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# Appendix A

## Scoping Summary Report



July 2021

## Goldendale Energy Storage Proposed Project

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# SEPA EIS Scoping Summary Report

Prepared for



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## Acronyms and Abbreviations

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Applicant	Free Flow Power Project 101, LLC
BPA	Bonneville Power Authority
CETA	Clean Energy Transformation Act
DS	Determination of Significance
Ecology	Washington Department of Ecology
EIS	Environmental Impact Statement
FERC	Federal Energy Regulatory Commission
kV	kilovolt
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
WAC	Washington Administrative Code

# 1 Introduction

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## 1.1 Purpose of Scoping Summary Report

The Washington Department of Ecology (Ecology) issued a Determination of Significance (DS) and opened a comment period on the scope of the proposed Goldendale Energy Storage project State Environmental Policy Act Environmental Impact Statement (SEPA EIS) on January 14, 2021. The proposed project is a closed-loop pumped-storage hydropower facility with an upper and lower reservoir that would be located off-stream of the Columbia River. The project is being proposed by Free Flow Power Project 101, LLC (Applicant).

Ecology determined the Applicant's proposal is likely to have a significant adverse impact on the environment, requiring an EIS under Revised Code of Washington (RCW) 43.21C.030 (2)(c) to be prepared per Washington Administrative Code (WAC) 197.11 procedures. The DS and Scoping Notice for the EIS initiated Ecology's environmental review process. The scoping comment period started January 14, 2021, ended on February 12, 2021, and included two online public meetings held on January 27 and February 3, 2021.

This Scoping Summary Report provides an overview of the Applicant's proposed project, the environmental review and scoping processes, and a summary of the scoping comments received. The notices, news releases, and meeting materials used during scoping are included as attachments.

The Applicant also applied for a hydroelectric project license from the Federal Energy Regulatory Commission (FERC). Separately, FERC issued a Notice Soliciting Scoping Comments for the Original Major License on November 4, 2020. FERC is conducting an environmental review for the proposed project in accordance with the federal National Environmental Policy Act, through a separate process.

## 1.2 EIS Process

SEPA requires agencies to consider environmental factors before taking action on state and local government decisions, such as issuing permits for projects. The SEPA review process helps agency decision-makers, applicants, and the public understand how the entire proposal will affect the environment.

An EIS is not a decision document. An EIS contains an unbiased and scientifically based analysis, which provides a comprehensive and objective evaluation of probable environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize impacts. The EIS prepared by Ecology for the Goldendale Energy Storage project will be used to inform permit decisions and potential changes to the proposed project.

Scoping is the first step in the EIS process. Additional public involvement and comment opportunities will be available once the Draft EIS is available for public review.

## 1.3 Scoping Process and Purpose

Scoping is designed to establish and confirm the focus of the EIS by seeking input from tribes, agencies, members of the public, and stakeholders on the content of the EIS. For scoping, these parties are notified that an EIS is being prepared, thus initiating their involvement.

Ecology conducted an EIS scoping period in accordance with SEPA requirements per WAC 197.11.408. More information about the scoping process is provided below in Section 3.1. Ecology invited tribes, agencies, members of the public, and stakeholders to provide input on the scope of the EIS related to the following:

- Alternatives
- Mitigation measures
- Probable significant adverse impacts
- Licenses or other approvals that may be required

Ecology is considering the scoping comments and will determine the full scope of the EIS. Not all elements of the environment outlined in WAC 197.11.444 will be included in the study.



## 2 Proposed Project

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### 2.1 Proposed Project Description

The proposed project would primarily be located in Klickitat County, Washington, approximately 8 miles southeast of the City of Goldendale, adjacent to John Day Dam (Figure 1). According to the Applicant, the proposed project area encompasses approximately 681.6 acres, most of which are private lands owned by NSC Smelter, LLC, and all proposed project construction activities would occur on private lands or within an existing utility right-of-way owned by the Bonneville Power Administration (BPA).

The Applicant's proposed project would consist of a closed-loop pumped-water storage system that releases water from an upper reservoir downhill to a lower reservoir to generate energy. The lower reservoir would be located on a portion of the former Columbia Gorge Aluminum smelter site, and water for the proposed project would be drawn from the Columbia River under a permit that once served the aluminum plant. Proposed project plans call for the lower reservoir to be filled once, with annual supplemental fills. The proposed project is expected to generate up to 1,200 megawatts of electricity and provide balancing services and renewable energy flexible capacity to utilities in the Pacific Northwest and potentially California. The Applicant's proposed project includes:

- Two reservoirs vertically separated by 2,400 feet of elevation
- No river or stream impoundments
- An underground water conveyance tunnel and powerhouse
- An electrical substation/switchyard and other related facilities
- 115- and 500-kilovolt transmission lines
- A new aerial transmission line that connects to the existing BPA's John Day Substation in Oregon, near the City of Rufus

Figure 1  
Project Area Map



## 2.2 Agency Determination of Significance

Scoping under SEPA began with issuance and publication of the DS and Scoping Notice (Attachment A). The DS and Scoping Notice included a description of the Applicant's proposed project and made the determination that the Applicant's proposal is likely to have a significant adverse impact on the environment and would require an EIS under RCW 43.21C.030 (2)(c). The DS and Scoping Notice also announced public scoping meeting dates and the duration of the scoping comment period.

Probable project impacts and areas of proposed study for the EIS were identified by Ecology to include (but not be limited to) the following:

- Air Quality
- Geologic and Soils Resources
- Aquatic Resources
- Terrestrial Resources
- Threatened and Endangered Species
- Transportation
- Recreation
- Land Use
- Aesthetics
- Cultural Resources
- Public Services and Utilities

Note that threatened and endangered species considerations are included under the relevant Aquatic Resources and Terrestrial Resources in Section 4.8 of this Scoping Summary Report.

## 3 Scoping Process

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### 3.1 Overview

Ecology conducted an EIS scoping period from **January 14, 2021, through February 12, 2021**. During the scoping period, Ecology held two online public scoping meetings on January 27 and February 3, 2021, for the public to provide oral comments. A variety of scoping materials were available for public review throughout the entire length of the scoping period on the project website (<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/Goldendale-Energy>). The Ecology project website was developed to provide information through the duration of the SEPA process, including the scoping period; during scoping, the website included a link to an online comment form.

Tribes, agencies, members of the public, and stakeholders were invited to participate in the scoping process and provide comments, as described in the following sections.

### 3.2 Ways to Provide Comments

During the scoping period, Ecology provided multiple ways to submit scoping comments, including:

- Using the online comment form that was available at <http://admin.ecology.commentinput.com/?id=eVi6D>, a link to which was provided on the Ecology project website
- Sending a comment by mail to:
  - Sage Park
  - Department of Ecology
  - 1250 West Alder Street
  - Union Gap, WA 98903-0009
- Making a public oral comment during the online public scoping meetings

### 3.3 Scoping Notifications

Ecology conducted the following public notice and outreach activities to notify tribes, agencies, members of the public, and stakeholders of the scoping period and announce upcoming public scoping meeting dates. Care was taken to ensure that notice of the scoping period and meetings reached all community members. Ecology offered translation services, if requested. A variety of outreach and notification methods were used to communicate information about scoping:

- Published legal notices (copies provided in Attachment A)
  - The DS and Request for Comments on the Scope of Environmental Impact Statement, including a description of the Applicant’s proposed project, how to submit comments, and scoping meeting announcements, was issued on January 14, 2021.
  - Ecology’s SEPA Register published the DS and Scoping Notice on January 14, 2021.
  - Legal notices were published in the following three newspapers of local circulation:
    - *Goldendale Sentinel*

- *Tri-City Herald*
- *The Columbian*
- Public and media notifications (Attachment B)
  - Ecology distributed a news release on January 14, 2021, found here: [https://ecology.wa.gov/About-us/Get-to-know-us/News/2021/Goldendale-Energy-Project\\_](https://ecology.wa.gov/About-us/Get-to-know-us/News/2021/Goldendale-Energy-Project_)
  - A Twitter message was posted to Ecology’s Central Region Twitter account (@ecyCentral) and was shared by Ecology’s main Twitter account (@ecologyWA).
  - Ecology distributed a postcard to those subscribed to a mailing list.
  - Information was published on Ecology’s Public Input and Events Listing website.
- Website (Attachment C)
  - Ecology developed and published a project-specific website at: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/Goldendale-Energy>.
- Tribal notifications (Attachment D)
  - Email notifications were sent to Northwest tribal governments.
  - Ecology also held phone calls with Natural Resources Directors of the following tribal governments:
    - Confederated Tribes and Bands of the Yakama Nation
    - Confederated Tribes of the Umatilla Indian Reservation
    - Nez Perce Tribe
    - Confederated Tribes of the Colville Reservation
    - Confederated Tribes of Warm Springs
- Agency notifications
  - State agencies were notified by email, listserv, and SEPA register notices.

### 3.4 Public Scoping Meetings

As mentioned previously, two public scoping meetings were held during the scoping period: one on January 27, 2021, and one on February 3, 2021. Due to the coronavirus pandemic, both meetings were held online. The January 27 meeting began at 6:00 p.m. and the February 3 meeting began at 10:00 a.m. Each meeting included a presentation and an opportunity for the public to provide verbal comment. Scoping meeting materials, including the PowerPoint presentation (Attachment E), text of the presentation script, and a video of the presentation were available to the public on the Ecology project-specific website throughout the scoping period.

## 4 Summary of Scoping Comments

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A total of 665 comment submissions were received. Comments were received via online forms (654) and through oral submissions (11) during the public scoping period. Of the 665 comments received, 631 were form letters (i.e., two unique form letters were submitted, each of which had lists of additional signatory parties submitting the same letter); thus, approximately 34 unique comments were submitted. Some of the submittals of form letters included additional comments with their signature; each signatory party to a form letter was counted separately, regardless of whether additional comment was received.

A variety of groups provided comments, including the following:

- Agencies (comments received from four agencies)
  - City of Goldendale
  - Klickitat County Natural Resources and Economic Development Department
  - Public Utility District No. 1 of Klickitat County
  - Washington Department of Fish and Wildlife
- Tribes (comments received from three tribal government representatives)
  - Confederated Tribes and Bands of the Yakama Nation
  - Kah-Milt-Pah (Rock Creek Band), a band of the Yakama Nation
  - Confederated Tribes of the Umatilla Indian Reservation, Department of Natural Resources
- Citizens (comments received from 646 individuals, including 631 submissions of form letters; a list of individuals who submitted comments is in Attachment F)
  - 15 individual comments
  - 631 signatories of two form letters
- Businesses (comment from one business)
  - Rye Development, also known as Free Flow Power Project 101, LLC (the Applicant)
- Organizations (comments received from 10 organizations)
  - American Rivers
  - Certified Electrical Workers of Washington
  - Columbia Pacific Building and Construction Trades Council
  - Columbia Riverkeeper
  - Friends of the White Salmon
  - Goldendale Chamber of Commerce
  - Longview/Kelso Building and Construction Trades Council
  - Mid-Columbia Economic Development District
  - Sierra Club
  - Washington State Building and Construction Trades Council

All comments received during the scoping period are included in Attachment F. Attachments to comment letters are not included but are available upon request. This section summarizes the key themes of the comments received during the scoping period and is not meant to provide a comprehensive or detailed listing of all comments.

## 4.1 Environmental Process and Procedures

- Complete a thorough and efficient review process.
- Provide sufficient information to allow officials to make a reasoned choice among alternatives.
- Consider the proper use of existing environmental documents.
- Provide government-to-government consultation with affected tribes.

## 4.2 Project Alternatives

- Assess all reasonable alternatives that will support the proposed project's purpose and objectives.
- Analyze a robust No Action Alternative.
- Consider a range of alternative sites including alternative locations that have the characteristics needed for cost-effectiveness, grid access, and proximity to wind and solar projects.
- Consider alternative sites that avoid impacts to avian species, cultural resources, and hazardous sites.
- Evaluate inclusion of a cover for the reservoirs to mitigate evaporation.
- Analyze alternative designs and clean energy alternatives.
- Consider pumped-storage hydropower and large battery installations as the main utility-scale storage technology alternatives.
- Consider an alternative to install pumps at existing dams and reservoirs.
- Analyze other renewable/decarbonized energy storage technologies such as stacked blocks, liquid air, underground compressed air, flow batteries, and solar and lithium-ion battery storage.
- Consider in the alternatives analysis the life-cycle cost and environmental impact of the proposed project and available alternatives, including a need to produce and replace depleted batteries, and the scale and effect of recycled battery waste.

## 4.3 Scope of EIS Analysis

- Analyze the direct, indirect, and cumulative impacts from construction and operation of the proposed project.
- Analyze potential impacts to geology, air quality, fish, wildlife, cultural resources, transportation, tribal religious resources, water quality, and waters of the United States.
- Analyze the proposed project's contribution to meeting commitments under the Clean Energy Transformation Act (CETA).
- Analyze how construction and operation could impact nearby wind turbine operation.
- Analyze the direct, indirect, and cumulative impacts of additional transmission lines in the Columbia Basin and in the proposed project vicinity.
- Analyze the reliability and capacity of the BPA transmission lines and the Northwest grid.
- Study all the state and federal laws and regulations that may apply to the proposed project, including those pertaining to environmental and natural resources protection (e.g., Clean Water

Act, Clean Air Act, and Endangered Species Act), hazardous wastes (Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation, and Liability Act), and cultural and historical resources protection (Native American Graves Protection and Repatriation Act, Archaeological Resources Protection Act, and National Historic Preservation Act), and analyze what the proposed project will do to comply with them.

- Examine the proposed project's post-operation site restoration plans, including enforceable funding requirements to ensure those plans are completed.
- Incorporate extensive previous studies and analysis that have been conducted on the proposed project site and proximate areas.

#### 4.4 Mitigation

- Evaluate if impacts to tribal cultural resources and other resources may be impossible to mitigate, and whether off-site mitigation will be sufficient to replace lost or adversely impacted habitats.
- Recommend compensatory mitigation for impacts to habitat at a ratio of 2:1 acre for the upper reservoir and a ratio of 1:1 acre for the lower reservoir/West Surface Impoundment area and appurtenant project components.
- Recommend compensatory mitigation to address impacts on raptors should be located in an area of known golden eagle and prairie falcon nesting habitat and provide forage species that benefit these birds (mule deer fawns, coyote pups, small mammals, yellow-bellied marmots, jackrabbits, and ground squirrels).
- Develop a management plan for the compensatory mitigation property that identifies the parcels to be acquired, the criteria used to select the parcels, habitat improvements that would be implemented on each parcel, and management to provide resilient habitat that mitigates for proposed project impacts.
- Develop a reservoir water quality monitoring and management plan to monitor levels of dissolved solids, nutrients, and heavy metals; ensure the water is safe for wildlife; and propose measures for addressing deteriorating water quality based on monitoring results.
- Evaluate potential mitigation measures to reduce traffic impacts.

#### 4.5 Cumulative Impacts

- Evaluate the impacts of the proposal along with impacts from climate change and existing dams to determine the long-term survival of the Columbia River fishery.

#### 4.6 Economics

- Include a detailed socioeconomic study as a key section of the EIS.
- Examine the socioeconomic study conducted by the Applicant for its FERC application to assess accuracy and supplement the study.



- Study socioeconomic aspects of the proposed project and complete a realistic accounting of benefits and costs, along with disclosure of who would realize the benefits and who would bear the costs.
- Analyze socioeconomic impacts, including family wage job creation and increased tax revenue.
- Incorporate life-cycle costing methodology into an assessment of alternative, grid-scale energy storage technologies.
- A robust cost-benefit analysis, including an analysis of daily fluctuations in Mid-Columbia energy rates, should be included to determine the economic viability of the proposed project and its potential economic impacts. Analyze impacts to ratepayers.

## 4.7 Support or Opposition

- General support was expressed for the proposed project by some organizations and individuals, for various reasons, such as the following:
  - The proposed project could serve as an example for future energy projects in the region by providing clean energy and could be a step toward achieving state and national emissions standards and energy goals.
  - The proposed project could provide potential economic benefits, including tax revenue and job creation during construction and operation.
  - The proposed project is believed by some commenters to be considered a “Project of Statewide Significance.”
- General opposition was expressed for the proposed project by some tribes, individuals, and environmental organizations, for various reasons, such as the following:
  - The proposed project could cause disruption to indigenous peoples’ lives.
  - The proposed project could have possible adverse effects on cultural resources, water quality, fish, and wildlife.

## 4.8 Elements of the Environment

### 4.8.1 *Terrestrial Resources*

- Analyze direct, indirect, and cumulative impacts on wildlife.
- Evaluate the effects of project construction and operation on threatened, endangered, candidate, and/or proposed species.
- Evaluate impacts on wildlife, including the loss of habitat as a result of the new development, the future implications for wildlife of siting a large-scale development, and the potential increase in avian mortality from wind turbines as a result of increased avian activity next to reservoirs.
- Analyze the impacts on Washington Department of Fish and Wildlife priority habitat resulting from construction of the underground powerhouse and southernmost tunnel portal on John Day Talus.
- Consider impacts to the landscape and habitat for native flora and fauna along with measures to minimize disturbance.

- Evaluate the potential impact on habitat due to construction activities, such as clearing and grubbing, that could exacerbate wildfires.
- Conduct baseline studies and provide a thorough analysis of potential impacts of construction and operation on raptor habitat.
- Analyze the results of the Applicant's wind analysis to determine risks to wildlife.
- Evaluate how evaporation over time may concentrate any solutes present in the water source, potentially causing the reservoir water to become toxic to terrestrial and avian wildlife.
- Evaluate how bats and migratory birds use the reservoirs with and without the application of plastic shade balls.
- Consider year-round acoustic monitoring if bats are attracted to the reservoir, and if they are, determine deterrent measures that should be implemented.
- Evaluate the use of fencing to deter wildlife and birds from using the reservoirs.

#### **4.8.2**      *Water Resources and Rights*

- Analyze direct, indirect, and cumulative impacts on water quality.
- Evaluate water quality impacts related to lubricants and oil used in the operation of the Francis-type variable-speed pump-turbines.
- Evaluate the potential for leaks in the lower reservoir lining that may provide a pathway for toxic material to be released from the West Surface Impoundment into the Columbia River.
- Evaluate potential contamination and temperature impacts from the upper reservoir on surrounding streams.
- Recommend the development of a reservoir water quality monitoring and management plan to ensure the water is safe for wildlife resources.
- Evaluate how water will be removed from the Columbia River and the speed of water removal.
- Evaluate how much of the water volume would have to be replaced annually and how much water would be lost to seepage into the soil.
- Evaluate potential interruption to the natural flow of a river system and effects to animal migration paths, wildlife displacement, and water quality.

#### **4.8.3**      *Cultural, Historical, and Archaeological Resources*

- Evaluate construction and operation impacts to cultural, historical, and archaeological resources, including impacts to tribal culturally significant sites, traditional cultural properties, and ceremonial and cultural practices.
- Incorporate the regulatory responsibility to protect cultural and archaeological resources within and adjacent to the proposed project area.
- Consider tribal-provided survey information when evaluating construction and operational impacts.
- Consider impacts to nearby traditional cultural properties associated with impacts to the multiple property aspect of a network of associated sites.

- Consider avoidance and minimization measures, such as preparation of an Inadvertent Discovery Plan and compliance with required permits for protection of historic and cultural resources.

#### **4.8.4 Tribal Resources**

- Consider tribal peoples' access to food and medicine in the area, including the Programmatic Agreement between the State of Washington and BPA for ongoing root and plant gathering access by Yakama Nation tribal members, and the access and use of the adjacent treaty fishing access site.
- Incorporate the regulatory responsibility to protect tribal lands and preserve irreplaceable tribal treaty resources.
- Consider the cumulative impacts to tribal resources resulting from the proposed project and other energy infrastructure.
- Consider comments concerning tribal and cultural resources that were submitted by the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, Department of Natural Resources, and the Kah-Milt-Pah (Rock Creek Band).

#### **4.8.5 Energy Resources**

- Analyze the importance of the proposed project in achieving Washington's CETA goals.
- Consider how hydropower and energy storage facilities like the proposed project could contribute to or accelerate President Biden's 2050 goal of a national net-zero emissions standard.
- Consider if utility-scale storage capacity is needed in order to integrate power from intermittent renewable energy sources and how the proposed project could help electric grid managers balance changing electricity portfolios with demand.
- Consider the differential in power units to operate the system over the course of a year, and whether the proposed project uses more energy than it produces.

#### **4.8.6 Aquatic Resources**

- Analyze direct, indirect, and cumulative impacts on fish.
- Analyze the effects of the proposed project's additional water demands on fish and other aquatic resources, the waters that support them, and the overall habitat conditions necessary for their health and well-being.
- Consider potential impacts to salmon and other Columbia River aquatic species, along with the potential effect on Puget Sound orcas.
- Evaluate the effects of water temperature changes from the proposed project, contributions to Columbia River water temperatures, and the subsequent effects on salmon.

#### **4.8.7 Hazardous Materials and Environmental Health**

- Analyze the proposed project's impacts on the Columbia River in the event that the reservoir becomes damaged, breached, or failed.
- Consider measures to avoid or minimize the risk of a dam failure.

- Consider measures to avoid or minimize impacts from existing and new sources of pollution (including hazardous materials) associated with construction and operation.
- Consider the effects of the cleanup action on Columbia River surface water and groundwater, and measures to avoid or minimize these impacts.

#### **4.8.8 Public Services and Utilities**

- Consider construction and operational effects on local police and fire departments.
- Analyze if the proposed project could improve the existing utility grid and reduce periodic curtailment, including during periods of peak output.
- Consider Public Utility District No. 1 of Klickitat County's supply of municipal water for the proposed project as well as other potential customers that may locate on the site.

#### **4.8.9 Air Quality and Greenhouse Gases**

- Analyze temporary air quality impacts resulting from construction of the facility and permanent air quality impacts resulting from operation of the facility.
- Consider prevailing winds and the difference in altitude in the evaluation of air quality impacts during construction and operation.

#### **4.8.10 Wetlands**

- Evaluate reduced function in stormwater retention, hydrology/water flow, stream reach functions, and habitat of specific wetland features.
- Evaluate potential impacts related to contamination and temperature from the upper reservoir on surrounding wetlands.

#### **4.8.11 Geologic and Soils Resources**

- Use past geotechnical investigations in the analysis.
- Evaluate what will occur with the material excavated from the proposed tunnel.

#### **4.8.12 Land Use**

- Consider Klickitat County's Energy Overlay Zone when evaluating effects of the proposed project.
- Consider the proposed project's effects on previously disturbed, privately owned land.

#### **4.8.13 Recreation**

- Analyze the proposed project's impacts on recreation, including paragliding, fishing, boating, birdwatching, petroglyph viewing, hunting, hiking, windsurfing, kiteboarding, kayaking, and other forms of recreation.
- Provide additional information in regard to public amenities that would be provided related to the proposed project, such as trails, cycle tracks, informational stops, and signage.

#### ***4.8.14 Aesthetics and Visual Quality***

- Evaluate the proposed project's scenic and other aesthetic impacts, including the aesthetic impacts of additional transmission lines.
- Consider local ordinances that enforce use of dark sky-compatible lighting.

#### ***4.8.15 Climate Change***

- Analyze climate impacts from the operation of the facility.

#### ***4.8.16 Noise and Vibration***

- Analyze construction and operational impacts related to noise.

#### ***4.8.17 Transportation***

- Evaluate the proposed project's construction and operational effects on traffic.

#### ***4.8.18 Environmental Justice***

- Analyze the proposed project's environmental justice impacts, including the proposed project's direct, indirect, and cumulative impacts to tribal nations, indigenous people, and low-income communities.

## 5 Next Steps

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The next step in Ecology's environmental review process is to begin work on the Draft EIS. This will include gathering data, conducting studies, and analyzing information. Scoping comments will be considered in refining the EIS scope and alternatives, and while developing the environmental analysis. Once a Draft EIS is published, tribes, agencies, members of the public, and stakeholders will be invited to review and comment on the document and participate in public hearings. Ecology plans broad outreach when the Draft EIS is available for public review.

The Ecology project-specific website (<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/Goldendale-Energy>) will be maintained and updated through the environmental review process. Interested parties can receive updates in the following ways:

- By email, by signing up here: [http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?SUBED1=GOLDENDALE\\_ENERGY&A=1](http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?SUBED1=GOLDENDALE_ENERGY&A=1)
- By mail, by sending a request to Meg Bommarito at [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov), 206-594-0010, or Department of Ecology, Northwest Regional Office, PO Box 330316, Shoreline, WA 98133-9716

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# Attachment A

## Published Legal Notices



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, Washington 98903-0009 • (509) 575-2490  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

STATE ENVIRONMENTAL POLICY ACT (SEPA)  
DETERMINATION OF SIGNIFICANCE AND  
REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT

January 14, 2021

**Lead agency:** Department of Ecology

**SEPA Responsible Official:** Sage Park, sage.park@ecy.wa.gov, 509-457-7120

**Description of the Proposal:**

The proposed Project will consist of a closed-loop pumped-storage hydropower facility with an upper and lower reservoir with over 2,400 feet of maximum gross head that will be located off-stream of the Columbia River. The Project will utilize variable-speed, pump-turbine generator units and provide balancing services and renewable energy flexible capacity to utilities in the Pacific Northwest and potentially California. The proposed Project will consist of the following new facilities:

- An upper reservoir consisting of a concrete face rockfill embankment dam approximately 175 feet high, 8,000 feet long, a surface area of about 61 acres
- A lower reservoir consisting of a concrete face rockfill embankment dam approximately 205 feet high, 6,100 feet long, a surface area of about 63 acres
- Upper reservoir ungated vertical intake structure with a hood to prevent vortex formation
- Lower reservoir horizontal intake structure, including vertical steel slide gates to allow isolation of tailrace tunnel from lower reservoir
- Water conveyance system and penstocks
- An underground water conveyance tunnel, underground powerhouse cavern, and underground transformer gallery cavern containing 18 115-kilovolt (kV) intermediate step-up transformers
- 115 and 500 kV transmission line(s)
- A substation/switchyard and other appurtenant facilities
- Aerial transmission line and interconnection to BPA's John Day Substation



- Minor appurtenant support structures (e.g., maintenance building, shop) and security fencing

Additional materials are available on the project website:

<https://ecology.wa.gov/Goldendale-Energy>

**Location of proposal:** The Project is primarily located in Klickitat County, Washington, approximately 8 miles southeast of the City of Goldendale, on John Day Dam Road. The proposed Project Boundary encompasses approximately 681.6 acres, most of which are private lands owned by NSC Smelter, LLC. All Project construction will occur either on private lands or within an existing utility right-of-way that is owned by the BPA.

**Proponent:** FFP Project 101, LLC

**EIS Required:**

The Department of Ecology has determined that the project will likely result in significant adverse environmental impacts. An environmental impact statement (EIS) is required under RCW 43.21C.030 (2)(c) and will be prepared after the scoping process.

Probable project impacts and areas of proposed study for the EIS including (but not limited to):

**Air Quality**

- Effects of project construction activities on air quality, including the adequacy of proposed measures to control windblown dust.

**Geologic and Soils Resources**

- Effects of project construction and soil disposal, including disposal of contaminated soils, on soil erosion and sedimentation.

**Aquatic Resources**

- Effects of project water withdrawals (e.g., initial fill and annual make-up water) on water quantity in the Columbia River.
- Effects of project construction, operation, and maintenance on water quality and fisheries resources in the Columbia River, including erosion and sedimentation and potential dispersion of contaminated soil particles.
- Effects of construction, operation, and maintenance activities on groundwater quality, recharge, and flow.

#### Terrestrial Resources

- Effects of project construction, operation, and maintenance activities, including maintenance for roads and transmission line right-of-way, on native and/or sensitive-plant communities, wetlands, and the spread and control of noxious and invasive weeds.
- Effects of project reservoirs in attracting wildlife (mammals and waterfowl) which may lead to drowning and indirect effects of injury or mortality of foraging golden eagles, peregrine falcons, and bats from the nearby nonproject wind turbines.
- Effects of increasing concentration of solutes in reservoir water over time potentially leading to toxicity for terrestrial and avian wildlife using the reservoirs.
- Effects of project transmission lines on raptors and other birds, including electrocution and collision hazards.
- Effect of permanent and temporary wildlife habitat loss due to construction of project features, including potential loss of habitat that supports foraging and/or nesting raptors and other birds.
- Effect of noise, lighting, vehicular traffic, and human presence during project construction, operation, and maintenance activities on wildlife, including Washington and Oregon special-status wildlife species, especially during sensitive periods (e.g., migrating or breeding).

#### Threatened and Endangered Species

- Effects of project construction and operation on threatened and endangered species.

#### Transportation

- Effects of project related traffic (construction and operation) on existing transportation systems.

#### Recreation

- Effects of proposed project construction, operation, and maintenance on recreational use in the project-affected area.

#### Land Use

- Effects of project construction, operation, and maintenance on wind energy and agricultural land uses and operation of and access to John Day Dam.

#### Aesthetics

- Effects of project construction, operation (including the presence of project facilities), and maintenance activities on visual resources.
- Effects of project construction and operation on noise levels in the project vicinity.
- Effects of project lighting on visual quality at night, including night sky viewing.

Goldendale Energy Storage Project SEPA DS & Scoping Notice  
 January 14, 2021

Cultural Resources

- Effects of project construction and operation activities on historic and archaeological resources, traditional cultural properties, and access to exercise traditional practices and treaty rights.

Public services and Utilities

- Effects of project construction and operation on fire, police, recreation areas, and other governmental services or utilities.

Ecology will determine the full scope of the EIS at the end of the scoping period after comments are reviewed. Elements of the environment are listed in the SEPA rules (WAC 197-11-444). Not all elements of the environment outlined in WAC 197-11-444 will be included in the study.


**Scoping:** Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required.

**Comments can be submitted via:**

- **By mail:** Sage Park, Department of Ecology, 1250 West Alder Street, Union Gap, WA 98903-0009
- **Online:** <http://admin.ecology.commentinput.com/?id=eVi6D>
- **During online public meetings as verbal comments:** You can register in advance by clicking on the links in the table below.

Meeting date	Link to join the meeting online	Join by phone	Access code
<b>Jan. 27, 2021 at 6:00 PM</b>	<a href="https://tinyurl.com/GoldendaleEnergyJan27">https://tinyurl.com/GoldendaleEnergyJan27</a>	415-655-0001	177 243 8033
<b>Feb. 3, 2021 at 10:00 AM</b>	<a href="https://tinyurl.com/GoldendaleEnergyFeb3">https://tinyurl.com/GoldendaleEnergyFeb3</a>	415-655-0001	141 470 2345

**Comments will be accepted through February 12, 2021.**

Responsible Official Signature  \_\_\_\_\_ Date January 14, 2021

Digitally signed by Park,  
 Sage (ECY)  
 Date: 2021.01.14 08:25:08  
 -08'00'

Sage Park, Regional Director  
 Central Regional Office  
 Department of Ecology

## State Environmental Policy Act (SEPA) Register

SEPA and NEPA documents posted by the Department of Ecology since 2000

Search (../..) / 202100180 - WA Department of Ecology

# 202100180 - WA Department of Ecology

**Lead Agency**

WA Department of Ecology

**Website**

<https://ecology.wa.gov/Goldendale-Energy-SEPA> (<https://ecology.wa.gov/Goldendale-Energy-SEPA>)

**Contact**

Meg Bommarito

(425) 649-7128

[meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov) (<mailto:meg.bommarito@ecy.wa.gov>)

**County**

KLICKITAT

**Region**

Central

**SEPA #**

202100180

**Document Type**

DS/SCOPING, EIS

**Date Issued**

01/14/2021

**Comments Due**

02/12/2021

**Proposal Name**

**Proposal Description**

The proposed Goldendale Pumped Storage Project, eight miles south of Goldendale next to the Columbia River, would create 1,200 megawatts of clean electricity to integrate into the existing power grid, as well as tap into and use power already being generated by the Northwest's wind and solar-energy projects. During periods of excess energy from these other sources, water would be pumped from a lower reservoir near the river to an upper reservoir on the bluff some 2,400 feet above. Water in the upper reservoir would then be held and released to the lower reservoir via an underground pipeline, generating electricity as it passes through three hydroelectric turbines, enabling Northwest utilities to meet peak electricity demand.

**Related Record****Location**

Parcel: 03171800000000, 03171900000200, 03171900000300, 03172000000100, 031729000000200, 031730000001300

Section/Township/Range: Township 03 North, Sections 18, 19, 20, 29, 30

Other identifying information: Approx. 8 miles southeast of the City of Goldendale, on John Day Dam Road. Project is adjacent to the Columbia River and will use the John Day Dam infrastructure.


**Applicant**


FFP Project 101, LLC

**Applicant Contact**

Erik Steimle  
220 Northwest 8th Avenue  
Portland, OR 97209

**Documents**

 DSForm\_Signed\_1-14-21.pdf (Document/DocumentOpenHandler.ashx?DocumentId=105132) (882 KB)

 SEPA\_Checklist\_Signed\_Dec2020.pdf (Document/DocumentOpenHandler.ashx?DocumentId=105128) (492 KB)

 SiteDiagram.jpg (Document/DocumentOpenHandler.ashx?DocumentId=105129) (2 MB)

Please email [SEPA Help \(mailto:sepahelp@ecy.wa.gov\)](mailto:sepahelp@ecy.wa.gov) with any updates, problems, or questions about SEPA Register.

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## LEGALS FOR JANUARY 20, 2021

Jan 20, 2021

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### This Just In....

- Public Notice – Summons for Publication – Berg, McLaughlin, & Nelson
- Public Notice – Funding Notice – Washington Gorge Action Programs
- Probate Notice to Creditors – John Mark Costantini – Thomas J Foley
- Public Notice – Request for Proposals – Klickitat County IT Department
- Notice of Public Comment Period and Meetings – Goldendale Energy Storage Project – Washington Department of Ecology
- Public Notice – Small Works Roster – City of Goldendale
- Public Notice – Special Election – Klickitat County Auditor
- Public Notice – Finance Committee Meeting – Klickitat County Treasurer
- Public Notice – Board of Commissioners Vacancy – Central Klickitat County Parks & Recreation District
- Public Notice – Board of Directors Meeting – Klickitat County Public Economic Development Authority

### NOTICE OF PUBLIC COMMENT PERIOD AND MEETINGS

Goldendale Energy Storage Project

Scoping for an Environmental Impact Statement

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The Department of Ecology (Ecology) invites you to comment on the scope of an environmental review of the possible impacts of a proposed pumped storage energy project along the Columbia River near Goldendale, WA. Ecology is seeking comments on what should be included in the study, project alternatives and possible mitigation to reduce project impacts.

FFP Project 101, LLC are proposing to develop the Goldendale Energy Storage Project - an off-stream, closed-looped water storage system that will release water from an upper reservoir downhill to a lower reservoir to create energy. The hydropower project would generate about 1,200 megawatts of electricity to be integrated into the existing power grid, using existing infrastructure from the nearby John Day dam. The project would use power already generated by wind and solar-energy projects for operations. Energy produced would serve markets in the Pacific Northwest.

Visit Ecology's website at <https://ecology.wa.gov/goldendale-energy-SEPA> for the SEPA checklist and other project information. Due to COVID-19, documents related to this site will not be available at libraries and other locations. If you are unable to view information online at the Ecology website and have questions, please contact Meg Bommarito at [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov) or 425-681-6236.

Written comments may be submitted Jan. 14 – Feb. 12, 2021 online at <http://admin.ecology.commentinput.com/?id=eVi6D> or by mail to Sage Park, Department of Ecology, Central Regional Office, 1250 West Alder Street, Union Gap, WA 98903-0009

Ecology will hold two online public meetings on Jan. 27 and Feb. 3, 2021. Due to COVID-19, no in-person public meetings will be held.

Jan. 27 at 6:00 PM: Join online at <https://tinyurl.com/GoldendaleEnergyJan27> or by phone at 415-655-0001, access code 177 243 8033

---

Feb. 3 at 10 AM: Join online at <https://tinyurl.com/GoldendaleEnergyFeb3> or by phone at 415-655-0001, access code 141 470 2345

To request ADA accommodation including printed materials in a format for the visually impaired, contact Ecology at 360-407-6831 or [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov). Persons with impaired hearing may call Washington Relay Service at 711. Persons with a speech disability may call TTY at 877-833-6341. If you need this document in another language, please contact Meg Bommarito at [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov) or 425-649-7128.

Para más información o para solicitar un intérprete, favor de comunicarse con Meg Bommarito al 425-649-7128 o [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov).

(0311)

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**NOTICE OF PUBLIC COMMENT PERIOD AND MEETINGS**  
 Goldendale Energy Storage Project  
 Scoping for an Environmental Impact Statement  
 The Department of Ecology (Ecology) invites you to comment on the scope of an environmental review of the possible impacts of a proposed pumped storage energy project along the Columbia River near Goldendale, WA. Ecology is seeking comments on what should be included in the study, project alternatives and possible mitigation to reduce project impacts.  
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12, 2021 online at [min.ecology.commentinput.com/?id=eVi6D](https://tinyurl.com/?id=eVi6D) or by mail to Sage Park, Department of Ecology, Central Regional Office, 1250 West Alder Street, Union Gap, WA 98903-0009  
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 Para más información o para solicitar un intérprete, favor de comunicarse con Meg Bommarito al 425-649-7128 o [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov). (0311)

**AFFIDAVIT OF PUBLICATION**

State of Washington  
 County of Klickitat } ss

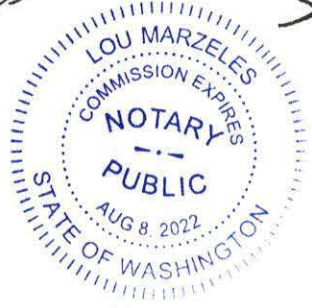
Naomi James, being first duly sworn on oath, deposes and says: That she is an agent of The Goldendale Sentinel, a weekly newspaper, which has been published, published in the English language, and related continuously as a weekly newspaper in the County of Goldendale, and in said County and State, and of said circulation in said County for more than six (6) months prior to the date of the first publication of the newspaper hereto attached, and that the said Goldendale Sentinel was on the 18<sup>th</sup> day of June, 1941, approved as a newspaper by the Superior Court of said Klickitat County, and that the annexed is a true copy.

of Public Comment Period and  
 s/Goldendale Pumped Storage  
 appeared in the regular and entire issue of said newspaper and not in a supplement thereof for a period of one (1) week(s) commencing on the 20th day of January, 2021 and ending on the 20th day of January, 2021 and said newspaper was regularly distributed to its subscribers during all of this period.

*Naomi James*  
 Naomi James  
 Agent

Subscribed and sworn to before me this 20th day of January, 2021

*Lou Marzeles*



(0311)

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## Legals

Goldendale, WA. Ecology is seeking comments on what should be included in the study, project alternatives and possible mitigation to reduce project impacts.

FFP Project 101, LLC proposes to develop the Goldendale Pumped Storage energy project - an off-stream, closed-looped water storage system that will release water from an upper reservoir downhill to a lower reservoir to create renewable energy. The hydropower project would generate about 1,200 megawatts of electricity to be integrated into the existing power grid, using existing infrastructure from the nearby John Day dam. The project would use power already generated by wind and solar-energy projects for operations. Energy produced would serve markets in the Pacific Northwest.

Visit Ecology's website at <https://ecology.wa.gov/goldendale-energy-SEPA> for the SEPA checklist and other project information. Due to COVID-19, documents related to this site will not be available at libraries and other locations. If you are unable to view information online at the Ecology website and have questions, please contact Meg Bommarito at [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov) or 425-681-6236.

