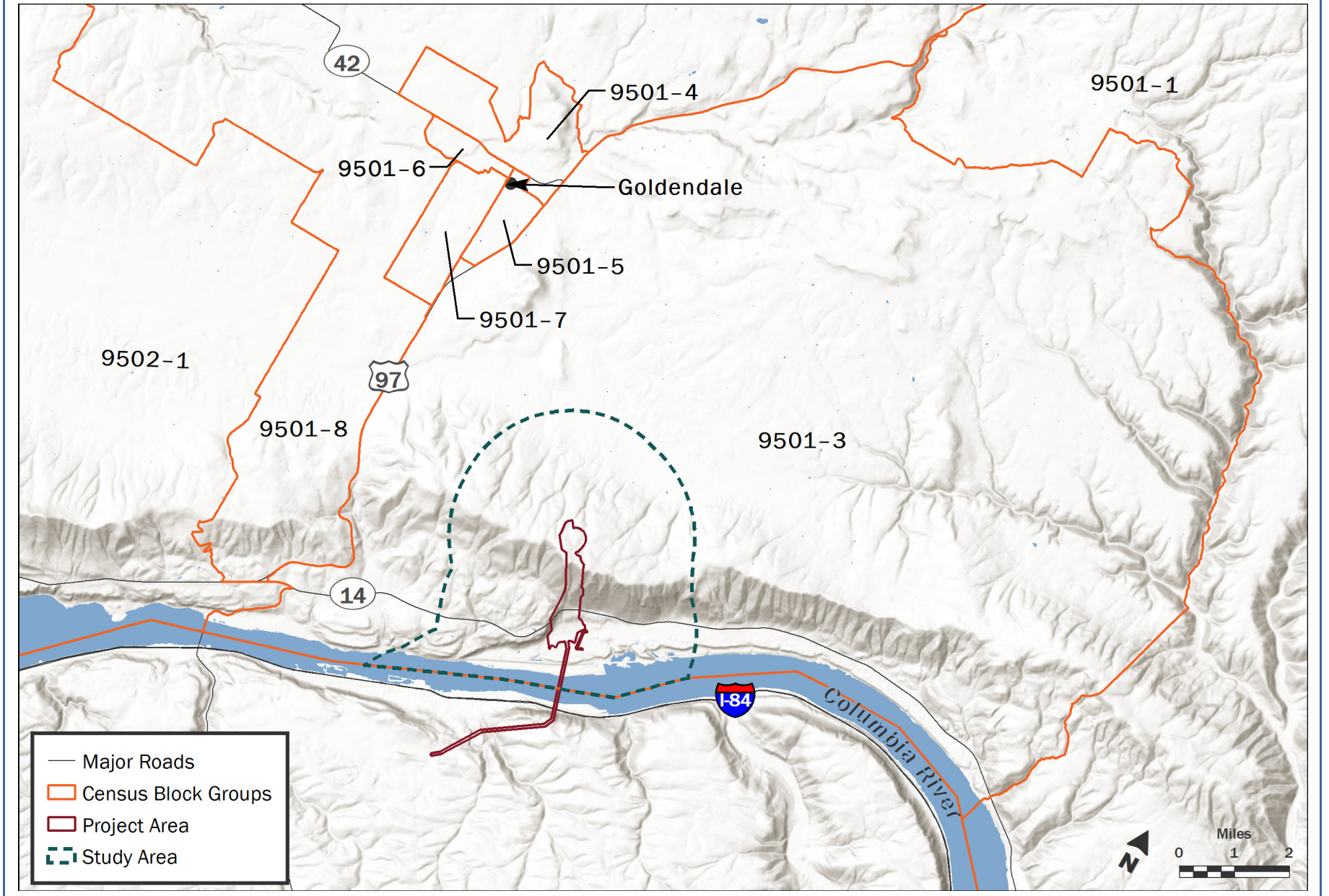
Census Geographic Areas

Census tracts are subdivisions of a county that average about 4,000 people. Tracts are designed to be relatively homogeneous in population characteristics, economic status, and living conditions at the time they are established.

Block groups are subdivisions of a census tract that generally include 600 to 3,000 people.

