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WASHINGTON STATE DEPARTMENT OF ECOLOGY
Goldendale Energy Storage Project Public Hearing

June 28, 2022

Trina Michael, CET-1390 Trinamichael.cet@gmail.com

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P R O C E E D I N G S

HEARING OFFICER: Okay. Boy, I'm -- is that loud enough? Or is it too loud? I'm very sorry over here. It's okay over there I hope.

Okay. Well, let's -- if everybody could quiet down so we can make sure everybody can hear, we'll get started here.

I'm Tim Poppleton. I'm the hearing's officer for tonight's hearing. On behalf of the Department of Ecology, welcome, and thank you for coming. We're here to discuss the draft Environmental Impact Statement, or EIS, for the proposed Goldendale Energy Storage Project here in Klickitat County.

I have three main responsibilities. First, to facilitate I meeting; second, I need to make sure everybody who wants to has the opportunity to come up and comment during the formal public hearing; third, I need to make sure that we obtain a clear record of the hearing. That is why I will be using a recorder to record your comments later.

But to my job, I need a little cooperation. So let's review the ground rules designed to support common courtesy and to keep order. First, silence your cellphones. I've had to check mine twice, because I always forget. Turn them to silent mode or step into the

1 hall if you have a phone call.

2 Please hold down the noise, as we've seen earlier,
3 it's hard to hear in here with -- if people are talking.

4 No districting, disruptive, of intimidating
5 behavior. Let's treat each other with courtesy. I don't
6 think that's going to be a problem.

7 Respect the right of others to have an opinion, even
8 if you don't agree. Use respectful language when
9 providing comments or asking questions. And speak in the
10 order called.

11 During the public hearing, I will call you to
12 testify in the order your name appear on the sign-in
13 sheet. And once you get up here, please state your name
14 so that we can have that clear for the record as we -- as
15 we go on.

16 Then I'll open the floor for anybody else who
17 decides to comment after hearing others. Sometimes
18 people do want to -- want to get in on it.

19 During the questions -- during the hearing, you may
20 ask questions for the record, but we won't respond to
21 questions. If you ask questions, they're just to get
22 them into the record.

23 If -- if you'd like an answer to your questions,
24 afterwards you can go up to any -- anybody with an
25 Ecology badge on, and we'll try to get your questions

1 answered for you.

2 The public hearing is your opportunity to provide
3 your statements that will be included as part of the
4 public record.

5 I'll try not to turn my head when I'm talking so
6 that you can hear me.

7 I want to make sure that you and your neighbors get
8 to comment. We know you took the time -- trouble to come
9 out here tonight, and we to leave at a reasonable hour,
10 so I'd like to limit the comment time to about three
11 minutes per person. If -- if you need more time than
12 that, if you need a lot more time than that, then please
13 consider submitting comments in writing. We want to be
14 respectful of everybody's time and -- but we do want to
15 hear your comments, also.

16 Please summarize lengthy comments or repetitive
17 ones. If you prefer, you can provide your comments in
18 writing, as I said. There are materials back there to
19 submit your comments on. Written comments receive the
20 same consideration, but must be received by 11:59 p.m. on
21 August 9, 2022.

22 Does that sound fair to everybody? Is everybody
23 okay with that?

24 UNIDENTIFIED SPEAKER: Yes, sir.

25 HEARING OFFICER: Thank you.

1 Okay. We're going to begin the formal hearing here,
2 now. And I want to make sure that we move some of the
3 recording equipment over to here so that we get your
4 comments, get those down. So just one second while I --
5 we move some of the recorders over there.

6 And we're to going to start off with -- as soon as
7 we're ready up there -- with Dan Spatz. And if I get
8 your name wrong, please -- well, state your name anyway
9 (indiscernible) recording. After him, we'll go with
10 William Myers, and then Mr. Alldorff. Looks like it's
11 Mike Alldorff.