Written comments may be submitted Jan. 14 Feb. 12, 2021 online at <http://admin.ecology.commentinput.com/?id=6V16D> or by mail to Sage Park, Department of Ecology, Central Regional Office, 1250 West Alder Street, Union Gap, WA 98903-0009.

Ecology will hold two online public meetings on Jan. 27 and Feb. 3, 2021. Due to COVID-19, no in-person public meetings will be held.

Jan. 27 at 6:00 PM: Join online at <https://tinyurl.com/GoldendaleEnergyJan27> or by phone at 415-655-0001, access code 177 243 8033

Feb. 3 at 10 AM: Join online at <https://tinyurl.com/GoldendaleEnergyFeb3> or by phone at 415-655-0001, access code 141 470 2345

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Para más información o para solicitar un intérprete, favor de comunicarse con Meg Bommarito al [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov) o 425-649-7128.

January 14 - 498970

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# Attachment B

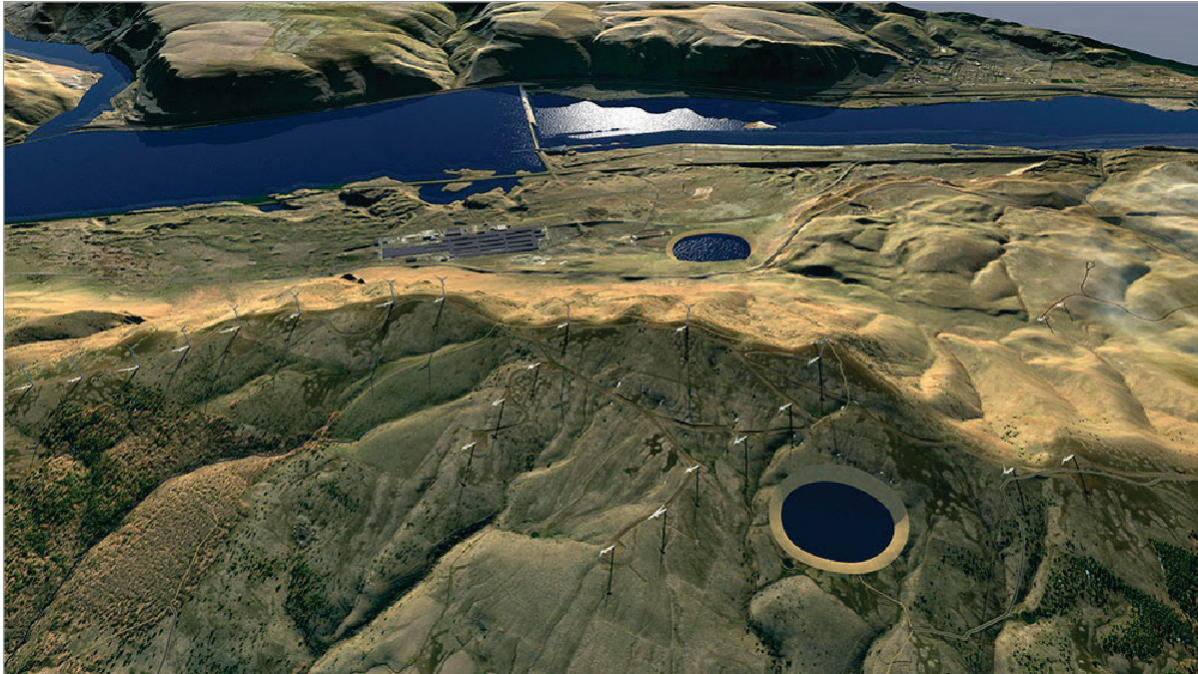
## Public and Media Notifications

## Ecology launches environmental review of proposed pumped storage energy project near Goldendale

### *Public input needed to shape the scope of the environmental study*

GOLDENDALE –

The Washington Department of Ecology is seeking comment on what should be considered when preparing an environmental impact statement for a new hydropower project proposed along the Columbia River in Klickitat County.



Upper and lower reservoirs are proposed to generate hydropower in a closed loop system above the John Day Dam.

Free Flow Power Project 101, LLC (FFP Project), is proposing to build a closed-loop water storage system that releases water from an upper reservoir downhill to a lower reservoir to generate energy. The power produced would feed into the electrical grid at nearby John Day Dam.

The lower reservoir would be located on a portion of the former Columbia Gorge Aluminum smelter site. Water for the project would be drawn from the Columbia River under a permit that once served the aluminum plant. Project plans call for the lower reservoir to be filled once, with supplemental fills annually.

Ecology is asking community members, stakeholders, tribes and others to weigh in on what should be studied in the scope of a full EIS for the Goldendale Pumped Storage Energy Project, including project alternatives, site impacts and what types of mitigation should be considered.

Scoping comments will be accepted through Feb. 12, 2021, and may be made [online](#) or in writing to Sage Park, Washington Department of Ecology, 1250 West Alder Street, Union Gap, WA 98903-0009, Attn: Goldendale Scoping.

People can learn more about the project, and make formal comments on the scope of the project during two online meetings:

**Jan. 27** from 6 to 8 p.m., online at <https://tinyurl.com/GoldendaleEnergyJan27> or by phone at 415-655-0001, access code 177 243 8033

**Feb. 3** from 10 a.m. to noon, online at <https://tinyurl.com/GoldendaleEnergyFeb3> or by phone at 415-655-0001, access code 141 470 2345project website.

More information about the meetings and the project documents can be found on the project [website](#).

The EIS will examine possible significant and adverse impacts resulting from the construction and operation of the proposed project. This includes impacts to both the natural environment and nearby communities through study of air quality, plant and animal habitat, transportation, water and cultural resources.

The EIS also will analyze how impacts can be reduced or eliminated through mitigation. A draft EIS is expected to be available for public review and comment sometime in 2022.

An EIS is an impartial, comprehensive study used as a resource for decision-makers and the public.

## Related links

[Goldendale Pumped Storage Energy Project](#)

## Contact information

### **Joye Redfield-Wilder**

Communications Manager

[jred461@ecy.wa.gov](mailto:jred461@ecy.wa.gov)

509-961-6277

Twitter: [EcyCentral](#)

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**Ecology - Central Region**  
@ecyCentral

YOUR INPUT WANTED: We're analyzing environmental impacts of a proposed hydropower project above John Day Dam near Goldendale. Let us know what you think needs to be covered in an EIS. Learn more:

[ecology.wa.gov/NewsGoldendale...](https://ecology.wa.gov/NewsGoldendale...)



10:00 AM · Jan 14, 2021 · Twitter Web App

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# Goldendale Energy Storage Project

## Public Comment Period to Begin an Environmental Review

Ecology is conducting a full study of possible environmental impacts related to the proposed Goldendale Energy Storage Project near Goldendale, WA. Ecology will develop an Environmental Impact Statement (EIS) and summarize the findings. The first step in the process is to determine the scope or extent of the environmental review.

### Public Comment Period: January 14 - February 12, 2021

We are asking the public, tribes and other stakeholder to give us ideas about what should be included in the study. We're looking for comments on project alternatives, resources that might be impacted, what should be studied, and what can be done to reduce impacts. You can provide comments:

- By mail to: Sage Park, Department of Ecology, 1250 West Alder Street, Union Gap, WA, 98903-0009
- Online at: <http://admin.ecology.commentinput.com/?id=eVi6D>

### Public Meetings: January 27 and February 3, 2021

Due to Covid-19, we are unable to host in-person meetings. We will host two online meetings where you can learn more about the project and submit verbal comments:

Meeting date	Link to join the meeting online	Join by phone	Access code
Jan. 27, 2021 at 6:00 PM	<a href="https://tinyurl.com/GoldendaleEnergyJan27">https://tinyurl.com/GoldendaleEnergyJan27</a>	415-655-0001	177 243 8033
Feb. 3, 2021 at 10:00 AM	<a href="https://tinyurl.com/GoldendaleEnergyFeb3">https://tinyurl.com/GoldendaleEnergyFeb3</a>	415-655-0001	141 470 2345



Central Regional Office  
1250 West Alder Street,  
Union Gap, WA 98903-0009

#### Public Comment Period

#### Goldendale Energy Storage Project Environmental Review

January 14—February 12,  
2021

If you are unable to view information online at the Ecology website, have questions, or need ADA or language accommodations, please contact Meg Bommarito at [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov) or 425-681-6236. Para más información o para solicitar un intérprete, favor de comunicarse con [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov) or 425-681-6236.

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# Attachment C

## Website



# Goldendale Energy Storage Project

We're conducting the environmental review on a proposed hydropower project on the Columbia River, adjacent to the John Day Dam near Goldendale. Free Flow Power Project 101, LLC (FFP Project), is proposing to build a closed-loop water storage system that releases water from an upper reservoir downhill to a lower reservoir to generate energy.

This review is done under [SEPA](#), the State Environmental Policy Act.

## I want to...

- Review scoping comments received
- Review project documents
- Receive email updates about the project



## Determination of Significance and scoping for an EIS

We've determined that the project is likely to have significant environmental impacts and are requiring a full evaluation in an environmental impact statement (EIS).

Our first step was to invite tribes, stakeholders, community members, and others to weigh in on what should be considered in the scope of the EIS. The comment period on the scope of the project ended Feb. 12, 2021. We're now moving forward with drafting the EIS and will use the comments made during scoping to inform what should be considered.



The project includes a new aerial transmission line that connect to the existing Bonneville Power Administration's John Day Substation in Oregon, near the City of Rufus. [Click to enlarge.](#)

The EIS examines possible significant and adverse impacts resulting from the construction and operation of the proposed project. This includes impacts to both the natural environment and nearby communities through studies of air quality, plant and animal habitat, transportation, water and cultural resources. It will also look at how impacts can be reduced or eliminated through mitigation.

A final EIS will have a public review process and is expected to be complete by mid-2022.

Read [frequently asked questions about SEPA](#) to learn more about the environmental review process.

Para más información, favor de comunicarse con Meg Bommarito al 425-649-7128.

## Scoping complete

The public comment period on what should be studied in the EIS, project alternatives, and what mitigation should be considered to reduce project impacts ended Feb. 12, 2021. Documents available for review included the [SEPA checklist](#) and [Determination of Significance](#).

## Comments received

[Online](#)

[At the Jan. 27, 2021 public event](#)

[At the Feb. 3, 2021 public event](#)

## Public meetings

We held online public meetings on Jan. 27 and Feb. 3 to share basic information about the project and to accept comments on the scope of the EIS. The same information was shared at both events.

[Video of presentation](#)

[Presentation](#) (PDF), [script](#)

## Want to receive project updates?

By mail — Send a request to Meg Bommarito at [meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov), 425-649-7128 or Department of Ecology, Northwest Regional Office, 3190 160th Ave SE, Bellevue, WA 98008.

By email — [Sign up for our listserv](#)



The hydropower project proposes to use an upper and a lower reservoir to generate energy in a closed loop system above the John Day Dam. Click to enlarge.

Free Flow Power Project 101, LLC (FFP Project), is proposing to build a closed-loop water storage system that releases water from an upper reservoir downhill to a lower reservoir to generate energy. The power produced would feed into the electrical grid at nearby John Day Dam.

The lower reservoir would be located on a portion of the former Columbia Gorge Aluminum smelter site, and water for the project would be drawn from the Columbia River under a permit that once served the aluminum plant. The FFP Project plans to purchase water from the Klickitat Public Utility District. Project plans call for the lower reservoir to be filled once, with annual supplemental fills.

The project is expected to generate up to 1,200 megawatts of electricity. It would send electricity to the grid through the existing infrastructure of the nearby John Day Dam.

The project includes:

Two reservoirs

A 2,400 feet gross elevation gain and involves no river or stream impoundments, allowing for water conveyances.

An underground water conveyance tunnel and powerhouse.

115 and 500 kilovolt transmission lines.

An electrical substation/switchyard and other related facilities.

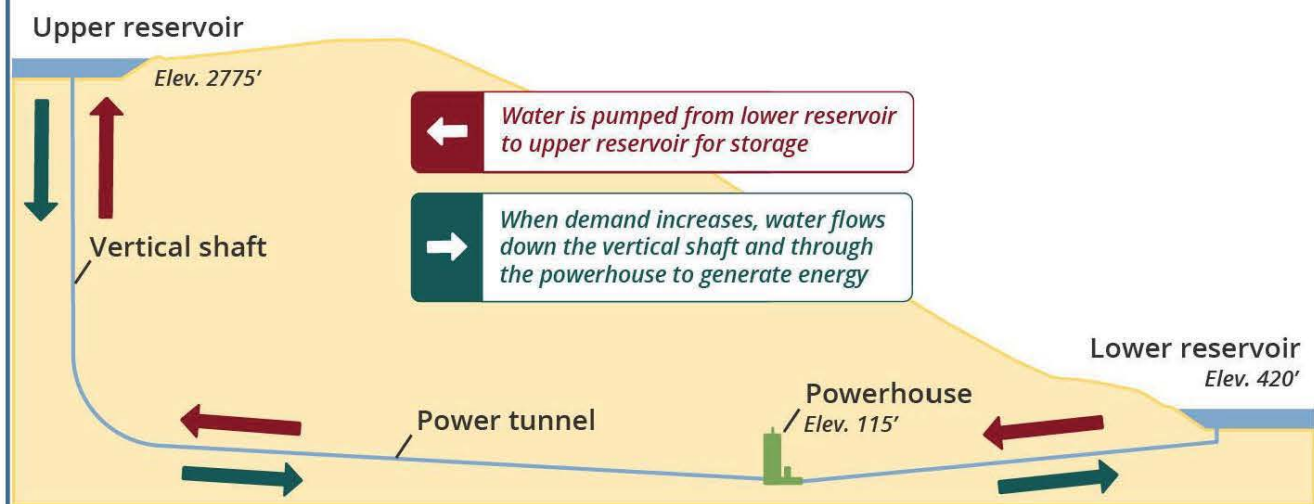


Diagram showing how energy will be produced using two reservoirs at different elevations.

## Frequently Asked Questions

### What is SEPA?

Washington aspires to grow communities in balance with natural resources. SEPA is Washington's State Environmental Policy Act that has helped achieve this balance for over 50 years. It helps manage the balance between the economy and protecting natural resources and quality of life.

SEPA outlines a process for identifying and analyzing potential environmental impacts associated with governmental decisions. These decisions may be related to issuing permits for private projects, constructing public or private facilities, or regulations, policies, and plans.

The SEPA review process helps agency decision-makers, applicants, and the public understand how the entire proposal will affect the environment. SEPA requires government — including Ecology — to take environmental factors into consideration before making decisions on proposed projects.

### How does the environmental review process work?

Local and state governments use science and objective data to evaluate thousands of projects every year. The process is straightforward. A lead agency evaluates the proposal and determines the level of impact it will have on the environment. This helps establish the level of environmental review. The lead agency then makes a formal decision called a threshold determination for the project in one of three categories:

Determination of Nonsignificance — The project is not likely to have significant adverse environmental impacts.

Determination of Mitigated Nonsignificance — The project could have significant adverse environmental impacts, but measures (mitigation) can be taken to avoid, reduce, or eliminate those impacts.

Determination of Significance — The project will likely result in significant adverse impacts. The lead agency is responsible for the Environmental Impact Statement (EIS) process. An EIS provides the public, the lead agency and other agency decision makers a more thorough review of the project than what's typically submitted in the SEPA checklist.

#### How long will the environmental review process take?

The time necessary to complete an Environmental Impact Statement (EIS) review varies greatly between proposals and depends on the complexity of the proposal and the scope of the review. The average EIS takes about 18-24 months to complete.

[Washington Administrative Code \(WAC\)](#) recommends the completion of an EIS in 24 months, but every proposal is different and each is reviewed independently so the EIS is comprehensive, objective, transparent, and defensible. Generally, the more complicated projects take longer.

#### How are the environmental review process and permits process related?

The environmental review process helps agencies and the public identify potential impacts to people and the environment that might result from a project that requires a permit or other agency decision. It also helps agencies identify actions that can be taken to help protect people and the environment from project impacts.

The SEPA review process looks at a wide range of potential impacts, including natural resources (plants, animals, water, etc.) and the built environment (traffic, noise, etc.). The SEPA process also identifies possible options for reducing those impacts. Agencies and local governments will use information from the SEPA review when making permit decisions.

#### What is scoping?

Scoping is the first step in the process of developing an environmental impact statement, or EIS. After a lead agency (or co-lead agency) issues a determination of significance, they will decide what impacts should be studied, how they should be studied, what alternatives should be considered, and what mitigation should be required to lessen or eliminate the impacts. This analysis is summarized in an EIS.

A 21-day public comment period is required for the scoping process. The lead agency asks tribes, members of the public, and other agencies to assist in identifying what should be studied and how. We are also interested to hear ideas for mitigation and project alternatives. This information collected is used to help develop the scope of the EIS.

#### What is an Environmental Impact Statement?

The purpose of an Environmental Impact Statement or EIS under SEPA is to fully understand the project's probable, significant, and adverse environmental impacts, and then determine if these probable impacts can be reduced or eliminated. The EIS document provides a comprehensive and objective evaluation of those impacts, reasonable alternatives, and mitigation measures that would avoid or minimize impacts.

The EIS is not a decision. It's not a permit and it's not an approval for the project to move forward. An EIS provides decision-makers important information to consider in making project decisions.

#### What types of comments are helpful during scoping?

Concerns identified during the scoping process can be further evaluated when a draft EIS is being prepared. It's usually easier and more effective to comment early, during the scoping process than wait until the draft EIS is available for comment.

Comments can address:

If the proposal is clearly described.

Which elements of the environment should be studied, such as air quality, water quality, fish and wildlife habitat, transportation systems, etc.

Reasonable range of alternatives (identification of an alternative site or approach that achieves the proposal objective).

Extent of study and analyses that are needed to understand impacts.  
Measures to avoid, minimize, and mitigate or offset effects of the proposal.

#### How can the public provide input on the proposed project?

Several opportunities for public involvement are built into the EIS process. The first is scoping, where the public can weigh in on what the lead agency should study in the EIS. We will hold two online public meetings as part of this process. A second public comment period will be held for the draft EIS. We will consider all public input before finalizing the scope of the EIS and the EIS itself.

#### What environmental permits and authorizations will be required for the project?

A preliminary list of the anticipated permits and decisions was provided by the project proponent and is included in the table below. After the SEPA environmental review is completed, permit decision-makers will use the information to help them decide if permits should be granted, conditioned or declined.

Agency	Permit
Federal Energy Regulatory Commission (FERC)	National Environmental Policy Act (NEPA) environmental review FERC license
Bonneville Power Administration	Large Generation Interconnection Agreement
US Army Corps of Engineers	Clean Water Act Section 404
Washington Department of Ecology	Clean Water Act Section 401 NPDES construction stormwater permit Reservoir permit Prospective Purchaser Agreement (detailed proposal for site cleanup)
Washington Department of Fish and Wildlife	Hydraulic Project Approval
Klickitat County	Building permits

#### When will environmental permitting begin?

Most permit decisions are made after SEPA process is completed and a final EIS is published. SEPA documents are considered by agencies when making permit decisions.

## More project information

### Federal environmental review process

This project is also being reviewed for environmental impacts through the federal [National Environmental Policy Act \(NEPA\)](#) process. To review the federal environmental review documents, visit its [document library](#).

### 401 Water Quality Certification

We're working with the Federal Energy Regulatory Commission (FERC) to license hydropower projects. The proponent submitted an application to receive a [401 Water Quality Certification](#) for the project. The comment period on the application ended Nov. 9, 2020.

If we determine that the project can meet water quality standards, we will issue the certification. Sometimes this is done with conditions to make sure that the standards will be met. These conditions become part of the FERC license.

## Cleanup of contamination left behind by former aluminum smelter

The lower reservoir of the proposed project would be located on a portion of the [former Columbia Gorge Aluminum smelter site](#) that is currently going through the process to clean up contamination left behind by past operations. We're working with liable parties Lockheed Martin and NSC Smelter to investigate the nature and extent of contamination and develop a cleanup plan for the entire site.

FFP Project 101, LLC, is seeking a prospective purchaser consent decree (PPCD) to define the cleanup actions needed for the portion of the site they propose to purchase for the energy project.

We will continue to make sure that activities at the site, whether they are related to cleanup or a future use, meet local, state, and federal requirements to protect the environment.

### Related links

[Goldendale Energy Storage Project news release](#)

### Contact information

Meg Bommarito  
Regional Planner  
[meg.bommarito@ecy.wa.gov](mailto:meg.bommarito@ecy.wa.gov)  
425-649-7128

Sage Park  
Regional Director, Central Regional Office  
[sage.park@ecy.wa.gov](mailto:sage.park@ecy.wa.gov)  
509-457-7120

### Media contact

Joye Redfield-Wilder  
Ecology Communications  
[joye.redfield-wilder@ecy.wa.gov](mailto:joye.redfield-wilder@ecy.wa.gov)  
509-575-2610

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# Attachment D

## Tribal Notifications

**Attachment C  
Tribal Contact List**

TRIBE CONTACTED	
Chinook Tribe	Nisqually Indian Tribe
Coeur d'Alene Tribe	Nooksack Indian Tribe
Columbia River Intertribal Fish Commission	Northwest Indian Fisheries Commission
Confederated Tribes and Bands of Yakama Nation	Port Gamble S'Klallam Tribe
Confederated Tribes of Chehalis Reservation	Puyallup Tribe
Confederated Tribes of Grand Ronde	Quileute Tribe
Confederated Tribes of the Colville Reservation	Quinault Indian Nation
Confederated Tribes of Umatilla Indian Reservation	Samish Indian Nation
Confederated Tribes of Warm Springs Reservation	Sauk-Suiattle Indian Tribe
Cowlitz Indian Tribe	Shoalwater Bay Indian Tribe
Duwamish Tribe	Skokomish Indian Tribe
Hoh Indian Tribe	Snohomish Tribe
Jamestown S'Klallam Tribe	Snoqualmie Indian Tribe
Kalispel Tribe of Indians	Snoqualmoo Tribe
Kikiallus Indian Nation	Spokane Tribe of Indians
Kootenai Tribe of Idaho	Squaxin Island Tribe
Lower Elwha Klallam Tribe	Stilliguamish Tribe of Indians
Lummi Nation	Suquamish Tribe
Makah Tribe	Swinomish Indian Tribal Community
Marietta Band of Nooksack Tribe	Tulalip Tribes
Muckleshoot Indian Tribe	Upper Skagit Indian Tribe
Nez Perce Tribe	Wanapum Tribe



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# Attachment E

## Scoping Presentation



# Goldendale Energy Storage Public Meeting

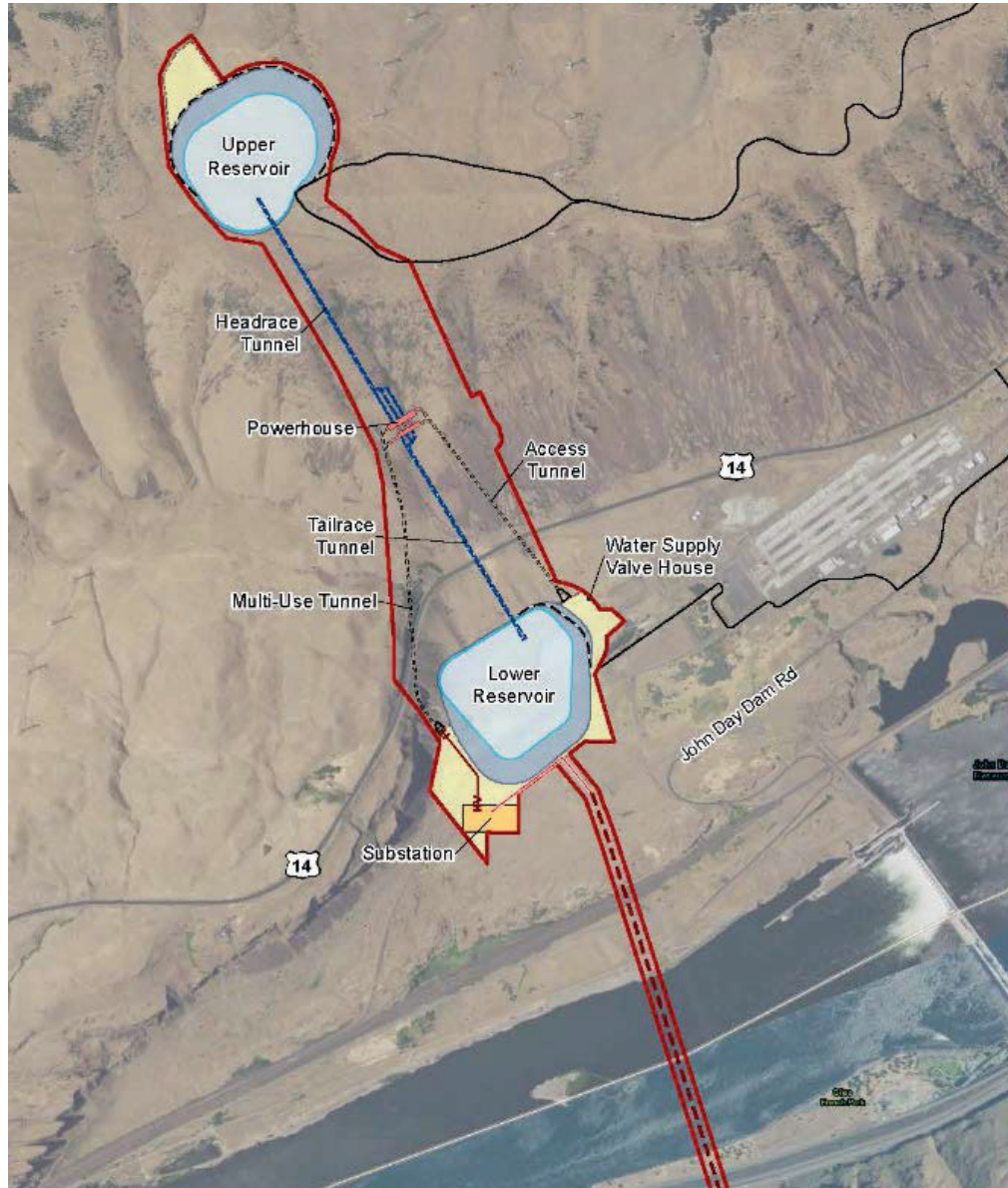
## Environmental Impact Statement Scoping

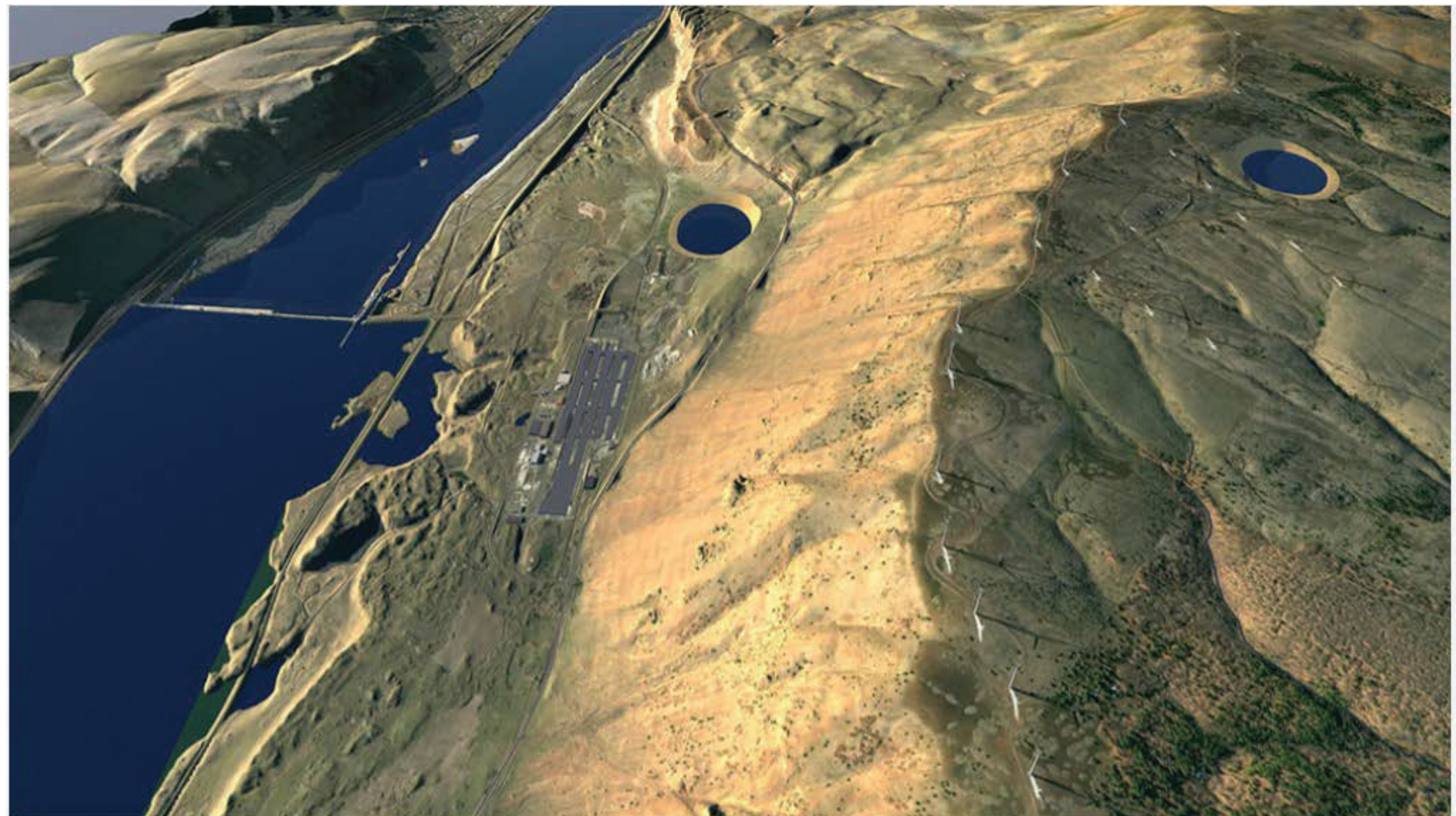
Jan. 27 and Feb. 3, 2021



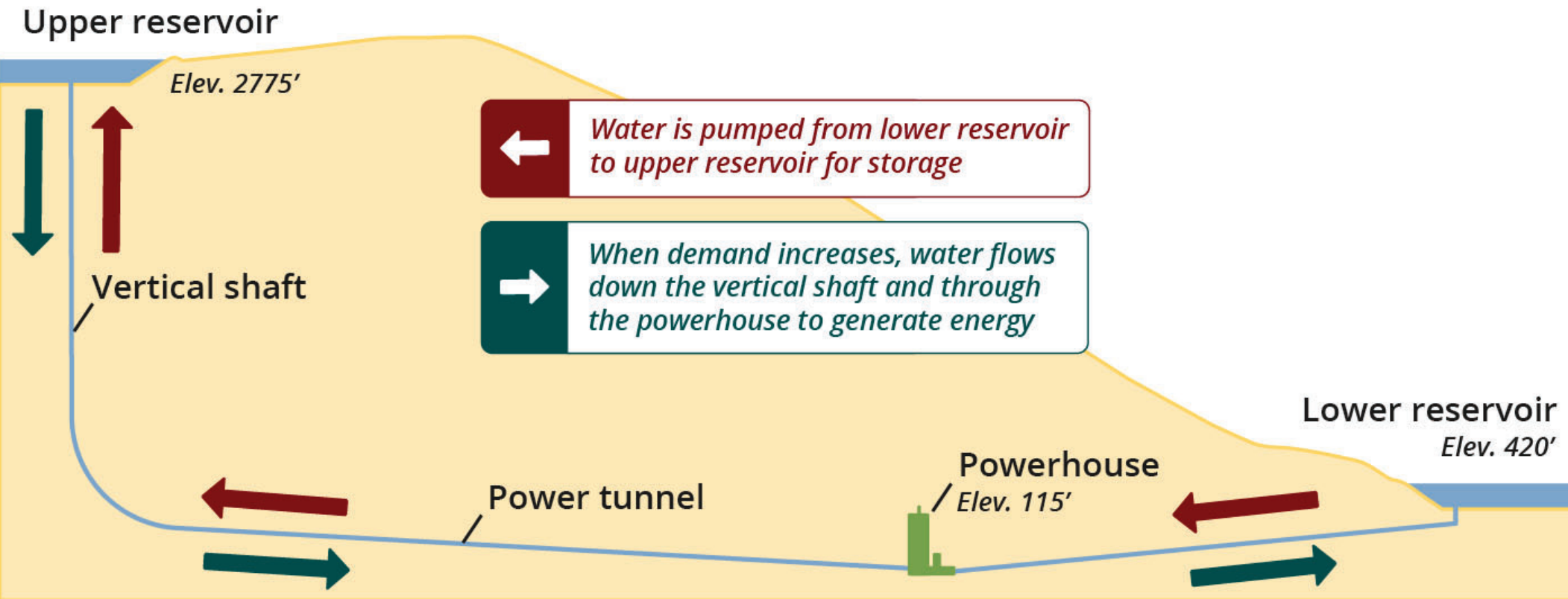
# Proposed Project Location







# Project Description



# Project Components

**Federal permit and  
environmental  
review**

**State  
Environmental  
Review**

**Ecology permits**

**Former smelter site  
cleanup**



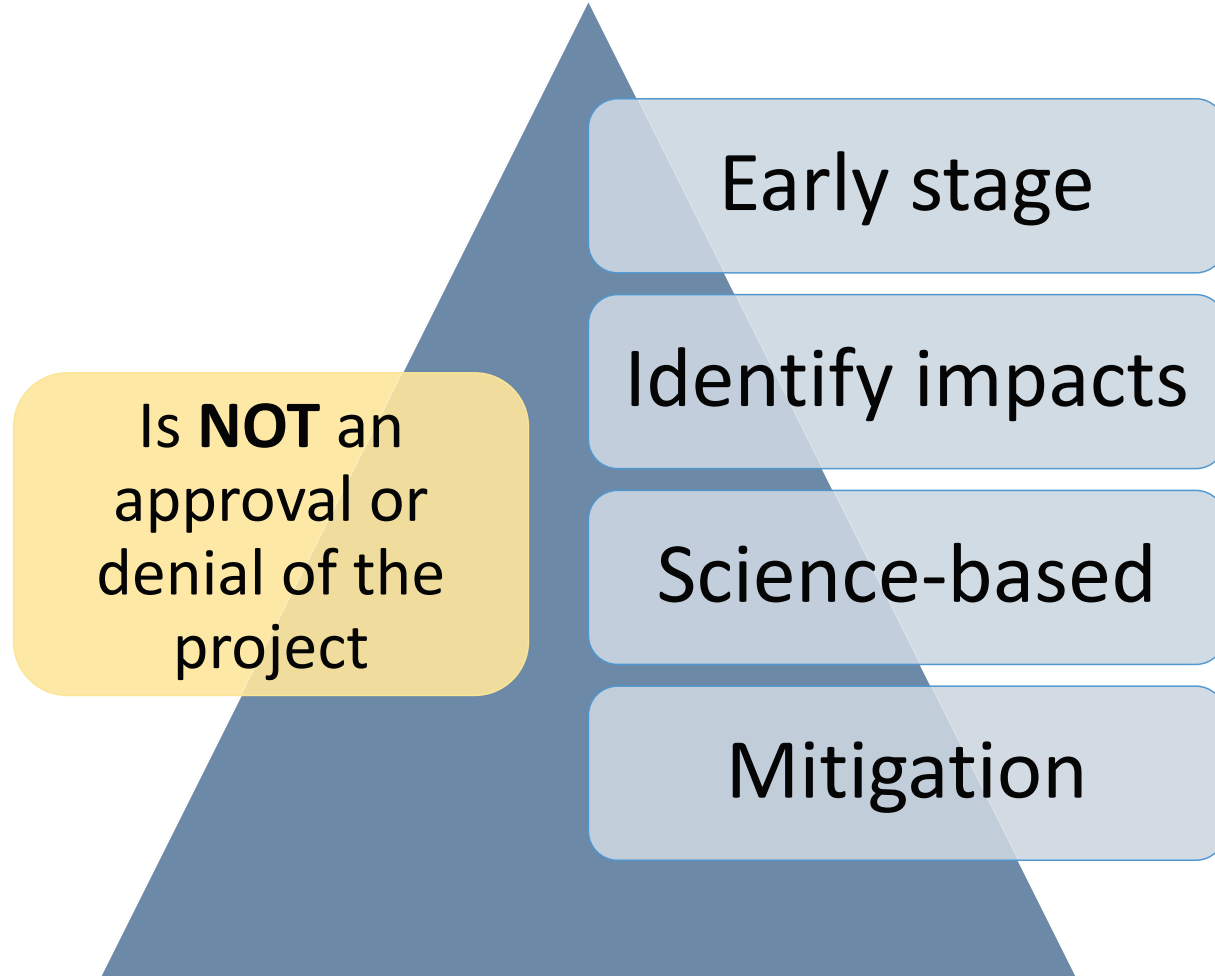
# Environmental Review

- Environmental impact statement
- Ecology document
- Opportunities for public comment

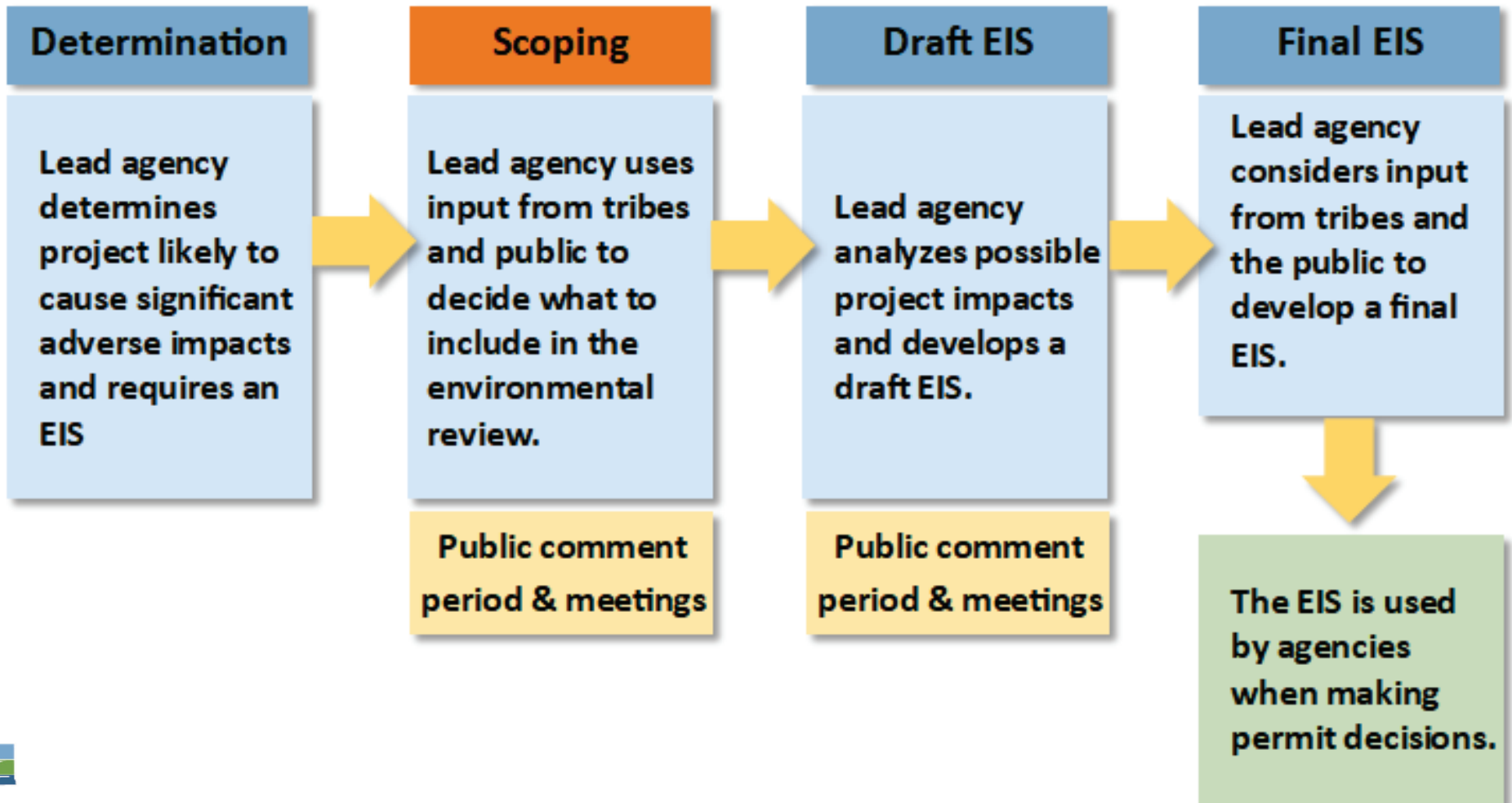




# Purpose of an Environmental Impact Statement (EIS)



# Scoping



# Providing Comments

## Due by Feb. 12, 2021

### Online

<http://ecology.wa.gov/Goldendale-Energy-SEPA>

### Mail

Sage Park, Department of Ecology  
1250 West Alder Street, Union Gap, WA, 98903-0009