(U.S. Census Bureau 2021a)

Figure 1
Environmental Justice Study Area



2.2 Technical Approach

Guidance on environmental justice technical analyses and demographic data were gathered from the following sources:

- U.S. Census Bureau 2015-2019 American Community Survey (ACS) 5-year estimate data for population demographics, median household incomes, ratios of incomes to poverty levels, age, educational attainment, and LEP populations and percentages (ACS 2019)
- Environmental Health Disparities (EHD) Layer of the Washington Tracking Network Map (WTN 2022)
- Environmental Justice: Guidance Under the National Environmental Policy Act (CEQ 1997)
- Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analyses (USEPA 1998)
- Promising Practices for EJ Methodologies in NEPA Reviews (NEPA Committee and EJ IWG 2016)
- SEPA EIS Scoping Summary Report (Anchor QEA 2021)
- Environmental Justice Task Force: Recommendations for Prioritizing EJ in Washington State Government (EJTF 2020).

This information was used to determine if communities of color, low-income populations, or other overburdened populations are present within the study area and to inform the analysis. Communities of color were identified using census data for all people who identify as a race other than white alone and/or list their ethnicity as Hispanic or Latino. Low-income populations are defined in this report as the percentage of people living at or below twice the federal poverty level.

Data on communities of color and low-income populations in the study area were compared to the population characteristics of Klickitat County. If the percentage of communities of color or low-income populations within the block group in the study area was greater than Klickitat County, the block group was identified as a community of color and/or a low-income population.

Community characteristics, including LEP, educational attainment, and age, were also gathered and will be used to inform the outreach approach for this EIS. Some information on Tribal populations is included in this report; however, impacts to Tribal populations are discussed in the *Tribal Resources Analysis Report* (Appendix H of the EIS) and EIS Section 4.9, Cultural and Tribal Resources. The proposed project would result in significant adverse impacts to Tribal resources.

2.3 Impact Assessment Approach

Potential disproportionate impacts from the proposed project on communities of color and low-income populations were evaluated using findings from the various resource analyses and EIS sections. These analyses examined potentially significant adverse direct and indirect impacts from construction and operation of the proposed project and from the No Action Alternative. Impacts were assessed for the resource areas outlined in Table 3.

Table 3
Significant Impacts Identified by Resource Area

RESOURCE AREA	SIGNIFICANT IMPACT(S) IDENTIFIED?
Soils and Geology	No
Surface and Groundwater Hydrology	No
Wetlands and Regulated Waters	No
Air Quality and Greenhouse Gases	No
Energy Resources	No
Public Services and Utilities	No
Aquatic Species and Habitats	No
Terrestrial Species and Habitats	Yes¹
Aesthetics/Visual Quality	No
Cultural and Tribal Resources	Yes²
Environmental Health	No
Land Use	No
Recreation	No
Transportation	No

Notes:

1. There would be significant adverse impacts on terrestrial species and habitat; however, impacts were found to be reduced through proposed mitigation and would not result in significant and unavoidable adverse impacts.
2. Construction and operation of the proposed project would have unique and significant adverse impacts on Tribal and cultural resources. Some mitigation options for Tribal and cultural resources have been proposed by the Applicant. However, to date, there is no information available about mitigation proposed by or supported by the Tribes that would reduce the level of impact to less than significant.

If the analyses identified significant adverse impacts to a resource area, those impacts were further assessed for their potential to disproportionately affect communities of color and low-income populations. Other potential impacts on people that were not identified as significant in the analyses are also discussed in Section 3 of this report.

Cumulative impacts are addressed in Chapter 6 of the EIS and Tribal resources impacts are addressed in the *Tribal Resources Analysis Report* (Appendix H of the EIS) and EIS Section 4.9, Cultural and Tribal Resources.

3 Technical Analysis and Results

3.1 Overview

This section describes the population demographics within the *Environmental Justice Report* study area (Section 3.2). It also discusses probable impacts to populations within the study area from the proposed project (Section 3.3) and No Action Alternative (Section 3.4). When significant adverse impacts were identified in the resource analysis reports or EIS sections, these impacts were assessed for the potential to disproportionately affect communities of color and low-income populations, or overburdened populations.

The analysis also considered mitigation measures that could avoid, minimize, or reduce the identified impact below the level of significance. Project impacts that would be mitigated are not anticipated to result in disproportionate impacts on communities of color, low-income populations, or other overburdened populations, but those significant adverse impacts and mitigation are also noted here where relevant.

3.2 Affected Populations

The project area is primarily located in unincorporated Klickitat County, Washington. Most of the project area is located on private lands owned by NSC Smelter, LLC, with smaller portions located on land owned by the Washington State Department of Transportation and Washington Department of Natural Resources. There is a very low level of development in the area. No residences have been identified within the project area and very few exist within the study area. There are scattered farm residences west and north of the northern extent of the proposed project, and a single reported residence is 0.4 mile away from the lower reservoir area (FFP 2020, 2022). The nearest population center is the town of Goldendale, which is approximately 8 miles from the project area.