12 So, Mr. Spatz, go ahead.

13 DAN SPATZ: Thank you very much. I
14 appreciate it.

15 Can you hear me okay?

16 UNIDENTIFIED SPEAKER: That might need
17 to be taller up there.

18 DAN SPATZ: What needs to be taller?
19 (Indiscernible) technology (indiscernible).

20 UNIDENTIFIED SPEAKER: There we go.

21 DAN SPATZ: Awesome. How about now?
22 Everybody? Okay.

23 All right. Thank you very much. My name is Daniel
24 Spatz. I'm a Klickitat County resident here in my
25 capacity is Capital Projects and Community Relations

1 Director for Columbia Gorge Community College. I'm
2 pleased to present our institution's workforce training
3 capacity as it relates to the proposed Goldendale Energy
4 Storage Project. Columbia Gorge Community College was
5 established in 1977. The college is a public, two-year
6 institution with campuses in the Dallas and Hood River.
7 We are independently accredited by the Northwest
8 Commission of Colleges and University.

9 CTCC established an electrical engineering
10 technology program in 2001 in response to the urgent need
11 for mainstem hydroelectric operators along the
12 Columbia/Snake system. As wind farms developed beginning
13 around 2006, we modified that program into a renewable
14 energy technology program, encompassing wind and solar,
15 as well as hydroelectric and even geothermal power. This
16 was the a first community college wind technician
17 training program on the west coast.

18 In 2018, we again modified the program, responding
19 to workforce needs in advanced technology industries,
20 while maintaining a renewable energy focus on
21 electronics, hydraulics, mechanical systems, and
22 industrial safety. Students learn theory and the
23 practical application of that theory. They learn to
24 think on their feet, problem solve in the field, and work
25 as a team to maintain complex systems.

GOV-006
Cont.

1 Hepner. Matthew Hepner, and Mike Alldorff before him.
2 Sorry.

3 WILLIAM MYERS: Thank you. My name is
4 Willy Myers -- William Myers. I'm the Executive
5 Secretary Treasurer of the Columbia Pacific Building and
6 Construction Trades Council, representing around 25,000
7 men and women in the construction industry.

8 We appreciate the Department of Ecology's providing
9 a thorough review of the Goldendale project. We are
10 encouraged by the draft EIS. The Goldendale Energy
11 Storage Project is a cornerstone of both Washington and
12 the broader Pacific Northwest clean energy economy. It
13 will provide quality jobs and rural economic development,
14 while helping Washington and the region meet its clean
15 energy goals with minimal environmental impacts.

16 The draft EIS left out a social economic analysis of
17 the project, which is disappointing. The fact that it
18 will create more than 3,000 family-wage jobs for building
19 trades members, with -- that will be generated over a
20 five-year construction timeline is significant. We are
21 encouraged and excited that the project owner and
22 developer have agreed and signed an MOU with the
23 Washington State Building and Construction Trades, which
24 commits the construction of the under project a labor
25 agreement, guaranteeing that over 3,000 family-wage jobs

1 for the region's tradespeople.

2 The project labor agreement also guarantees that
3 every employee will have healthcare benefits, especially
4 in light of what our recent experience is -- that's also
5 very important to this region -- and pensions to retire
6 with dignity.

7 They'll also be contributing to training the
8 workforce to meet our construction needs of the future.

9 Let's work together to build this important energy
10 project. Thank you.

11 HEARING OFFICER: Thank you.

12 Mike Alldorff -- I'm sorry, I'm having a hard time
13 reading this, so I'm hoping I'm getting the name right.

14 Are you there? After him, it will be Matthew Hepner
15 and Shannon Stull.

16 MIKE ALLDORFF: Good evening. My
17 name's Mike Alldorff. I represent the members of Iron
18 Workers Local 29 in Oregon and the southern five counties
19 in Washington State. We are in support of the project.
20 The Goldendale Energy Project will give rural people
21 opportunities in the building trades apprenticeship
22 programs. These programs lead to lifelong careers with
23 full-family benefits and a great retirement to retire
24 with dignity. Again, we are in support of the project.
25 Thank you.

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1 cont.