**Public comments  
will be used to  
finalize the scope  
of the EIS**

**Written comments  
are given the same  
consideration as oral  
comments**





# Permitting

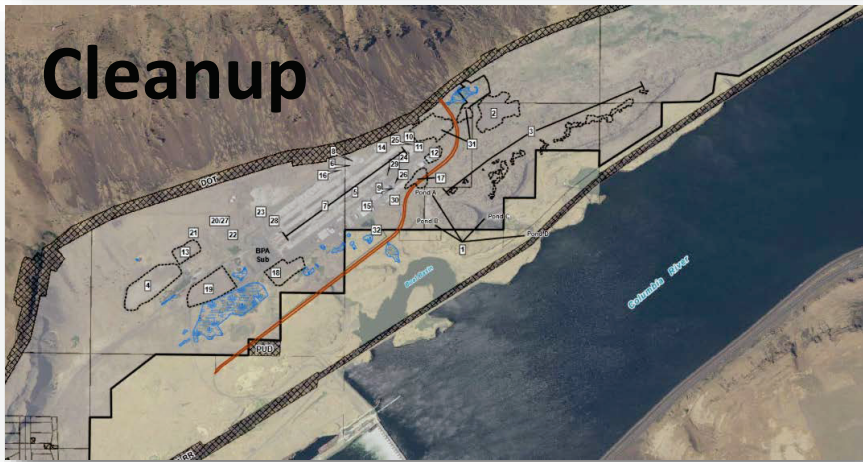
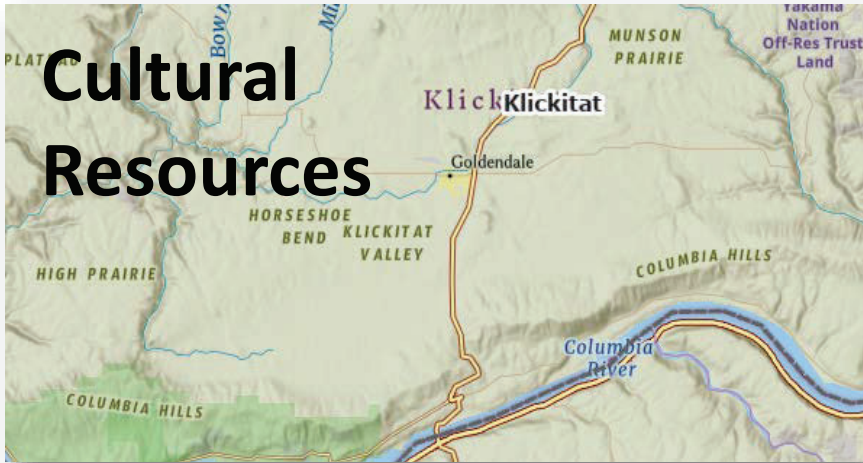




# Former Columbia Gorge Aluminum Smelter Cleanup Site



# Areas of Concern

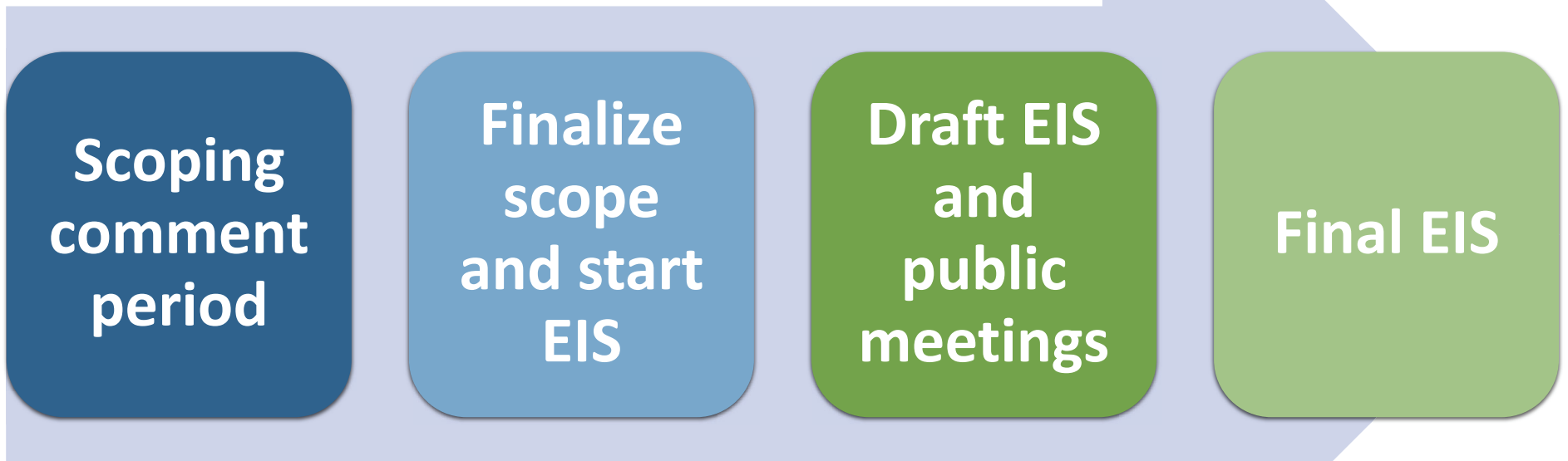


# Project History

Date	Event
September – November 2020	Ecology public comment period on application for 401 water quality certification
December 2020	Ecology receives final SEPA checklist
January 14, 2021	Ecology makes a determination of significance, begins scoping for EIS



## Next Steps



**Public comments will be used to help us determine the scope of the EIS**







# Thank you!

Join our listserv to receive updates  
[tinyurl.com/goldendaleEnergyListserv](http://tinyurl.com/goldendaleEnergyListserv)

**Sage Park**

Central Regional Office Director

[Sage.Park@ecy.wa.gov](mailto:Sage.Park@ecy.wa.gov)

509-457-7120

**Meg Bommarito**

Project Manager

[Meg.Bommarito@ecy.wa.gov](mailto:Meg.Bommarito@ecy.wa.gov)

425-649-7128

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# Attachment F

## Scoping Comments

## **ECOMMENTS**

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### **I-1: Robert Lee**

**Address:** 11395 HIGHWAY 14  
**Submit Date:** 02/01/2021

#### **Comment I-1-1**

In regards to the Goldendale Energy Storage Project proposed at the old Goldendale Aluminum Plant site. It seems to me that installing large pumps at all the dams to pump water back up when there is surplus electricity and reusing it when needed, would be much cheaper and much more practical. The lakes are already built. The generators and power grids are already built at the dams. This would eliminate the risk of a dam break that could be devastating to Swale Creek and Centerville area if the lakes are built on the proposed site.

### **I-2: Jessica Metta**

**Address:** 802 Chenoweth Loop Road  
**Submit Date:** 02/02/2021

#### **Comment I-2-1**

Please see attached letter of support.



February 2, 2021

Sage Park  
Washington Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009

*Re: Goldendale Energy Storage Project EIS Scoping*

Dear Ms. Park,

I am writing on behalf of Mid-Columbia Economic Development District (MCEDD) to express support for the Goldendale Energy Storage Project. The project, which is located within the Columbia Gorge Renewable Energy Zone, is a high-priority project listed in MCEDD's Comprehensive Economic Development Strategy, and our No. 1 priority project in Washington.

The Columbia River Gorge is an important center of renewable energy production and high-tech innovation. With an abundance of wind and solar electricity facilities in the Gorge, storage is becoming increasingly important. It is impossible for our region to meet our clean energy goals if we cannot store renewable energy to use when we need it.

The proposed Goldendale Energy Storage Project is a result of nearly two decades of work by private landowners and the community of Goldendale, WA. It is my understanding there has been a considerable amount of environmental studies, planning, and analysis completed over the last 20+ years to support commercial development on this land.

The proposed closed-loop pumped-storage hydropower facility is a creative reuse of a former brownfield site, transforming the property into a clean energy resource and a flexible water battery. It also helps electric grid managers balance a rapidly changing electricity supply with demand. The Goldendale project is expected to create more than 3,000 family-wage jobs at a time when rural Washington and Oregon desperately need them.

Goldendale Energy Storage Project is the type of project that will help Washington and Oregon reduce our dependence on fossil fuels while creating opportunities for rural communities. We are highly supportive of the project.

Sincerely,

A handwritten signature in blue ink that reads "Jessica Metta".

Jessica Metta  
Executive Director

**I-3: George Winn**

**Address:** 2133 Nichols BLVD

**Submit Date:** 02/07/2021

**Comment I-3-1**

Please keep the scope of this wide enough to withstand litigation, but narrow enough to not waste time. Projects like this allow our region to store power, a critical piece of the puzzle to adapt to climate change. I am curious about how the water would be removed from the Columbia, and the speed of removal.

I am also curious what sort of public amenities this facility will provide in terms of trails, cycle tracks, informational stops, signage, et cetera. Please make it all cycle accessible, not just for automobiles.

**I-4: gaywood paul**

**Address:** po box 798

**Submit Date:** 02/08/2021

**Comment I-4-1**

Both reservoirs should have double liners with a life of 75 years (and then replaced) and monitored moisture sensors around the berm down to a depth below the bottom to prevent water leaching through the rock/soil and flowing into the Columbia River. The lower reservoir location is probably contaminated from previous activity at the old AL plant and core samples should be taken before issuing any permits. Any contaminated rock/soil should be removed.

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-5: Mark Riker**

**Address:** 906 Columbia St SW, Suite 107

**Submit Date:** 02/09/2021

**Comment I-5-1**



February 3, 2021

Department of Ecology  
Attn: Sage Park  
1250 West Alder Street  
Union Gap, WA 98903-0009

RE: Goldendale Energy Storage Project

Dear Ms. Park,

As Executive Secretary of the Washington State Building and Construction Trades Council representing approximately 80,000 construction workers here in Washington, I want to offer our support to the Goldendale Energy Storage Project.

Our organization serves as a voice of workers in the building and construction trades across the state, and as that voice, we understand the importance of economic development and security in Washington's rural areas. The Goldendale Energy Storage Project would not only provide economic opportunities to thousands in the areas that need them but would do so with the mission of achieving Washington's CETA clean energy goals.

The Goldendale Energy Storage Project would serve as a job creator and a community builder – generating over 3,000 family wage jobs over its four-year construction cycle and infusing over \$2 billion in the economy of rural Washington and Oregon. Klickitat County and communities along the Columbia River gorge would receive millions in tax revenue.

The Project would also play an integral role in achieving Washington's 100% clean energy goals by 2045 by supplying reliable non-emitting electricity. The Goldendale Energy Storage Project will enable utilities to balance the demand of electricity with the rapidly changing energy supply. Furthermore, the project will provide the state with a local, clean energy source that will leave behind minimal environmental impact.

It should also be noted that the Goldendale Energy Storage Project is considered a "Project of Statewide Significance" by the Washington State legislature due to its investment in environmental improvements and innovation activities.

Like our state legislature, the Washington State Building and Construction Trades Council believes that this project would serve as an example of how investment in renewable energy projects can make our communities stronger, our region cleaner, and our state more prosperous.

Thank you for giving me an opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark L. Riker".

Mark L. Riker, Executive Secretary  
Washington State Building & Construction Trades Council

opeiu8/aff-cio

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-6: Ilene Le Vee**

**Submit Date:** 02/09/2021

**Comment I-6-1**

I'm disappointed to learn that none of the plans called for covering the reservoirs particularly when it's obvious that significant water losses will occur due to evaporation. Given the site location I think evaporation levels will be so high that it will be necessary to add to water levels more often than anticipated.

**I-7: Matthew Hepner**

**Address:** 19802 62nd Ave S #105

**Submit Date:** 02/09/2021

**Comment I-7-1**



**MATTHEW HEPNER**  
Executive Director  
Phone: (253) 243-5408  
matthew@cew-wa.com



**CERTIFIED ELECTRICAL  
WORKERS OF WASHINGTON**  
REPRESENTING ELECTRICAL WORKERS STATEWIDE

February 9, 2021

Department of Ecology  
Attn: Sage Park  
1250 West Alder Street  
Union Gap, WA 98903-0009

RE: Goldendale Energy Storage Project Scoping

Ms. Park,

The Certified Electrical Workers of Washington -IBEW support the Goldendale Energy Storage Project because it is an important element in both Washington and the region's clean energy future while providing quality family wage jobs and rural economic development.

The Goldendale Energy Storage Project supports Washington state's clean energy commitment through the Clean Energy Transformation Act (CETA) with minimal environmental impacts. CETA requires that all electric utilities in Washington state reach 100% clean electricity supply by 2045.

It is impossible for Washington to meet the CETA goals if we can't store renewable energy to use when we need it. This Project will help meet that need.

The Project also helps electric grid managers balance a rapidly changing electricity portfolio with demand. This compared to other clean energy sources like wind and solar that are intermittent in nature - pumped storage enables grid operators to access reliable electricity 24/7. We only have to look down to California's grid emergency and blackouts last year to see the importance of having energy storage available to support other clean energy resources when they go offline.

The Project will create more than 3,000 family wage jobs during its four-year construction period, and another 50 to 70 permanent jobs in an area of the state that desperately needs them. It also infuses \$2 Billion+ dollars into rural Washington benefitting local economies throughout the Gorge and providing Klickitat County with millions in new tax revenue.

The success of the Project is also important to IBEW because it sends a message to other potential investors that carbon-free projects will be permitted and built in Washington.

Thank you for giving me an opportunity to comment.

Sincerely,

Matthew Hepner  
Executive Director  
Certified Electrical Workers of Washington

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-8: Michael Canon**

**Address:** 1103 S. Columbus Ave

**Submit Date:** 02/10/2021

**Comment I-8-1**

February 9, 2021

To: Sage Park, Department of Ecology SEPA Responsible Official  
From: Mayor Mike Canon, City of Goldendale, WA  
RE: Scoping comments, Goldendale Energy Storage Project (FFP Project 101, LLC)

I am writing as the Mayor of Goldendale to both submit the City's scoping comments and to express the City's long-standing and continued support for the Goldendale Energy Storage Project.

By way of background, the project developers have pursued an aggressive outreach and education effort for many years. The area is familiar with large project construction given the multi-generational contact with such projects (John Day Dam, Goldendale Aluminum Smelter, extensive wind projects). Local residents are well aware of the effects the proposed project is likely to have during construction and operation, leading to wide-spread support for the undertaking.

That support recognizes that many jobs will go to highly specialized contractors, but it also recognizes the role new, large projects offer for local workers during construction and operation. Also, our local school, hospital, fire, and other special taxing districts receive an influx of new funding that is well beyond the capability of the local economy to generate without such projects.

In addition to commenting on the scoping topics listed by Ecology, the importance of the proposed project to the socio-economic well-being of the City of Goldendale leads me to request that Ecology determine that a detailed socio-economic study of the project be treated not as an optional Environmental Impact Statement element but as essential information that would be helpful to the lead agency in evaluating the proposal and meeting the test of adequacy as discussed in Section 3.3.5 of the SEPA Handbook and further reinforced in *Barrie v Kitsap County (1980)*.

Many of the probable project impacts and areas for proposed study in the EIS, as listed in the January 14, 2021 scoping notice, have been previously addressed in Klickitat County's Programmatic EIS for its energy overlay zone action, which the City suggests be included by reference in the Ecology EIS.

The City's main scoping comment is our request that a socio-economic analysis be performed not as an optional element but as a key section of the EIS (see above); the City also makes the following scoping comments:

Air Quality	The City of Goldendale is the closest incorporated community to the project site. Given the prevailing winds and the difference in altitude, it is unlikely there would be any construction or operation effects from the project on Goldendale.
Transportation	The local area can easily absorb operations worker commute traffic, plus there is a robust and developing rural transit system in the Columbia River Gorge that could be adapted to worker needs. Recent experience with wind project construction, which brought hundreds of outside-the-area workers, most of whom were traveling the same route Goldendale Energy Storage construction workers would use, demonstrated that local roads can readily accommodate greatly expanded worker traffic.
Recreation	The Goldendale area has a rich, underutilized recreation infrastructure including state and county parks, river activities, hiking, and Maryhill Museum. Increased use of these resources during construction is unlikely to stress that infrastructure and the estimated permanent workforce would have a negligible effect on recreation.
Aesthetics	As stated above, the City of Goldendale is the closest incorporated community. The remote site would have no aesthetic effects. With respect to night sky viewing, both the City of Goldendale and Klickitat County recognize the importance of dark skies and have ordinances enforcing use of dark sky-compatible lighting. It has been our experience that raising this issue with project developers leads to the incorporation of dark sky considerations into facility design and operation.
Public Services and Utilities	While Klickitat County and Klickitat PUD would be the lead entities, there is close cooperation between emergency response organizations in this area, including Goldendale's police and fire departments. Construction and operation issues may require some specialized additional training, but that is not an unusual requirement.

In closing, the City of Goldendale is in an area that is likely to be key to achieving the Clean Energy Transformation Act's (CETA) aggressive goals. Variable renewable energy resources, especially if the state is to achieve the 100% goal by 2045, need the kind of support a closed-cycle pumped storage hydro project like the Goldendale Energy Storage Project provides. The technology is thoroughly tested in multiple domestic and international facilities, its life-cycle cost is far below available alternatives, and it is free of the need to replace depleted batteries – which should be a consideration in both the alternatives analysis and life-cycle costing analyses.

It is the City's hope that Ecology's Section 5 obligation to incorporate CETA's goals into the department's planning and decision-making process, as stated in the statute, coupled with the statute's repeated reference to pumped storage hydro, will guide the department as it prepares this EIS.

Sincerely,

Mike Canon

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-9: Muhsin Seyhanli**

**Address:** 10570 Hwy 14

**Submit Date:** 02/10/2021

**Comment I-9-1**

Sage Park, WA State Department of Ecology

Thank you for giving me an opportunity to express my thoughts regarding the Goldendale Pumped Storage Project. In short, I enthusiastically support the project as I feel the Storage Project is absolutely necessary for the future of renewable energy development in NW and West Coast USA. The project will also assist BPA's Hydro System in managing intermittent energy loads. The unique project location incorporates favorable features such as short distance proximity of upper and lower reservoirs, and significant elevation difference of reservoirs in a small footprint. These desirable features will be instrumental in the efficient operation of the project upon completion.

I started my work career in 1968 at the old Reynolds Metals Troutdale, OR primary aluminum smelter. The following years to date have also been in management of other Northwest smelters at The Dalles, OR and Goldendale, WA in various capacities as Production Manager, General Manager, and Business Leader. Currently I am involved with remediation of the Goldendale smelter. During these years, I worked with BPA in procuring very large blocks of energy for smelters' operations, and first hand experienced the energy trends from hydro surplus to hydro shortages which essentially ended primary aluminum production in NW.

Due to number of dam limitations the BPA hydro system eventually relinquished direct customer support, and shifted to supporting only local public utility and investor owned utility companies such as PG&E. Wind energy generation then stepped in a big way as region's energy demands continued to increase. Currently, WA Klickitat County and neighboring counties are prominent wind energy regions in the US. The last Goldendale WA operating company GAC was the pioneer in wind energy development in WA Klickitat County and OR Wasco County.

The Northwest and West Coast renewable generation is now increasing with new solar generation in Klickitat County and throughout the west coast. Renewable energy, although clean, does not lend itself to supporting around the clock energy demand by many industries. Additionally, at times the sudden surge of renewable generation exceeds then prevailing demand. In recent years the BPA dam system attempted to be the modulator of this varying generation but because of its capacity limitations and fish flow related requirements now needs assistance. The Goldendale Pumped Storage Project will ably and efficiently fill the renewable management void. The project will support the growth of new industries in the region with resultant economic benefits.

Due to above considerations I strongly support a favorable water quality certificate be issued to the Goldendale Project.

Regards,

Mac Seyhanli

COO-CGA

541-993-1906

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-10: Mike Bridges**

**Address:** PO Box 2393

**Submit Date:** 02/10/2021

**Comment I-10-1**





## **Longview/Kelso Building Trades Council**

*Mike Bridges, President*

*Adam Davis, Recording Secretary*

February 10, 2021

Sage Park  
Washington Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009  
Attn: Goldendale Scoping

Dear Ms. Park:

Sustainable job development is a vital component to keeping rural Washingtonian communities healthy and vibrant. The Goldendale Energy Storage Project would be a catalyst in providing family-wage jobs to many of these communities while also helping our state and federal policymakers achieve our goals to reduce carbon emissions.

The Goldendale Project would propel the state closer to its goal of a 100% clean energy supply by 2045 and bring the neighboring states of California and Oregon closer to their own renewable energy mandates. Additionally, the Project would act as a safety net for grid operators during our region's transition from non-renewable to renewable energy. Only with a massive amount of energy storage capacity will we be able to meet the increasing demand of electricity during this transition.

It should also be noted that hydropower and energy storage facilities like the Goldendale Energy Storage Project would not only accelerate – but are critical to – President Biden's 2050 goal of a national net-zero emissions standard.

Apart from its environmental benefits, the Goldendale Project would be an economic stimulant for communities in rural Washington. An estimated 3,000 jobs will be created during its 4-year construction with another 50-70 jobs that will remain after its completion.

To that end, the project fits hand and glove with the economic development strategy laid forth by the Mid-Columbia Economic Develop District, which seeks to advance the renewable energy sector through the creation and sustainability of high-quality jobs in rural Washington and Oregon.

Due to the aforementioned benefits of the Goldendale Energy Storage Project, the Longview/Kelso Building and Construction Trades Council offers its full support to its construction and operation.

Sincerely,

Mike Bridges  
President  
Longview/Kelso Building and Construction Trades Council

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-11: Willy Myers**

**Address:** 3535 SE 86th Avenue

**Submit Date:** 02/10/2021

**Comment I-11-1**



# Columbia Pacific Building and Construction Trades Council

February 3, 2021

Department of Ecology  
Attn: Sage Park  
1250 West Alder Street  
Union Gap, WA 98903-0009

RE: Goldendale Energy Storage Project – Scoping for Environmental Review

Department of Ecology:

My name is Willy Myers and I am the Secretary-Treasurer of the Columbia Pacific Building and Construction Trades Council (CPBCTC), representing more than 15,000 members in 25 different crafts.

The CPBCTC supports the Goldendale Energy Storage Project because the project represents Washington's clean energy future by providing clean energy to power our lives and clean energy family wage jobs to support our families here in the Gorge.

It is important that in the scope of the EIS it comprehensively analyzes the minimal environmental impact of the project but also the socioeconomic impacts including family wage job creation and new increased tax revenue that will positively impact public safety, schools and services for our most vulnerable.

The EIS must also analyze the importance of the project in reaching the new commitments made by Washington state through the Clean Energy Transformation Act (CETA). Under CETA by 2045 utilities must supply Washington customers with electricity that is 100% renewable or non-GHG emitting, with no provision for offsets. The Goldendale Energy Project is a critical component of achieving that mandate.

We must have a thorough and efficient review process so that Washington can build the critical infrastructure we need to achieve our clean energy future while providing the family wage jobs that support our communities.

Sincerely,

  
Willy Myers  
Executive Secretary-Treasurer

**I-12: Susan VanLeuven**

**Address:** 325 Ingraham Rd.

**Submit Date:** 02/10/2021

**Comment I-12-1**

Dear Ms. Park,

Thank you for the invitation to participate in the scoping process. Although this project has been enthusiastically promoted by industry and Klickitat County officials, important details need to be examined before informed consideration can be given to approval of this project.

This project is being advanced as an economic opportunity by some of its strongest proponents, and most of the economic benefit seems to be associated with construction. If economic benefits are to be included in an environmental impact assessment, then economic liabilities must also be included. What will be the costs of operating and maintaining the system? What will be the cost of decommissioning the infrastructure when the facility reaches the end of its service lifespan? A realistic accounting of both benefits and costs needs to be done, along with disclosure of who would realize the benefits and who would bear the costs.

Regarding water use, the project description calls for annual supplemental fills to replace lost water volume. The project is sited in a hot and windy location, and water loss from the open reservoirs will be significant. How much of the water volume will have to be replaced annually? How is water loss by seepage into the soil addressed?

This facility will require energy to pump water to the upper reservoir, as well as maintain a control system and shelter for workers onsite. It is unlikely that the hydropower output will offset the power needed to operate the facility. What is the differential in units of power (not cost or price of electricity) to operate the system over the course of a year? The energy required for supplemental filling of the lower reservoir should be included in computations. This information will be helpful in consideration of the value of the project for advancing a green energy initiative. A facility that uses more energy than it produces is not an energy efficient system, and therefore lacks credibility as a green energy project.

The construction of the project will permanently alter the landscape and habitat for native flora and fauna on this site. What measures are proposed to minimize disturbance? What will be done with the excavated material from the tunnel? This is a unique landscape and offsite mitigation will not be sufficient to replace lost or adversely impacted habitats. What is the expected service life of the project? A short-term project that results in permanent loss of other values must be carefully considered.

Thank you for the opportunity to provide these comments.

Sincerely,  
Susan VanLeuven

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-13: Diana Adams**

**Address:** 903 E. Broadway

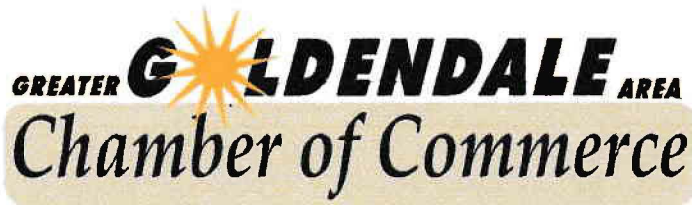
**Submit Date:** 02/11/2021

**Comment I-13-1**

Goldendale Chamber of Commerce scoping comments related to the Goldendale Energy Storage Project (attached/uploaded).

Diana Adams

Goldendale Chamber of Commerce scoping comments related to the Goldendale Energy Storage Project (attached/uploaded).




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903 East Broadway, Goldendale, WA 98620 • (509) 773-3400 •  
[www.goldendalechamber.org](http://www.goldendalechamber.org)

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February 11, 2021

Sage Park  
 Department of Ecology  
 1250 West Alder Street  
 Union Gap, WA 98903-0009

RE: Scoping comments, Goldendale Energy Storage Project (FFP Project 101, LLC)

I am writing as the President of the Goldendale Chamber of Commerce to both submit the Chamber's scoping comments and to express the Chamber's long-standing and continued support for the Goldendale Energy Storage Project.

By way of background, the project developers have pursued an aggressive outreach and education effort for many years. Chamber members are familiar with large project construction given the multi-generational contact with such projects (John Day Dam, Goldendale Aluminum Smelter, extensive wind projects). Local residents are well aware of the effects the proposed project is likely to have during construction and operation, and there is wide-spread support for the undertaking.

Our support recognizes that many jobs will go to highly specialized contractors, but it also recognizes the role new, large projects offer for local workers during construction and operation. Also, our local school, hospital, fire, and other special taxing districts would receive an influx of new funding that is well beyond the capability of the local economy to generate without such projects as reflected in this table (estimated project cost of \$2 billion used):

<u>Taxing District</u>	<u>2019 Dist levy</u>	<u>New construction Value2</u>	<u>Estimated tax revenue from NC3</u>
County General	1.300624583	2,000,000,000.00	\$2,601,249.17
County Road	1.610842698	2,000,000,000.00	\$3,221,685.40
Goldendale School Dist	1.5	2,000,000,000.00	\$3,000,000.00
EMS	0.5	2,000,000,000.00	\$1,000,000.00
Klickitat County Hospital	0.615283486	2,000,000,000.00	\$1,230,566.97
Fire 7	0.846270051	2,000,000,000.00	\$1,692,540.10
Library	0.363580148	2,000,000,000.00	\$727,160.30
Rec Dist 1	0.27	2,000,000,000.00	\$540,000.00
<b>Annual Total</b>			<b>\$14,013,201.93</b>

The area served by the Goldendale Chamber has the potential to be a major contributor to achieving the Clean Energy Transformation Act's (CETA) aggressive goals. Our area understands and supports clean energy projects, and that is a critically important aspect in meeting CETA's timeline.

We are currently the fourth-largest wind power production area in the Nation (see attached) and also host the largest solar project under construction in Washington State. There is considerable potential for additional renewable energy project construction in our area and our scoping comments reflect our understanding – based on experience with operating projects – of what it will require for variable renewable energy resources to contribute to achieving the 100% goal by 2045.

One key benefit from pumped storage hydro, as well as other utility-scale storage technologies, is the ability to use what would otherwise be unused curtailed renewable resource generation. Existing projects in our area are subject to periodic curtailment, frequently during periods of peak output, because the existing utility grid needs the kind of support a closed-cycle pumped storage hydro project like the Goldendale Energy Storage Project provides.

Pumped storage hydro's unique position in providing utility-scale storage is that the technology is thoroughly tested in multiple domestic and international facilities, its life-cycle cost is far below available alternatives, and it is free of the need to periodically replace depleted batteries – which should be a consideration in both the alternatives analysis and life-cycle costing analyses of Ecology's EIS.

With this background, and recognizing the obligations placed on Ecology by CETA Section 5 and other citations<sup>1</sup>, the Goldendale Chamber's main scoping recommendations are to incorporate the following points in the Alternatives Analysis as described in Section 3.3.2 of the SEPA Handbook:

CETA-Related Considerations	<ul style="list-style-type: none"><li>• The CETA statute and related rulemaking recognize the importance of utility-scale storage in meeting the 100%</li></ul>
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<sup>1</sup> (4) The commission, department, energy facility site evaluation council, department of ecology, and all other state agencies must incorporate this section into all relevant planning and utilize all programs authorized by statute to achieve subsection (1) of this section. (referenced section appears below)

**Sec. 5. (1)** It is the policy of the state that nonemitting electric generation and electricity from renewable resources supply one hundred percent of all sales of electricity to Washington retail electric customers by January 1, 2045. By January 1, 2045, and each year thereafter, each electric utility must demonstrate its compliance with this standard using a combination of nonemitting electric generation and electricity from renewable resources.



	<p>non-emitting electric generation and electricity from renewable resources by 2045 goal.</p> <ul style="list-style-type: none"> <li>• Pumped storage hydro and large battery installations, as the main utility-scale storage technologies, should be treated as alternatives and assessed in terms of their life-cycle costs (reiterated below), including the effects of the need to replace batteries on a regular basis during the project’s life; the environmental impact of battery production vs pumped storage hydro components; and the scale and effect of recycled battery waste, which doesn’t have a pumped storage hydro counterpart.</li> </ul>
<p>Location</p>	<ul style="list-style-type: none"> <li>• Renewable energy projects are based on the Second Law of Thermodynamics; they collect and aggregate diffuse energy resources from large areas and concentrate that energy into electricity that is used in the utility grid. Not all areas can support cost-effective renewable energy projects that meet the 2045 target as addressed in the CETA<sup>2</sup> statute, making it important to favor development of projects in areas – like Klickitat County – that are favorable to the siting and permitting needs of wind and solar. Storage extends the viability and cost-effectiveness of renewable energy projects and, for technical reasons related to grid operations, are best deployed near renewable energy generation projects. It is unusual to have a site such as the Goldendale Energy Storage Project that has both the physical characteristics needed for cost-effectiveness, grid access, and proximity to wind and solar projects.</li> <li>• The project location alternatives analysis should include the elements listed above, which reflect both CETA and SEPA Manual criteria.</li> </ul>

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<sup>2</sup> CETA Section 5 (3) In planning to meet projected demand consistent with the requirements of subsection (2) of this section and RCW 19.285.040, if applicable, an electric utility must pursue all cost-effective, reliable, and feasible conservation and efficiency resources, and demand response. In making new investments, an electric utility must, to the maximum extent feasible:

- (a) Achieve targets at the lowest reasonable cost, considering risk;
- (b) Consider acquisition of existing renewable resources; and
- (c) In the acquisition of new resources constructed after the effective date of this section, rely on renewable resources and energy storage, insofar as doing so is consistent with (a) of this subsection.

Life Cycle Costing	<ul style="list-style-type: none"> <li>• Grid-scale energy storage projects have multi-decade lifespans. Globally, pumped storage hydro projects routinely have 40-60 year operational lives.</li> <li>• Life cycle costing methodology should be incorporated into any assessment of alternative, grid-scale energy storage technologies.</li> </ul>
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Other scoping comments:

Use of Existing Documents	<ul style="list-style-type: none"> <li>• Klickitat County, in support of its energy overlay zone decision making process, funded a programmatic EIS (PEIS) addressing wind and solar renewable energy project siting. Included in that PEIS was a comprehensive avian use study. The PEIS should be incorporated into Ecology's EIS for the Goldendale Energy Storage Project.</li> </ul>
Existing Land Use	<ul style="list-style-type: none"> <li>• The project site is on privately owned land that is not open and unclaimed. A large portion of the land is heavily disturbed from past manufacturing facilities.</li> </ul>
Traditional Tribal Activities	<ul style="list-style-type: none"> <li>• Inaccurate public statements have been made that access and use of ceded land for traditional tribal activities has not been allowed on renewable energy project sites and that the Goldendale Energy Storage Project has the potential to expand this issue.</li> <li>• Renewable energy project land leases in Klickitat County make explicit that traditional tribal activities are allowed. In addition, landowners have the additional flexibility of allowing use of project sites for agricultural, hunting, and other activities – which can include traditional tribal activities.</li> </ul>

In closing, the Goldendale Chamber agrees with the City of Goldendale's observation that:

...the City of Goldendale is in an area that is likely to be key to achieving the Clean Energy Transformation Act's (CETA) aggressive goals. Variable renewable energy resources, especially if the state is to achieve the 100% goal by 2045, need the kind of support a closed-cycle pumped storage hydro project like the Goldendale Energy Storage Project provides.

It is the City's hope that Ecology's Section 5 obligation to incorporate CETA's goals into the department's planning and decision-making process, as stated in the statute, coupled with the statute's repeated reference to pumped storage hydro, will guide the department as it prepares this EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Diana Adams', written in a cursive style.

Diana Adams  
President

**Windpower Capacity by County  
Top Counties - 2020 Data**

<u>Counties/State</u>	<u>MW</u>
Kern County_CA	3,115
Nolan County_TX	2,097
Gilliam County_OR	1,307
Klickitat County_WA	1,248
Benton County_IN	1,190
Kenedy County_TX	1,089
Carson County_TX	1,074
Sherman County_OR	1,056
Solano County_CA	1,027
Floyd County_TX	1,018
Scurry County_TX	1,001
Sterling County_TX	991
Lincoln County_CO	894
Huron County_MI	871
Webb County_TX	858
Dewey County_OK	853
Ford County_KS	843
Logan County_CO	818
Starr County_TX	794
Willacy County_TX	787
O'Brien County_IA	750
Oldham County_TX	743
Pecos County_TX	683
Glasscock County_TX	678
Riverside County_CA	663
Kay County_OK	658
Adair County_IA	656
Taylor County_TX	652
Borden County_TX	640
Columbia County_WA	634
Converse County_WY	621
White County_IN	601
Mower County_MN	600
Jackson County_MN	598
Wilbarger County_TX	581
Weld County_CO	580
Castro County_TX	576
Garfield County_OK	568
McLean County_IL	548
Woodward County_OK	545

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-14: WDFW Verhey**

**Submit Date:** 02/11/2021

**Comment I-14-1**



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
Southwest Region 5 • 5525 South 11<sup>th</sup> St Ridgefield, WA 98642  
Telephone: (360) 696-6211 • Fax: (360) 906-6776

February 11, 2021

**FILED ELECTRONICALLY**

Ms. Sage Park  
Regional Director  
Washington Department of Ecology  
Central Regional Office  
1250 West Alder Street  
Union Gap, WA 98903-0009

**Attn: Goldendale Scoping**

Dear Ms. Park:

Thank you for the opportunity to provide comments on the scope of the Environmental Impact Statement (EIS) for the proposed Goldendale Energy Storage Project (Project). The Project is an important step toward utilities better managing the energy grid to accommodate fluctuations in wind and solar energy and is consistent with the Governor's decarbonization goals for the state. While we understand the need for this facility, we offer the following comments to be considered during the State Environmental Policy Act (SEPA) process to determine the scope of the EIS.

Our primary concerns are the need for compensatory mitigation to mitigate for impacts of the Project on wildlife foraging areas and the development of deterrence measures needed to prevent wildlife attraction to the reservoirs for foraging, which will increase the risk of bird or bat strikes at nearby wind farms.

**WDFW Fish and Wildlife Management**

The WDFW is an agency of the State of Washington with jurisdiction over fish, shellfish, and wildlife resources and charged with the duty of protecting, conserving, managing, and enhancing those resources. (Washington Revised code, Title 77) The WDFW mission statement is to preserve, protect, and perpetuate fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities.

## General Scoping Comments

The Department of Ecology has identified most of the environmental issues associated with the Project in the Determination of Significance and Request for Comments on the Scope of Environmental Impact Statement document. We recommend including all of them during the preparation of an EIS for the Project. We also recommend continued strong engagement with the Yakama Nation and any tribe that may be affected by this Project and other energy generation, transmission, and storage proposals. We recommend including the following additional environmental concerns as well. We identified these concerns by reviewing the Goldendale Energy Storage Final License Application (FLA) and the SEPA Environmental Checklist.

### Aquatic Resources

- FLA, Exhibit A, section 3.0  
We recommend evaluating water quality impacts related to lubricants and oil used in the operation of the Francis-type variable speed pump-turbines. The turbines may discharge lubricants into the water during operation.
- FLA, Exhibit E, section 2.2.1  
Evaluate reduced function in stormwater retention, hydrology/water flow through the area, stream reach functions and habitat of the wetland of features S7, S8, and P2.
- Although the West Surface Impoundment contaminated material is to be removed, we recommend evaluating the potential of leaks in the lower reservoir lining that may provide a pathway for toxic material to be release from the West Surface Impoundment into the Columbia River. This information may be used in the development of a monitoring plan.
- The annual loss of water from the reservoir due to evaporation is 420-acre ft. per year. Evaporation over extended periods of time may concentrate any solutes present in the water source, potentially causing the reservoir to become toxic to terrestrial and avian wildlife utilizing the Project waters. We recommend the development of a reservoir water quality monitoring and management plan to ensure the water is safe for wildlife resources. Specific methods to annually monitor levels of dissolved solids, nutrients, and heavy metals should be developed. A schedule for annually reporting the monitoring results and any proposed measure for addressing deteriorating water quality based on monitoring results should be developed.