3.2.1 Communities of Color

This section identifies communities of color in the study area based on the census block group data. Race and ethnicity characteristics were compiled from the ACS 2015 to 2019 5-year estimates for the block group that intersects the study area (Table 4). The same information was compiled for Klickitat County and Washington State for comparison and context.

People of color are defined in this report as all people who identify in the census data as a race other than white alone and/or list their ethnicity as Hispanic or Latino.

For this analysis, a block group is identified as a “community of color” if the percentage of people of color within the block group is greater than the percent of people of color in Klickitat County. Klickitat County’s population is 18% people of color. Thus, any study area block group with a population of more than 18% people of color is identified in this report as a community of color. Block Group 3 in Census Tract 9501 (Figure 1) within the study area is 22% people of color, which is above the County threshold of 18%.

Table 4
Percent People of Color in Study Area and Reference Areas

	TOTAL POPULATION	WHITE ALONE, NOT HISPANIC OR LATINO ¹	RACE OTHER THAN WHITE ALONE AND/OR HISPANIC OR LATINO ¹	PERCENT PEOPLE OF COLOR
Block Group 3 (in Census Tract 9501)	1,719	1,334	385	22%
Klickitat County, Washington	21,721	17,847	3,874	18%
Washington State	7,404,107	5,073,945	2,330,162	31%

Source: ACS 2019

1. The ACS 5-year estimates (2015 to 2019) shown in Table 4 are averages from small-sample surveys with potentially high margins of error.

3.2.2 Low-Income Populations

Low-income populations are identified using a combination of data from the U.S. Census Bureau and the Washington Department of Health (DOH). For this report, low-income is defined as an income at or below twice the federal poverty level. The 2021 federal poverty level for a four-person household was \$26,500 (ASPE 2021).

The population of a block group is identified as a “low-income population” if the percentage of low-income people is greater than the percentage for Klickitat County. Klickitat County is 38% low-income. Thus, any block group partially or fully within the study area that is greater than 38% low-income is identified as a low-income population. Block Group 3 in Census Tract 9501 (Figure 1) has been identified as a low-income population because its population is 56% low-income, which is greater than Klickitat County (Table 5).

Table 5
Household Incomes in Study Area and Reference Areas

	TOTAL POPULATION	NUMBER OF LOW INCOME PEOPLE	PERCENT OF POPULATION LOW INCOME ^{1, 2}
Block Group 3 (in Census Tract 9501)	1,719	966	56%
Klickitat County, Washington	21,636	8,204	38%
Washington State	7,266,810	1,860,917	26%

Source: ACS 2019

2. For this analysis, the “ratio of income to poverty level in the past 12 months” census data were used to determine the population at or below twice the poverty level and to indicate the low-income percentage of the population.
3. The ACS 5-year estimates (2015 to 2019) shown in Table 5 are averages from small-sample surveys with potentially high margins of error.

3.2.3 *Overburdened Communities*

This analysis also reviewed the Washington Tracking Network (WTN) program data identifying overburdened populations. WTN combines information on a variety of environmental and public health factors and includes a map that ranks environmental health disparities for all state census tracts. Specifically, this analysis used the Environmental Health Disparities (EHD) layer, an interactive tool that compares communities across our state for environmental health disparities.

Tracts ranked 9 or 10 are considered as areas with environmental justice considerations (EJTF 2020). The EHD ranking was evaluated for Census tract 9501, the tract overlapping the study area. Census tract 9501 is ranked a 2 (WTN 2022), which is considered low for environmental health disparities and not an overburdened community.

Washington Tracking Network Map Information

The **Environmental Health Disparities (EHD)** layer evaluates environmental health risk factors in communities and estimates a cumulative environmental health impact score reflecting pollutant exposures and factors that affect people's vulnerability to environmental pollution. The layer shows pollution measures such as diesel emissions and ozone, as well as proximity to hazardous waste sites. It also displays measures like poverty and cardiovascular disease.

3.2.4 *Tribes*

Although Tribal reservations do not overlap the study area, the area is used by and culturally important to the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Bands of the Warm Springs Reservation of Oregon, and the Nez Perce Tribe. Uses include hunting, traditional gathering, camping, and traditional Tribal rituals, such as ceremonies and vision quests, and other traditional practices. Federally recognized Tribes have been and will continue to be invited to provide guidance and comments on the proposed project.