ORG-006
_IWL29

1 HEARING OFFICER: Thank you.

2 Shannon Stull and then Garth Bachman.

3 MATTHEW HEPNER: Did you forget
4 Matthew Hepner?

5 HEARING OFFICER: Matter Hepner first.
6 Just checking to see if you're paying attention.

7 MATTHEW HEPNER: Thank you, sir. I
8 appreciate it.

9 So my name is Matthew Hepner. I'm the Executive
10 Director of the Certified Electrical Workers of
11 Washington, representing over 10,000 workers statewide,
12 and I'm a journeyman wireman, myself.

13 With the passage of major state climate legislation,
14 like the Clean Energy Transformation Act, the Low Carbon
15 Fuel Standard, and the Climate Commitment Act, we have to
16 build new forms of generation and energy storage if we're
17 going to meet those goals. This project is a critical
18 development project for the western grid. Storage
19 projects like this make wind and solar viable at an
20 industrial scale. We can't build industrial solar and
21 wind without storage, so this is the bottleneck that we
22 really need to have for the green energy technology take
23 off.

24 If we're serious about energy independence, we have
25 to build. If we're serious about addressing climate

1 change, we have to build. If we're serious about
2 apprenticeships and economic development, we have to
3 build.

4 This project hits the bull's-eye in so many
5 categories; jobs, apprenticeship, clean energy,
6 increasing local tax revenues for schools, hospitals,
7 police and fire departments, and roads.

8 We urge Ecology diligent and continued support of
9 this critical energy project permitting process. Thank
10 you.

11 HEARING OFFICER: Thank you. Shannon
12 Stull, then Garth Bachman, then Lucille Beris.

13 SHANNON STULL: Good evening. I
14 probably won't be as good as him, but my name is Shannon
15 Stull. I am the business manager for Labor's Local 335
16 covering Southwest Washington. I already have a bunch of
17 Klickitat County members -- or residents working at the
18 solar farm for us right now. So obviously, we are in
19 favor of this project, so please make it happen. Thank
20 you.

21 HEARING OFFICER: Thank you.
22 Garth Bachman.

23 GARTH BACHMAN: Hello, and thank you
24 for allowing me to speak this evening. My name is Garth
25 Bachman. I'm the business manager of the International

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_IBEW48

1 Brotherhood of Electrical Workers Local 48, based in
2 Portland, Oregon. We have a diverse membership of
3 nearly -- actually, over 5,600 members, of which over a
4 thousand reside in Southwest Washington. Of geographical
5 jurisdiction consists of ten counties in Oregon and five
6 counties in Washington, including Klickitat County.

7 We are very excited about this proposed project, as
8 it will provide 3,000 construction jobs, a Willy Myers
9 pointed out just a few moments ago. The project owner
10 and developer have already signed a memorandum of
11 understanding with the Washington State Building and
12 Construction Trades Council that guarantees the
13 construction jobs for this project will be family-wage
14 jobs. This is crucial to the standard of living for the
15 region's workforce.

16 The project is scheduled to be five years in
17 duration, which will be very helpful in the long term for
18 building highly-skilled workforce for the future. There
19 will be thousands of hours of apprentice training on this
20 site, which will benefit our region for many years to
21 come. This project will help train tomorrow's skilled
22 trades people, which will not just benefit our tax base,
23 but will provide more opportunities for members of our
24 communities that may not have had the chance to learn a
25 skilled trade.

ORG-009
Cont.

1 All this and more can be accomplished while at the a
2 same time, building an environmentally friendly project,
3 as well a renewable energy future for the State of
4 Washington. Thank you.

5 HEARING OFFICER: Thank you. Lucille
6 Beris, and then we'll have Andrew Fouts.

7 LUCILLE BERIS: Good evening, and
8 thank you. I am here representing the Goldendale Chamber
9 of Commerce. Rick Lundeen (phonetic), our past president
10 who is ill and not able to attend, so I agreed to read
11 his statement.

12 What the Goldendale Chamber -- what he took
13 president of Chamber, they decided to focus on long-term
14 economic development that would bring companies and
15 industries to Goldendale, with a goal to bring
16 sustainable long-term employment and prosperity to our
17 community. The Goldendale Pump Storage Project is just
18 such an opportunity for our community.