### Terrestrial Resources

- FLA, appendix C, section 2.2.3  
We recommend evaluating the impact of the construction of the underground powerhouse and southernmost tunnel portal on John Day Talus, a WDFW Priority Habitat. Talus slopes are important habitat for reptile hibernacula, rare plants, and nesting.

- FLA, Appendix D, Section 2.2.5  
We recommend compensatory mitigation for permanent impacts of the Project to habitat. We recommend a mitigation ratio of 2:1 acres for impacts of the upper reservoir; a ratio of 1:1 acres for the lower reservoir/West Surface Impoundment area and appurtenant Project components because of degraded state of the habitat. To address impacts on raptors due to the removal of habitat and construction of a reservoir, the preferred compensatory mitigation property should be located in an area of known golden eagle and prairie falcon nesting habitat; and should provide forage species that benefit these birds (mule deer fawns, coyote pups, small mammals, yellow-bellied marmots, jackrabbits, and ground squirrels).

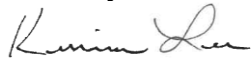
We recommend the development of a management plan for the compensatory mitigation property that identifies the parcels to be acquired, the criteria used to select the parcels, habitat improvements that would be implemented on each parcel and management to provide resilient habitat that mitigates for Project impacts.

- The potential of wildfires related to clearing and grubbing and construction activities should be evaluated. Vegetation clearing to construct the project will create slash that could build up concentrations of combustible material that could fuel wildfires.
- FLA, Exhibit D, Section 2.3.2, 2.3.3  
The licensee states the use of reservoir deterrent such as exclusion fencing and floating plastic shade balls to discourage migratory bird use of the reservoirs will be assessed. Since it has not been determined that plastic shade balls will be utilized at either reservoir, an evaluation of how bats and migratory birds use the reservoirs with and without the application of plastic shade balls should occur. The Project is located adjacent to a wind farm. Increased attraction of birds and bats by the reservoirs could increase bird and bat mortality at the wind farm. Bats and insects may be attracted to the water.
- In addition, the cliffs and talus slopes within the Project area are potential roost and hibernacula sites for bats. There is no available survey information for bats in the project area. Since the use of the Project area by bats is unknown, we recommend evaluating Project impacts on bats. We recommend using year-round acoustic monitoring to determine if bats are attracted to the reservoirs, the species of bats and when they are using the area. If the monitoring shows that bats are attracted to the reservoir, we recommend implementing deterrent measures specifically for bats. Acoustic deterrents that have been used at wind project may be effective.
- We recommend evaluating the use of fencing to deter wildlife and birds from using the reservoirs.
- We recommend installing flight diverters on the transmission lines where these lines are not feasible to be buried; and include quantifiable thresholds for determining when additional measures would be needed to address high-mortality areas based on proposed transmission line monitoring.



Thank you for this opportunity to provide the WDFW comments on scoping for the Project EIS. We are interested in working together on this important project. If there are any future meetings planned with the Project proponent, we would like to collaborate in this effort. Please contact Patrick Verhey at (509) 431-8296 or by e-mail at [Patrick.Verhey@dfw.wa.gov](mailto:Patrick.Verhey@dfw.wa.gov) if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Kessina Lee".

Kessina Lee, WDFW Regional Director  
Southwest Washington/Region 5  
Washington Department of Fish and Wildlife

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-15: Jim Smith**

**Address:** 1313 S Columbus Ave

**Submit Date:** 02/11/2021

**Comment I-15-1**



Honesty | Accountability | Customer Focused

February 11, 2021

Washington Department of Ecology  
1250 West Alder Street,  
Office of the Columbia River  
Union Gap, WA, 98903-0009

Attn: Sage Park, Regional Director

RE: Comments Regarding Goldendale Energy Storage Project

Public Utility District #1 of Klickitat County (KPUD) appreciates the opportunity to comment to the Washington Department of Ecology on the appropriate scoping for the proposed environmental review for the Goldendale Energy Storage project under the provisions of SEPA. We request consideration be given to our comments in the following areas:

**KPUD Water Rights / Project Water Supply** - With these comments KPUD's first priority is to clearly communicate with and achieve recognition / concurrence from Ecology on the matter of water supplied for this project. On Ecology's website for this project, under the project details tab, the provision of water is described as ".....*water for the project would be drawn from the Columbia River under a permit that once served the aluminum plant.*" In its Notice of Significance Ecology states, as a topic to be studied; "*Effects of project water withdrawals (e.g., initial fill and annual make-up water) on water quantity in the Columbia River.*"

These comments cause KPUD concerns in that they are an incomplete, and as such they are potentially a misleading characterization of how water will be provided to the Goldendale Energy Storage Project. It is not clear why and what review would occur of effects on the Columbia River when the water will be provided under a valid municipal water right. As Ecology is aware KPUD obtained the water rights formerly held by NSC and its predecessors who previously owned and operated Goldendale Aluminum. The water right was changed to municipal use after a very rigorous extent and validity analysis and impairment analysis. To be clear, and as KPUD believes Ecology understands but we wish to reiterate, the project, per se will not be withdrawing water from the Columbia River. KPUD will utilize facilities, obtained from NSC, the current property owner, and refurbish and expand as necessary to supply water in accordance with its municipal water rights, to provide water for the Project, as well as other potential customers that locate on the site at such time site clean-up allows. As such any characterization of how the Project is obtaining water for their operations, including the scoping document, should clearly recognize this arrangement, the details of which are currently under negotiation between FFP, NSC and KPUD. I would finally note that contrary to a characterization made by Ecology staff at the January 27 meeting, KPUD does not anticipate leasing water to the project. Rather the water will be sold and provided to the Project and other potential development as customers of the KPUD under either a rate schedule or contractual arrangement generally comparable to other KPUD transactions of a similar nature. We appreciate Ecology staff clarifying that matter in their remarks at the second public meeting

and trust Ecology's website and other communication will be clear and correct in its characterization on this matter.

More specifically as it relates to water supply, KPUD sponsored Washington State Senate Bill 6044 was passed and signed into law on March 30, 2012. The law expressly authorizes KPUD to supply water to a pumped storage project. The Cliff's Water System Plan document (PWS ID #224608), serving the Project was submitted to both Washington State Department of Health (DOH) and Department of Ecology (Ecology). KPUD reached agreement with Ecology and Health to allow for the expressed use of water for the Project and other potential development at the NSC site. Again, KPUD urges Ecology to recognize these facts in the scoping document.

**Recognition and Incorporation of Previous Environmental and Related Investigative Efforts for this Project Specifically and Location Generally** – In 2005 Klickitat County, after considerable consideration, multiple public hearings conducted by the Klickitat County Planning Commission and Board of Commissioners, and the completion of an EIS, adopted an ordinance and subsequent regulations establishing the Klickitat County Energy Overlay Zone (EOZ). The EOZ was the result of considerable local effort by Klickitat County and its residents to determine if, where and how they wished to see renewable energy resources developed in the county. As Ecology certainly is aware, and must recognize in their scoping document for this project, the proposed Goldendale Energy Storage Project lies within the EOZ.

Ecology is also aware that Klickitat County has seen considerable renewable energy development since that time. Today Klickitat County is one of the nation's leading producers of wind energy with over 1,250 MW in commercial operation. Each of these projects underwent their own permitting / licensing processes and associated studies.

In 2008 KPUD submitted a preliminary permit application for a pumped storage project at the same location as the proposed Project. KPUD's application was granted by FERC on April 1, 2009. In November 2012 KPUD received a successive preliminary permit. During the terms of these preliminary permits, KPUD researched Project feasibility, conducting the full array of consultation, public outreach and a host of environmentally related studies required for permitting and licensing.

The area of the proposed Project has been extensively studied and developed in the almost 16 years since Klickitat County adopted the EOZ. It is likely this area has been studied to a greater extent than any other area of the Pacific Northwest for its suitability for energy project development. Renewable Energy development has received strong support among Klickitat County residents during that time. KPUD requests that Ecology's scoping document acknowledge and incorporate the efforts previously performed in the early development of this project specifically and for renewable energy generally within the EOZ. The scoping document should incorporate and reflect the extensive volume of previous studies and analysis that have been conducted on the site of this Project and proximate areas to the Project.

**Consideration of Economic Impact Considerations** - KPUD obtained the water rights from National Smelter Corp (NSC) first with the hopes that Goldendale Aluminum might at some time restart, and secondly, in the event resumption of the smelter did not occur, to facilitate the beneficial use of the water in the County and for the redevelopment of the smelter property in order to replace the lost jobs and tax base associated with the closure of Goldendale Aluminum. Goldendale Aluminum was by far Klickitat County's largest employer and the loss of those jobs and tax base is still being felt today. In

response to that loss the KPUD Board of Commissioners correctly anticipated the development of renewable energy would be a significant economic development opportunity, supporting said development through direct participation in projects as well as supporting development through provision of transmission services. KPUD supports the development of the Goldendale Energy Storage Project as a continuation of our efforts to recover from the loss of Goldendale Aluminum jobs and tax base. As part of its efforts to pursue the project KPUD commissioned and economic impact study of the project performed by EcoNorthwest and completed (in draft) in May of 2015. That study concluded:

*ECONorthwest's analysis indicates that over the pre-construction and construction years, the JD Pool project will have cumulative direct, indirect and induced economic impacts in Washington and Oregon of \$1.39 billion in output, \$366 million in labor income, and 6,650 full-year-equivalent jobs. These impacts will be spread unevenly over time based on when spending occurs. Once the pumped storage facility is up and running, operating impacts in Washington and Oregon will total \$16.85 million in output, \$5.8 million in labor income, and 72 jobs annually. About 72 percent of output and 65 percent of job impacts in the region would occur in Klickitat County. JD Pool would generate an estimated \$15.1 million in property and other taxes to the County, primarily going towards education. These impacts will continue into the future.*

KPUD is aware that the current Project developers have also conducted an economic impact study performed in 2019 by Highland Economics. It concluded:

*Including ripple effects in other sectors, total economic activity supported by the Project in Klickitat County during construction is estimated to total 900 to 1,100 job-years and \$53.6 million to \$65.6 million in total labor income. In total, in all of Washington and in Oregon, 6,900 to 8,400 jobs years and \$650 million to \$795 million in labor income will be supported. On an average annual basis this equates to or approximately 190 to 230 jobs and \$10.7 million to \$13.1 million in labor income annually in Klickitat County. In total in Washington and in Oregon, this equates to approximately 1,390 to 1,730 jobs and \$130 million to \$159 million in labor income annually.*

*.....the first year after project construction, property taxes paid to Klickitat County by the Project may be as much as \$20 million to \$30 million. Thereafter, the value would fluctuate based on the net profitability of the Project. These property taxes would support local jurisdictions and county services in Klickitat County.*

These studies clearly demonstrate the significant economic impact the construction and operation of the Goldendale Energy Storage Project would have, certainly for Klickitat County specifically but for the region generally. These anticipated benefits drove the Mid-Columbia Economic Development District to incorporate support for the project in their March 2020 Economic Development Strategy. We urge Ecology incorporates economic consideration such as jobs, wages, and tax revenues into its analysis.

**Impact of Goldendale Energy Storage on Smelter Site Cleanup and Redevelopment** – KPUD, through its own previous development effort as well as through its continued support of redevelopment of the NSC property has gained a reasonable understanding of the contamination issues and associated cleanup efforts at the site. We further understand that the Project developer, FFP is seeking a prospective purchaser consent decree to define the cleanup actions needed for the portion of the site they propose to purchase for the energy project. Based on KPUD's understanding of the specific property in question we believe those cleanup efforts are not only manageable given the scope of the project, but more importantly will likely accelerate and broaden clean up actions at the site. We believe Ecology should

incorporate in its effort the impact of the Project in enhancing cleanup and restoration on the area covered by the prospective purchaser's agreement specifically and the NSC site as a whole.

**Consideration of Role of Project in Meeting Washington's Clean Energy and Carbon Reduction Legislation and Goals** - KPUD also anticipated that, as the percent of regional energy supply was increasingly comprised of intermittent renewable resources, there would be need for capacity resources to integrate said renewables into a reliable regional power supply. That is now clearly the case. While solar and wind energy is capable of replacing lost fossil fuel generation in the region (primarily coal generation) it is now clear that as wind and solar increase as a percentage of the regions electricity generation mix, the need for dispatchable capacity resources is becoming critically apparent. Failure to construct these types of resources to integrate wind and solar will result in either Washington failing to meet its renewable energy and carbon reduction goals, or result in an electric grid system prone to rolling blackouts as has happened recently in California. Conversely utility scale storage, such as the Goldendale Energy Storage Project will enable the further development of renewable energy into a reliable electric supply while meeting Washington's energy policy laws.

The consulting firm E3, in late 2019 issued a report pointing out the immediacy of the need for new capacity in the region. It stated:

*Near-term (today-2025): the Pacific Northwest faces a near-term capacity shortfall of 3-7 GW*

*Mid-term (2025-2030): capacity need grows to as much as 10 GW as additional firm capacity retires and this need is not fully replaced by planned additions*

*All planned capacity additions, and significantly more, are required by 2030 •*

*Even in an optimistic scenario (if all planned capacity additions detailed in the reviewed utility IRPs are approved and constructed), the region remains approximately 3 GW short by 2030*

The study also pointed out that its conclusions are comparable to those conducted by the Northwest Power and Conservation Council, the Bonneville Power Administration, the Pacific Northwest Utilities Conference Committee and the region's largest utilities integrated resource plans. Projects such as the Goldendale Energy Storage Project have long lead times. Projects such as this need to move into construction expeditiously to meet the needs identified by 2030. Failure to do so will lead to either system reliability problems such as those that began to recently appear in California, or a reliance on fossil fuel generation greater than would otherwise be necessary. KPUD urges Ecology to recognize this fundamental fact in the Project scoping document.

**Legislature's Designation of Goldendale Energy Storage as a Project of Statewide Significance-** House Bill 2819 designated the Goldendale Energy Storage Project as a "project of statewide significance." It is KPUD's understanding that the legislature intended this designation to help to prioritize this project for expedited permitting and multi-level collaboration with the Governor's Office for Regulatory Innovation and Assistance. The designation also requires cities and counties with development projects of statewide significance to include a plan for consultation with affected tribes. KPUD supported this legislation and urges Ecology to comply with its intent and language and reflect that compliance in its scoping process. In the event that the Yakama Nation participates in State processes, this scoping document should encourage constructive dialogue between FFP, project supporters including local government and the Yakama Nation to reach mutually agreeable solutions to the Yakama's concerns, as contemplated by the designation of statewide significance legislation.

Once again KPUD appreciates Ecology's consideration of our comments and stands ready to assist Ecology in any way we can in moving this critical infrastructure forward.

Sincerely,



Jim Smith  
General Manager



**I-16: Robin Everett**

**Address:** Sierra Club

**Submit Date:** 02/12/2021

**Comment I-16-1**

Rye Development's plan to build the Pacific Northwest's largest pumped-storage hydroelectric development along the Columbia River threatens water quality, wildlife, and ignores the objections of tribal nations. Thank you for giving this project the full environmental evaluation it deserves! I am writing to ask Ecology in its scoping to include: -A robust ?No Action? alternative is required so as to define the impacts of NOT licensing this project, or any project, at this location. -The EIS must evaluate the Project's environmental justice impacts, including the Project's direct, indirect and cumulative impacts to Tribal Nations and Indigenous people, described above, and low-income ratepayers. -The EIS must evaluate alternative designs and clean energy alternatives to the Project. -The EIS must evaluate the project's direct, indirect, and cumulative impacts on fish and wildlife.



## Robin Everett

Rye Development's plan to build the Pacific Northwest's largest pumped-storage hydroelectric development along the Columbia River threatens water quality, wildlife, and ignores the objections of tribal nations. Thank you for giving this project the full environmental evaluation it deserves! I am writing to ask Ecology in its scoping to include: -A robust "No Action" alternative is required so as to define the impacts of NOT licensing this project, or any project, at this location. -The EIS must evaluate the Project's environmental justice impacts, including the Project's direct, indirect and cumulative impacts to Tribal Nations and Indigenous people, described above, and low-income ratepayers. -The EIS must evaluate alternative designs and clean energy alternatives to the Project. -The EIS must evaluate the project's direct, indirect, and cumulative impacts on fish and wildlife.

Contact: Full Name	Email	Address1	City	State	Postal Code	Personal Message
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Samantha Briley	samanthabriley169@yahoo.com	1460 Secretariat Dr	Helena	AL	35080	
Karen Christian	kcaz1@cox.net	8435 S Tumbling X Ranch Pl	Vail	AZ	85641	"NO ACTION ALTERNATIVE" Don't do this to the great Columbia!!!!
Julia Devrell	tyandjul@mac.com	13226 W Serenade Cir	Sun City West	AZ	85375	I support "No action alternative" for the Goldendale pump storage. Respect our tribal citizens and let them decide.
Susan Bye	byesusane@gmail.com	42843 W Sandpiper Dr	Maricopa	AZ	85138	No destroying another river!!!!
dc katten	ladykestrelhawk13@gmail.com	41667 N 51st St	Cave Creek	AZ	85331	NO MORE DESTRUCTION and ABUSE to MOTHER EARTH and ALL HER INDIGENOUS PEOPLES NOW & FOREVER !!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
Fred Oswald	fredoswald@yahoo.com	1520 Magnolia Ln	Prescott	AZ	86301	River-destroying dams must come down and no more should be built.
Jeffrey Blackman	jblaw33@gmail.com	PO Box 41624	Tucson	AZ	85717	These lands, which are important to Northwest Tribes, should be left alone. We have been screwing the American Indians since the moment we arrived in this country and it has to stop. Thank you.
Susan Phillips	sphillips24@yahoo.com	PO Box 725	Cornville	AZ	86325	This matters to me because I am a person of this country that doesn't want to harm the land, or the native americans who already have a lot of bad things going on. There are other places to do this kind of business. I stand with the tribes and say NO to the Goldendale Hydroelectric Project.
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	codysmom6675@aol.com	6675 N Gray Gos Rd	Chino Valley	AZ	86323	
Jen Rund	jenrund@yahoo.com	35 Los Cedros Dr	Novato	CA	94947	I would like to voice my support for Native tribes in the area of the Goldendale Hydroelectric project, and ask that you respect their wishes and build somewhere else (or not at all!). There are other forms of sustainable clean energy that could, and should, be developed, and the will of sovereign tribes should be respected on their lands. Thank you.

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Please support a No Action Alternative for Goldendale Pump Storage.

Pollution is BAD. Clean Energy is GOOD. You know the difference.

The Native Americans have suffered so much by domination of their lands. Please continue to protect their tribal lands and find someplace else for this development.

We have a few new pumped-storage projects proposed in our area too and if they are permitted there would be a lot of tunneling through sensitive areas, impounding water over lands that have cultural resources, and a lot of land disturbance where the cultural and natural resources are. Let those impacted have the greater voice as to how best to protect or minimize the damage to those resources.

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We MUST know what the effects of our action and inaction will have on the future of our country. It's way past time to wake up to what our environment needs to flourish.

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It is culturally insensitive to develop this project on sacred native American land.  
This inefficient project would ignore the rights of sovereign native American tribes, cause environmental destruction and not meet the states decarbonization goals.

Proud to support the NW tribes

Again, infringing and destroying sacred indigenous land. This must stop!

American Indian tribes signed with good faith treaties with the federal government. It is disgraceful how the whites turned it all upside down and unilaterally broke the treaties. If these tribes do not want this Goldendale hydroelectric project, then their determination should be followed. Leave them alone.  
Our great Indigenous American Tribes have been abused and taken advantage of. This needs to stop NOW.

Protect Culturally Sacred Native Tribal Lands! The project is inefficient. Take a "No Action Alternative" for Goldendale Pump Storage. Thank you.

Protect these sacred spaces and precious waters. We can do better than this. Wind! Solar! Preserve the tribal lands, honor the people so affected by this decision, and let the river flow naturally. We can do better than this!

Listen to the people!!

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Please continue your hard work toward addressing the climate crisis and protecting our environment! For our children! stop destroying our lands...we need to learn to conserve what we have...and remember that 'without earth there is no heaven.'

IMO, if this affects NW Tribes, you should get their permission first.

I guess the main question I have is why is additional hydroelectricity needed?



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Native Americans have the right to maintain their heritage and sacred lands!

Department of Ecology, Please stop this Goldendale Hydro Project. After the Disasters In Michigan with Multiple Failures in Dams, Destroying towns like Sanford Michigan, Please put a stop to this! There is no reason Solar or wind Turbines could not do the Job without Damaging the Water To the NW Tribal Nations and Indigenous people . The USA stole enough from these people!!!! Do not allow more injustice and Crimes perpetuated on these Tribes! It is very immoral that it was even being considered! I believe it will damage a very fragile Earth and Water Eco System that is probably already strained Thank You James B ryder 248.321.4298 Birmingham, MI 48009

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I stand with the NW Tribes! NO to the Goldendale Hydroelectric Project!!

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This cannot be located on sacred NW Tribal lands!!! Put it in your own backyard, but stop using tribal lands as your own -- they are not yours to do with whatever you want!!!

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I believe this action with taken by the previous administration. And should be dumped.

I strongly support the "No Action Alternative" for the Goldendale Pump Storage Project. I strongly support the NW Tribes.

No

To alter an intact natural system compromises its ability to hold Climate Change in check, for whatever venture mankind wishes to do with it.

NO DAMS! SOLAR ONLY!!!!

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Rye?s proposal ignores the objections of sovereign tribal nations. The Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) have opposed this project since its inception due to the irreparable destruction it would destroy archeological, ceremonial, burial petroglyph, monumental and ancestral use sites and cause significant harm to the Yakama way of life. If this is such a safe project, why not place the development in the middle of a wealthy white community?

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Because this area is sacred to Native Americans, we must prevent the Goldendale Hydroelectric Project.

We believe in Tribal sovereignty and the protection of their lands and right to have a voice in decisions affectin them.

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PROTECT WHAT LITTLE LAND THEY HAVE LEFT!!!

We need to transition to renewable energy. This project is going to destroy the natural habitat, disturb wildlife and is a slap in the face of tribal nations!!!

It is imperative to "stop and think" before taking actions that locals are against.

Pumped storage projects in general have a large environmental impact. This one in particular tramples on native american rights and culture, and the fact tribal leaders haven't even been consulted should be reason enough to deny the permit.

As a concerned taxpayer and citizen, I am asking for a ?No Action Alternative? for Goldendale Pump Storage because this project is both inefficient and a massive environmental injustice. This not an appropriate project to meet the needs of Washington State's climate goals and will negatively impact Northwest tribes. Too often native communities and communities of color have been the chosen sites for energy projects without consideration of the impact on these communities. This project must not be approved. It's time to build out a renewable energy grid, not more fossil fuel projects. Push renewable projects and let them furnish needed electricity for the grid, complete with the utility-size storage batteries as seen in some recent western state operations.

Dams kill fish and wreck the ecosystem. Go rooftop Solar!

We need to all we can to support renewable energy. Stop any more oil; we do not need it.

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Patricia Morgan	imaginemeincostarica@gmail.com	PO Box 591	Bingen	WA	98605	At some point, the strategy to supply electricity or other resources to the burgeoning population will have to change from build-build-build, drill-drill-drill, to major conservation. We cannot continue to rape our mother for our greedy wants and desires. As the Earth is saying to us in its fast-moving climactic changes, it cannot support our cancerous ways. The fish need to be free to migrate. The blood vessels of the earth need to flow. Wake up and listen to our wise indigenous peoples.
Martha Taylor	denmarth@comcast.net	6545 53rd Ave NE	Seattle	WA	98115	I believe the NW Tribes know best what is appropriate for their ancestral lands.
Jennifer Lyne	jenlyneviola@gmail.com	12640 Case Rd SW	Olympia	WA	98512	I see no reason for the Rye Development's plan for the pumped-storage project. Consider the environmental impact and the impact on NW Tribes. I really want to see a "No Action" alternative to be chosen.
William Gregory	trailseekerwrg@yahoo.com	816 Thurmond Ln	Sedro Woolley	WA	98284	It's time to honor the treaties we made when we removed native peoples from their historic lands. It's time to listen to their concerns, and treat them with respect. It's time to learn to live with what we have, and not remake nature to our liking.
Terrence Brown	zepboy845@gmail.com	3216 E 26th St	Vancouver	WA	98661	No more development of the gorge resources...it's a national park !! Why not drill in Yellowstone or Glacier National Park
Douglass MacKenzie	dougmackenzie1@gmail.com	9995 Manitou Beach Dr NE	Bainbridge Island	WA	98110	Not my church is not a message we should send to our tribal brothers and sisters.
Catherine and Hal Martinez	halcat42@gmail.com	20455 1st Ave NE Apt E302	Poulsbo	WA	98370	Our focus now should be on escalation of clean renewable power and clean power delivery. It is also past time the nation honored treaties with sovereign indigenous nations.
Ian Bond	iangbond@gmail.com	7003 Palatine Ave N	Seattle	WA	98103	Please prioritize the PNW tribes' request for a "No action" alternative!
Robin Carlson	gfxbabe@yahoo.com	1903 E Providence Ave	Spokane	WA	99207	The No Action Alternative is the only option here. This land is sacred to the landowners -- the tribe(s) -- and should not be disturbed. There are other places such a dam may be constructed.
Jean Waight	jeanwaight@gmail.com	919 Coronado Ave	Bellingham	WA	98229	The Northwest is my home, and I'm very happy to be neighbors with NW Tribes, who do so much to return us to respect for the resources Nature gave us.
John Osborn	john@waterplanet.ws	Box 362	Vashon	WA	98070	The proposed Goldendale Hydroelectric Project risks environmental damage as well as damage to indigenous cultural sites. As such, the project should not move forward.
Madeline Craig	carol_craig@yakama.com	P.O. Box 779	Toppenish	WA	98948	This and other project would destroy our culture and tradition of traveling to our usual and accustomed area on ceded land and guaranteed through the Treaty of 1855.
Lynda Cunninggh	lyndeee2@gmail.com	1529 Division St Apt 204	Camas	WA	98607	This project is not the best way of the future for us.

This project just cannot happen!! The Tribes are completely correct that the area is culturally sensitive and sacred! We are asking for a No Action Alternative leaving this area untouched. Washington needs to look further and make better decisions while showing respect for ALL NW Tribes!

This project would authorize construction of a project with unavoidable environmental justice concerns. Green energy should not be built on the backs of tribal nations. If anyone is in touch with conservation of natural resources, it is the tribal nations. It is and has been an essential part of their culture. Tribal nations objections should be respected, especially regarding potential damage to culturally important areas. We live in one world. We are all connected. I stand by the tribes because I respect them and their concerns. I am asking for a no action alternative. We need to restore rivers to their natural state, not build more impediments to the fish who migrate along them.

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**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-17: American Rivers- Moran**

**Address:** PO Box 1234

**Submit Date:** 02/12/2021

**Comment I-17-1**

American Rivers submits the attached comments on the scope of the Environmental Impact Statement to be prepared by Washington Department of Ecology for the Goldendale Energy Project.

## American Rivers- Moran

American Rivers submits the attached comments on the scope of the Environmental Impact Statement to be prepared by Washington Department of Ecology for the Goldendale Energy Project.



February 12, 2021

Sage Park  
Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009

Submitted electronically to: <http://admin.ecology.commentinput.com/?id=eVi6D>

RE: Comments on the Scope of the Environmental Impact Statement for the Goldendale Energy Storage Project

Dear Ms. Park,

Thank you for the opportunity to provide comments on the scope of the Environmental Impact Statement to be prepared under the State Environmental Policy Act for the proposed Goldendale Energy Storage Project.

## **Introduction**

On June 23rd, 2020, Rye Development on behalf of FFP Project 101, LLC (FFP) filed a Final License Application (FLA) to the Federal Energy Regulatory Commission (FERC) for the Goldendale Pumped Storage Project (Project). Washington State Department of Ecology (Ecology) has initiated the Washington State Environmental Policy Act (SEPA) review process with a Determination of Significance issued on January 14, 2021. Ecology has determined that “the proposed Goldendale Energy Storage Project is likely to have significant environmental impacts requiring full evaluation in an environmental impact statement (EIS).”<sup>1</sup> The proposed Project is a closed-loop pumped storage hydropower facility located on the Washington side of the Columbia River at River Mile 215.6 near John Day Dam. The Project would be located approximately 8 miles southeast of the City of Goldendale in Klickitat County, Washington. The Project facilities include 1) an upper reservoir consisting of a rockfill embankment dam approximately 175 feet high and 8,000 feet long, with a surface area of about 61 acres, and storage of 7,100 acre-feet (AF), 2) a lower reservoir consisting of an embankment approximately 205 feet high and 6,100 feet long, with a surface area of about 63 acres, and storage of 7,100 AF, 3) an underground water conveyance tunnel, powerhouse, and transformer cavern, and 4) a 500 kilovolt (kV) transmission line(s). The estimated energy generating capacity is 1,200 megawatts (MW).

American Rivers (AR) offers the following comments in response to Ecology’s notice soliciting scoping comments for the Goldendale Energy Storage Project issued on January 14<sup>th</sup>, 2021.

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<sup>1</sup> Washington Department of Ecology (January 14, 2021), Environmental Review: Scoping. Retrieved from <https://ecology.wa.gov/Events/SWM/Goldendale-Energy/Goldendale-Energy>

## **Interest of American Rivers**

American Rivers (AR) is a 501(c)(3) nonprofit organization whose mission is to protect wild rivers, restore damaged rivers, and conserve water for people and nature. Headquartered in Washington, DC, AR has offices across the country and more than 300,000 members, supporters, and volunteers, including many of whom live in the Columbia River Basin states of Washington, Oregon, Idaho, and Montana. AR has been working in the Pacific Northwest for nearly 30 years, and we have a strong interest in protecting and restoring the Columbia River and its tributaries for the benefit of healthy fish and wildlife populations, and human communities. Rye Development's application for a new hydropower project license directly affects the interests of AR and its participation in this process is in the public interest. AR has been engaged in the proposed Project since 2018.

American Rivers appreciates the opportunity to provide these comments to Ecology for the purposes of drafting a comprehensive EIS which examines possible significant and adverse impacts resulting from the construction and operation of the Project.

## **Comments**

American Rivers recognizes the importance of energy storage and grid resilience in meeting our nation's clean energy goals. We also recognize the significant value of irreplaceable tribal cultural resources within the proposed Project area as well as several probable impacts to water resources and wildlife. The FLA, its accompanying additional information provided by Rye Development (Rye), and Rye's record of communication with affected tribal communities leave room for concern that the Project poses an uncertain benefit to grid resilience while posing detrimental and unavoidable environmental and cultural concerns. AR holds concerns regarding the Project's potential to destroy irreplaceable cultural resources; its impacts on water quality and quantity; management of the contaminated West Surface Impoundment and surrounding contaminated sites; its impacts on terrestrial and aquatic wildlife; and the economic and energy generating viability of the Project.

While Ecology outlines some of these areas of concern in its scoping notice, AR has not found the license application materials to clearly identify sufficient plans for avoiding or mitigating Project impacts. Further, on December 17, 2020, FERC issued its Notice of Application Accepted for Filing and Soliciting Motions to Intervene and Protests which states that "The application is not ready for environmental analysis at this time."<sup>2</sup> Significant additional information is necessary to properly inform this licensing process. While we agree that environmental analysis is premature, the abundance of resource-related concerns and the controversial nature of the Project warrant a Determination of Significance and the preparation of an EIS for this Project. We also agree with Ecology's Determination of Significance which states, "The Department of Ecology has determined that the project will likely result in

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<sup>2</sup> FERC (December 17, 2020), Notice of Application Accepted for Filing, In FERC Docket No. 14861

significant adverse environmental impacts.”<sup>3</sup> Our aforementioned areas of concern are detailed further hereafter.

## **I. Impacts to Native American archaeological and cultural resources**

AR asserts that the entities most qualified to address tribal cultural resources are the sovereign Tribal Nations themselves. AR does not speak on behalf of tribes and instead respects and reaffirms their concerns regarding the threat to their cultural resources and lifeways. Rye’s FLA affirms that multiple culturally significant sites have been found within the Project boundary. Therefore, comprehensive cultural resource identification surveys, as well as non-disturbance and/or mitigation plans must be completed prior to the issuance of an EIS.

According to an archeological resource survey conducted in 2019 by the Confederated Bands and Tribes of Yakama Nation (Yakama Nation) and included in Appendix G of Rye’s FLA, the proposed development of the Project threatens multiple culturally significant resources including archeological, ceremonial, burial petroglyph, monumental and ancestral use sites located both adjacent to and within the Project area. Page 5 of Appendix G states,

...previous cultural resources surveys have identified archaeological sites in and around the Project area, and these are described in more detail in Section 2.2.3. In addition, the Project received a comprehensive archaeological resources survey performed by the Yakama Nation in 2019. The existing documentation suggests that the area includes sensitive archaeological resources. [Washington State Department of Archaeology and Historic Preservation] has indicated that there are recorded archaeological sites in the general area and that the area’s landforms and environment have the potential to contain archaeological resources.<sup>4</sup>

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) has also stated that “the proposed undertaking is within a historic property of cultural and religious significance.” Much of CTUIR’s communications with Rye have been kept confidential to protect tribal cultural resources, but the tribe has stated that they intend to undertake a cultural resources survey of the Project area. In addition, on October 16, 2020, the Nez Perce Tribe requested in a letter to FERC that an ethnographic study be conducted to identify any “Nez Perce-specific resources” within the project area.<sup>5</sup> The CTUIR survey and Nez Perce Tribe study have not yet been conducted. Any spiritual, cultural, or religious resources significant to either tribe should be identified, and a non-disturbance plan should be developed before an EIS is prepared.

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<sup>3</sup> Washington Department of Ecology (January 14, 2021), Determination of Significance and Request for Comments on Scope of Environmental Impact Statement. Retrieved from:

<https://fortress.wa.gov/ecy/ezshare/swm/GoldendaleEnergy/SEPA-DSform.pdf>

<sup>4</sup> FFP Project 101, LLC (June 23, 2020), Final License Application, Appendix G: Historic Properties Management Plan, p. 5. Retrieved from [https://www.ryedevelopment.com/wp-content/uploads/2018/09/Goldendale-FLA\\_Appendix-G\\_HPMP.pdf](https://www.ryedevelopment.com/wp-content/uploads/2018/09/Goldendale-FLA_Appendix-G_HPMP.pdf)

<sup>5</sup> Letter from Patrick Baird to FERC (October 16, 2020). In FERC Docket No. 14861

Rye does not have a history of acting in good faith with the affected tribes, particularly the Yakama Nation, who has also opposed previous iterations of this Project. In a February 21, 2019, letter to FERC, Yakama Nation writes,

The Yakama Nation does not believe that Rye Development conducted the pre-application in a good faith effort. This is the first time that the Yakama Nation has been afforded the opportunity to read any preliminary studies conducted by Rye Development. Nor were we aware that a draft Historic Properties Management Plan was being drafted as part of this document.<sup>6</sup>

Additionally, the Nez Perce Tribe was not made aware of the project until September 22, 2020 – more than two months after FERC filed its Notice of Application Tendered for Filing with the Commission and Soliciting Additional Study Requests. In order to move forward in good faith and sponsor meaningful consultation with affected tribes, Rye must engage in and/or complete the necessary archeological and ethnographic studies prior to the preparation of an EIS. AR believes that Rye has a responsibility to ensure a good faith relationship with Yakama Nation, CTUIR, the Nez Perce Tribe, and any other affected sovereign tribes.

Due to the strong opposition of the Yakama Nation and at least two outstanding and necessary tribal cultural resource studies (those of CTUIR and the Nez Perce Tribe), AR is profoundly concerned about the suitability of the Project's location and encourages Ecology to fully explore alternatives beyond those provided in the FLA which are limited to changes in reservoir storage capacity. The direct, indirect, and cumulative consequences of destroying cultural, religious, and spiritual sites, and impeding tribal peoples' accessibility to foods and medicines due to Project construction and operation are significantly harmful. Thus, an EIS is warranted in order to sufficiently evaluate these impacts and potential alternatives to the Project. These siting concerns are of utmost importance.

## **II. Impacts to water quality and aquatic resources**

The Project's probable impact to water quality and quantity in and around the Columbia River is of concern. FERC's Scoping Document 1 (SD1) indicates Rye's intended protection and enhancement measures which would "avoid or minimize effects on fish, aquatic habitat, and other aquatic resources," one of which suggests to "avoid construction within aquatic habitat wherever possible (including intermittent/ephemeral streams and stock ponds)."<sup>7</sup> However, the upper reservoir is slated for construction atop two ephemeral streams (S7 and S8) and one ephemeral pond (P2). According to Appendix B of the FLA,

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<sup>6</sup> The Confederated Tribes and Bands of the Yakama Nation (February 21, 2019), Comment to FERC. In FERC Docket No. 14861

<sup>7</sup> FERC (October 29, 2020), Scoping Document 1 for the Goldendale Pumped Storage Project, P-14861-002, p.11. In FERC Docket No. 14861



Based on the observations described above from field investigations conducted in May 2019, ERM identified one wetland and six waterbodies existing within the study area. Two of the six waterbodies within the study area, S7 and S8 are likely jurisdictional waters of the U.S. as they connect to perennial streams downstream of the project area and therefore are subject to regulation under Section 404 of the federal Clean Water Act.<sup>8</sup>

Additionally, Exhibit E at 13 of the FLA states,

Construction of the upper reservoir will permanently impact approximately 890 linear feet of stream S7, 75 linear feet of stream S8, and the entirety of pond P2 (0.03 acre).<sup>9</sup>

The affected ephemeral streams are tributaries to Swale Creek, a perennial, salmon-bearing tributary to the Klickitat River – 10.8 miles of which was federally protected under the Wild and Scenic Rivers Act in 1986. It is important for Ecology to know that under Section 7(a) of the Wild and Scenic Rivers Act,

The Federal Power Commission [FERC] shall not license the construction of any dam, water conduit, reservoir, powerhouse, transmission line, or other project works under the Federal Power Act, as amended, on or **directly affecting** any river which is designated in section 3 of this Act as a component of the national wild and scenic rivers system... [emphasis added]<sup>10</sup>

Destroying sections of tributaries to Swale Creek has the potential to alter instream flows, which could have long-lasting impacts on salmon spawning, rearing and migration, domestic and agricultural water supply, terrestrial wildlife habitat, stock watering, and aesthetics and recreation well downstream of the Project reservoir. According to a 2009 Riparian Vegetation Assessment of Little Klickitat River and Swale Creek (WRIA 30), “the lower reach of Swale Creek (within Swale Canyon) is on Washington State’s list of impaired water bodies (303(d)) as Category 5 for water temperature.”<sup>11</sup> Reducing instream flow in a semi-arid basin like the Swale Creek basin, which receives minimal rainfall and incurs high summer air temperatures, can have drastically negative impacts on water temperature. This, in turn, poses a great risk to salmonids at all life stages. Additionally, surface water from Swale Creek is used for irrigation in the

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<sup>8</sup> FFP Project 101, LLC (June 23, 2020), Final License Application, Appendix B: Wetlands and Waters Delineation Report, p. 14. Retrieved from [https://www.ryedevelopment.com/wp-content/uploads/2018/09/Goldendale-FLA\\_Appendix-B\\_Wetland-Delineation.pdf](https://www.ryedevelopment.com/wp-content/uploads/2018/09/Goldendale-FLA_Appendix-B_Wetland-Delineation.pdf)

<sup>9</sup> FFP Project 101, LLC (June 23, 2020), Final License Application, Exhibit E: Environmental Report, p. 13. Retrieved from [https://www.ryedevelopment.com/wp-content/uploads/2018/09/7\\_Goldendale-FLA\\_Exhibit-E.pdf](https://www.ryedevelopment.com/wp-content/uploads/2018/09/7_Goldendale-FLA_Exhibit-E.pdf)

<sup>10</sup> Wild and Scenic Rivers Act, Public Law 90-542; 16 U.S.C § 1271 et seq. (1968)

<sup>11</sup> Germiot, S. (2009, June 30). *Riparian Vegetation Assessment: Little Klickitat River and Swale Creek*. Retrieved from: <https://www.klickitatcounty.org/DocumentCenter/View/165/Riparian-Vegetation-Assessment---Little-Klickitat-River-and-Swale-Creek---June-2009-PDF>

Goldendale area.<sup>12</sup> The Klickitat River Salmon and Steelhead Production Plan prepared in 1990 lists preventing further degradation of summer flows in the Swale Creek drainage as a habitat protection objective which would also serve to prevent negative impacts to agriculture and irrigation.<sup>13</sup>

More of these impacts are detailed in the November 9, 2020, Columbia Riverkeeper et al. letter to Ecology regarding Clean Water Act 401 Water Quality Certification. In its EIS, Ecology must analyze the water quality issues identified in Columbia Riverkeeper et al.'s 401 certification comments (Attachment A). Aquatic studies of these ephemeral waterbodies and the potential Project impacts to downstream aquatic resources, including those of the Klickitat River which are protected under the Wild and Scenic Rivers Act, must be conducted, and Ecology should explore any instream flow rights that may pertain to Swale Creek or its downstream waterbodies. The results of these studies should then guide the creation of appropriate avoidance and/or mitigation plans.