The proposed project would have significant adverse impacts on Tribal resources. This is discussed in EIS Section 4.9, Cultural and Tribal Resources, of the EIS and more details regarding project impacts to federally recognized Tribes are included in the *Tribal Resources Analysis Report* (Appendix H of the EIS).

3.3 **Project Impact Analysis**

The project impact analysis evaluates potential disproportionate impacts from the proposed project on communities of color and low-income populations using findings from the various resource analyses and EIS sections. Only elements of the environment with significant impacts are assessed in the following sections. Potential significant adverse impacts were identified for terrestrial species and habitats and Tribal and cultural resources (Anchor QEA 2022; Ecology et al. 2022). Impacts to Tribal and cultural resources are described in the *Tribal Resources Analysis Report* and EIS Section 4.9, Cultural and Tribal Resources. Potential significant adverse impacts were assessed for the potential to disproportionately affect communities of color and low-income populations in Sections 3.3.1 and 3.3.2. Block Group 3 in Census Tract 9501 (Figure 1) has been identified as a community of color and a low-income population.

3.3.1 *Impacts from Construction*

Construction of the proposed project is anticipated to begin in 2025 and end in 2030. Pre-construction activities would include establishing the site, access, and construction camp facilities, establishing temporary power, and establishing construction water supply. The project would construct the upper and lower reservoirs, as well as the powerhouse complex, conveyance tunnels, and the substation and interconnection.

Probable significant adverse impacts associated with construction were identified for terrestrial species and habitats and Tribal and cultural resources. Impacts to Tribal and cultural resources are not evaluated in this report, but are described in the *Tribal Resources Analysis Report* and EIS Section 4.9, Cultural and Tribal Resources. Impacts to terrestrial species and habitats would not directly impact people and are therefore also not evaluated in this section. Although the impacts from construction that were identified in the other resource analysis reports and EIS sections would not be significant, there is a potential that construction could have impacts on some people. The closest isolated residence to the project area is 0.4 mile away, and the nearest population center, Goldendale, is located approximately 8 miles from the project area. Although Block Group 3 in Census Tract 9501 (Figure 1) has been identified as a community of color and a low-income population, the block group is large; there is a very low level of development and few people in the area near the proposed project. Impacts for individuals who are closer to the project area could include the following:

- Completing the earthwork construction elements of the proposed project would create temporary noise and ground-borne vibrations, but these are expected to occur in areas where very few people could be affected.
- Construction visual changes would disrupt natural harmony, cultural order, and coherence, and may affect viewers intermittently during construction.
- Construction emissions of the proposed project could affect air quality in the area.
- Construction activities could occasionally or intermittently lead to an increased demand for fire, police, hospital, and emergency services.
- Temporary and intermittent traffic and access changes to recreational opportunities and access to recreational facilities within 10 miles during construction may affect some recreational users.
- Construction traffic, road closures, and detours could result in temporary traffic interference and congestion on regional and local roads and highways.

3.3.1.1 *Direct Impacts*

Direct impacts to Tribal and cultural resources are not evaluated in this report, but are described in the *Tribal Resources Analysis Report* and EIS Section 4.9, Cultural and Tribal Resources. No other direct significant adverse impacts associated with construction activities were identified with impacts to people; therefore there would be no disproportionate direct impacts on communities of color or low-income populations.

3.3.1.2 *Indirect Impacts*

Indirect impacts to Tribal and cultural resources are not evaluated in this report, but are described in the *Tribal Resources Analysis Report* and EIS Section 4.9, Cultural and Tribal Resources. No other indirect significant adverse impacts from construction were identified for any of the resource areas; therefore, there would be no disproportionate indirect impacts on communities of color or low-income populations.

3.3.2 *Impacts from Operation*

Operation of the pumped-water energy storage system would release water from an upper reservoir downhill to a lower reservoir to generate up to 1,200 megawatts of electricity. At the beginning of an operation cycle, water would be pumped from the lower reservoir through the conveyance system to the upper reservoir. To generate power, water would be released from the upper reservoir and passed through three 400-megawatt variable speed, reversible pump-turbine units to the lower reservoir (FFP 2020).

Probable significant adverse impacts associated with operations were identified for terrestrial species and habitats and Tribal and cultural resources. Impacts to Tribal and cultural resources are not evaluated

in this report, but are described in the *Tribal Resources Analysis Report* and EIS Section 4.9, Cultural and Tribal Resources. Impacts to terrestrial species and habitats would not directly impact people and are therefore also not evaluated in this section.