19 Klickitat PUD had started the preliminary FERC
20 permit process with goals of bringing in additional
21 partners to finish the permit process. Development in
22 Portland and National Energy stepped up. Copenhagen --
23 excuse me -- Copenhagen Infrastructure Partners had taken
24 the energy role and is better fit for the project.

25 The Goldendale Energy Storage Project is designed

1 for renewable energy produced by solar and wind
2 generation, and there is excess amount of it. This is
3 accomplished by pumping water from the lower reservoir,
4 that will be located at the old aluminum smelter plant,
5 to the upper reservoir, which is located on the north --
6 due north at the a top of the bluff. The lower reservoir
7 is visible from the Highway 14. The upper will not be
8 visible, nor will the pump house or piping that connects
9 the reservoir.

10 The initial public comment period on the
11 Environmental Impact Statement is a major milestone to
12 the process. This project will provide 3,000
13 construction job over the building period, with 5,270
14 long-term jobs once it is completed. The local college
15 is setting up to help with apprenticeship training to
16 provide skilled labor for this storage project. This
17 will bring money into our community. It will help our
18 local merchants prosper. It will provide tax revenue for
19 our county.

20 If you need more information on the project outside
21 this meeting, please feel free to call the Goldendale
22 Chamber of Commerce. Thank you.

23 HEARING OFFICER: Thank you.

24 Andrew Fouts, and then we'll have Diana Winther and
25 Larry Bellamy.

1 ANDREW FOUTS: Good evening. I'd like
2 to thank Department of Ecology and the community for
3 hearing my testimony tonight.

4 For the record, my name is Andrew Fouts. I'm a
5 journeyman steam fitter and the current government
6 affairs direct for Plumbers and Steamfitters Local 598
7 out of Pasco, Washington. I'm testifying in support of
8 the Goldendale Energy Storage Project.

9 With carbon goals for Washington looming a pivot
10 away from fossil fuels to renewable, non-emitting forms
11 of energy, production will be necessary to meet the goals
12 that we've set for this state. While there's no easy way
13 forward, there are already pieces in place that can help
14 us put the United States and this state on a path to
15 carbon-free energy future, greatly increasing our energy
16 independence, and creating robust redundancy in our grid,
17 by leveraging the nation's greatest asset, its skilled
18 workforce. The same men and women that built our
19 national labs, Naval fleet, interstate highway system,
20 dams, power plants, our fire and police stations,
21 hospitals, schools, stadiums, and embassies.

22 This state can position itself as a leader to the
23 world on clean energy production, storage, and climate
24 stewardship. In utilizing exist infrastructure and
25 deploying energy technology, like gravity pump storage,

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1 we can create an energy environment that perfectly
2 compliments as much use of wind and solar as practical,
3 but also provides dispatch capacity and storage solutions
4 for our grid, all the while developing the next
5 generation of workers.

6 This five-year project will see an apprentice
7 through their entire training program, creating a local
8 work force of highly-skilled craftspeople and good
9 family-wage careers. On top of the estimated 14 million
10 in additional tax revenue, the boost to local business
11 and ancillary development that will come, will help drive
12 the positive economic outlook for this community and
13 county for years to come.

14 I hope you guys will consider my testimony in
15 advancing this project, and thank you for the opportunity
16 to speak tonight.

17 HEARING OFFICER: Thank you.

18 Diana Winther and then Mac Seyhaul and then Larry
19 Bellamy.

20 DIANA WINTHER: Good evening. For the
21 record, my name is Diana Winther, and I'm a resident of
22 Longview, Washington. I recognize that I'm a little bit
23 far from home, but the Goldendale Energy Storage Project
24 is important enough for me to travel to here to show my
25 support in person.

1 I'm a proud member of the International Brotherhood
2 of Electrical Workers Local 48. I'm also president of
3 the Cowlitzs-Wahkiakum Central Labor Council.

4 You're going to hear a lot of the same information
5 about the importance of jobs and family-wage jobs, and
6 having healthcare and having the opportunity to retire
7 with dignity throughout this hearing, likely. And I
8 think it might seem repetitive, but I also think it's
9 really important.