Rye also estimates the need to draw approximately 7,640 acre-feet of water from the Columbia River for initial fill of both reservoirs and 360 acre-feet per year to account for “evaporation and leakage.”<sup>14</sup> This is contradictory to the figures given in both the FLA’s Exhibit E at 14 (9,000 acre-feet for initial fill and 390 acre-feet per year for maintenance fills) and the SEPA checklist submitted by Rye in July 2016 (7,640 acre-feet for initial fill and 260 acre-feet for maintenance fills); therefore, clarification by Rye is necessary.<sup>15</sup> The FLA further contradicts itself when referring to potential water losses from the two reservoirs. Exhibit B accounts for losses attributed to “evaporation and leakage” with seepage estimates of 100 acre-feet per year.<sup>16</sup> Exhibit E states, “the reservoirs will be lined so that the reservoirs will not leak, therefore any losses are associated with evaporation.”<sup>17</sup> Seepage from the reservoirs is reasonably foreseeable, even with lining, and given this, Rye should factor seepage into conservative fill estimates.

AR also holds concerns related to the water rights which Rye proposes to use for reservoir fill. In its SEPA checklist, Rye states, “Initial fill water and periodic make-up water for the Project will be purchased from Public Utility District No. 1 of Klickitat County, Washington (KPUD), who owns an existing water right and will provide the water via an existing conveyance system adjacent to the proposed Project.”<sup>18</sup> After reviewing the FLA’s Appendix K and the enclosed Cliffs Comprehensive Water System Plan, we are unsure of whether or not KPUD’s existing water rights allow for the withdrawal of the quantity of Columbia River water necessary for reservoir fill within Rye’s estimated time frame (6 to 12 months, as stated in FLA Appendix B). For example, Table 4-3 of the Cliffs Comprehensive Water System Plan included in Appendix K indicates that the proposed total allowable consumptive water quantity is 4, 851 acre-feet per

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<sup>12</sup> Confederated Bands and Tribes of the Yakama Nation, Washington Department of Fisheries, & Washington Department of Wildlife. (1990). *Klickitat River Subbasin Salmon and Steelhead Production Plan*. Washington. Retrieved from [http://docs.streamnetlibrary.org/Subbasin\\_Plans/Columbia\\_Gorge/Klickitat90.pdf](http://docs.streamnetlibrary.org/Subbasin_Plans/Columbia_Gorge/Klickitat90.pdf)

<sup>13</sup> Confederated Bands and Tribes of the Yakama Nation et al. Klickitat River Subbasin Plan, p 17.

<sup>14</sup> FFP, Exhibit B, p. 7

<sup>15</sup> FFP Project 1010, LLC (July 2016), SEPA Environmental Checklist, p. 14. Retrieved from: <https://fortress.wa.gov/ecy/ezshare/swm/GoldendaleEnergy/SEPAChecklist.pdf>

<sup>16</sup> FFP, Exhibit B, p. 7

<sup>17</sup> FFP, Exhibit E, p. 14

<sup>18</sup> FFP, SEPA Environmental Checklist, p. 5

year.<sup>19</sup> This is almost 3,000 acre-feet less than what Rye states is needed for initial reservoir fill. If the quantity of water allowable for municipal purposes is not enough for initial fill of the reservoirs, AR understands that leasing water from Lake Roosevelt at Grand Coulee Dam could be an option for Rye. If this is accurate, Ecology will need to demonstrate that water from Lake Roosevelt is lawfully available for this intended use, and Rye must be transparent with any plans to lease water from Lake Roosevelt and the costs associated with this water lease. AR also understands that at least a portion of KPUD's water rights is held in the State's water right trust program. If water from this trust is used for the Project, Ecology should ensure that any and all necessary processes which determine extent and validity of the water rights are executed in compliance with state law. We encourage Ecology to closely examine KPUD's water rights and allocated uses as part of an EIS.

Further, the FLA does not provide sufficient and specific methods or proposed materials which would prevent the seepage of water from the reservoirs into groundwater or into nearby wind turbine facilities nor does it provide a comprehensive water quality management plan which would monitor water quality in the reservoirs and set threshold criteria and reporting standards. Rye makes mention of a Reservoir Water Quality Monitoring Plan (WQMP) which will be developed in consultation with Ecology and will "ensure that dissolved solids, nutrients, and heavy metals in the Project reservoirs do not rise to concentrations that could adversely affect aquatic life and wildlife."<sup>20</sup> This WQMP must be developed and approved by Ecology prior to the development of an EIS in order to sufficiently explore Project impacts and the effect of proposed mitigation measures on those impacts.

### **III. Contaminated site management**

Portions of Project infrastructure, including the lower reservoir, are slated for construction atop the site of the retired Columbia Gorge Aluminum (CGA) smelter, which is now a Resource Conservation and Recovery Act contaminated site. According to SD1, "Specifically, the lower reservoir and new water fill pipeline would be located within the footprint of Solid Waste Management Unit (SWMU) number 4 also known as the West Surface Impoundment," which contains "approximately 89,000 cubic yards of sludge primarily composed of alumina, dust, and particulates from wastewater and residual waste generated by plant emission control systems."<sup>21</sup> The consequences of Project construction without an exhaustive cleanup plan developed in collaboration with and approved by Ecology could be significant for Columbia River surface water and groundwater.

In a letter from FERC to Rye on July 23, 2020 (Schedule B AIR), FERC outlined four deficiencies in the FLA related to groundwater and soil contamination that were specifically requested by FERC in response to the Draft License Application (DLA).<sup>22</sup> Rye responded to the

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<sup>19</sup> John Grim & Associates (June 2010), Cliffs Comprehensive Water System Plan, p. 37. Retrieved from: [https://www.ryedevelopment.com/wp-content/uploads/2018/09/Goldendale-FLA\\_Appendix-K\\_KPUD-Letter.pdf](https://www.ryedevelopment.com/wp-content/uploads/2018/09/Goldendale-FLA_Appendix-K_KPUD-Letter.pdf)

<sup>20</sup> FFP, Exhibit E, p. 18

<sup>21</sup> FERC, Scoping Document 1, p.8-9

<sup>22</sup> FERC (July 23, 2020), License Application Deficiencies, Request for Additional Information, and Response to Request for Waiver of Regulations. In FERC Docket No. 14861

Schedule B AIR and included more detailed plans for the removal and disposal of contaminated materials within the Project area than were originally provided within the DLA and FLA. Specifically, the response to the Schedule B AIR states,

...the Applicant will prepare a Hazardous Materials Management Plan (HMMP) to govern all construction activities that require disturbance of the subsurface...The HMMP will be prepared in consultation with Ecology, NSC, and LMCO such that the HMMP reflects the current knowledge at the site as well as being consistent with the plans and requirements of the regulatory stakeholders and the landowner.<sup>23</sup>

While an intention to create this HMMP is mentioned, AR maintains that the HMMP must be developed and approved by Ecology before an EIS is prepared in order to sufficiently examine Project impacts and the effect of proposed mitigation measures on those impacts. A mutually satisfactory plan for managing the cleanup of contaminated sites in critical.

Additionally, AR has not found record of meaningful communication between Rye and Ecology. In FERC's Schedule B AIR, FERC specifically requests from Rye,

...please revise Exhibit E to include an analysis of how project construction and operation would or would not affect [the Solid Waste Management Unit (SWMU) 13 – West SPL Storage Area, the ditch on the southern end of SWMU 13, and WMU 19 – Plant Construction Landfill] sites. This information should be developed in consultation with Washington DOE. Your response should include documentation of the consultation, any recommendations and comments provided by the Washington DOE on your proposal, and any recommendations you have considered but rejected and the basis for such rejection.<sup>24</sup>

Rye replied, "Consultation to date with Ecology is documented in Exhibit E section 6.3."<sup>25</sup> In reviewing the revised Exhibit E section 6.3, AR does not find any mention of consultation beyond communications related to the Prospective Purchaser Consent Decree, indicating a lack of consultation with Ecology regarding FERC's requested clarifications. Further, according to the 2014 Agreed Order No. DE 10483 issued by Ecology, requirements for clean-up of the CGA site include the development of a Remedial Investigation Work Plan, a Remedial Investigation/Feasibility Study, and a Draft Cleanup Action Plan which would be finalized by Ecology. FERC's SD1 mentions, "As of the date of this SD1, the Remedial Feasibility Study to identify cleanup alternatives and Draft Cleanup Plan has yet to be completed."<sup>26</sup> AR maintains that these requirements must be finalized before an EIS is prepared. Rye must prioritize consultation with Ecology and begin immediate development of contaminated site management plans prior to the preparation of an EIS.

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<sup>23</sup> FFP Project 101, LLC (November 20, 2020), Response to the Commission's request for additional information, p. 19-20. In FERC Docket No. 14861

<sup>24</sup> FERC, Request for Additional Information, p. B-3

<sup>25</sup> FFP, Response to the Commission's request for additional information, p. 4

<sup>26</sup> FERC, Scoping Document 1, p. 8

#### **IV. Impacts to terrestrial and aquatic wildlife**

Potential Project impacts to both terrestrial and aquatic wildlife, some of which are outlined in Exhibit D of Rye's FLA, are certainly significant in nature and should be explored during preparation of an EIS. Both construction and operation of the Project stand to impact migratory and resident birds, raptors, bats, and several fish and amphibian species through the destruction or disruption of habitat, construction of attractant waterbodies, and placement of attractants in close proximity to existing windfarms.

The construction of both the upper and lower reservoirs is likely to attract migratory and resident birds and bats to an area in which an active wind farm operates (Tuolumne Wind Project Authority (TWPA) wind farm owned by Turlock Irrigation District (TID)), increasing the risk of avian and bat mortality caused by collisions with wind turbines. In a May 28, 2019, letter to FERC from Washington Department of Fish and Wildlife (WDFW), the department writes, "The new source of water will attract waterfowl, bats and bald eagles (*Haliaeetus leucocephalus*), putting them at a high risk of negatively interacting with wind turbines; consequently, increasing wind turbine mortality rates on them."<sup>27</sup> While Rye maintains a lack of responsibility for the impacts to avian species due to injury or mortality from interaction with the wind turbines, the potential of Project development to increase these impacts is grounds for the exploration of geographic alternatives.

In addition to the potentially lethal impacts of attracting greater numbers of birds, the reservoirs are also likely to impact the laminar flow of air around the TWPA which has negative implications for raptors including the golden eagle. The United States Fish and Wildlife Service (USFWS) wrote in a March 3, 2020, letter to FERC,

Currently golden eagles appear to have a difficult time navigating the wind currents affected by existing wind power infrastructure near the project area. The potential of the proposed Project to further alter the remaining laminar wind currents lends credence that resulting impacts to avian species would not be exclusive to wind power production in the area.<sup>28</sup>

Golden eagles are federally protected under the Bald Eagle Protection Act of 1962 and are listed as a species of concern by the State of Washington. WDFW wrote in comments to FERC on March 10, 2020, "We disagree with the applicant's opinion that the habitat near the upper reservoir is not unique or uncommon. The uniqueness of this habitat is linked to the proximity to golden eagle and prairie falcon nesting habitat."<sup>29</sup> Ecology must consider this Project area as notably valuable in terms of raptor habitat and to conduct baseline studies and provide a thorough analysis of potential impacts of Project construction and operation on raptor habitat and existence in its EIS.

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<sup>27</sup> Washington Department of Fish & Wildlife (May 28, 2019), Additional study requests and comments on the PAD for the Goldendale Energy Storage Project. In FERC Docket No. 14861

<sup>28</sup> U.S. Fish & Wildlife Services (March 3, 2020), Comment to FERC. In FERC Docket No. 14861

<sup>29</sup> Washing Department of Fish & Wildlife (March 10, 2020), Comment to FERC, In FERC Docket No. 1486.

Rye's FLA makes mention of a Wildlife Management Plan which would include the acquisition of mitigation lands of similar quality for the golden eagle foraging habitat. WDFW wrote in their May 28, 2019, letter to FERC, "There will be temporary and permanent reduction of habitat as a result of the construction of the Project that should be addressed through compensatory mitigation." AR agrees that such a compensatory habitat mitigation plan should be implemented if the Project is constructed. However, Rye has yet to provide the number of acres which will be acquired and has only provided examples of potential acquisition locations. Without this information, the potential benefits of habitat acquisition cannot be fully realized. This information should be determined and reported by Rye in consultation with WDFW and USFWS as part of the preparation of an EIS.

Finally, on October 14, 2020, FERC utilized the U.S. Fish and Wildlife Service's ECOS-IPaC website to generate an official list of federally-protected threatened, endangered, candidate, and species proposed for federal protection, and designated or proposed critical habitats that may occur within the boundary of or be affected by the Project. FERC issued a memo on the same day affirming USFWS' findings as follows: "The endangered gray wolf, threatened yellow-billed cuckoo, threatened bull trout and its designated critical habitat, and proposed endangered gray wolf Western Distinct Population Segment may occur within the project boundary or be affected by the project."<sup>30</sup> AR asserts that effects of Project construction and operation on these federally threatened and endangered species be studied exhaustively during Ecology's EIS.

## **V. Project cost-benefit analyses and ownership**

AR has concerns about the financial viability of the Project and how the proposed pumped storage Project contributes to Washington state's clean energy goals. A robust cost-benefit analysis, including an analysis of daily fluctuations in Mid-Columbia (Mid-C) energy rates, should be included in Ecology's EIS to determine the economic viability of the Project and its potential economic impacts. A well-grounded understanding of the Project's viability and its possible contributions to Washington state's decarbonization objectives will determine the Project's necessity and can prevent potentially profound economic consequences in our region.

Additionally, AR asks for clarification on the energy generating capacity of the Project. According to information in SD1 and Rye's FLA, "The Project is designed to generate for 12 hours a day of full power generation, at a maximum of 1,200 MW and a minimum of 100 MW, and pump water from the lower reservoir to the upper reservoir in about 15 hours" (FLA, Exhibit B, p. 6). In order for the Project to produce the maximum amount of energy (1,200 MW), it would need to generate power (run all water from the upper reservoir to the lower) for 12 hours. In a 24-hour period, this would allow for only 12 hours of time in which all water could be pumped back into the upper reservoir. According to page 10 of SD1, "FFP states that the project pumping cycle would take approximately 15 hours to complete at a maximum pumping flow of 6,700 cfs." With the given timeframe and with Rye's apparent impression of consistent Mid-C

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<sup>30</sup> FERC (October 14, 2020), List of Threatened, Endangered, Candidate, and Proposed Species Generated by ECOS-IPaC Website. In FERC Docket No. 14861

power prices, it is unclear how the Project would feasibly generate 1,200MW in a 12-hour period. A full understanding of the operations and economic feasibility of the Project is imperative.

Additionally, AR encourages Ecology to thoroughly explore a variety of viable alternatives during the environmental review process. Rye's FLA fails to provide alternative Project locations or alternative project designs other than changes in reservoir capacity. A range of alternative sites should be explored, and alternative decarbonized energy storage technologies should be examined, including solar and lithium-ion battery storage – technologies that are currently being deployed to improve resilience of California's volatile power grid.

## **Conclusion**

American Rivers has considerable concerns about the proposed Goldendale Pumped Storage Project that we have identified for Ecology to address through the preparation of its EIS. Washington state's unparalleled tribal, cultural, and natural resources are essential to this landscape and its communities. Given the severity of the likely harmful effects of Project construction and operation on irreplaceable tribal cultural resources and archeological sites, infringement on tribal peoples' access to food and medicine in the area, water quality and supply, and wildlife, American Rivers respectfully requests that Ecology thoroughly consider each of these factors as it conducts the EIS for this controversial project. American Rivers also requests that Ecology ensure that Rye has gathered all necessary and outstanding data and has included this information in its FLA prior to the preparation of its EIS. This outstanding information includes appropriate and meaningful consultation with all involved Native American tribes.

AR appreciates the opportunity to provide comments, and we thank Ecology for its review and consideration of our comments.

Respectfully submitted,



Wendy D. McDermott  
Director, Rivers of Puget Sound and Columbia Basin  
American Rivers  
206-213-0330 ext. 1  
[wmcdermott@americanrivers.org](mailto:wmcdermott@americanrivers.org)

## Appendix A

Columbia Riverkeeper et al. letter to Washington Department of Ecology regarding Clean Water Act 401 Water Quality Certification



**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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Attachments available upon request.

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-18: Simone Anter**

**Address:** Columbia RiverKeeper

**Submit Date:** 02/12/2021

**Comment I-18-1**

110 comments submitted to Ecology by Columbia Riverkeeper on behalf of our members.

## Simone Anter

110 comments submitted to Ecology by Columbia Riverkeeper on behalf of our members.



Columbia Riverkeeper  
401 Portway Avenue, Suite 301  
Hood River, OR 97031  
phone 541.387.3030  
[www.columbiariverkeeper.org](http://www.columbiariverkeeper.org)

February 12, 2021

Sage Park  
Washington Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009  
Attn: Goldendale Scoping

*Submitted via email to: [sage.park@ecy.wa.gov](mailto:sage.park@ecy.wa.gov).*

*Submitted via email.*

**RE: Public Comments Responsive to Ecology's SEPA Scoping Comment  
Period on the Proposed Goldendale Pumped Storage Project, FERC Docket  
No. P-14861-002.**

Dear Washington Department of Ecology,

Columbia Riverkeeper (Riverkeeper) is a 501(c)(3) nonprofit organization with a mission to protect and restore the Columbia River, from its headwaters to the Pacific Ocean. Riverkeeper plays an active role in educating the public about proposed developments along the Columbia River that may threaten life connected to and dependent on the River. Rye Development (Rye), dba Free Flow Power 101, LLC, proposes the Northwest's largest pumped storage hydroelectric project along the Columbia River in Klickitat County, Washington, near the John Day Dam. The Goldendale Energy Storage Hydroelectric Project (Project) threatens irreplaceable tribal cultural and religious resources, water quality, fish, and wildlife. On behalf of our 16,000 members in Oregon and Washington, Columbia Riverkeeper transmits the collected, attached 110 comments gathered through our website and virtual outreach.

The comment letter signed by the attached list of people states:

*Dear Washington Dept. of Ecology,*

*I strongly support the decision of the Washington Dept. of Ecology (Ecology) to conduct an Environmental Impact Statement (EIS) for the Free Flow Power 101, LLC Goldendale Pumped Storage Project (Project) because of the adverse significant impacts to the environment. Ecology's EIS must analyze the following:*

- 1. A robust "No Action" Alternative. This alternative should describe in detail all of the ecological, cultural, recreational and commercial benefits and activities the site does and could support if the project is not developed.*
- 2. The Project's environmental justice impacts, including the Project's direct, indirect and cumulative impacts to Tribal Nations and Indigenous people, and low-income ratepayers;*
- 3. Alternative designs and clean energy alternatives to the Project; and*
- 4. Direct, indirect, and cumulative impacts on fish, wildlife, and water quality.*

The signers in the attachment submit the above comment for your consideration. Many added their own personalized comments, which are included in a table to ease your review. Please consider these as individual comments.

Sincerely,



Simone Anter  
Staff Attorney  
Columbia Riverkeeper  
simone@columbiariverkeeper.org  
Columbia Riverkeeper

	Last Name	First Name	City	State	Zip Code	Comment
1	Adamson	Chris	Gig Harbor	WA	98335	We need to work together with the tribes to respect and care for the land that is integral to their culture and everyone's future. We need to find alternatives that do not just consider profit. We need to consider our childrens future instead of an easy quick solution. There are better ways.
2	alexandra	Kathryn	Anacortes	WA	98221-8581	This project will result in direct indirect and cumulative impacts on fish wildlife and water quality and should not be approved
3	Aoki	David	Vancouver	WA	98683-1851	
4	Armstrong	Amber	White Salmon	WA	98672-2521	
5	Bailey	Jacob	Orting	WA	98360-9638	
6	Banks	Wesley	Vancouver	WA	98682-0067	While the concept sounds good, this project is not good. Its impacts on indigenous people would completely outweigh the benefits, if any, of the project.
7	Becker	Jessica	Yacolt	WA	98675-9526	The damming of the Columbia River has already negatively impacts local Native Americans. This project seems to continue to do irreparable damage. There are other ways to create renewable energy.
8	Bingle	Bonnie	Vancouver	WA	98665-0903	
9	Blackwood	Barbara	Spokane Valley	WA	99206-5728	
10	BOYD	MARILYN	Seattle	WA	98125-6625	1. This project has not been identified as a need to meet the state,Äôs regional clean energy goals. 2. I am concerned about this project negatively affecting wildlife, including golden and bald eagles, and water quality. 3. For too long, tribal rights have been diminished, neglected and ignored.
11	Burch	Kristian	Camas	WA	98607-8977	
12	Campbell	Roberta	Tacoma	WA	98408-3625	I am deeply concerned about the environment, wildlife and climate change and what we can do.
13	Canale	Shaw	Coupeville	WA	98239	Environment before profit c

14	Cetas	Elijah	Portland	OR	97222-6569	We need to move beyond 'sacrifice zones'. We can build renewable energy, reduce consumption and waste, and give benefits to the most marginalized without further harm to plants and animals, cultural resources, and sacred landscapes. I am a climate organizer, part of the Sunrise Movement, and other groups. It is difficult to oppose any renewable energy project, given the enormous changes we need to see in my lifetime to reduce emissions. But I also know that all our efforts to stop the climate crisis are in vain if it leads to more extinction and injustice. This is the wrong project. Listen to the Yakama Nation, sovereign stewards of these lands for millennia. Don't make the mistake of thinking you know best for their landscape. Thank you,
15	Choma	Becky	Brush Prairie	WA	98606	
16	Ciancibelli	Allison	Twisp	WA	98856-9786	
17	Clark	Roger	Bellingham	WA	98225-6213	There are too many negatives and doubtful benefits as well as unlikely economic success to justify this project.
18	Cody	Heidi	Vancouver	WA	98664-5432	If this affects the Yakama nation, fish, wildlife and water quality, make sure you shouldn't do it differently or not do it at all.
19	Cole	Jackie	Woodinville	WA	98072-6501	
20	Couture	Ray	Seatac	WA	98168-3035	I care about the planet which sustains all life not just human. If we do not care about the planet we are nothing more than a virus confidently destroying our host. Our demise will follow.
21	Curry	Linda	Kelso	WA	98626-5308	
22	Derie	Joann	Vancouver	WA	98682-7063	I strongly believe in clean energy alternatives that promote a healthier environment. I live next to the Columbia River and this will effect our fish, wildlife, and water quality.

23	dicken	don	Ellensburg	WA	98926-8007	i appreciate the 'clean' power columbia river dams deliver but they are not without costs. i think right now we should be talking about removing snake river dams rather than talking of adding additional structures to mess with my favorite river
24	Dixon	Angie	Clinton	WA	98236-9622	We must work with our rivers and other ecosystems, not impose our shortsighted demands that always cause problems and destruction to the life support of every living creature that depends on the river or other ecosystem. WE MUST START TO THINK AND ACT DIFFERENTLY IN ACCORDANCE WITH NATURE OR WE ARE DOOMED AND DOOM EVERY OTHER LIVING SPECIES ON THIS PLANET. And if we continue our destructive practices, shame on us and we will all pay the price.
25	Doane	Anne	Camas	WA	98607-7986	
26	Dodge	Tiffany	Seattle	WA	98103-8874	
27	Ellison	Richard	Seattle	WA	98115-4639	As a biologist, i believe any large project that expects multiple impacts, especially to cultural and ecological resources, should require a full EIS.
28	Featherstone	Suz	Olympia	WA	98512	We need to do all we can to help build stable salmon populations for the health of the orcas and the Puget Sound Eco system



29	Fischlin	Segue	Seattle	WA	98102-3203	While I don't understand what 'pumped storage' means, I am concerned about the effects of hydroelectric dams upon salmon spawning, as it has been proven that fish ladders (mostly) don't work. I would like to see a greater focus placed upon energy efficiency and looking at ways to reduce energy use. For example, supporting infrastructure development for small electric vehicles such as ebikes and etrikes over electric cars and resisting the catastrophic energy demands of 'smart cities' and self-driving vehicles, along with 5g. John McAfee has pointed out that a tremendous amount of energy is wasted sending SPAM alone. Why aren't spammers hunted down and shut down? So there are many many ways to reduce energy usage without a reduction in quality of life that aren't being explored. Wind and solar (esp in eastern WA) should also be examined, esp if there are any efficient designs of VAWT now available.
30	Fisher	Karen	Ferndale	WA	98248-9650	
31	Gannon	Vicky	Seattle	WA	98121-2121	I care about the environment and the damage that we are close to being able to undo and I care about the rights of native Americans.
32	Genest	Karen	Vancouver	WA	98683	I am concerned that this project has the potential to negatively impact the environment as well as the local native residents in the areas. We have a tendency to want to protect "white" cultural resource but mindlessly destroy those that are important to any indigenous cultures. We need to make a change.
33	Gillespie	Bob	Mount Vernon	WA	98273-5817	
34	Gilmore	Thomas	Bellingham	WA	98225-7910	
35	Hackett	Alex	Nampa	ID	83686-5125	

36	Herron	Lorena	Battle Ground	WA	98604-3225	This project is very alarming to me because of tensional detrimental effects on indigenous peoples as well as native species.
37	Heye	Lydia	Portland	OR	97224-4494	It is important that lawmakers don't overlook Tribal needs, especially when approving new infrastructure projects such as these.
38	Hinman	Bill	Longview	WA	98632-1837	We only have one earth and republicans are doing everything they can to destroy it.
39	Houghton	Abigail	Seattle	WA	98118-3937	
40	Ikenberry	Julie	Lyle	WA	98635-9512	Environmental and social impacts must be at the forefront of all considerations. We can no longer move forward with development that does not take these into account. Please drop this project.
41	Jacobs	Diane	Portland	OR	97213-4654	I stand firmly in solidarity with the Yakama Nation and the Confederated Tribes of the Umatilla Indian Reservation in opposing the construction of the massive pumped storage hydroelectric project. The cultural significance of this area must be respected.
42	Jacobs	Kelsey	Moses Lake	WA	98837	Projects such as these must not be undertaken lightly and must have the full review of the Department of Ecology, as well as review by all local tribal parties.
43	Jim	Debra	Toppenish	WA	98948-5594	Adverse effect on Salmon and other water life in the Columbia River.
44	Johnson	Lorraine	Seattle	WA	98125-2600	So we have a future that is robust and varied.
45	Johnson	Nancy	Edmonds	WA	98020-3936	
46	Kays	Noah	Camas	WA	98607-8573	Honor our environment and the Indian treaties
47	Keely	S.	Kalama	WA	98625-9511	The Goldendale Project's environmental justice impacts to Tribal Nations and Indigenous people, is not right. The state of Washington should stand with our BIPOC communities in protecting their health and prosperity. I urge you to provide a robust 'No Action' Alternative.

48	Kepford	Pam	Everett	WA	98203	We need our fish! Orcas need our fish. Respect the rights of the Indigenous, they were here for 10,000 years and left the land pristine. We need to become in tune with the Earth, rather than exploit her to death.
49	Kramer	Robin	Olympia	WA	98506-2826	
50	Kreher	Leslie	Monroe	WA	98272-2322	We need to protect our environment. The future is in power sources that are not carbon based. Please support putting funds toward clean, renewable energy.
51	Kreider	Tawn	Vancouver	WA	98661-4951	Soooo tired of having to convince the government and powers that be to always consider the environment first, future generations second and money last. Why is it so hard to understand that we as humans don't get to abuse and trash the environment on a whim??? Does climate change, species extinction and native culture mean nothing?!? I care about all these things passionately and vehemently oppose Goldendale Pumped Storage Project. Let the Washington Dept. of Ecology (Ecology) to conduct an Environmental Impact Statement !
52	Krueger	Gail	Vancouver	WA	98661-4813	
53	Kuzma	Ken	Longview	WA	98632-9819	
54	lane	Kathy	Vancouver	WA	98663	
55	Leavitt	Donna	Edmonds	WA	98026-8214	This is sacred landscape and should not be violated further.
56	Lee	Mona	Seattle	WA	98118-3851	There is no Planet B.
57	Leed	Mark	Vancouver	WA	98661-5176	This project's footprint on the landscape, and its impact on cultural resources of the Yakama Nation render it unacceptable. This is not the type of clean energy project needed to meet Washington's goals for greenhouse gas emissions reduction.

58	Lindberg	Robert	Vancouver	WA	98662-3328	This decision should not be taken lightly considering the potential environmental impact if this project were approved.
59	Long	Robyn	Seattle	WA	98117	
60	Lybarger	Lisa	Kalama	WA	98625-9476	The Columbia river has had enough!
61	Mackey	Melvin	Vashon	WA	98070-7547	The Yakama Nation has vehemently opposed this development because of the proposal,Ãs devastating impacts to irreplaceable tribal cultural resources.
62	Magliola	Lawrence	Sequim	WA	98382-9310	
63	Magner	Millie	Seattle	WA	98199-1441	If we are to save salmon, the time to act is now. We have the opportunity to save much more than salmon and orca. The steps we take to save these iconic species will reverberate - they'll ripple like a stone thrown into a pool of water. They will be that action that proves to us that we care enough to take on climate change. By saving these species, we take the steps to save ourselves.
64	Marre	Rosemary	Vancouver	WA	98683	I live near the Columbia river and my husband is a site steward for the Department of Natural Resources Nature Preserves in our area. My husband and I frequently enjoy outings in the Columbia Gorge. I am concerned about the impact of the project on the river, the natural environment and scenery. I think it is an ill conceived plan and unnecessarily destructive. I think it is a poor use of resources that could and should be directed toward low impact green energy projects. Please put a stop to this project. Thank you.
65	Marrs	Christopher	Port Townsend	WA	98368-9237	It's past time to work with and to honor the tribe's cares and the needs of the environment. I support the Dept. of Ecology's decision and hope you will also.
66	Marshall	Liz	Bellingham	WA	98225-4762	

67	Martinson	Julianne	Everett	WA	98201-1114	The EIS must be done to analyze impacts on water quality, fish and wildlife, but the Project's impacts on indigenous and low-income ratepayers must bear heavy scrutiny. I support a strong 'No Action' alternative.
68	McDonough	Rebecca	Eastsound	WA	98245-0165	We all need to work to save the environment in any way we can - including this.
69	Melton	Nancy	Seattle	WA	98115-6564	This is Tribal Land! It is not the government's to disrupt. Goldendale is a beautiful spot, leave it alone. Think of the major impact this would have on the area- plant life, animal life and ecological disruption. An EIS must be required. I do not think that we have enough time on the planet to waste on any further destruction of the earth. I care-we all should- about saving open spaces. Listen to reason. Please. We only have so little time to secure our challenges on this 'blue marble'.
70	Mintz Kavas	Lisa M.	Lynnwood	WA	98087-6057	
71	Montour Lewis	Sara	Everett	WA	98203	
72	Neumeister	John	New York	NY	10032	
73	Pence	Joanne	Columbia City	OR	97018-9784	I live next to the Columbia River in Oregon. Decisions made in Washington directly affect my life here. Please work to save our environment.
74	Pendergast	Betsy	Port Townsend	WA	98368-4434	
75	Perkins	Sherry	Seattle	WA	98178-4405	
76	Pinsonault	Kathleen	Portland	OR	97222-5756	
77	Pyz	Anastasia	Vancouver	WA	98685-1912	We must act with care and intention when it comes to our environment since we as humans are so intimately connected with the earth around us. Failure to properly build and inspect these kinds of projects can lead to grave harm to the environment, local wildlife, and downstream ... us.
78	Rall	Ben	Spokane	WA	99205-5635	
79	Raymond	Teri	Orient	WA	99160-9406	My grand kids need a viable earth too.
80	Rietz	Marguerite	Blaine	WA	98230-9353	

81	Riggin	Joyce	Longview	WA	98632-3308	
82	Roberts	Brad	White Salmon	WA	98672-1068	If science tells us water temperature in the Columbia River is already too high for the salmon why would we add another water heating piece of infrastructure? Short sighted corporate greed should not be allowed to further damage salmon habitat. Send these carpet baggers a message that we are trying to save the salmon not destroy them!
83	Roberts	Caroline Y.	White Salmon	WA	98672-1068	We already have the aftereffects of nuclear, oil, coal, dams and other energy development. We need to research this thoroughly BEFORE devastating harmful effects come to light.
84	Rojas	Jessica	Portland	OR	97211-6527	Projects like this can only do one thing- disturb a already fragile ecosystem and fisheries, and create greater biological and economic loss to our region. The dollars saved from not allowing this project to proceed will greatly exceed the minimal gains of allowing these dollars to leave our region and create a domino effect of greater loss.
85	Rucker	Pat	Vancouver	WA	98661-5336	Pumped storage will help with climate change, but it cannot come at the expense of everything else. The Yakama deserve to have final say in any project that would impact their cultural sites. This was their home first and that should always be respected.
86	Rummerfield	Mike	Onalaska	WA	98570-0661	
87	Ryan-Mapolski	Cassie	Portland	OR	97206-3550	
88	Saul	Greg	Olympia	WA	98501-3917	
89	Scavezze	Barbara	Olympia	WA	98501-5994	
90	Shea	Joan	Spokane	WA	99223-7223	Immediate action is essential to protecting restoring ecological balance NOW, and into the future!
91	Shikuma	Stanley	Seattle	WA	98144-6512	

92	shirley	john	Vancouver	WA	98665-8540	These systems interrupt the natural flow of a river system. This leads to disrupted animal migration paths, issues with water quality, and wildlife displacement.
93	Snook	Richard	Tumwater	WA	98501	Not everything needs to be sold to the highest bidder!!! There is always a requirement to respect ownership first!.....especially when it comes to land and endangered habitats! Am sure the company building this power facility had other options; and if they didn, they should be encouraged to fine other locations.
94	Snyder	Nichole	Federal Way	WA	98023-2327	We have already destroyed enough indigenous land. Now is the time to really think about why we are doing to make sure we protect ALL communities and especially the sacred and historical sites of our indigenous communities. All impacts need to be properly explored and documented and weighed before moving forward to destroy more land for a project like this. How will it impact the Yakama Nation, our salmon, our resident orcas? These things are all connected. We need to protect life and stop destroying it.
95	SOWDON	Lyn	Vancouver	WA	98684-5704	It's time we support the rights of all people.
96	Spurling	Leslie	Shoreline	WA	98133-6209	In this day and time, it seems incredible that we would need to petition to protect indigenous lands and the environment. Obviously, we still do.
97	Staley	Sheri	Shelton	WA	98584-8848	
98	Stewart	Todd	Olympia	WA	98502-7655	
99	Studley	Linda	Marysville	WA	98271-7805	We need to fully investigate clean energy development in this area before proceeding
100	Swihart	Janet	Long Beach	WA	98631-1506	As Earth's stewards we must make wiser, forward thinking choices. Let's all try harder than this.

101	Tseu	Christy	Ariel	WA	98603-9736	Ecology determined that the pumped-storage hydroelectric development may lead to significant adverse impacts on the environment, which requires an Environmental Impact Statement (EIS).
102	Turnbull	Laura	Portland	OR	97217-4365	It is past time to take a stand to protect our natural environment! Environmentally neutral or beneficial projects must replace those with negative consequences. This is no time for short cuts and easy approvals.
103	Van Haalen	Teresa	Spokane Valley	WA	99016-5299	Our Columbia river is a source of all that sustains up here in the northwest!
104	Vogel	Sally	Lacey	WA	98503-3132	The past is important to me. Modern civilization has erased all too many of the cultural treasures that are important both historically and spiritually to the descendants of the people who made them. Fighting climate change is important but perhaps there are other ways to do it.
105	WARNER	Donna	El Paso	TX	79934-3318	
106	Way	Steve	Vashon	WA	98070-7850	There's so much wrong with this project. If the power generated is truly needed, why not spend an equivalent amount on renewable energy projects that do not harm the environment or, most importantly, trample once again on the rights and standing of Indigenous people. Best alternative of all: consult with Indigenous people as the equals that you are, truly work together, and arrive at a place that is acceptable to all.
107	Whitefield	Donna	Camas	WA	98607-8049	The Yakima Nation deserves to have its feelings respected in regard to this. Please don't do anything without an environmental impact statement and a cultural impact statement.
108	Wilkins	Mary Jo	Kennewick	WA	99337-4614	I live along the Columbia River. I want this area's wild flora and fauna to remain pollution free.
109	wilson	bea	Edmonds	WA	98020-3909	
110	Wright	Janet	Friday Harbor	WA	98250-8966	



**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-19: Anthony Aronica**

**Address:** P.O. Box 150

**Submit Date:** 02/12/2021

**Comment I-19-1**

YAKAMA NATION COMMENTS FOR ENVIRONMENTAL IMPACT STATEMENT ON PROPOSED GOLDENDALE PUMPED STORAGE PROJECT.

Anthony Aronica

YAKAMA NATION COMMENTS FOR ENVIRONMENTAL IMPACT STATEMENT ON  
PROPOSED GOLDENDALE PUMPED STORAGE PROJECT.



February 12, 2021

SUBMITTED ELECTRONICALLY

Sage Park  
Washington Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009  
Attn: Goldendale Scoping

RE: YAKAMA NATION COMMENTS FOR ENVIRONMENTAL IMPACT STATEMENT ON  
PROPOSED GOLDENDALE PUMPED STORAGE PROJECT.