Although the impacts from operations that were identified in the other resource analysis reports and EIS sections would not be significant, there is also a potential that operation of the proposed project could have impacts on some people. Although Block Group 3 in Census Tract 9501 (Figure 1) has been identified as a community of color and a low-income population, the block group is large; there is a very low level of development and few people in the area near the proposed project. Impacts for individuals who are closer to the project area could include the following:

- The facility would be a dominant structure from some viewpoints but only seen at a distance from the most accessible areas. Viewers may be aware of the visual changes; however, important views would still be available.
- In the unlikely event of a catastrophic failure of either of the reservoir's embankments, there is a possibility of a physical safety threat to persons working in the immediate vicinity of the failure.

3.3.2.1 *Direct Impacts*

Direct impacts to Tribal and cultural resources are not evaluated in this report, but are described in the *Tribal Resources Analysis Report* and EIS Section 4.9, Cultural and Tribal Resources. The change in land use would not impact adjacent land uses or people in the area. No other direct significant adverse impacts associated with operation of the proposed project were identified with impacts to people. Therefore, there would be no disproportionate direct impacts on communities of color or low-income populations.

3.3.2.2 *Indirect Impacts*

No indirect significant adverse impacts from operation of the proposed project were identified for any of the resource areas; therefore, there would be no disproportionate indirect impacts on communities of color or low-income populations.

3.3.3 *Proposed Mitigation Measures*

No mitigation measures are proposed because there are no disproportionate impacts to communities of color and low-income populations.

Impacts to potentially affected Tribal communities and the potential for mitigation are discussed in the *Tribal Resources Analysis Report* and EIS Section 4.9, Cultural and Tribal Resources.

3.3.4 *Significant and Unavoidable Adverse Impacts*

There would be no significant adverse impacts to communities of color or low-income populations from construction or operation of the proposed project.

3.4 **No Action Alternative**

Under the No Action Alternative, the proposed project facilities would not be constructed. Investigation of contamination and development of cleanup actions for the Columbia Gorge Aluminum smelter site would continue through the separate Model Toxics Control Act cleanup process. No significant adverse impacts of the No Action Alternative were identified for any of the resource areas. Therefore, the No Action Alternative would result in no disproportionate impacts on communities of color or low-income populations.