10 Although, the draft Environmental Impact Statement
11 does not speak to the positive social impacts, I think
12 it's essential to note that this energy storage facility
13 will be built by over 3,000 skilled union workers the
14 from the area. The jobs created by building this project
15 will allow those tradespeople to support their families,
16 and their local spending will support the families of
17 business owners in the area. The \$14 million in annual
18 tax revenue generated can be used for improvements to
19 roads and schools and provide funding for local essential
20 services.

21 This project will also allow building trades unions
22 the opportunity to start more apprentices, giving those
23 folks a chance to start rewarding careers that come with
24 the quality wages and benefits needed in today's economy.

25 I understand that moving forward with this project

1 will impact environmental and tribal resources, and that
2 is not something to ignore. The draft EIS states that
3 the environmental impacts can be reduced through
4 mitigation, but the tribal impacts are more challenging
5 to address. I'm hopeful that the parties can work
6 together to find an equitable compromise, because the
7 alternative is a loss for us all. And I'm just referring
8 to the members I represent who would miss out on years of
9 employment if this project isn't permitted. Although, I
10 think that is important.

11 I live in an area that is significantly economically
12 depressed, and a project like this would literally change
13 people's lives.

14 But jobs are only a small piece of why I support
15 construction of this facility. Washington's committed to
16 a renewable energy future. We cannot add more renewable
17 energy sources to the grid without ways to store that
18 energy. Lithium-ion batteries are not going to be able
19 to provide all the storage we need. And, frankly, mining
20 lithium comes with its own environmental concerns.

21 If we truly intend to combat climate change, we need
22 this project and more projects like it. If we don't
23 start moving forward with actual ways to make our goals
24 into reality, we are going to fail. And that failure
25 doesn't mean we blow an arbitrary deadline that's in the

1 law, it's means we are not doing what we need to do to
2 address the impacts of climate change. The land
3 throughout our state, whether sacred or not, will be
4 impacted negatively by our inaction.

PUB-039
Cont. 5 So I support this project continuing to move
6 forward. To prevent its construction means that we are
7 maintaining the unacceptable status quo we have now, and
8 no one, not union workers, not tribal members, not small
9 business owners, not members of this community, not
10 Washingtonians throughout the state, will be served by
11 that failure. Thank you.

12 HEARING OFFICER: Thank you.

13 Mac Seyhaul, and then Larry Bellamy and Jim Smith.

PUB-040
_Seyhaul 14 MAC SEYHAUL: Thank you for giving me
15 the opportunity. My name is Mac Seyhaul, and I'm a 51 --
16 I came to the county in 1971, have been here. And I also
17 have to say at this point, I've been with the aluminum
18 industry, starting at (indiscernible) down there in
19 Portland in the '60s, and I've been at this location all
20 these years as a production manager, general manager,
21 vice-president.

22 So as such, I've been in the -- direct and in
23 directly been associated -- been in the energy field;
24 buying, using, trying to be efficient. And at some point
25 between our two plants here, Goldendale and the Dallas,

1 we used, consumed -- purchase and consumed as much as to
2 supply all the homes in the city of Seattle.

3 So what I'd like to give my support to this project.
4 I'll say very clearly, I've seen the changes in the
5 energy industry through the decades, and this is a
6 project we need now for our future security, and it's the
7 right location. I've studied a little bit of locations
8 of such projects. Everybody I've listened has said this
9 is an ideal location, because the two reservoirs are very
10 close to each other, and it's close to BPA power station
11 we have at the plant. So it's an ideal location.

12 Now, for those in my community that have
13 reservations, I have to say that work with -- I'll say at
14 this point, that I worked with Ecology for decades, with
15 a lot of regulators, made many trips to Olympia, and
16 you're good people at the end. All the times we were --
17 you know, we looked at an issue from different
18 perspectives, but I can -- I can assure my fellow
19 Goldendale, Klickitat County residents, you will do a
20 great job.

21 To some degree involved with the clean-up of the
22 site, so I know how thorough you are. It took us three
23 years to get a plan before we could start clean up. And
24 it's so detailed, so I know you will not -- you will do a
25 very good job.

PUB-040
Cont.