Dear Ms. Park,

Included herein are comments on behalf of the Confederated Tribes and Bands of the Yakama Nation ("Yakama Nation") in response to the January 14, 2021 State Environmental Policy Act ("SEPA") Determination of Significance ("DS") Request for Comments on Scope of Environmental Impact Statement ("EIS") in response to the proposed FFP Project 101, LLC pumped storage project under Federal Energy Regulatory Commission ("FERC") License Application No. 14861 ("Project"). The Yakama Nation's comments below demonstrate for the Washington Department of Ecology's ("DOE") Project EIS review that the proposed action will have significant adverse environmental impacts, many of which cannot be avoided or mitigated if Project implementation is permitted. The damage to the Yakama Nation's cultural resources and the local aquatic and terrestrial resources disproportionately injures the heritage and traditional practices of Yakama people because mitigation cannot replace the destruction ancestral sites that are still used to observe ceremonial and cultural practices. This letter preserves, incorporates, and reasserts the Yakama Nation's concerns regarding the Project made known to the FERC and Project Applicants through previous communications.<sup>1</sup> This letter further agrees with and incorporates corresponding EIS comments submitted by the Columbia Riverkeeper.

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<sup>1</sup> See Exhibit A - Letter From the Yakama Nation Superintendent of Natural Resources to FERC Secretary, Comments on NEPA Scoping Document No. 1 (Dec. 28, 2020) with incorporated concurring comments; Letter From the Yakama Nation Superintendent of Natural Resources to Breean Zimmerman, Comments on Application For Section 401 Water Quality Certification (Nov. 6, 2020) with incorporated concurring comments; and, Letter From Yakama Nation Tribal Council

## I. Background.

The 1855 Treaty between the United States and the Yakamas (“Treaty”) reserved a 1.3 million acre Reservation “for the exclusive use and benefit” of the Yakama people.<sup>2</sup> The Treaty further designated reserved rights for Yakamas to exercise “in common with” citizens of the United States at all usual and accustomed places within the Treaty Territory.<sup>3</sup> A federal treaty is considered the supreme Law of the Land under the U.S. Constitution.<sup>4</sup> Pursuant to its status as a sovereign Native Nation and its Treaty-reserved authority, Yakama Nation acts as a Co-Manager of the Columbia River fishery, as recognized by federal courts,<sup>5</sup> for the protection of all natural and cultural resources in Yakama Nation’s Treaty Territory. The Yakama Nation Treaty Territory encompasses usual and accustomed fishing sites, cultural areas, and ceremonial locations from the mouth of the Columbia River upstream north of the 49<sup>th</sup> parallel.

The Yakama Nation’s enrolled membership exceeds 11,000 people whose history, culture, and way of life are intertwined with Nch’i Wa’na (the Columbia River), and its host of salmon, fish, plants, medicines, and animals. Protecting the land adjacent to and the waters of the Columbia River is critical for ensuring the Yakama Nation’s Treaty-reserved resources and rights, and ultimately to the health and welfare of the Yakama people.

The Yakama Nation has expressed strong concerns, even before Project proponents filed a FERC draft license application, that this Project would have significant adverse impact on cultural, terrestrial, and aquatic resources. Reservoir construction over the top of Traditional Cultural Properties (“TCP”) and National Register of Historic Places (“NRHP”)-eligible sites creates an acute loss to Yakama people that cannot be replaced or off-set. Previously, the Yakama Nation opposed similar project proposals at this location due to the numerous natural and cultural resources that are incompatible with industrial development because it will permanently destroy TCPs and continuing access to ceremonial sites, loss of terrestrial and aquatic resources, and has the potential to exasperate existing soil and groundwater contamination from the former Columbia Gorge Aluminium (“CGA”) smelter site.

## II. Project Description.

The Yakama Nation’s understanding of the Project is consistent with the description summarized in the DOE Request for Comments on Scope of EIS, dated January 14, 2021, based on the FERC License Application, dated June 23, 2020.

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Chairman to FERC Secretary, Comments and Recommendations for Additional Study (Mar. 11, 2020).

<sup>2</sup> See Treaty with the Yakamas, U.S. – Yakama Nation, June 9, 1855, 12 Stat. 951, art. II, cl. 3.

<sup>3</sup> See *Id.* at art. III, cl. 2.

<sup>4</sup> See U.S. Const. art. VI, cl. 2.

<sup>5</sup> See *United States v. Washington*, 384 F. Supp. 312, 382 (W.D. Wash. 1974), *aff’d*, 520 F.2d 676 (9th Cir. 1975); see also *U.S. v. State of Oregon*, 666 F.Supp. 1461 (D. Or. 1987).

### III. Direct Adverse Impacts To Yakama Nation Treaty Resources.

#### *i. Cultural Properties*

The Project Area of Potential Effect (“APE”) is in an area of exceptional cultural importance to the Yakama Nation. The Project cumulatively adds to other energy infrastructure, including hydro-electric dams and utility-scale wind turbine facilities, that devastate and destroy Yakama Nation’s traditional fishing sites, villages, burial sites, ceremonial gathering places, root and medicine harvests, and cultural landmarks up and down the Columbia River. This Project development directly damages and alters nine culturally significant sites or TCP’s. Two of those sites impacted by the APE are NRHP-eligible TCP sites, including a NRHP-eligible multiple property documentation TCP, and a nationally-designated Archaeological District. Allowing the TCPs to be damaged will materially diminish their NRHP-eligibility by destroying the plants and features associated with Yakama legends. Further, diminishing the multiple property documentation TCP also compromises other documented TCPs nearby because the ‘multiple property’ aspect is culturally affiliated with, and draws enhanced meaning from, the network of associated sites.

The archaeological and TCP sites are irreplaceable to the Yakama Nation’s cultural resource inventory as a source of significant cultural and spiritual meaning for Yakama people. Yakamas exercised ancestral harvest and ceremonial practices at these sites, as they *still* do today. The EIS must recognize the scale of negative impact to these cultural resources, including the insufficiency of proposed mitigation effects. Ultimately the construction of a pump storage facility at this proposed site unavoidably destroys cultural resources through earthworks and reservoir storage. Only the Yakama Nation can determine what is culturally significant to its people.

#### *a. Unacceptable Limits On Cultural Use And Access*

The Project development would impede and disrupt an existing Programmatic Agreement between the State of Washington and the Bonneville Power Authority for on-going root and plant gathering access by Yakama members.<sup>6</sup> Yakama members regularly access this site for root and medicing gathering, and to practice religious and cultural ceremonies. The Programmatic Agreement preserves and recognizes the critical archaeological and cultural resources within the Project APE. This Project will also directly and indirectly restrict access and use at the adjacent North Shore Treaty fishing Access Site which is a Treaty-fishing location in the Zone 6 Fishery.

Additionally, a decommissioning plan cannot possible replace or restore TCP’s to their ancestral condition – the cultural resource is forever decimated. The nature and character of the cultural resources within the APE will be significantly harmed or lost

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<sup>6</sup> See Exhibit B - Programmatic Agreement Among The Bonneville Power Administration, The Washington State Historic Preservation Officer, And The Advisory Council On Historic Preservation (May 1997).

forever if construction occurs. This irreplaceable loss seriously injures ongoing cultural access for the sites' integral meaning to the Yakama people's religious and ceremonial practices.

ii. *Terrestrial and Aquatic Resources.*

Calling the Project, a "closed-loop" system is disingenuous and misleading. Approximately 2.93 million gallons of water will be drawn from Columbia River to fill the Project's two reservoirs. These open air reservoirs must be continuously replenished at a rate of approximately 1.2 million gallons of water per year from the Columbia River to offset losses from evaporation and leakage. Emptying of these reservoirs for maintenance and repair will require additional water to replace lost volumes. The Columbia River fishery already suffers from the negative impacts of over-allocated water resources. Salmonids and other aquatic species require stable water quantity, quality, and temperature for survival. This Project, when combined with the impacts from existing dams and their impoundments, and the comorbidities of climate change, may irreversibly tilt the ecological scales long-term survival of the Columbia River fishery.

The Project's upper reservoir will permanently destroy several ephemeral waterbodies including approximately 965 linear feet of streams. These streams are perennial tributaries of the Klickitat River located approximately 2.4 miles north of the survey area. The upper reservoir represents a source of potential contamination to the surrounding streams and wetlands. Additionally, it is unclear what the impacts will be if earthworks at either proposed reservoir gets damaged, breached, or completely fails.

Combined, the two proposed reservoirs would result in over 120 acres of surface water features to attract birds and bats which may result in more interactions with wildlife and an increase in birds and bats being wounded or killed by wind turbines. Additionally, these water bodies are expected to further alter laminar wind currents which are already influenced by existing wind farms. The Project area is home to bald eagle, golden eagle, and prairie falcon nesting, which combined with foraging and rearing habitat makes this area unique for these species. Eagle nesting, rearing, and foraging habitat would be degraded during both the construction phase and upon completion of the two reservoirs. The area also provides habitat and supports plant species important to Yakama Nation for gathering and food sovereignty practices.

Ephemeral and seasonal waterbodies at the site are important sources of seasonal water for many plant and animal species living in this otherwise dry region. The seasonality of the water supply is necessary for those plants and animals to complete life cycle phases. Ephemeral or seasonal waterbodies also slow surface water and stormwater runoff reducing erosion and flood impacts and allow for water to infiltrate to replenish groundwater. Possible leakage from the reservoirs will contaminate and adversely impact these interconnected terrestrial and aquatic resources.

iii. *Columbia Gorge Aluminium Smelter Cleanup*

The Project's lower reservoir is proposed over the former Columbia River Gorge Aluminum ("CGA") Smelter, which is now a Resource Conservation and Recovery Act

("RCRA") contaminated site that is subject to ongoing management and clean-up by the DOE under the state Model Toxics Control Act. The Project Applicant has not characterized or developed an actual plan to address the soil contaminants that would be excavated during construction of the lower impoundment. The Applicant must have a plan for properly disposing of that material in accordance with applicable law if hazardous or dangerous material is excavated during construction.

Previously FERC has denied the development of pump storage at this location because of necessary cleanup activities that are still ongoing and imperative for environmental recovery.<sup>7</sup> Additionally, the consequence of a potential leak or breach in the lower reservoir, adjacent to the Columbia bank, compounds concerns over existing soil contaminants.

#### IV. Conclusion.

The Yakama Nation's Treaty-reserved cultural and natural resources will be irrevocably damaged or destroyed due to the Project construction and location on culturally and environmentally sensitive areas. Project development attacks and threatens Yakama Nation's Treaty resources and the Yakama members who rely these resources. The decades-long industrial development of utility-scale energy facilities have had targeted harm on the Yakama Nation's Treaty resources, far beyond the balance of interests for other non-Yakama entities. SEPA protects of these jeopardized resources and the EIS tool must incorporate the regulatory responsibility to preserve irreplaceable resources.

For further comments or questions please contact phil\_rigdon@yakama.com and jerry\_meninick@yakama.com or at (509) 865-5121, exts. 4655 and 6323.

Respectfully,



JERRY MENINICK, DEPUTY DIRECTOR  
YAKAMA NATION CULTURAL RESOURCES



PHIL RIGDON, SUPERINTENDENT  
YAKAMA NATION DEPARTMENT OF NATURAL RESOURCES

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<sup>7</sup> See *Public Utility District No.1 of Klickitat County, Washington, Clean Power Development, LLC*, 155 F.E.R.C. ¶ 61,056 (2016).

cc: Erik Steimle, Vice President, Rye Development, FFP Project 101, LLC  
Rob Whitlam, State Archaeologist, Washington Department of Archaeology &  
Historical Preservation  
Dennis Griffin, State Archaeologist, Oregon State Historic Preservation Office



## EXHIBIT A

1. Letter From the Yakama Nation Superintendent of Natural Resources to FERC Secretary, Comments on NEPA Scoping Document No. 1 (Dec. 28, 2020) with incorporated concurring comments.
2. Letter From the Yakama Nation Superintendent of Natural Resources to Breean Zimmerman, Comments on Application For Section 401 Water Quality Certification (Nov. 6, 2020) with incorporated concurring comments.
3. Letter From Yakama Nation Tribal Council Chairman to FERC Secretary, Comments and Recommendations for Additional Study (Mar. 11, 2020).

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Exhibit Coversheet Only.

[Paginated separately.]

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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Attachments available upon request.

## **EXHIBIT A**

### **Letter From Yakama Tribal Council Chairman To FERC Secretary (Mar. 2020)**

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Exhibit Coversheet Only.

[Paginated separately.]

## **EXHIBIT B**

### **Programmatic Agreement Among The Bonneville Power Administration, The Washington State Historic Preservation Officer, And The Advisory Council On Historic Preservation**

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Exhibit Coversheet Only.

[Paginated separately.]

**Goldendale Energy Storage – Scoping Comments**

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Attachments available upon request.

**Goldendale Energy Storage – Scoping Comments**

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**I-20: Simone Anter**

**Address:** Columbia RiverKeeper

**Submit Date:** 02/12/2021

**Comment I-20-1**

Attached, please find Columbia Riverkeeper, Friends of the White Salmon, and Sierra Club's comments\* on the scope of the EIS for the Goldendale Project.

\*Note: Appendix 4: The Native American Graves Protection and Repatriation Act has been loaded as a separate comment due to file size limits.

**I-21: Simone Anter**

**Address:** Columbia RiverKeeper

**Submit Date:** 02/12/2021

**Comment I-21-1**

Attached, please find Appendix 4 (the Native American Graves Protection and Repatriation Act) of the Columbia Riverkeeper, Friends of the White Salmon, and Sierra Club's comments on the scope of the EIS for the Goldendale Project.

The letter and Appendices 1,2,3 and 5 are loaded as a separate comment due to file size limits.

## Simone Anter

Attached, please find Columbia Riverkeeper, Friends of the White Salmon, and Sierra Club's comments\* on the scope of the EIS for the Goldendale Project.

\*Note: Appendix 4: The Native American Graves Protection and Repatriation Act has been loaded as a separate comment due to file size limits.



February 12, 2021

Sage Park  
Washington Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009  
Attn: Goldendale Scoping

*Submitted via email to: [sage.park@ecy.wa.gov](mailto:sage.park@ecy.wa.gov).*

**RE: SEPA Scoping Comments on the Proposed Goldendale Pumped Storage Project, FERC Docket No. P-14861-002.**

Dear Washington Department of Ecology,

On January 14, 2021, the Washington Department of Ecology (Ecology), announced its intent to prepare an Environmental Impact Statement (EIS) on the proposed Goldendale Energy Storage Hydroelectric Project (Project), pursuant to the State Environmental Policy Act (SEPA). *See generally* RCW 43.21C. Columbia Riverkeeper, the Washington Chapter of the Sierra Club, Friends of the White Salmon and Washington Environmental Council (collectively, “Commenters”) commend and appreciate Ecology’s Determination of Significance for the Project. The following comments are submitted on behalf of Commenters to help Ecology identify issues that must be addressed during the environmental review process. Ecology’s EIS must thoroughly document and explain the human health risks and environmental impacts posed by the Project. Ultimately, Ecology may and should deny Rye Developments (Rye) pending applications based on Ecology’s substantive SEPA authority. *See* WAC 197-11-660.

#### **I. Statement of Interest and Background on the Goldendale Pumped Storage Project.**

Columbia Riverkeeper (Riverkeeper) is a 501(c)(3) non-profit organization whose mission is to protect and restore the water quality of the Columbia River and all life connected to it from the headwaters to the Pacific Ocean. The organization’s strategy for protecting the Columbia River and its tributaries includes working in river communities and enforcing laws that protect public health, salmon, and other fish and wildlife. Riverkeeper has been actively engaged



in Rye, dba Free Flow Power 101, LLC's proposed Project since 2017 and closely followed other pumped storage projects proposed in this area, the most recent iteration rejected by FERC in 2016. *See* Public Utility District No.1 of Klickitat County, Washington & Clean Power Development, LLC, 155 F.E.R.C. ¶ 61,056 (2016).

The Washington State Chapter of the Sierra Club is a 501(c)(4) non-profit organization with over 100,000 members and supporters in Washington State and over 3.8 million nationally. Headquartered in Seattle, the Washington State Chapter members and supporters live throughout the state of Washington. The Sierra Club works to protect communities and the planet.

Friends of the White Salmon River is a non-profit 501(c)(3) organization that has worked since 1976 to protect and restore naturally-reproducing anadromous fish populations, and to protect the shorelines, water resources, and habitat areas that affect wild salmonid populations within Klickitat County. Friends of the White Salmon River has an interest in protecting and conserving water resources affecting wild salmonid populations.

Washington Environmental Council (WEC) is a nonprofit, statewide advocacy organization that has been driving positive change to solve Washington's most critical environmental challenges since 1967. WEC's mission is to protect, restore, and sustain Washington's environment for all. Commenters appreciate the opportunity to provide these comments and supporting materials, including the Appendices with this letter.

Rye proposes the Northwest's largest pumped storage hydroelectric project along the Columbia River in Klickitat County, Washington, near the John Day Dam, with transmission facilities extending into Sherman County, Oregon. The project would occupy 18.1 acres of land with a portion of the Project within an existing transmission right-of-way owned by the U.S. Army Corps of Engineers and administered by Bonneville Power Administration. The Project includes an off-stream, pumped-storage complex with: (1) a 61-acre upper reservoir formed by a 175-foot-high, 8,000-foot-long rockfill embankment dam at an elevation of 2,950 feet mean sea level (MSL) with a vertical concrete intake-outlet structure; and (2) a 63-acre lower reservoir formed by a 205-foot-high, 6,100-foot-long embankment at an elevation of 590 feet MSL with a horizontal concrete intake-outlet structure and vertical steel slide gates. *See* Scoping Document at 6. According to Rye, the Project consists of over 2,400 feet of maximum gross head that involve no river or stream impoundments, allowing for relatively small water conveyances. Other features include an underground water conveyance tunnel, underground powerhouse, 115 and 500 kilovolt transmission line(s), a substation/switchyard, and other appurtenant facilities. Goldendale Pumped Storage Project CWA 401 Certification Application at 1 (June 23, 2020).

Rye would site the Project's lower reservoir on lands that previously housed the CGA smelter (also known as Harvey Aluminum, Martin Marietta Aluminum, Commonwealth

Aluminum, or Goldendale Aluminum), now a Resource Conservation and Recovery Act (RCRA) contaminated site, which include contaminated lands and groundwater. *Id.* at 2. The Project is expected to require 9,000 acre feet of Columbia River water for the initial fill and an additional 390 acre feet per year to offset evaporative losses. Goldendale Energy Storage Final FERC License Application, FERC Project No. 14862 (FLA) at 14.<sup>1</sup>

The Project threatens irreplaceable tribal cultural and religious resources, water quality, fish, and wildlife. The Project would permanently destroy large segments of unique waterbodies, including “waters of the United States,” in the scenic Columbia Hills and cause downstream impacts to perennial waterbodies. *See* Columbia Riverkeeper et. al, Public Comments on Free Flow Power 101, LLC Goldendale Pumped Storage Project Clean Water Act 401 Water Quality Certification, (Nov. 9, 2020). The Project requires withdrawing millions of gallons of Columbia River water, threatening designated uses and impacting water quality in an already degraded river. *Id.* Tribal, federal, and state fish and wildlife agencies have raised significant concerns about the Project’s impacts on water quality, fish, and wildlife. *Id.* All of these issues, discussed in greater detail below, must be addressed in Ecology’s EIS.

Like many people in the Pacific Northwest and nationally, Commenters are deeply concerned about a decision that will authorize the construction of a Project with such detrimental and unavoidable environmental justice concerns. At a time when our nation is supposedly reconciling with its deeply ingrained systemic racism, pushing forward an alleged “green-energy” project of this magnitude that will obliterate tribal cultural and religious resources; hinder, if not prohibit, tribal access; and continue the nation’s pattern of deep disregard for tribal cultural resources, is unacceptable. As the state of Washington sets de-carbonization goals, projects with such blatant disregard for environmental justice cannot be allowed a fast track through the licensing process. Green energy cannot be built on the backs of tribal nations.

## **II. Washington’s State Environmental Policy Act**

In adopting the State Environmental Policy Act, the Washington State Legislature declared the protection of the environment to be a core state priority. RCW 43.21C.010. SEPA declares that “[t]he legislature recognizes that each person has a fundamental and inalienable right to a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment.” RCW 43.21C.020(3). This policy statement, which is stronger than a similar statement in the federal counterpart of NEPA, “indicates in the

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<sup>1</sup> The numbers in Rye’s FLA are higher than those in FERC’s Scoping Document, which read: “The initial fill would require 7,640 acre-feet of water and would be completed in about six months at an average flow rate of approximately 21 cubic feet per second (cfs) (maximum flow rate available is 35 cfs). It is estimated that the project would need 360 acre-feet of water each year to replenish water lost through evaporation.” Scoping Document 1 for the Goldendale Pumped Storage Project, FERC Project No. P-14861-002, at 7 (Oct. 29, 2020).

strongest possible terms the basic importance of environmental concerns to the people of the state.” *Leschi v. Highway Comm’n*, 84 Wn.2d 271, 279-80 (1974).

At the heart of SEPA is a requirement to fully analyze the environmental impact of projects that have a significant impact on the environment. RCW 43.21C.031(1). An EIS is required for any action that has a significant effect on the quality of the environment. WAC 197-11-330. Significance means a “reasonable likelihood of more than a moderate adverse impact on environmental quality.” WAC 197-11-794. The purpose of this analysis is not to generate paperwork. Rather, the EIS allows decision-makers to make judgments based on a fully informed appreciation for the environmental impacts of decisions, the available alternatives, and any mitigation that may be appropriate. To facilitate reasoned decision-making, an EIS must include and evaluate “reasonable alternatives” to the proposed action, including a “no-action” alternative. WAC 197-11-440(5). To fully capture a project’s impacts, EISs must examine the direct, indirect, and cumulative impacts of projects. WAC 197-11-792(c); WAC 197-11-060(4)(d).

SEPA regulations also explicitly direct that environmental impacts outside the jurisdiction of the deciding agency should be considered. WAC 197-11-060(c). Crucially, agencies are required to assess both the direct impacts of the proposal as well as the indirect impacts. WAC 197-11-060(4)(d). For example, when considering a government action, a SEPA document must also consider the effects of private growth that may be encouraged by this government action. *Id.*; *Cheney v. City of Mountlake Terrace*, 87 Wn.2d 338, 344 (1976) (SEPA requires that decision makers consider more than the “narrow, limited environmental impact” of the current proposal...agency “cannot close its eyes to the ultimate probable environmental consequences” of its current action).

### **III. Scope of the Project’s EIS**

#### **A. The EIS Must Define the Proper Purpose and Need for the Project and Consider an Appropriate Range of Alternatives.**

The consideration of alternatives is the heart of the environmental review process. It is through the identification of reasonable alternatives, the examination of the environmental impacts that will result under each alternative, and the comparison of those impacts, that the agency and the public can fully understand the impacts of a proposed project. “SEPA requires that ‘alternatives to the proposed action’ be included in the EIS.” *Citizens for Safe & Legal Trails v. King County*, Wash. App. LEXIS 2092, \*20 (2003). RCW 43.21C.030(c)(iii). Additionally, “an EIS must provide sufficient information to allow officials to make a reasoned choice among alternatives.” *Citizens for Safe & Legal Trails*, Wash. App. (2003), *Solid Waste Alternative Proponents v. Okanogan County*, 66 Wn. App. 439, 442, 832 P.2d 503 (1992); see also WAC 197-11-440(5). Courts have gone as far to say that, “SEPA is essentially a procedural statute to ensure that environmental impacts and alternatives are properly considered by the decision makers.” *Save Our Rural Env’t v. Snohomish Cy.*, 99 Wn.2d 363, 371, 662 P.2d 816 (1983). As such, an agency may not undermine this process by defining a project’s purpose so narrowly as to preclude consideration of reasonable alternatives. *Cf. Muckleshoot Indian Tribe v.*

*U.S. Forest Service*, 177 F.3d 800, 814 n.7 (9th Cir. 1999)(discussing defining a project's purpose under NEPA.).

“SEPA borrows heavily from NEPA” and reference to NEPA analysis is appropriate when construing SEPA's requirements.” *Coalition for a Sustainable 520 v. United States DOT*, 881 F. Supp. 2d 1243, 1259 (2012). *See also Eastlake Cmty. v. Roanoke Assocs*, 82 Wn.2d 475, 488 n. 5, 513 P.2d 36 (1973). In explaining the purpose and need and reasonable alternatives that Ecology's EIS must address, Commenter's analysis draws on some NEPA analysis and case law, which are relevant to explaining the SEPA requirements.

### **1. The Purpose and Need.**

The first step in the SEPA process, is for the agency to “make certain that the proposal that is the subject of environmental review is properly defined.” WAC 197-11-060(3)(a).

According to Rye, the purpose of and need for this Project, or the Project's objective, is to assist Washington, Oregon, and California in meeting their “carbon reduction and environmental policy goals,” and specifically Washington's goal of ensuring that “all of its electricity come from carbon-free sources by midcentury.” FLA at 2. Stated differently, Rye's goal, and thus the “underlying purpose and need” for the project, is to “facilitate the transition to Washington's clean energy future.” *Id.* at 3. Ecology must assess all reasonable alternatives that will support this goal. To do less would be to artificially restrict the purpose and need for this project to no other end than to prevent the consideration of reasonable alternatives.

Arguably, this project is limited to the development of “utility-scale storage to solve the operational challenges of integration.” *Id.* at 2. If Ecology accepts this more limited purpose and need for this project, it must conduct an corresponding alternative analysis. Indeed, Rye admits that there are other “viable, least-cost energy storage options available,” in addition to its preferred pumped storage technology. *Id.* “Proposals should be described in ways that encourage considering and comparing alternatives. Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions.” WAC 197-11-060(3)(a)(iii). Ecology is thus obligated to identify these alternatives and explore the relative environmental impacts of implementing these technologies to meet Washington's goal of moving to all renewable electricity generation.

### **2. Reasonable Alternatives.**

Under SEPA, the EIS must contain a detailed discussion of alternatives to the proposed action. RCW 43.21C.030(2)(c)(iii). Alternatives that the EIS must consider are, “actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. WAC 197.11.440(5)(b), *OPAL v. Adams County*,

128 Wn.2d 869, 875 (Sup. Ct. Wa.1996). However, the number of alternatives must be reasonable. *Id.* See also *City of Mukilteo v. Snohomish County*, 2017 Wash. App. LEXIS 129 \*1, \*24 (2017) (using this definition to describe a reasonable alternative.).

First, as required by the law and to establish the baseline against which any environmental impact of any specific alternative can be compared, Ecology must consider a no action alternative. Next, given Rye's broadly stated project goal, Ecology must consider alternatives that look well beyond the four corners of this specific project, to include alternatives that ensure Washington can meet its energy generation goals and to explore alternatives for utility-scale storage. In any case, Ecology must identify and analyze reasonable alternatives to the specific proposed project. This analysis must examine alternative locations for this project and alternative designs at the chosen site.

#### **i. No Action Alternative.**

Ecology must define and explain impacts of not licensing this project, or any project, at this location, this the no action alternative. The no action alternative must be compared to the other alternatives. WAC 197-11-440(5). This description of the impacts of various alternatives, and the comparative analysis allowed by the development of such information, is the true benefit of the SEPA process. To be meaningful the SEPA document must include the information necessary to allow a thorough and objective assessment of the alternatives. To this end, the identification and review of a no action alternative is essential. Indeed, the no action alternative acts as the starting point for the comparison of the impacts, be they beneficial or adverse, of the proposal and reasonable alternatives.

Here, because this is a new project, the no action alternative is not permitting this project to go forward. Thus, Ecology must describe the value of the site as it exists and the ecological, cultural, recreational, and commercial benefits and activities the site does and could support if the project is not developed.

#### **ii. The EIS must consider clean energy alternatives.**

Ecology must evaluate alternatives to the Project. Washington's Deep Decarbonization Analysis does not call out the Project as necessary energy infrastructure to meet the state's decarbonization goals. See Evolved Energy Research, Washington State Energy Strategy Decarbonization Demand and Supply Side Results (Aug. 2020) (Appendix 1). The state's analysis is still underway and, to date, does not demonstrate a "need" for the Project. Even if large-scale pumped-storage hydroelectric power is called out as necessary to meet the state's deep decarbonization goals, it is not clear Rye's Project is necessary to meet that demand. For example, pumped storage at a different location could meet that need. Furthermore, Governor

Inslee, a national climate leader, has not taken a position in favor of the Project. Rye's FLA includes "Letters of Support"; Rye did not produce a letter of support from the Governor's Office.

In considering alternatives, Ecology must consult with the Governor's Office, the Washington Department of Commerce, Ecology staff, and other experts on the state's deep decarbonization efforts to verify if Rye's alleged "benefits" pencil out.

Even if the Project would provide climate benefits, Ecology must consider: (1) the lengthy permitting and construction timeline for pumped storage in general, (2) the added complexity for Rye's Project due to scale of tribal cultural tribal resources, and (3) the need for the Project a decade or more in the future given the rapidly-changing and dynamic nature of energy markets.

According to a third-party economic analysis, the Project cannot provide renewable energy integration and replacement capacity to support regional decarbonization goals affordably and reliably. Anthony Jones, Critique of the Goldendale Energy Storage Hydroelectric Project, Notification of Intent (December 3, 2019)(Appendix 2). The Rocky Mountain Econometrics analysis concludes that a combination of rising construction costs and decreasing open-market energy prices undercut Rye's claims that the project is necessary to meet the state's decarbonization goals. Overall, Ecology must analyze alternatives to the Project, including alternative site locations, designs, and developments.

**iii. FERC must consider alternatives to pumped storage to provide utility-scale storage to solve the operational challenges of integration.**

In support of its application Rye claims that "[o]f the viable, least-cost energy storage options available, pumped storage is the best-proven, least-cost energy storage technology at scale." This raises precisely the question Ecology must answer: what other "viable, least-cost energy storage options" are available? The answer to this question must be found in Ecology's analysis of the reasonable alternative to the Project. In the FLA, Rye briefly analyzes wind, solar, and Lithium Ion batteries as potential green energy alternatives to pumped storage. FLA Exhibit C at 7. In comparing pumped storage to wind and solar energy, Rye quickly concludes that "[p]umped hydro storage is the only asset that provides large-scale, cost-effective renewable energy storage capacity and a range of essential grid reliability services, the value of which will increase as penetration of intermittent renewable resources rises." FLA Exhibit C at 8. However, comparing renewable energy generation to storage is like comparing apples to oranges. Thus, Rye's only adequate alternative analyzed is Lithium Ion batteries. That being said, Ecology must include an analysis of Lithium Ion batteries as an alternative to pumped storage. In addition,

there are several other renewable energy storage technologies that Rye's FLA failed to analyze and that Ecology must include in its analysis. These include, but are not limited to:

1. Stacked Blocks, which store energy by “automating a six-armed robotic crane to stack thousands of purpose-built, 35-metric-ton monoliths into a Babel-like tower and drop them down again...to release the power.” Julian Spector, GREEN TECH MEDIA, *The 5 Most Promising Long-Duration Storage Technologies Left Standing* (March 31, 2020). This technology adapted pumped hydro's gravity storage in a format with more geographic diversity. *Id.*
2. Liquid Air, a mechanism that “cools down air and stores it in pressurized above-ground tanks,” and uses them for grid storage. *Id.*
3. Underground Compressed Air, whereby you “use excess electricity to pump compressed air into a suitable underground formation that acts like a giant storage tank. Releasing the pressurized air allows the plant to re-generate electricity when needed.” *Id.*
4. Flow Batteries, particularly Avalon Batteries, which found a way around material cost challenges associated with flow batteries. *Id.*

#### **iv. Ecology must analyze alternative sites for a pumped storage project.**

When the purpose of a project is not, but its own terms, tied to specific location, the agency must assess alternative locations for the project. *Ilio'ulaokalani Coal. v. Rumsfeld*, 464 F.3d 1083, 1098 (9th Cir. 2006)(discussing alternative sites in the NEPA context). The history of tribal opposition to developments in this area and the extensively documented cultural resources should have made this location a non-starter for Rye. Despite this, the location alone does not represent the sole location for siting of this Project. The proliferation of proposed pumped storage projects on the West Coast alone demonstrates this. *See Generally* Courtney Flatt, NORTHWEST PUBLIC BROADCASTING, *New Energy Storage Project on Upper Columbia Brings Jobs — and Concerns from Colville Tribes* (Dec. 23, 2019), Julian Spector, GREEN TECH MEDIA, *Montana Developer Ready to Build Modern-Day Pumped Hydro Storage* (Aug. 13, 2019), Brian Gailey, KLAMATH FALLS NEWS, *CIP Acquires Swan Lake pumped hydro project* (Nov. 11, 2020), Sammy Roth, LA TIMES, *Environmental Disaster or to a Clean Energy Future? A New Twist on Hydropower* (Mar. 5, 2020), Bloomberg News Editors, RENEWABLE ENERGY WORLD, *In quest for bigger batteries, California mulls pumped hydro* (Jun. 10, 2019). Furthermore, studies have undertaken “to develop a series of advanced Geographic Information System algorithms to locate prospective sites for off-river pumped hydro across a large land area such as a state or a country.” Bin Lu, et al., *Geographic information system algorithms to locate prospective sites for pumped hydro energy storage*, 222

APPLIED SCIENCE 300, (2018). The Project need not be built at this site and Ecology must look at alternative sites for the Project.

**v. Ecology must consider alternative project designs.**

Finally, Ecology must explore alternatives to design and proposed operations of the facility as proposed. In its application Rye discusses its efforts to “evaluate the cost-benefit of various reservoir sizes.” FLA Exhibit A at 8. This analysis falls well short of what is required under SEPA. For example, Rye claims that it merely changed the size of the reservoirs, but retained “a total generating capacity of 1,200 megawatts (MW), which is considered most appropriate for the site and market conditions.” *Id.* Alternative generating capacities, and the resulting impact on the footprint of the Project must also be explored. Further, Ecology must consider the locations of the reservoirs, and the potential alternatives for other locations within the property boundary. Moving the various elements of the facility within the Project site will likely change the on-the-ground impacts. These alternatives must be considered.

The same is true for the other equipment and infrastructure that will be needed to run the facility. Ecology must consider and disclose the impacts for alternative designs and layouts.

In addition, Ecology must consider the impact from alternative operational parameters for the project. According to Rye’s application, “The Project is designed to generate for 12 hours a day of full power generation, at a maximum of 1,200 MW and a minimum of 100 MW, and pump water from the lower reservoir to the upper reservoir in about 15 hours.” FLA, Exhibit B at 6. In order for the Project to produce the maximum amount of energy (1,200MW), it will need to generate power (run all water from the upper reservoir to the lower) for 12 hours. Ecology must require the development of alternative operational patterns and reveal and discuss the potential resulting impacts to the environment.

Finally, Ecology must explore alternatives that mitigate the known adverse impacts that will result from the Project, as proposed. As discussed in detail below, the Project will have significant impacts on the environment, including but not limited to, direct, indirect, and reasonably foreseeable negative impacts to the people, fish, and wildlife in the vicinity of the proposed facility.

**IV. Ecology is Legally Obligated to Evaluate Direct, Indirect, and Cumulative Impacts as part of the EIS.**

Under SEPA, an EIS must consider direct effects, indirect effects, and cumulative effects. WAC 197.11.792(2)(c)(i)-(iii). This scoping comment does not attempt to discuss in detail every issue that should be covered in the EIS. Instead, this comment lists some of the most pertinent direct and indirect impacts that the Project’s EIS should analyze.



**A. The EIS Must Acknowledge that not all Affected Tribal Nations Have Finished Surveying the Area and thus not all Unavoidable Environmental Impacts have been Identified.**

Under RCW 43.21C.030(c), the EIS must include a detailed statement on, “(i) the environmental impact of the proposed action; (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented.” RCW 43.21C.030(C)(i),(ii). Because numerous archeological and cultural resource surveys of the area have yet to be conducted, finished, and filed with FERC on the Project, it will be impossible for Ecology to include this detailed statement. The EIS must include this uncertainty as part of its summary. *See* WAC 197.11.440(4)(stating, “the summary shall briefly state the proposal's objectives, specifying the purpose and need to which the proposal is responding, the major conclusions, significant areas of controversy and uncertainty, if any.”).

First, the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation), which has been actively involved in Rye’s proposal since at least 2017, and were contracted by Rye to conduct archaeological and cultural resource surveys of the area, have yet to conclude and submit the final cultural resource survey. Rye’s FLA states that “the APE (Area for Potential Effect) has been surveyed for archaeological and historic architectural resources, as well as TCPs (Traditional Cultural Properties) that are significant to the *Yakama Nation*. [emphasis added]. FLA Exhibit E at 78. But, the FLA goes on to list numerous cultural resource surveys that have yet to be finished by the Tribe including:

- Conducting additional survey to correct the boundary of the Push-Pum TCP so that it properly incorporates connected plant resources as documented in 1995 and 2019 (per the recommendation of Yakama Nation);
- Evaluating the Columbia Hills Multiple Property Documentation (MPD) TCP under NRHP Criterion B, C, and D (per the recommendation of Yakama Nation);
- Evaluating Sites 45KL566, 45KL567, 45KL570, 45KL744, 45KL746, and LS-3 for the NRHP both individually and for their contribution to the Push-Pum TCP, Columbia Hills MPD TCP, and Columbia Hills Archaeological District assessing Project effects to the Push-Pum TCP, Columbia Hills MPD TCP, the Columbia Hills Archaeological District.

FLA Exhibit E at 78.

Second, the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) have yet to conduct their cultural and archaeological surveys of the area, despite participating in the FERC process early.<sup>2</sup> Rye's FLA includes the following as surveys yet to be conducted, including

- Identifying historic properties of religious and cultural significance to the Confederated Tribes of the Umatilla Indian Reservation (CTUIR);
- any identified historic properties of religious and cultural significance to the CTUIR, and any of the archaeological resources that are determined to be eligible for the NRHP.

FLA Exhibit E at 78.

Third, on October 16, 2020, the Nez Perce Tribe requested that Rye conduct an ethnographic study to identify any Nez Perce-specific resources in the Project area that could be affected by construction of the project, stating that because the Tribe did not know about the development they did not have the opportunity to submit study requests to determine detrimental impacts to their Tribe. Letter from Patrick Baird to FERC (Oct. 16, 2020), In FERC Docket No. 14861 & Telephone Memo from Suzanne Novak to FERC (Oct. 7, 2020), In FERC Docket No. 14861. On October 29, 2020, FERC directed Rye to conduct that survey.

Lastly, it is unclear if Rye has contacted or been in sufficient contact with representatives from the Confederated Tribes of Warm Springs (Warm Springs) to allow the Tribe time to contribute surveys of the area if appropriate.

At this time, Yakama Nation, CTUIR, Nez Perce, and Warm Springs, the Columbia River Inter-Tribal Fish Commission Tribes, have not been afforded the opportunity to identify tribal cultural and religious resources that risk destruction from the Project. Rye's FLA states, "[o]nly the Yakama Nation can determine what is significant to the tribe," presumptively this suggests that Rye would agree that only CTUIR, Nez Perce, and Warm Springs can determine what is significant to their tribes. Conducting the EIS now may undermine these surveys because without them it is near impossible that Ecology will be able to identify all significant issues that the Yakama Nation, CTUIR, Nez Perce, and Warm Springs will raise and therefore the EIS must identify and discuss this uncertainty.

## **B. Tribal Archaeological and Cultural Resources.**

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<sup>2</sup> See Letter from Kristen Tiede to FERC (Jan. 21, 2018), In FERC Docket No. 14861. Letters submitted by CTUIR have been filed confidentially to protect tribal cultural resources.