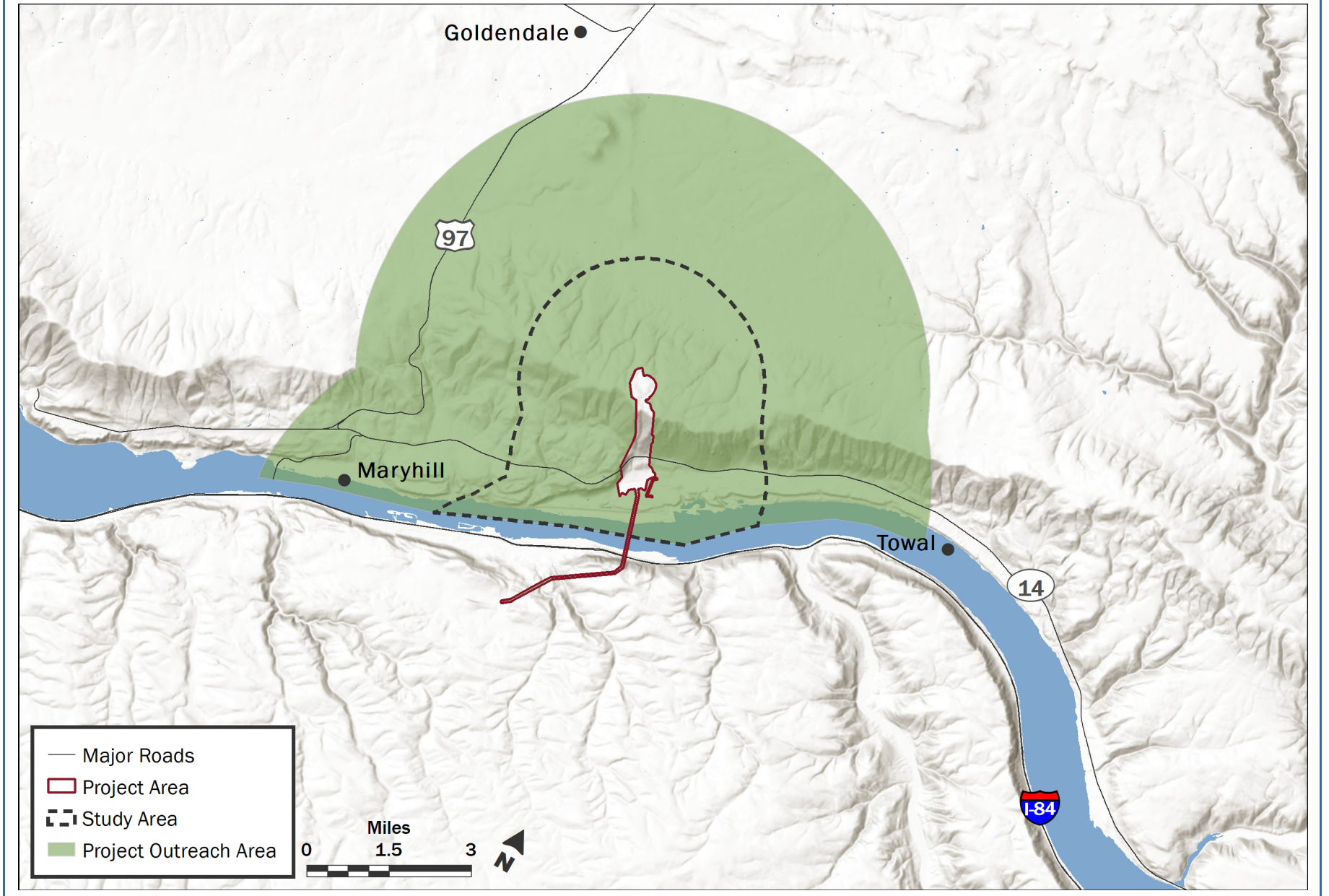
4 Outreach

4.1 Outreach Area

Separate from the environmental justice analysis, block groups within 5 miles of the project footprint were analyzed for population characteristics that could help inform the public involvement and outreach strategy. The goal is to ensure that appropriate methods are used to communicate project information to all interested and impacted community members.

This 5-mile area includes Block Groups 3, 7, and 8 in Census Tract 9501 and Block Group 1 in Census Tract 9502 (Figure 2). This report only includes block groups in Washington.

Figure 2
Potential Outreach Area



4.2 Limited English Proficiency

Limited English Proficient population information is used to tailor outreach and determine when language services, like translation or interpretation, are needed. U.S. Census Bureau 2015 to 2019 ACS 5-year estimate data were reviewed to identify LEP populations in the outreach area (Table 6). ACS data show Spanish is the most widely spoken language in the outreach area, other than English. Language access services will be made available, as needed.

Table 6
Population with Limited English Proficiency in Outreach Area

TOTAL POPULATION	LEP POPULATION	PERCENT LEP ¹
5,487	35	0.6%

Source: ACS 2019

1. Population 5 years and older that indicated speaking English less than "very well"

Limited English Proficiency

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English have limited English proficiency, or "LEP."

The Census and ACS ask people whether they speak English "very well," "well," "not well," or "not at all." Government agencies rely on ACS language data to determine how and where to provide language assistance service (U.S. Census Bureau 2021b).

We have defined LEP individuals as the population 5 years or older who self-identify as speaking English less than "very well" according to the U.S. Census ACS 5-year estimate data.

4.3 Educational Attainment

Educational attainment data are used to tailor communication about the project. Information about educational attainment was obtained from the U.S. Census Bureau's ACS 5-year estimates (2015 to 2019) for the outreach area (Table 7). According to the data, 9% of the population within the outreach area has less than a high school graduate education, the same as the state average. To support general best practices all materials will be written in plain talk.

Table 7
Population with Educational Attainment Less than High School Graduate in Outreach Area

TOTAL POPULATION	LESS THAN HIGH SCHOOL GRADUATE	PERCENT
4,182	383	9%

Source: ACS 2019

4.4 Age

Age data for the study area are used to tailor communication about the project. Table 8 provides information on people over age 65 from the U.S. Census Bureau's 2015 to 2019 ACS 5-year estimates for the block group that intersects the study area. According to the data, 25% of the population within the outreach area are over age 65. This is higher than the state average of 15%. This will be considered when planning public meetings and developing communication materials.

Table 8
Population with Age Over 65 Years Old in Outreach Area

TOTAL POPULATION	POPULATION OVER 65 YEARS OLD	PERCENT
5,650	1,391	25%

Source: ACS 2019

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