Ecology must fully account for tribal nations' input on Rye's proposal in the EIS. Rye sited the Project in an area of incalculable significance for tribal nations, an area that includes multiple documented Traditional Cultural Properties (TCPs), tribal-access agreements, and TCP's either: 1) eligible for inclusion on the National Historic Register of Historic Places (NHR); or 2) already included. Moreover, Rye has, for years, failed to change the Project's location over the objections of sovereign tribal nations.

Yakama Nation has opposed the Project since its inception. Yakama Nation also opposed earlier iterations of a pumped-storage hydroelectric proposed at the site.

According to the Tribe, Rye's development would destroy archeological, ceremonial, burial, petroglyph, monumental, and ancestral use sites—and cause significant harm to the Yakama way of life. Letter from Yakama Nation to Erik Steimle (Feb. 14, 2018), *In* FERC Docket No. 14861. A Yakama Nation representative explained the Tribe's opposition at a Washington State Senate hearing in early 2020:

As you're aware, the Columbia River was dammed over the last century. In doing so, that impacted many of our rights, interests and resources. All of these things have been impacted: our fish sites, our villages, our burial sites up and down the river. This is another example of energy development, development in the West, that comes at a cost to the Yakama Nation.

Courtney Flatt, OPB, *Northwest Clean-Energy Advocates Eye Pumped Hydro to Fill Gaps, with Tribes Noting Concerns* (July 27 2020) (Appendix 3).

Rye has repeatedly misstated Yakama Nation's position on the Project, which has confused federal and state agencies, as well as public understanding of the Tribe's position. Yakama Nation in comment letters to FERC, has gone as far as to say that Rye is not operating in good faith. A letter submitted by Yakama Nation in February 2019 states:

The Yakama Nation does not believe that Rye Development conducted the pre-application in a good faith effort. This is the first time that the Yakama Nation has been afforded the opportunity to read any preliminary studies conducted by Rye Development. Nor were we aware that a draft Historic Properties Management Plan was being drafted as part of this document.

Confederated Tribes and Bands of the Yakama Nation, Comment to FERC, (Feb. 21, 2019), *In* FERC Docket No. 1486.

Yakama Nation's archaeological resource survey, completed in 2019, concluded that multiple sites of cultural and religious importance are located within the Project boundary.<sup>3</sup>

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<sup>3</sup> The Yakama Nation is still in the process of completing their 2020 Cultural Resources Survey of the Project area.

According to Rye's FLA, "the proposed Project area is within a NRHP-eligible [National Register Historic Properties] TCP (Traditional Cultural Property) (Push-pum) and a NRHP-eligible Multiple Property Documentation TCP (Columbia Hills) and one Archaeological District (Columbia Hills District)." FLA Appendix G at 12. The FLA states:

The entire Columbia Hills and the archaeological sites contained within are significant to the understanding of how Yakama people lived and utilized the land. Information yielded from 'archaeological' resources is important to Yakama elders to determine what kinds of activities took place at a specific location. It also lends itself useful in identifying what kinds of resources are present.

FLA Exhibit E at 76. The proposed Project will also have a serious impact on the health and safety of the Yakama people, who use the Push-pum site to gather traditional medicines and foods that underlie ceremonial practices. Rye's FLA states that, "[w]ithin that Project area, there is a stipulation for BPA to create a plan that will allow tribal members to access Push-pum to gather foods and medicine significant to the tribe." FLA Exhibit E at 78. However, there is no discussion of how construction or management of the Project will interfere with this access or interfere with the integrity of the foods and medicines gathered.

The significance of this area to the Yakama Nation cannot be overlooked. While the Yakama Nation has filed tribal cultural resource surveys as "confidential" with FERC, available information, including FLA Appendix G, details the Project area's importance for tribal cultural and religious resources.

The Yakama Nation is not the only affected Tribal Nation. CTUIR has also weighed in on the development. While most letters submitted by CTUIR have been filed confidentially to protect tribal cultural resources,<sup>4</sup> the Tribe has publicly said that "The proposed Project is likely to have substantial, harmful impacts on tribal cultural resources, including sites and artifacts," and are poised to conduct their own cultural resources survey of the area. CTUIR NEPA Scoping Comments (Dec. 28, 2020), *In* FERC Docket No. 14861. On October 16, 2020, the Nez Perce Tribe requested that Rye conduct an ethnographic study to identify any Nez Perce-specific resources in the Project area that could be affected by construction of the project, stating that because the Tribe did not know about the development they did not have the opportunity to submit study requests to determine detrimental impacts to their Tribe. Letter from Patrick Baird to FERC (Oct. 16, 2020), *In* FERC Docket No. 14861 & Telephone Memo from Suzanne Novak to FERC (Oct. 7, 2020), *In* FERC Docket No. 14861. On October 29, 2020, FERC directed Rye to conduct that survey.

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<sup>4</sup> See Appendix 4 and 5, for historical context surrounding the treatment of Indian remains and cultural property in the United States resulting in the need for tribes to file cultural resource information confidentially.

Both CTUIR and the Nez Perce Tribe have not been afforded the opportunity to identify tribal cultural and religious resources that may be impacted by the Project. *See infra* at Section IV(A).

In addition to the cultural resources impacted within the Project footprint, Project construction and operation would impact off-site, adjacent tribal and non-tribal use of an irreplaceable cultural and historic treasure: an array of over 60 bear-paw petroglyphs on the basalt walls above the Columbia River. Located in the channel of the John Day Dam Lock, the petroglyphs are open to public viewing. Rye's application fails to mention, let alone analyze, how Project construction and operations would impact the experience of tribal and non-tribal members who view and reflect on the renowned petroglyph collection.

When looking at the impacts to tribal cultural and religious resources from this Project the EIS must analyze: the destruction of TCPs unique to this geographic location, the destruction of TCPs eligible for, or already included, on the NRH, the serious impacts to public health and safety of Indian people who rely on foods and medicines in the area, the cumulative impacts that the Project will have on archeological and cultural resources of at least four tribes, the future implications that developing this Project will have on this site, including opening the area to more development, and the socio-economic impact to the community, including Indian people. WAC 197-11-44.

The EIS must analyze how the Project's construction and cultural resource destruction, cumulatively impacts the Yakama Nation, CTUIR, Nez Perce, and Warm Springs and must look at these impacts in conjunction with and through the lens of government sanctioned cultural genocide that has impacted these tribes and threatened their life ways. Ecology's EIS analysis must not and cannot take the Project's destruction of archaeological and cultural resources out of the context of history, otherwise the cumulative and future impacts of the Project will evade analysis.

### **C. Water Quality Issues.**

The Project would permanently destroy large segments of unique waterbodies, including "waters of the United States" and "waters of the state" in the scenic Columbia Hills. The Project would also cause downstream impacts to perennial waterbodies. The Project requires withdrawing millions of gallons of Columbia River water, threatening designated uses and impacting water quality in an already degraded river. Columbia Riverkeeper and other commenters submitted detailed technical comments to the Washington Department of Ecology on Rye's 401 water quality certification application, which outline in great detail the water quality issues from the Project and are incorporated herein by reference. *See* Columbia

Riverkeeper et. al, Public Comments on Free Flow Power 101, LLC Goldendale Pumped Storage Project Clean Water Act 401 Water Quality Certification, (Nov. 9, 2020) (Appendix 1). Ecology must analyze the water quality issues identified in Columbia Riverkeeper et al.’s 401 certification comments in the EIS.

#### **D. Avian, Terrestrial, and Aquatic Wildlife Impacts.**

The Project will have significant impacts on wildlife. On March 10, 2020, comments to FERC, the Washington Department of Fish and Wildlife (WDFW) noted: “We disagree with the applicant’s opinion that the habitat near the upper reservoir is not unique or uncommon. The uniqueness of this habitat is linked to the close proximity to golden eagle and prairie falcon nesting habitat.” Comments by WDFW and the U.S. Fish and Wildlife Service (USFWS) detail the Project’s impacts to wildlife, including increased mortality of bats and raptors by nearby wind turbines, and wildlife habitat. WDFW Comment to FERC, (Mar. 10, 2020), *In* FERC Docket No. 14861; USFWS Comment to FERC (Mar. 3, 2020), *In* FERC Docket No. 14861. Furthermore, the Oregon Department of Fish and Wildlife (ODFW) and WDFW collectively identified four threatened, endangered, candidate, or proposed species, as well as one critical habitat within the project boundary.<sup>5</sup> *See* Letter from U.S. Dep’t of Interior Fish & Wildlife Service to FERC (Oct. 14, 2020), *In* FERC Docket No. 14861. Rye elected to site its Project adjacent to and, in the case of the upper reservoir, within a wind turbine complex. In multiple comments to FERC, USFWS and WDFW describe how building large reservoirs will attract birds—including threatened, sensitive, and candidate species—and, in turn, increase birds killed by the wind turbine complex. USFWS explains:

As recently as January 2020, a golden eagle wind turbine strike mortality occurred southwest of the proposed Project (Figure 1). Five additional golden eagle mortalities have been documented to the northeast of the proposed Project. Two golden eagle nests also occur within close proximity to the proposed Project. This history of mortalities shows a landscape already compromised by wind power infrastructure. Currently golden eagles appear to have a difficult time navigating the wind currents affected by existing wind power infrastructure near the project area. The potential of the proposed Project to further the remaining laminar wind currents lends credence that resulting impacts to avian species would not be exclusive to wind power production in the area.

USFWS Comment to FERC (Mar. 3, 2020), *In* FERC Docket No. 14861. USFWS also notes that radio telemetry data collected in 2007 for eight months “indicates significant use of the entire project area” by golden eagles. *Id.* at 2. USFWS explains: “Since prey availability is a primary

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<sup>5</sup> ODFW and WDFW collectively identified the following species: 1. The Western Distinct Population Segment of Gray Wolf; 2. Gray Wolf; 3. Yellow-Billed Cuckoo; and 4. Bull Trout. WDFW also identified Bull Trout critical habitat as within the project boundary.

factor in governing habitat selection of golden eagles . . . the habit in the area of the proposed upper reservoir is a determining factor in golden eagle nesting preference for the area.” *Id.* at 2 - 3 (internal citations omitted). The Project also threatens bats. WDFW notes:

The construction of a new body of water at the upper reservoir, will likely provide habitat for and attract insects in close proximity to wind turbines. In turn the insect[s] will attract foraging bats to the area, putting them in close proximity to the wind turbines. Bats are also attracted to water features to drink from. Bat fatalities have been found to be caused by wind turbine blade strikes and bats flying close to the turbine blades in an effort to avoid them resulting in barotrauma. There are no available bat survey data specific to the Project upper reservoir site. Bats are known to have a long life span and slow reproductive rate. Loss of large numbers of bats may have significant impacts to local or regional populations.

WDFW, Comment to FERC, (Mar. 10, 2020), *In* FERC Docket No. 14861. USFWS and WDFW comments detail the direct and indirect wildlife-habitat impacts from the Project’s infrastructure, and how the Project’s location, adjacent to a large wind turbine complex, will harm threatened, sensitive, or candidate species. Both WDFW and USFWS provided detailed recommendations for the Project’s Draft License Application compensatory wildlife mitigation plan. To date, Rye has yet to produce a mitigation plan that incorporates key agency recommendations. *See* FLA Appendix D, *Wildlife Mitigation Plan* (June 2020).

Ecology’s EIS must address the Project’s impacts on wildlife, including the loss of habitat as a result of the new development, the future implications of siting a large scale development here on wildlife, the increase in avian mortality from wind turbines as a result of increased avian activity next to reservoirs, and the impacts to threatened, endangered, candidate, and/or proposed species.

### **E. Wind Turbines near Proposed Project.**

Rye chose to site the upper reservoir within and directly adjacent to an existing wind turbine complex. FLA Exhibit E at 5 (Figure 2.1-1A). The upper reservoir and the 62-wind-turbine complex, are located on land that is leased by the Tuolumne Wind Project Authority (TWPA) and contains TWPA’s wind turbines, which TWPA uses to supply energy and capacity to the Turlock Irrigation District (TID). TID is an irrigation district organized under the laws of the State of California (California Water Code §§ 20500-29978) and supplies electric power and energy to the residents and businesses within its service area. *See* Turlock Irrigation District, Comment to FERC, (Mar. 11, 2020), *In* FERC Docket No. 14861. TID raised five concerns regarding the Project. Specifically, TID raised concerns that the Project would: (1) redirect the wind used by the turbines, which would reduce their energy output; (2) increase wind turbidity, which would reduce their energy output and increase wear and tear on the turbines; (3)

saturate and thereby weaken the foundations of some of the turbines; (4) increase the wildlife around the turbines, which will increase animal strikes and interfere with TWPA's operations and output; and (5) interfere with the operations of the turbines' underground power lines when constructing the Project's underground components. *Id.* at 2–3. The concerns raised by TID must be analyzed by Ecology in their environmental review because they involve unique risks on the environment in this geographic location.

Furthermore, Rye has failed to provide adequate information in response to Commission staff's request for more information following Rye's deficient FLA. Specifically, FERC states that,

In order to assess the compatibility of the proposed project with existing land uses and the potential indirect effects of the proposed project on the golden eagle, staff requested in comments on the draft license application, that you conduct studies (e.g., modeling) to demonstrate how project construction and operation would influence air flow above the upper reservoir and around the wind turbines and how it would affect wind turbine operation and generation and include the modeling results in the final license application.

Without elaboration, in the final license application, you acknowledge the potential influence of the project on wind turbine performance and wind flow, but state that a thorough analysis can only be performed during final project design.

Letter from FERC to Erik Steimle, (Jul. 23, 2020), *In* FERC Docket No. 14861. In a December 17, 2020 letter from FERC, the Commission denied Rye's request to use the Expedited Licensing Process because of the information deficiencies in the FLA, stating that "[b]ased on staff's analysis, FFP's November 20, 2020 and December 4, 2020 filings only partially address staff's July 23, 2020 and October 29, 2020 information requests." *Id.* at 12. One such filing was Rye's wind analysis, which it committed to expand by February 2021. *Id.* The results of this wind analysis must be analyzed by Ecology because the presence of the wind turbines create and involve unique risks if this Project is implemented, including risks that would impact wildlife.

#### **F. Aluminum Smelter Cleanup Site**

According to FERC's NEPA Scoping Document,

Portions of the project's proposed infrastructure (such as the proposed lower reservoir) would be located on the site of the former Columbia River Gorge Aluminum (CGA) Smelter, which is now a Resource Conservation and Recovery Act (RCRA) contaminated site that is currently owned by NSC



Smelter, LLC, and is subject to ongoing management and clean-up by Washington Department of Ecology (Washington DOE).

Scoping Document at 1. Previously proposed pumped storage projects in the area have been denied licenses by FERC because of the ongoing cleanup activities associated with CGA RCRA cleanup. *See Public Utility District No.1 of Klickitat County, Washington, Clean Power Development, LLC*, 155 F.E.R.C. ¶ 61,056 (2016). Rye's FLA states that,

The impoundment has tested as having non-hazardous and non-dangerous material; however, this area will be characterized further prior to being excavated as part of the construction of the lower reservoir. Because the material is unsuitable fill, it will be excavated and properly disposed of pursuant to full characterization in collaboration with the Washington Department of Ecology.

It is concerning that Rye has not completed characterization of this area as part of the FLA, nor has the developer created a plan for dealing with the material excavated during construction, if further characterization conflicts with prior testing. If material is excavated during construction and tests as being hazardous or dangerous waste, Rye must have a plan in place for properly disposing of that material in accordance with state and federal law. That being said, Ecology must include an analysis of the status of CGA as part of its environmental review, particularly focusing on any incremental benefits to cleanup that may occur from Project construction and adverse significant effects. 40 C.F.R. § 1508.27(b)(1). Additionally, Ecology must analyze whether or not Project construction activities may threaten a violation of State, Federal, or local law in regards to ongoing cleanup of the CGA RCRA site.

### **1. Other Issues to Evaluate in the EIS**

Ecology must also examine the following issues in the EIS:

- The Project's environmental justice impacts, including the Project's direct, indirect and cumulative impacts to Tribal Nations and Indigenous people, described above, and low-income ratepayers.
- The Project's scenic and other aesthetic impacts, including the aesthetic impacts of additional transmission lines.
- The direct, indirect, and cumulative impacts of additional transmission lines in the Columbia Basin and in the Project vicinity.

- The Project's impacts on the reliability and capacity of the BPA transmission lines and the Northwest grid.
- The Project's construction and operational impacts on air quality and noise.
- The Project's post-operation site restoration plans, including enforceable funding requirements to ensure those plans are completed.
- The Project's impacts on the Columbia River in the event of a reservoir failure.
- The Project's impacts on recreation, including paragliding, fishing, boating, birdwatching, petroglyph viewing, hunting, hiking, windsurfing, kiteboarding, kayaking, and other forms of recreation.
- The Project's construction and post-construction traffic impacts.
- The Project's socioeconomic impacts, including impacts to ratepayers.

#### **G. Conclusion.**

Commenters respectfully reiterate that the EIS must examine the full direct, indirect, and cumulative impacts of the proposed Project. This Project will significantly affect the quality of the human environment. Commenters identify pertinent issues that Ecology must address in its environmental review and which emphasize that the intensity of this project, i.e. the severity of the impact, is extremely high, destroying irreplaceable tribal cultural and religious resources and archeological sites, infringing on tribal peoples' access to food and medicine gathered in the area, impeding access to culturally significant areas, and impacting water quality and wildlife.

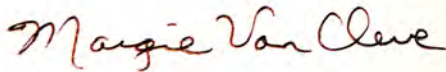
Sincerely,



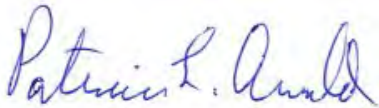
Simone Anter  
Staff Attorney  
Columbia Riverkeeper  
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Lauren Goldberg  
Legal and Program Director  
Columbia Riverkeeper  
[lauren@columbiariverkeeper.org](mailto:lauren@columbiariverkeeper.org)



Margie Van Cleve  
Sierra Club - Washington State Conservation Chair



Patricia L. Arnold  
President  
Friends of the White Salmon  
[pat.arnold@friendsofthewhitesalmon.org](mailto:pat.arnold@friendsofthewhitesalmon.org)

Rebecca Ponzio  
Climate and Fossil Fuel Program Director  
Washington Environmental Council

cc: Lauren McCloy, Governor's Office  
Jennifer Hennessey, Governor's Office  
Jamila Thomas, Governor's Office  
Phil Rigdon, Yakama Nation  
Rose Longoria, Yakama Nation  
Anthony Aronica, Yakama Nation  
Chris Marks, CTUIR  
Carl Merkely, CTUIR

Nakia Williamson-Cloud, Nez Perce Tribe

**APPENDIX 1**  
Evolved Energy Research  
WA State Energy Strategy Decarbonization Demand  
and Supply Side Results

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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Attachments available upon request.

## **APPENDIX 2**

### **Critique of the Goldendale Energy Storage Hydroelectric Project Notification of Intent**

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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Attachments available upon request.

## **APPENDIX 3**

Courtney Flatt, OPB

Northwest Clean-Energy Advocates Eye Pumped  
Hydro to Fill Gaps, with Tribes Noting Concerns

7.27.20



**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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Attachments available upon request.

**APPENDIX 4**  
**INDIAN REMAINS, HUMAN RIGHTS:**  
**RECONSIDERING ENTITLEMENT UNDER**  
**THE NATIVE AMERICAN GRAVES**  
**PROTECTION AND REPATRIATION ACT**  
Jack F Trope and Walter R. Echo-Hawk

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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Attachments available upon request.

## **APPENDIX 5**

**Indian Remains, Human Rights, Reconsidering  
Entitlement Under the Native American Graves  
Protection and Repatriation Act  
by Angela R. Riley\***

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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Attachments available upon request.

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-22: Erik Steimle**

**Address:** 220 NW 8th Avenue

**Submit Date:** 02/12/2021

**Comment I-22-1**

February 12, 2021

Sage Park  
Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009  
Via upload

RE: Scoping comments, Goldendale Energy Storage Project (FFP Project 101, LLC)

Dear Ms. Park,

Thank you for the opportunity to submit these comments about the scope of environmental review under the Washington State Environmental Policy Act (“SEPA”)<sup>1</sup> for the proposed Goldendale pumped storage hydroelectric facility (the “Project”). I write in my capacity as the Vice President of Project Development for Rye Development, LLC, (“Rye”) which is responsible for developing the facility on behalf of its owner, Copenhagen Infrastructure Partners, LLC (“CIP”). CIP is one of the largest sustainable energy investment funds in the world and focuses on renewable and green energy facility development. Both CIP and Rye are proud that upon its completion the Project will be a key component in Washington’s ability to achieve the objectives set forth in the state’s 2019 Clean Energy Transformation Act (“CETA”)<sup>2</sup>. The importance of the Project is reflected by the 2020 passage of legislation<sup>3</sup> that specifically designates “pumped storage project using water rights approved by the legislature for that purpose” as projects of statewide significance eligible for, among other things, expedited permitting and environmental review.<sup>4</sup> The water rights upon which this Project relies were approved by the 2013 legislature as eligible for pumped storage facilities. Thus, this Project falls squarely within those facilities that Washington’s elected officials have deemed to be of statewide importance and meritorious of expedited processing.

Not only does the state of Washington recognize the role that pumped storage hydro will play in providing renewably-generated electricity, but Rye itself was an active participant in development of the *Joint Statement of Collaboration on U.S. Hydropower: Climate Solution and*

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<sup>1</sup> RCW 43.21C.

<sup>2</sup> RCW 19.405

<sup>3</sup> Laws of Washington 2020, c. 46, §2.

<sup>4</sup> RCW 43.157.020.

*Conservation Challenge* (“Joint Statement”)<sup>5</sup> published by Stanford University in 2020. This Joint Statement is the result of a two-and-a-half-year dialogue between the U.S. hydroelectric industry and environmental and river conservation organizations facilitated by Stanford University’s Woods Institute for the Environment, Stanford’s Steyer-Taylor Center for Energy Policy and Finance, and the Energy Futures Initiative. The Joint Statement that these diverse stakeholders arrived at recognizes the urgent need to decarbonize our electric system at the same time as the nation’s rivers and streams, including the habitats they support, are under extreme pressure from alterations to the rivers’ processes and the effects of global climate change. Pumped storage hydro is recognized in the Joint Statement as having the promise to provide storage for large amounts of renewable energy until needed, thereby reducing carbon emissions from fossil-fueled electrical generation in a manner that is not detrimental to healthy rivers and their habitats.

It is unsurprising that this site has been selected for this development. Such a proposal requires acreage, water, and proximity to transmission, all of which are present here. What is also present is the Energy Overlay Zone of Klickitat County. This area of Washington, with proximity to the existing hydroelectric system and high voltage transmission lines, has long been recognized as ideal for the development of renewable electricity. In anticipation of the greening of America’s electrical supply the county prepared a programmatic Environmental Impact Statement (“EIS”) that supported the development of an energy overlay designation placed onto large swaths of land suitable for energy development. The breadth, scope and quality of that EIS has enabled renewable energy developers to submit facility applications whose project-specific environmental reviews tiered off of (were predicated upon) the programmatic SEPA review of each element of the environment that had the potential to be significantly impacted by energy facility development. The proposed Project is located within this overlay zone. As a matter of both law and fact, the compatibility of the site to energy development has already been determined through the EIS supporting the Energy Overlay Zone and Klickitat County’s implementation of the energy overlay zoning itself.

To support Rye’s permit and license applications, project-specific data and information has been gathered and analyzed in a variety of studies. Rye has submitted a complete license application to the Federal Energy Regulatory Commission (“FERC”) including its Pre-Application Document, (“PAD”), Draft License Application (“DLA”), and Final License Application (“FLA”). After filing the PAD, Rye hosted public meetings and solicited feedback from agencies, tribes, and other stakeholders on engineering, cultural, and environmental studies needed to refine its understanding of the potential impacts the Project could have. The results of these studies were incorporated into the DLA filed with FERC in December of 2020. In June of 2021 after soliciting further comments and completing additional studies and analysis, Rye filed its a FLA with FERC. The PAD, DLA, and FLA include substantial amounts of additional

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<sup>5</sup> <https://www.ryedevelopment.com/newsentry/rye-development-is-pleased-to-announce-our-agreement-with-environmental-and-industry-organizations-recognizing-the-importance-of-new-hydropower-for-integrating-wind-solar-into-the-us-electric-grid-to/>



information regarding the existing environment and resource impacts that would arise related to this Project. FERC will use this information to assess the FERC license application. The environmental topics covered in the PAD, DLA, and FLA largely overlap with the same elements of the built and natural environment under SEPA. This information will also inform FERC as it conducts its own NEPA review of this Project. All of these studies, reports and associated materials for this specific Project can be found on Rye's Project website at <https://www.ryedevelopment.com/projectstor/goldendale-washington/>.

Beyond the programmatic EIS and the volumes of information about this Project's potential impacts available at the link above, Klickitat County is the repository of extraordinary amounts of additional data and technical study-supported analysis of the project-specific environmental impacts of the many other renewable energy facilities that have been developed and operated in the county over the last fifteen years. Vast areas have been studied for the effects of energy facility development on threatened, endangered and priority species and habitats including without limit avian species; cultural resources; earth, air and water; scenic resources; recreation, land use and shoreline uses; environmental health, noise, light and glare; historic and cultural preservation; transportation; and public services and utilities.

SEPA<sup>6, 7</sup> encourages the proper use of existing environmental documents when the impacts associated with a new proposal have been adequately evaluated in a previous SEPA document. As discussed above, the potential impacts of this specific Project have already been studied exhaustively and should be examined by Ecology and its selected consultant in preparing the scope of the EIS and the content of the Draft EIS. In addition, Rye respectfully asks that the additional renewable energy facility environmental documents in Klickitat County's planning files be carefully reviewed before preparing the scoping determination for this project, and to incorporate their analysis into the EIS for this project where appropriate. This approach serves the shared interests of stakeholders in appropriate SEPA examination in an expedited manner that results in a document that contains a reasonably thorough of the environmental impacts of a project that is of statewide significance.

The comments below are limited to those elements of the Project that Rye believes should be included in the scope of the EIS as having more than an insignificant impact on the built and natural environment. Scoping is conducted to "narrow the focus of the EIS to significant environmental issues, to eliminate insignificant impacts from detailed study, and to identify alternatives to be analyzed in the EIS."<sup>8</sup>

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<sup>6</sup> WAC 197-11-600(2).

<sup>7</sup> WAC 197-11-610.

<sup>8</sup> 2017 State Environmental Policy Act Handbook, <https://ecology.wa.gov/DOE/files/4c/4c9fec2b-5e6f-44b5-bf13-b253e72a4ea1.pdf>, at p. 32. (Last viewed February 10, 2021).

## **Description of the Proposal**

Before speaking to the elements of the environment that should be identified through scoping for further review, we believe that describing the proposal accurately is imperative. An accurate description also helps eliminate confusion about what is not a part of the Project. Our review of scoping comments submitted to Ecology to date suggests that there is significant misunderstanding about what is and is not included in this proposal.

What is included in the Proposal: The Goldendale proposal is for a closed-loop pumped storage hydropower facility comprised of an upper reservoir with a surface area of about 59 acres with capacity to store of 7,100 acre-feet (AF) of water, a lower reservoir with a surface area of about 62 acres with capacity to store of 7,100 AF, an underground water conveyance tunnel and underground powerhouse and 230-kilovolt (kV) transmission line(s). Both reservoirs will be lined to prevent seepage/leakage. This is a closed-loop system where water in the upper reservoir is repeatedly released to the lower reservoir and then returned to the upper reservoir. Electricity is generated as water released from the upper reservoir passes through electrical generation turbines enroute to the lower reservoir, where the water is then pumped back to the upper basin for reuse in repeated cycles. The water for the initial fill of the upper reservoir and periodic make-up water lost to evaporation will be purchased from Public Utility District No. 1 of Klickitat County, Washington (“KPUD”) using a pre-existing KPUD-owned conveyance system and municipal water right. The water right associated with this proposal has been historically put to beneficial use and has since been approved by the Washington legislature for use in pumped storage facilities. The quantity, priority, time, place and purpose of use of this right and any associated impacts have already been examined and resolved by Ecology. The Project will become a buying customer of the KPUD like any other entity or individual that purchases water from the district.

What is not included in the Proposal: The proposed lined-bed reservoirs will not discharge to Columbia River or any streams that drain into the Columbia River. The Project includes no river or stream impoundments. No new water right is needed for the Project. Aside from possible construction stormwater, the Project will not discharge water into any water bodies, rivers, or streams. The site where the lower reservoir will be developed is not a pristine greenfield site. Instead, it is a brownfield with decades of use as an aluminum smelter. The entire Project area landscape is in a state of permanent visual disturbance due to the presence of existing interstate highways, high voltage transmission lines, the John Day facilities, and hundreds of towering wind turbines on both the north and south sides of the Columbia River.

## **Topics for study in the EIS**

With the clarifications about regarding the accurate description of the proposal, we turn to our comments regarding the scope of the EIS. We concur with Ecology’s identification of those

impacts that should be the focus of this EIS, namely impacts to geology, air quality, plant and animal habitat, cultural resources, and transportation<sup>9</sup>.

Geology: Development of this proposal will include the creation of two contained, lined-bed reservoirs on a lower and an upper shelf, along with associated infrastructure for water return, electricity generation and transmission. Rye will coordinate its site activities with Ecology, which has previously stated that the pumped storage project will not hinder the cleanup process. The Project boundary itself does not include any land subject to further cleanup activities.

The Project area has been studied and sampled extensively over the years in conjunction with activities related to the former smelter and to determine feasibility for the currently and previously proposed pumped storage hydroelectric facilities. Studies have been completed to properly characterize unsuitable fill materials in reservoir areas for disposal. Geological and geotechnical investigations for the design of the Project, including studies that characterize the surface and subsurface geological conditions at potential areas of concern, such as dam foundations, tunnel alignments, underground caverns, and powerhouse foundation are also complete. While the land disturbances activities associated with the facility make the geology of the area, inclusive of soils, topography, physical features, erosion are appropriate areas for examination in the EIS, the information to develop this section of the EIS already exists and should be used to inform both the scope and content of Ecology's EIS.

Air: The operation of this 1,200-megawatt project will serve to offset the emissions of criteria pollutants and greenhouse gases associated with the generation of electricity using fossil fuels. The temporary impacts resulting from the project's construction and the permanent impacts of the operation of the facility on air quality and climate are also appropriate for examination in the EIS. The information to develop this section of the EIS already exists and should be used to inform both the scope and content of Ecology's EIS.

Plant and animal species and habitats: The Project's FLA and the FERC record contain significant amounts of information regarding plant and animal species (including avian) and habitats (including streams and wetlands) present in the area of the Project, as well as information on the potential impacts on them from the Project. Rye has proposed mitigation to offset any impacts to wildlife species. The information to develop this section of the EIS already exists and should be used to inform both the scope and content of Ecology's EIS.

#### Cultural Resources:

Rye has already engaged the Washington Department of Archaeological and Historic Preservation ("DAHP") and Tribal interests of the Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, and the Nez Perce Tribe in accordance with requirements of Section 106 of the National Historic Preservation Act

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<sup>9</sup> <https://ecology.wa.gov/Events/SWM/Goldendale-Energy/Goldendale-Energy>

as part of the federal FERC review of the proponents' hydroelectric facility license application. DAHP has indicated that there are recorded archaeological sites in the general area, and the area's landforms and environment are sensitive for archaeological resources. An archaeological survey has already been completed in areas proposed for disturbance by the project and we have engaged with each of the three Tribes for their preparation of cultural resource studies that will further inform the effects of development of this Project. Studies by the Yakama Nation are complete, the Umatilla work will begin within the week, and Nez Perce work will be complete by spring of 2021.

Rye understands the necessity of, and will obtain, all required permits associated with work in and around historic and cultural resources and graves, as well as the need to prepare an Inadvertent Discovery Plan to ensure that contractors and subcontractor appropriately respond to inadvertent discoveries. We are continuing to engage with DAHP and the other interested Tribes throughout the licensing process regarding inventory needs as well as appropriate measures for protection and/or mitigation of identified cultural resources. The EIS should evaluate these materials, steps, and measures to inform an analysis of the effects of this Project.

Transportation: The construction phase of the Project will entail large numbers of trucks and vehicles coming to and departing from the site. Although the rural nature of Klickitat County would suggest that the transportation network is ill-equipped to handle the volumes of traffic that will occur during construction, the development of wind farms in the immediate vicinity has resulted in significant improvement to local and regional roads. Additionally, those wind projects included transportation plans filed with Klickitat County to address impacts. This Project's transportation impacts should be analyzed in the EIS to inform the development of mitigation measures and transportation plans that will reduce, to the maximum extent feasible, impacts to transportation networks in the county.

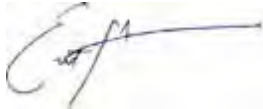
Socioeconomic Impacts: In addition to the areas of impact discussed above and identified by Ecology as appropriate for study in the EIS, the socioeconomic impacts of the Project should be included. Both the construction and operations of the facility will require significant labor, materials, and supplies. The tax revenues those activities will generate, and the direct, indirect, and induced economic activity that will occur as a result is significant. To support FERC's review of the proposal, Rye engaged the services of a professional independent third-party consulting firm to examine the macro and micro, direct and indirect economic impacts associated with the Project. The study authors used the IMPLAN model to perform its work. IMPLAN is widely recognized as one of the most credible regional impact models used for such assessments. The EIS should examine that study to assess its accuracy and to supplement it where deemed appropriate.

**Closing**

Rye and CIP appreciate the opportunity to provide both its comments on scoping and an explanation of the tremendous amount of studies already completed to inform decision-makers of the probable significant adverse impacts of this Project. While we believe that the quality and quantum of such information, when coupled with mitigation measures proposed and the added mitigation provided by compliance with all applicable laws, regulations and development standards could support issuance of a Mitigated Determination of Non-Significance, we are confident that Ecology and its EIS consultant will make maximum use out of that existing information to assist in determining the scope of the EIS and development of its content. We are happy to answer any question you may have about the proposal and look forward to timely environmental and permit review of the Project.

Very Truly Yours,

RYE DEVELOPMENT, LLC



Erik Steimle  
Vice-President of Project Development

Cc: Amelie Pederson, CIP Assistant General Counsel

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-23: Bronsco Jim**

**Address:** PO Box 751

**Submit Date:** 02/12/2021

**Comment I-23-1**

COMMENTS BY THE KAH-MILT-PAH (ROCK CREEK) BAND FOR ENVIRONMENTAL IMPACT  
STATEMENT ON THE PROPOSED GOLDENDALE PUMP STORAGE PROJECT



Sage Park  
Washington Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009

February 12, 2021

Dear Ms. Park:

I am the designated chief of the Kah-Milt-Pah (Rock Creek Band) and I am providing comments for our people in reference to the Goldendale Pump Storage Project Environmental Impact Statement. The Kah-Milt-Pah Band has ancestral ties to this land where this project is proposed and we have grave concern for the potential impacts this project will have to our resources.

The location of this site is known as Put-a-lish and is a sacred site to our Kah-Milt-Pah Band. From the valley toe where the land meets the N'chi Wana (Columbia River) to the top of the ridge Put-a-lish is very important to our people. At the bottom of the ridge is where there was a village site known as Willa-wit-is with fish access sites and other culturally important properties. There are many culturally significant plants we gather on the north facing slope of this ridge site and also on top at Put-a-lish. Our families still camp and fish at Willa-wit-is to this day. The foods that are gathered here are our First Foods that we utilize for subsistence and ceremonial purposes.

We have concerns for our ancient village site, fishing sites, and root gathering sites which will all be disturbed when these two 60 acre reservoirs will be constructed and when the large pipes will be installed vertically along the ridge. This project will desecrate our sacred site and food gathering sites. We have concerns for the N'chi Wana and the amount of water that will be withdrawn and deprive the fish and other aquatic species since there will be evaporation from these reservoirs and additional water withdrawals will be required to fill the reservoir.

Our people have already endured the construction of wind farms in the Put-a-lish over decade ago on our sacred site and root gathering fields. If this project is approved and proceeds than the avian and wildlife species will also be displaced and their habitat will be degraded. This area is also an important wildlife migration corridor for deer and elk. We always have concern for all wildlife since they cannot speak for themselves and they take care of us to provide us with food, clothing, and ceremonial instruments. We continue to practice our seasonal realm of traveling and gathering our traditional foods and medicines in all our Usual and Accustomed lands.

We are here today to be counted, voicing the concern from our people of Kah-Milt-Pah and the surrounding areas along the N'chi Wana (Columbia River). Thank you

Bronco Ume-tee-chum Jim Jr

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-24: Carl Merkle**

**Address:** CTUIR, 46411 Timíne Way

**Submit Date:** 02/12/2021

**Comment I-24-1**

Attached please find the comments of the Confederated Tribes of the Umatilla Indian Reservation Department of Natural Resources on scoping for the Environmental Impact Statement for the Goldendale Energy Storage Project.

Thank you.



Carl Merkle

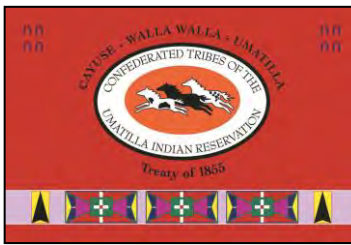
Attached please find the comments of the Confederated Tribes of the Umatilla Indian Reservation Department of Natural Resources on scoping for the Environmental Impact Statement for the Goldendale Energy Storage Project.

Thank you.

**Confederated Tribes *of the*  
Umatilla Indian Reservation**

Department of Natural Resources

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46411 Timine Way  
Pendleton, OR 97801

www.ctuir.org      ericquaempts@ctuir.org  
Phone: 541-276-3165      Fax: 541-276-3095

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February 12, 2021

Sage Park  
Regional Director  
Washington Department of Ecology  
Central Regional Office  
1250 West Alder Street  
Union Gap, WA 98903-0009  
[sage.park@ecy.wa.gov](mailto:sage.park@ecy.wa.gov)

Submitted Electronically to: <http://admin.ecology.commentinput.com/?id=eVi6D>

RE: CTUIR DNR Comments on Scoping for Goldendale Energy Storage Project  
Environmental Impact Statement

Dear Ms. Park:

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Department of Natural Resources (DNR) submits the following comments on scoping for the Goldendale Energy Storage Project Environmental Impact Statement (EIS). The proposed project by the applicant Free Flow Power (FFP) 101, LLC, would be located in Klickitat County, Washington, with some infrastructure in Sherman County, Oregon, connected by transmission lines spanning the Columbia River.

While the CTUIR has been generally supportive of renewable energy, efforts to reduce fossil fuel use, and measures to reduce harmful in-river hydropower impacts on fisheries and water quality, this project possesses certain attributes that make it problematic in multiple respects, and mandate that, at a minimum, it receive very close and careful scrutiny. The CTUIR DNR has significant concerns about the project and encourages you to conduct a thorough examination of the substantial environmental and other impacts that could occur from project construction and operations.

There are many important issues to identify and assess related to the project as you prepare an EIS, including but not limited to project alternatives, site impacts and potential mitigation options. There may be impacts for which no mitigation is possible, and those should be addressed as well. Impacts studied, as you described, should include those “to both the natural environment and nearby communities through study of air quality, plant and animal habitat, transportation, water and cultural resources.” Specific issues that we believe merit consideration and analysis are identified and discussed below.

### *CTUIR Background*

The CTUIR is a federally-recognized Indian tribe, with a reservation in Northeast Oregon and ceded, aboriginal, and traditional use areas in Oregon, Washington, Idaho, and other Northwest states. These areas include the site this project would occupy. In 1855, predecessors to the CTUIR—ancestors with the Cayuse, Umatilla, and Walla Walla Tribes—negotiated and signed the Treaty of 1855 with the United States. The Treaty is a contract between sovereigns and is “the supreme Law of the Land” under the United States Constitution. In the Treaty the CTUIR ceded millions of acres of land to the federal government, and in exchange received assurances that pre-existing tribal rights would be protected, and our interests would be respected, in perpetuity. A paramount objective in the Treaty was protecting and maintaining our tribal culture, traditions, and way of life. To do so requires protection and maintenance of our essential cultural resources—which include both specific sites and locations (and any and all artifacts found there) and the tribal First Foods (water, fish, big game, roots, berries, and other plants) that have been and continue to be woven into the fabric of our lives. This objective—protecting and maintaining the essential features of our history, our culture, and through them our very existence—remains paramount for the CTUIR.

### *Goldendale Pumped Storage Project Issues*

The following is a list suggested by the Washington Department of Ecology for subjects to be discussed in scoping comments:

- Project alternatives
- Impacts to the environment
- What can be studied (analyzed) to understand the extent of analysis of impacts
- What impacts might be difficult or impossible to avoid
- What might be done to address or lessen the impacts on the environment (mitigation)

### Project alternatives

One project alternative should be a “no-action” alternative. Another alternative should be siting the project in another location, one where tribal cultural resources are not found or situated, and one where toxic contamination on the site is not present or has been completely remediated.

### Impacts to the environment

Potential impacts from the project could include both immediate and long-term, and direct and indirect. The full range of potential impacts should be identified and analyzed. “Environmental” impacts could include those to the land, the air, and the water—water would include the Columbia River, tributaries that flow into it, and groundwater. Water-related impact assessment/analysis should include possible effects on water quality and beneficial uses as designated under the Clean Water Act.

While described as “closed-loop,” the project would still use large amounts of water from the Columbia River, which is critical habitat for multiple salmonid populations listed as threatened or endangered under the federal Endangered Species Act.<sup>1</sup> These species require sufficient quantities of water of suitable temperature, and these requirements are regularly unmet now under the current river management regime. The EIS should identify and analyze the effects of the project’s additional demands on these fish and others, the waters that support them, and the overall habitat conditions necessary for their health and well-being.

The proposed project presents two different circumstances that are each somewhat unique—particular to this specific site. Portions of the site contain toxic contaminants from earlier industrial activities, and immeasurably-significant tribal cultural resources are also present on the site. Regarding toxics, the existence and extent of any discharges of toxic substances or contaminants, both during construction and operations, to the land, air, and water should be addressed. The EIS should also examine whether the project would have any effects on ongoing efforts to clean up the site, both soil and groundwater.<sup>2</sup>

Regarding tribal cultural resources, the project is highly likely to have substantial, harmful impacts on such resources, including sites and artifacts—those located in-water, or below the ordinary-high-water line, and those above and beyond the shoreline, on land. The EIS must identify and assess the full range of potential impacts (again, direct and indirect, near- and longer-term) and the implications for tribal rights, tribal member’s ability to exercise them, and the resources on which they are based, in the immediate area, and in affected areas beyond the project. Determining the presence and location of cultural resources must be done in close coordination and consultation with affected tribes. The EIS must examine not only the resources themselves, but also the implications of the project on tribal members’ access to them.

The Federal Energy Regulatory Commission has suggested that its environmental impact analysis should include examination of the effects of project construction and operation activities on historic and archaeological resources, traditional cultural properties, and access to exercise traditional practices and treaty rights. The agency has also proposed developing and implementing a Historic Properties Management Plan in consultation with the Washington and Oregon State Historic Preservation Officers and affected Native American tribes to protect and manage cultural resources.

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<sup>1</sup> Reportedly the project could require as much as 2.93 billion gallons of Columbia River water initially, and as much as 1.2 million gallons each year to make up for water lost through evaporation and leakage.

<sup>2</sup> Portions of the project would be located on or within a hazardous waste site containing toxic contaminants in the soil. The EIS must fully assess this situation and how it will be addressed should the project proceed, providing information on such questions as whether the applicant will have the necessary expertise and resources to safely and effectively alleviate all the associated risks and dangers. This seems of particular interest since, according to the Federal Energy Regulatory Commission, the contaminated site is subject to ongoing management and clean-up by the Washington Department of Ecology; in other words, clean-up has not been completed, and the plans for such clean-up have not been completed.

From our understanding and perspective, the cultural resources assessment for this project is incomplete. So far the inventory of historic properties does not include the historic properties of religious and cultural significance to the CTUIR that are in the project area.<sup>3</sup> To our knowledge the applicant has not consulted with or contacted the CTUIR about those properties that would be adversely affected by the Project, even though we have repeatedly raised concerns about them.

What can be studied (analyzed) to understand the extent of analysis of impacts

In addition to the typical sources for environmental data, the CTUIR believes it will be necessary, in addressing tribal cultural resources issues in this process, to engage in more confidential communications because of the proprietary and sensitive nature of such information about those issues. Tribal cultural resources-related information needs to be identified and developed in close coordination with affected Indian Tribes, including the CTUIR.

Socioeconomic aspects of the project should be considered and studied for both non-Indian and Indian communities. The EIS also needs to study and analyze all the state and federal laws and regulations that may apply to the project and the site—including those pertaining to environmental and natural resources protection (e.g., CWA, CAA, ESA), hazardous wastes (RCRA, CERCLA), and cultural and historical resources protection (NAGPRA, ARPA, NHPA)—and what the project will need to do to comply with them.

What impacts might be difficult or impossible to avoid

Because of their unique, irreplaceable nature and location, the CTUIR DNR believes that impacts from the project on tribal cultural resources may be impossible to avoid.

What might be done to address or lessen the impacts on the environment (mitigation)

Again, because of their unique, irreplaceable nature and location, the CTUIR DNR believes that impacts from the project on tribal cultural resources may be impossible to mitigate.

*Conclusion*

The CTUIR DNR appreciates your consideration of our comments on scoping for the proposed Goldendale Energy Storage Project Environmental Impact Statement. We have substantial questions and concerns about the project and hope that comprehensive examination and analysis of potential impacts will better inform further actions regarding it. The CTUIR does request government-to-government consultation with the Department on this matter. If you have any questions, please contact Audie Huber, Inter-Governmental Affairs Manager, at

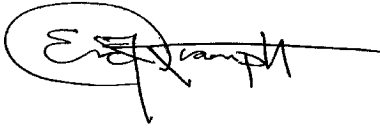
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<sup>3</sup> The CTUIR's Cultural Resources Protection Program has stated that "the proposed undertaking is within a historic property of religious and cultural significance to the Confederated Tribes of the Umatilla Indian Reservation that has been recommended as eligible for inclusion in the National Register of Historic Places. This project would adversely affect this historic property." Yakama Nation has documented and described potentially affected resources as including archeological, ceremonial, burial petroglyph, monumental and ancestral use sites.

CTUIR DNR Letter on Goldendale Energy Storage Project EIS Scoping  
February 12, 2021  
Page 5 of 5

[audiehuber@ctuir.org](mailto:audiehuber@ctuir.org), or Carl Merkle, Policy Analyst, at [carlmerkle@ctuir.org](mailto:carlmerkle@ctuir.org). Thank you for your attention to our input.

Respectfully,

A handwritten signature in black ink, appearing to read "Eric J. Quaempts", with a large, stylized flourish extending to the right.

Eric J. Quaempts  
Director, Department of Natural Resources  
Confederated Tribes of the Umatilla Indian Reservation

Cc: Fish and Wildlife Commission  
Tribal Water Commission  
Cultural Resources Commission

**Goldendale Energy Storage – Scoping Comments**

Comment period: January 14 – February 12, 2021

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**I-25: David McClure**

**Address:** 127 W. Court St.

**Submit Date:** 02/12/2021

**Comment I-25-1**

Please find attached Klickitat County's SEPA scoping comments for the Goldendale Energy Storage Project. Thank you.

David McClure

Director

Klickitat County Natural Resources and Economic Development

David McClure

Please find attached Klickitat County's SEPA scoping comments for the Goldendale Energy Storage Project. Thank you.

David McClure

Director

Klickitat County Natural Resources and Economic Development





**KLICKITAT COUNTY  
NATURAL RESOURCES &  
ECONOMIC DEVELOPMENT DEPARTMENT**

127 W. Court St., Goldendale, Washington 98620  
Telephone: 509 773-7060

February 12, 2021

Sage Park  
Regional Director  
Central Regional Office  
Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009

RE: Goldendale Pumped Storage Project 401 SEPA Scoping Comments

Dear Ms. Park:

Thank you for the opportunity to provide SEPA scoping comments regarding FFP Project 101, LLC's application for 401 water quality certification for Federal Energy Regulatory Commission (FERC) license application (FERC No. 14861) for the proposed Goldendale Energy Storage Project (Project). The Project is located in Klickitat County, with the exception of transmission lines that aerially span the Columbia River to connect with transmission infrastructure located in Oregon.

The Project is an off-stream, closed-loop pumped storage facility that will not discharge to surface water or ground water. Public Utility District #1 of Klickitat County (Klickitat PUD) will supply water to the Project utilizing its municipal water right for the Cliff's Water System. Klickitat PUD may supply water from its water right for use in a pumped storage generating facility (RCW 54.16.410).

The Project's lower reservoir is located on a portion of the former Columbia Gorge Aluminum Smelter (AL Smelter) site, which Ecology is investigating for cleanup (Facility ID #95415874. Cleanup ID #11797). A considerable amount of data and information have been produced to support this investigation. This would be a good resource for data and information to incorporate in the Environmental Impact Statement (EIS) for the Project 401 water quality certification. With respect to the AL Smelter site cleanup, the Project will contribute to site cleanup by removing and disposing of contaminated materials from the area identified as the West Surface Impoundment, which is where the Project's lower reservoir will be located.

The Project's upper reservoir is located in an area that is already heavily disturbed as a result of livestock grazing and wind energy development. Roads that were constructed for the wind energy projects will be used by the Project. Several EISs were produced to support SEPA

review for nearby wind energy projects and for Klickitat County's Energy Overlay Zone. Many of these documents are on the County's website <http://www.klickitatcounty.org/273/Wind-Projects> and <http://www.klickitatcounty.org/283/Index-to-Final-Energy-Overlay-Zone-EIS-F>. I recommend contacting Klickitat County's Planning Director to identify the most relevant EISs for consideration in the SEPA review for the Project's 401 water quality certification.

The Project's upper reservoir is located in the Swale Creek subbasin of WRIA 30, Klickitat. Watershed planning under chapter 90.82 RCW has been conducted for WRIA 30 and the approved watershed plan is being implemented. Klickitat County is the Lead Agency for watershed planning and plan implementation in WRIA 30. The scope of the watershed plan includes the optional water quality component (RCW 90.82.090) and habitat component (RCW 90.82.100), as well as the required water quantity component (RCW 90.82.070). We conducted numerous studies in Swale Creek basin during watershed plan development and implementation. Ecology has the WRIA 30 Watershed Plan and Detailed Implementation Plan, as well as many of the study reports that have supported plan development and implementation. However, many of these reports are available on the County's website <http://www.klickitatcounty.org/239/WRIA-30---Klickitat-Planning-Documents>. I recommend that Ecology utilize the data and information from watershed planning and plan implementation for the SEPA review for the Project's 401 water quality certification.

Swale Creek has water quality issues (e.g. Category 5 for temperature impairment). While I anticipate there will be very little (possibly during construction) if any water quality impact from the Project, I ask that Ecology consider work done under watershed planning (.e.g. the draft water quality maintenance and monitoring program plan that was developed with grant funding from Ecology) and consult with Klickitat County during development of mitigation options if Ecology determines that there will be impacts and mitigation is appropriate.

WRIA 31 Rock/Glade is immediately to the east of WRIA 30. Klickitat County is also the Lead Agency for watershed planning in WRIA 31 under chapter 90.82 RCW. As in WRIA 30, we conducted many water quality, habitat, and water quantity assessments to support the development of the approved watershed management plan for WRIA 31. Please contact me if the geographic area of SEPA review for the Project extends into WRIA 31 and I will provide data and information from watershed planning. Also, as in the Swale Creek subbasin of WRIA 30, please consult with Klickitat County during development of mitigation options if Ecology determines that there will be impacts in WRIA 31 and mitigation is appropriate.

Klickitat County is a distressed area, as identified by Washington Employment Security Department <https://esd.wa.gov/labormarketinfo/distressed-areas>) and the Project is within a Historical Underutilized Business Zone (HubZone) designated by the US Small Business Administration <https://maps.certify.sba.gov/hubzone/map#center=46.046738,-120.036648&zoom=9> and a Qualified Opportunity Zone census tract designated by Governor Inslee and confirmed by the Internal Revenue Service <https://maps.certify.sba.gov/hubzone/map#center=46.046738,-120.036648&zoom=9> . The Project will provide a significant number of much needed, good paying jobs during construction and operation.

The clean technology sector (including the Project) and redevelopment of the AL Smelter site are identified as a catalyst opportunities in Klickitat County's Economic Development Strategic Plan <http://www.klickitatcounty.org/DocumentCenter/View/3482/2017-05-22-Klickitat-County-Strategic-Plan-V14-FINAL-1> . The Project is also identified as the top priority in the Mid-

Columbia Economic Development District's Comprehensive Economic Development Strategy, not just for Klickitat County, but for the Washington side of the Columbia River Gorge Region. [https://www.mcedd.org/wp-content/uploads/2019/04/CEDS\\_2019update\\_full-doc.pdf](https://www.mcedd.org/wp-content/uploads/2019/04/CEDS_2019update_full-doc.pdf) SEPA review for the Project should include these economic development planning documents and an analysis of the economic impacts of the Project.

Utility-scale energy storage capacity, such as will be provided by this 1,200 MW Project, is needed in order to integrate power from intermittent renewable energy sources (e.g., wind and solar) on the regional power grid and enable the state to meet its decarbonization goals while maintaining grid reliability. I submit that SEPA review for the Project should give significant weight to the environmental benefits of the Project.

Thank you for considering my comments.

Sincerely,



David McClure  
Director

# **PUBLIC MEETING COMMENTS**

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## Proposed Goldendale Energy Storage Project

### State Environmental Policy Act Environmental Impact Statement Scoping

Transcript of oral comments received January 27, 2021

#### Start of session

Good evening. My name is Katherine Walton and we're here tonight to accept comments on the State Environmental Policy Act scoping for the proposed Goldendale Energy Storage Project.

This meeting is taking place online on January 27, 2021. When I call your name and unmute you, state your name and contact information if you want it included for the record. If we do not have your contact information, we will not be able to send you information about next steps and final decisions on the proposed projects. Once unmuted make sure you speak clearly when commenting so that we can get a good recording of your testimony.

We will begin with Matthew, to be followed by Brian. Ok, Matthew, I'm going to go ahead and unmute you.

Matthew Hepner:  
Hello?

Katherine Walton:  
Great, we can hear you. Go ahead and start whenever you're ready.

#### Comment: Matthew Hepner

Thank you, Katherine. My name is Matthew Hepner. I am the Executive Director of the Certified Electrical Workers of Washington, representing over 10,000 IBEW electrical workers statewide and I'm also a journeyman electrician. The Certified Electrical Workers of Washington and the IBEW support the Goldendale Energy Storage Project because it is an important element in both Washington and the region's clean energy future, while providing quality family wage jobs and rural economic development. Goldendale Energy Storage Project supports Washington state's clean energy commitment to the Clean Energy Transformation Act, or CETA. With minimal environmental impacts, CETA requires that all electric utilities in Washington state reach 100% clean electricity supply by 2045. It's impossible for Washington to meet the CETA goals if we can't store renewable energy to use when the grid demands it. This project will help meet that need.

The project also helps electric grid managers balance a rapidly changing electricity portfolio with demand. This compared to other clean energy sources like wind and solar that are intermittent in nature. Home storage enables grid operators to access reliable electricity 24/7. We only have to look down to California's grid emergency and blackouts last year to see the importance of having energy storages, energy storage, available to support other clean energy resources when they go offline. This project will create more than 3,000 family wage jobs during its four year construction period and another 50 to 70 permanent jobs in operation in an area of the state that desperately needs them. It also infuses two billion plus dollars into rural Washington, benefiting local economies throughout the Gorge and providing Klickitat County with millions in new tax revenue.

Success of the project is also important to the IBEW because it sends a message to other potential investors that carbon free projects will be permitted and built here at home in Washington state. Thank you for giving me the opportunity to comment. That's all.

Angie Fritz:

Katherine, I think you might need to unmute yourself.

Katherine Walton:

Oh, there we go. Brian, I went ahead and unmuted you.

[Comment: Brian Skeahan](#)

Oh, ok, thank you. Actually, primarily I just put in the chat I'm only seeing in the participant's panel myself and the Ecology staffers, obviously Matthew because he just spoke. So, I'm not sure why all of the people who are participating aren't showing up because I know that you let them in, I heard the pings.

Katherine Walton:

Great. Thank you, Brian. That was a great question. And we'll take that down in note. Thank you.

Brian Skeahan:

OK. While I am unmuted I would like just to note and thank Sage for one of the clarifications she made in her introductory remarks. That being that the water supply for the project is going to be provided by Klickitat PUD utilizing our existing water right. So, I noticed in preparation of the meetings that some of the Ecology websites were somewhat ambiguous about that. So, I appreciate clarifying the fact that the project proponents or developers themselves are not requesting water, but will be essentially a customer of the Klickitat PUD's water system.

Katherine Walton:

Thank you, Brian. Is there anyone else who wishes to comment? You can go ahead and raise your hand or you can indicate in the chat that you would like to be unmuted. I'll give folks a few seconds to do that.

Great. Ok. If you would like to send Ecology written comments, please remember they are due or postmarked by February 12, 2021.

Angie Fritz:

Hey, Katherine?

Katherine Walton:

Oh yeah, Angie.

Angie Fritz:

I see one more hand has popped up. I want to make sure we get all of our commenters.

Katherine Walton:

Oh, absolutely. Thank you for your eyes on that. Alright, Eric. So, we've got a comment from Eric. I'm gonna go ahead and unmute you right now.

[Comment: Erik Steimle](#)

Thank you. My name is Erik Steimle and I'm here this evening on behalf of the development team representing Rye Development and Copenhagen Infrastructure Partners. Can everyone hear me all right?

Katherine Walton:

Yes, we can hear you.

Erik Steimle:

Excellent. So, I'd first like to start by thanking Ecology and other stakeholders that are on and participating this evening. We look forward to continuing to work with all of you as the Washington SEPA process proceeds. Copenhagen Infrastructure Partners, or CIP, is an energy infrastructure investment company based in Denmark that's focused on the development of new renewable energy projects and energy storage. The company has a long record of investing in projects that have a beneficial impact on communities, address climate change, and create sustainable well-paying jobs. Their corporate ethic principles are guided by the UN's Principles for Responsible Investments and the 10 Principles of the UN Global Compact.

Rye Development, a coordination with CIP, Rye Development is the leading developer of new low impact hydropower in the United States. The proposed Goldendale Energy Storage Project is the result of nearly two decades of working vision of private landowners and the community of Goldendale. Rye and CIP are honored to be in a position to help shepherd this project forward. The community of Goldendale is unique. It's not every community that can look decades into the future and commit time and resources to ensure redevelopment of commercial land. In this case, Brownfield land redeveloped to support a combination of renewable energy, pump storage, and commercial development that's reliant on both.

As part of this effort, there's already been a considerable amount of environmental studies, planning and analysis completed over the last two decades to support commercial development on this land. This project, the Goldendale Energy Storage Project, helps our region reduce greenhouse gas emissions and dependence on fossil fuels using mature, cost competitive technology. It's more timely than ever, as it's important, it's gonna be an extremely important element in helping Washington utilities meet the requirements of the Clean Energy Transformation Act, or CETA. We know it will be impossible for our region to meet some of these energy and climate goals if we can't store renewable energy when we need to use it.

Finally, the location of the facility and proximity to the existing high voltage transmission system allows the renewable energy stored at the Goldendale facility to be a reliable source of on-demand renewable electricity 24 hours a day, seven days a week, in addition to being a new equitable source of job creation. We believe the Goldendale Energy Storage Project can be a cornerstone for the state and the broader region's clean energy economy and we're excited to work with these stakeholders on that opportunity. Thank you.

#### [Ending session](#)

Katherine Walton:

Thank you, Erik. I'm gonna give folks just another couple seconds. Great. If you would like to send Ecology written comments, please remember that they are due or postmarked by February 12, 2021. We accept written comments using our online form and by mail. You should see information on how to do this on the screen. You can also find instructions on how to comment in writing by visiting the Department of Ecology's website and searching for the proposed Goldendale Energy Storage Project.

All oral comments received tonight and during the online February 3rd event, as well as all written comments received online or postmarked by February 12, 2021 will be included in the record for this proposal.

After the comment period closes the next step in the process will be to consider the comments and incorporate what is appropriate into drafting the environmental impact statement, called an EIS. We

will send notices about the availability to comment on the EIS to everyone that provided written oral comments and other people on the interested party list for the scoping. If you would like to receive notices about the EIS, but don't think that we have your contact information, please let us know in the chat box or contact us after the hearing and ask to be added.

Thank you, everyone, for joining us.





## Proposed Goldendale Energy Storage Project

### State Environmental Policy Act Environmental Impact Statement Scoping

Transcript of oral comments received February 3, 2021

#### Start of session

Good morning. My name is Katherine Walton, and we're here tonight, today, to accept comments on the State Environmental Policy Act scoping for the proposed Goldendale Energy Storage Project.

This meeting is taking place on February 3rd, 2021. When I call your name and unmute you, please state your name and contact information if you wanted it included for the record. If we do not have your contact information, we will not be able to send you information about next steps and final decisions on the proposed projects. Once unmuted, please make sure you speak clearly when commenting so that we can get a good record of your testimony. We have 35 people in attendance right now, and five have indicated that they would like to provide comments.

We will begin with Willy, to be followed by Bob, who will be followed by Mark.

Willy, I have gone ahead and unmuted you.

Willy Myers:

Perfect. Can you hear me?

Katherine Walton:

Yes, I can. Go ahead.

#### Comment: Willy Myers

Thank you for giving me an opportunity to speak today. I am Willy Myers, Executive Secretary Treasurer of the Columbia Pacific Building Trades Council, representing more than 15,000 men and women working in 25 different crafts in southwest Washington and Oregon.

The Columbia Pacific Building Trades supports the Goldendale Energy Storage Project because it represents the Washington's clean energy future by providing clean energy to power our lives and clean energy, family-wage jobs to support our families here in the gorge. It is important that in the scope of the EIS it comprehensively analyzes the minimal environmental impact of the project but also the socio-economic impacts, including family-wage job creation and new increased tax revenue that will positively impact public safety, schools, and services for our most vulnerable.

The EIS must also analyze the importance of the project in reaching the new commitments made by Washington state through the Clean Energy Transformation Act, or CETA. Under CETA, by 2045 utilities must supply Washington customers with electricity that is 100% renewable or non-greenhouse-gas emitting, with no provisions for offsets. The Goldendale Energy Project is a critical component of achieving that mandate.

Oops. Sorry. We have -- we must have a thorough and efficient review process so that Washington can build the critical infrastructure we need to achieve our clean energy future while providing the family-wage jobs that support our communities.

Thank you again for letting me have a moment to speak.

Katherine Walton:

Thank you William, going to go ahead and mute you. And also, and this is for everybody, once you're done commenting go ahead and please lower that hands. So I make sure that I keep a current list.

Bob, I'm going to go ahead and unmute you. After Bob we have Mark followed by Michael.

[Comment: Bob Carroll](#)

All right, thank you for giving me the opportunity to comment today. I'm Bob Carroll. I'm a business representative with W, local union 48. That's the international brotherhood, electrical workers. As a proud representative over 5000 electrical workers across the Pacific Northwest, international brotherhood of electrical workers local 48 rights to express support for the proposed Goldendale Energy Storage Project to play a fundamental role in accelerating Washington's renewable energy goals under the clean energy transformation act. And would serve as an exemplary model to other environmentally conscious hydroelectric systems in the region. The project is essential to Washington's commitment to reduce carbon emissions by 2045 under the. As utilities move away from fossil fuel power, additional storage capacity will become critical to keeping Washington's homes and businesses power. Pump storage enables grid operators to access a constant supply of electricity. And allows utility companies to store intermittent renewable energy. For what is needed the most additionally, the project's closed loop system is uniquely designed to leave a nominal environmental footprint that would generate 1200 megawatts of carbon free energy. This equates to the power harnessed from 7320 acres of wind turbans. Or 53640 acres of solar panels. The compliment, it's environmental benefits. The Goldendale storage project would create over 3000 family wage jobs in rural Washington and then tax revenue for these communities. This proposal comes at the heels of Covid-19's economic blow. And projects such as these will play an integral role in the revitalization of rural Washington, Oregon's middle class. The international brotherhood of electrical workers local 48 wishes for a successful deployment of this project and stands ready to a system that's construction. Once again thank you for allowing me to make these comments. Have a good day.

Katherine Walton:

Thank you so much. Next up, we have Mark, followed by Michael, followed by Simone. Mark, I'm going to go ahead and unmute you now.

[Comment: Mark Riker](#)

Good morning. For the record, my name is Mark Riker. I am the Executive Secretary of the Washington State Building and Construction Trades Council representing approximately 80,000 construction workers here in Washington.

I'm here today to offer our support for the Goldendale Energy Storage Project. Our organization serves as a voice of workers in the building and construction trades across the state, and as that voice, we understand the importance of economic development and security in Washington's rural areas. The Goldendale Energy Storage Project would not only provide economic opportunities to thousands in the areas that need them, but would do so with the mission of achieving

Washington's CETA clean energy goals. The Goldendale Energy Storage Project would serve as a job creator and community builder, generating over 3,000 family-wage jobs over its four-year construction cycle and infusing over \$2 billion dollars in the economy of rural Washington and Oregon. Klickitat County and communities along the Columbia River Gorge would receive millions in tax revenue.

The project would also play an integral role in achieving Washington's 100% clean energy goals by 2045 by supplying reliable, non-emitting electricity. The Goldendale Energy Storage Project will enable utilities to balance the demand of electricity in the rapidly changing energy supply.

Furthermore, the project will provide the state with local clean energy source that will leave behind minimal environmental impact.

It should also be noted that the Goldendale Energy Storage Project is considered a project of statewide significance by the Washington State Legislature due to its investment in environmental improvements and innovative activities. Like our state legislature, the Washington State Building Trades Council believes that this project would serve as an example of how investment in renewable energy projects can make our communities stronger, our region cleaner, and our State more prosperous.

Thank you.

Katherine Walton:

Thank you. I've got Michael, followed by Simone, followed by Dana. And Mark, when you've got a second, if you could put your hand down so I make sure we don't have you -- keep you on the list. Thank you so much.

Ok, Michael, I'm going to go ahead and unmute you now.

Michael Bridges:

Good morning. Can you hear me ok?

Katherine Walton:

I can, thank you.

[Comment: Michael Bridges](#)

All right. Good morning. My name is Mike Bridges, and I'm the current President of the Longview/Kelso Building and Construction Trades Council. We represent thousands of building and construction trades members in southwest Washington, and just want to thank everybody for the opportunity to comment on this project.

Sustainable job development is a vital component to keeping rural Washington communities healthy and vibrant. The Goldendale Energy Storage Project would be a catalyst for providing family-wage jobs to many of these communities while also helping our state and federal policy makers achieve our goals to reduce carbon emissions. The Goldendale project would propel the State closer to its goal of 100% clean energy supply in 2045 and bring the neighboring states of California and Oregon closer to their own renewable energy mandates.

Additionally, the project would act as a safety net for grid operators during our region's transition from non-renewable to renewable energy. Only with a massive amount of energy storage capacity will we be able to meet the increasing demand of electricity during this transition.

It should also be noted that hydropower and energy storage facilities like the Goldendale Energy Storage Project would not only accelerate but are critical to President Biden's 2050 goal of national net zero emission standard. Apart from its environmental benefits, the Goldendale Project would be a economic stimulate for communities in rural Washington, an estimated 3,000 jobs will be created during its four-year construction, with another 50 to 70 jobs that will remain after its completion.

To that end, the project fits hand in glove with the economic development strategy laid forth by the Mid-Columbia Economic Development District, which seeks to advance the renewable energy sector through the creation of sustainability of high-quality jobs in rural Washington and Oregon. Due to the aforementioned benefits of the Goldendale Energy Project, the Longview/Kelso Building and Construction Trades Council offers its full support to its construction and operation.

And I'd like to thank you again for the opportunity to comment.

Katherine Walton:

Thank you Michael. Michael, I went ahead and muted you. If you could put your hand down -- perfect. Next up, I've got Simone, followed by Dana, and followed by Eric. That is currently my entire list of folks who have indicated that they would like to give oral comment. If you would like to give oral comment, and you are not one of those three people, please go ahead and raise your hand, or indicate in the chat that you would like to give oral comment. I see we have one more person. Thank you.

Ok, Simone, I'm going to go ahead and unmute you now.

Simone Anter:

Can you hear me?

Katherine Walton:

I can, thank you.

[Comment: Simone Anter](#)

All right. Good morning. My name is Simone Anter, and I'm a staff attorney at Columbia Riverkeeper. I'd like to start by highlighting a theme that underscores my comments, and that is the fact that this is the largest development of its kind proposed in the Pacific Northwest, which has, so far, had wholly inadequate environmental review. FERC alone cannot be trusted to do the environmental assessment required here, and that's why it's so important for Ecology to conduct a thorough EIS.

This is a massive development project that should not happen and should never have been sited in this location. Riverkeeper will be submitting detailed technical comments on a broad range of topics that must be addressed in the scope of the EIS, but today, I will speak on the top three issues that Ecology must assess.

First, this project will obliterate irreplaceable tribal cultural resources, including archaeological, ceremonial, burial, petroglyph, monumental, and ancestral use sites. Yakama Nation has opposed this project and similar projects in the area for years because of the unavoidable destruction to cultural and religious resources that will occur. Both CTUIR and Nez Perce are also in the process of starting cultural resource surveys of the area because of the risk.

More generally, tribal nations across Oregon and Washington have borne the disproportionate impacts of green energy development. Specifically at this site, we've seen tribes having to work out

access agreements with the wind turbine operators and private individuals in order to visit their sacred sites and continue to gather foods and medicines.

We have also seen hydropower flooding traditional fishing sites, villages, and burial sites along the Columbia and in this exact area. We cannot just fast track alleged green energy developments in the name of a climate solution, and put the burdens on tribal nations and people of color who are already on the front lines of climate change. They cannot also be on the front lines of green energy development. Riverkeeper, along with our members, agree with and stand in solidarity with tribal nations.

Second, there are extensive wildlife impacts. This is an area where fish and wildlife agencies have outlined in detail how this project will impact wildlife, specifically avian species, and the developer has not addressed these concerns.

Third, Riverkeeper just celebrated its 20-year anniversary and, in that time, few applicants have so woefully and inadequately described their projects' impacts to water quality. Ecology must look at this. The project would permanently destroy large segments of unique water bodies, including waters of the United States in the scenic Columbia Hills and cause downstream impacts to perennial water bodies. The project requires withdrawing millions of gallons of Columbia River water, threatening designated uses, and impacting water quality in an already degraded river.

Like many people in the Pacific Northwest and nationally, Riverkeeper is deeply concerned about the construction of a project with such detrimental and unavoidable environmental justice concerns. At a time when our nation is supposedly reconciling with its deeply ingrained, systemic racism, pushing forward an alleged green energy project of this magnitude that will obliterate tribal cultural and religious resources, hinder, if not prohibit, tribal access in the area, and continue the nation's pattern of deep disregard for tribal cultural resources is unacceptable.

As the State of Washington sets decarbonization goals, projects with such blatant disregard for environmental justice cannot be allowed a fast track through the licensing process. Green energy cannot be built on the backs of tribal nations.

Thank you for the opportunity to provide public comments.

Katherine Walton:

Thank you, I'm going to mute you, and it looks like you put your hand down. Thank you.

Next, we've got Dana, followed by Eric, followed by Ilene. And that is my list right now so if anyone else would like to provide oral comment, please go ahead and indicate that in the chat, or raise your hand.

Dana, I'm going to go ahead and unmute you now.

Dana Peck:

Thanks. I'm Dana Peck. Can you hear me ok?

Katherine Walton:

I can, thank you.

Dana Peck:

I always like to check. The joys of rural Internet service.

Comment: Dana Peck

I'm the outgoing, retiring, however you'd like to phrase it, Executive Director of the Goldendale Chamber of Commerce. I'd like to strongly associate our comments with those made by the union representatives. We heartily endorse this project. It's on a piece of heavily disturbed land, on the Columbia side, and the smelter affects going back decades, and on the upper reservoir side, it's also heavily disturbed land that's been under agricultural and wind power development also for decades, if not generations in the case of agriculture.

The most specific comment I'd like to add to what the union representatives have said is that I hope the Ecology and its alternatives analysis will take a real look at life cycle costs to the alternatives to this project in terms of meeting the state's green energy goals and being a priority project for the state. The alternatives to storage for renewable energy tend to be either new natural gas plants or batteries, both of which have environmental impacts that far exceed the pump storage project, especially looked at in a lifecycle. And that's particularly true for the battery component, which I hope you'll include in your analysis.

The other thing that I'd like to encourage you to use -- Klickitat County, some years back, did a programmatic environmental impact statement that assessed many of these issues from a publicly funded EIS. And I don't know if Ecology currently plans to tier off of or in any way use that analysis, but it's -- although it's getting a little dated at this point, the avian study in particular is pretty accurate and is also reinforced by analyses that have occurred by individual project developers who've built off of that.

The one other thing I'd like to add, as someone who is pretty familiar with the wind leases that have occurred in Klickitat County and also across the river in Oregon, is that they all have provisions for Native American access. That was put in place both by the developers and at the request to the landowners, many of whom have longstanding personal relationships with the tribal members that go back to grandfathers and great grandfathers in -- at least in Klickitat County, where I know them the best, the land owners and the developers responding to the landowner requests were insistent that nothing happen that would interfere with the Native American access for traditional uses.

Thank you.

Katherine Walton:

Thank you. It looks like my list is changed. I currently have one person, and that is Eileen. Eileen, I'm going to go ahead and unmute you now.

Comment: Ilene Le Vee

Thank you. Good morning. My name is Ilene Le Vee. I was born and raised in Klickitat County on a ranch close to the White Salmon area and continue to be a ranch and farm land owner in Klickitat and Clark Counties.

I would like to say that I would be most supportive of what -- I'm sorry. I'm hearing feedback. Is, is that something that other folks are hearing as well, or is it just me?

Katherine Walton:

Hi, Ilene. I did hear a noise. If you want to go ahead and restart your comment, that's -- we can restart the timer.

Ilene LeVee:

No, no, no, that's just fine. I just wanted to say most specifically that I appreciated what the Riverkeeper representative had to say, and I think that, with projects of this kind, the indications of longstanding employment, and greater numbers of employment, and greater numbers of economic gains for Klickitat County most specifically are dramatically overstated. I suspect very strongly that the electricians and experts in the construction of such a project would not come from Klickitat County, certainly, but from perhaps all areas of the state, hopefully. And then, once the project is done, they all go home. And then there is a very minimal number of folks who would potentially have the opportunity to continue to support, construction-wise or problem-wise, the ongoing efficacy of the program.

I am very much questioning the long term economic gains of this project, and I'm much more concerned about the long term degradation of what seems to be a continuing problem historically for this county. And I am greatly distressed by the fact that everything sounds, in the information provided, like it's going to be a longstanding, wonderful outcome for the county and the region. But I'm questioning that, and I'm hoping that Ecology will do the same, as it begins to close down, at some point in the future, its input and then gains on the decision-making phase of this project.

I think I've said what my major concerns are, and I will close. And thank you very much for the opportunity.

Katherine Walton:

Thank you, Ilene. Ilene, I'm going to go ahead and mute you again. Thank you. If you want to go ahead and put your hand down?

And then we have Erik. Erik, I'm gonna go ahead and unmute you. And just a reminder for folks, this is my list right now. So if anyone else would like to provide comments, please write that in the chat or raise your hand.

Ok, Erik, you've been unmuted.

Erik Steimle:

Excellent. Can you hear me all right?

Katherine Walton:

I can, thank you.

[Comment: Erik Steimle](#)

Excellent. On behalf of Rye Development and Copenhagen Infrastructure Partners, we'd like to thank Ecology and the other stakeholders for participating today. We look forward to continue to work with all of you as the Washington SEPA process proceeds, and they move forward with an EIS.

Copenhagen Infrastructure Partners, or CIP, is an energy infrastructure investment company that's based in Denmark, and they're focused solely on the development of new renewable energy projects. The company has a long record of investing in projects that have a beneficial impact on communities, address climate change, and create sustainable, well-paying jobs. Their corporate ethic principles are guided by the U. N. Principles for Responsible Investments and the 10 principles of the U. N. global compact.

Rye Development is a leading developer of new, low-impact hydropower in the United States. The proposed Goldendale Energy Storage Project is the result of nearly two decades of work and vision

of private landowners and the community of Goldendale. Rye and CIP are honored to be in the position to help shepherd this project forward.

I think it's safe to say that the community of Goldendale is pretty unique. It's not every community that we work in that can look decades into the future and commit time and resources to ensure redevelopment of commercial land. In this case, brownfield lands redeveloped to support a combination of renewable energy, pump storage, and commercial development relying on both.

As part of this effort, there's already been a considerable amount of environmental studies, planning, and analysis completed over the last two decades to support commercial development of this private land. This project helps our region reduce greenhouse gas emissions and dependence on fossil fuels, using mature cost competitive technology. And it's an important element in helping Washington utilities meet the requirements of the Clean Energy Transformation Act, or CETA, as you heard about earlier this morning. We know it will be impossible for our region here in the Pacific Northwest to meet our clean energy and climate action goals if we can't store renewable energy to use it when we need it.

Finally, the location of the facility and proximity to the existing high voltage transmission system allows the renewable energy stored at Goldendale to be a reliable source of on-demand renewable electricity, 24 hours a day, seven days a week, in addition to being what we feel is a new and equitable source of job creation. We believe the Goldendale Energy Storage Project can be a cornerstone for Washington's broader region clean energy economy, and we are excited to participate in that opportunity with the local community.

Thank you for the time today.

#### Ending session

Katherine Walton:

Thank you, Erik. I'm going to go ahead and mute you.

Is there anyone else who wishes to comment? I will wait about five seconds to see if anyone else raises their hand or lets me know that they would like to comment.

Ok. Thank you very much.

If you would like to send Ecology written comments, please remember that they are due or postmarked by February 12, 2021. We accept written comments using our online comment form and by mail. You should see information on how to do this on the screen. You can also find instructions on how to comment in writing by visiting the Department of Ecology's website and searching for the proposed Goldendale Energy Storage Project.

All oral comments received today and during the online January 27th event, as well as written comments received online or postmarked by February, 12, 2021 will be included in the record for this proposal. After the comment period closes, the next step in the process will be to consider the comments and incorporate what's appropriate into drafting the Environmental Impact Statement.

We will send notice about the availability to comment on the EIS to everyone that provided written or oral comment and other people on the interested party list for scoping. If you would like to receive notices about the EIS but don't think that we have your contact information, please let us know in the chat box, or contact us after the hearing and ask to be added.

Thank you, everyone, for joining us.