1 The reason I support the project, because the power
2 energy situation has changed. What I start at Troutdale,
3 it we were dependant on BPA system, the dams. Power
4 wasn't expensive. \$1 a megawatt an hour. And when it
5 went to two, three, we shut down in '71. And you all
6 know what the power costs are regionally, nationwide.
7 It's 50, 70, 100. Hawaii pays 300, thereabouts. So it
8 has changed quite a bit, and so we have a need for it.

9 And secondly, the energy sources we're dependant on
10 are not -- not going be there anymore. Hydro stepped
11 out, and coal, you know.

12 So I have to say, that this project will give us
13 viability for a future with the wind projects and the
14 solar projects. Thank you very much.

15 HEARING OFFICER: Thank you.

16 Larry Bellamy and then Jim Smith.

17 MAC SEYHAUL: Oh, that's yours.

18 LARRY BELLAMY: Hi, my name is Larry
19 Bellamy. I'm the City Administrator for the City of
20 Goldendale, which is the closest incorporated community
21 to the site of this proposed project.

22 Thank you to the Department of Ecology for
23 completing such a thorough analysis for the project.
24 It's a value document that will help decision makers make
25 important choices about this significant project for both

1 our community and our state as we work to meet the goals
2 of the Washington Clean Energy Transformation Act. With
3 the passage of that act, the Goldendale Energy Storage
4 Project demonstrates how partnerships between rural and
5 urban communities can help ensure the state meets its
6 policy goals.

7 Numerous studies have concluded that the site is
8 ideal for pump storage, and we are fortunate to have this
9 site in our community and have a committed developer
10 willing to responsibly bring a pump storage to fruition.

11 As others have stated, the Goldendale Energy Project
12 is not only a good way to reuse the site, it's an
13 ideal -- an ideal way to reuse the site, taking advantage
14 of the geology and the geography needed to pump -- for
15 pump storage, and to take advantage of the grid access
16 and the proximity to wind and solar projects to make it
17 cost effective.

18 The design of the project takes into account several
19 considerations, including aesthetics, air quality,
20 greenhouse gasses, and aquatic species. As the draft EIS
21 has concluded, this project can provide a valuable
22 service in an environmentally sensitive -- or
23 environmentally responsible way.

24 In addition to the environmental benefits, it will
25 bring to the community profound economic benefits. We

GOV-004
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1 understand that it will create approximately 3,000 high
2 quality family-wage jobs during construction, including
3 apprenticeships and building trades for the long term
4 that can only be provided in long-term construction
5 projects.

6 We know from previous large construction projects
7 that the city and our locals business both here and in
8 the surrounding communities can accommodate these workers
9 and their families.

10 Not only will there be short-term construction
11 benefits, but the community of Goldendale will have many
12 long-term benefits, from permanent full-time jobs and a
13 estimated 14 million in indirect annual property taxes.
14 It will make a huge difference in our community's working
15 families by supporting schools, emergency services,
16 hospitals, parks, and roads.

17 We are also encouraged by the developer's commitment
18 to invest \$10 million in the clean up of the site of the
19 former Columbia Gorge aluminum smelter, which is good for
20 the health of people here, and downstream on this long --
21 long-time industrial site.

22 The City continues to very supportive of this
23 project as we go through these processes. Thank you very
24 much.

25 HEARING OFFICER: Thank you.

GOV-004
Cont.

1 Jim Smith, and then we'll have Tim O'Donnell and
2 David Myers.

3 JIM SMITH: Hi, I'm Jim Smith. I am
4 the General Manager at Klickitat Public Utility District.
5 We are a public utility with locally elected public
6 officials that allow for local control by our residents.
7 Our mission is to provide safe and reliable water, waste
8 water, and electric service consist with sound business
9 principals. If this project moves ahead, we will be
10 providing both water and electric service.

11 I want to express our gratitude for being able to
12 provide public comment on this important document and on
13 this important project. The PUD supports the Goldendale
14 Energy storage Project.

15 As the owner of the water system that would provide
16 water service to the project, we agree with the finding
17 of no significant adverse impact on ground and surface
18 water hydrology. We've provided water services for over
19 50 years in this community and who have extensive
20 experience.

21 As the local electric utility and as producer of a
22 renewable energy, we also agree with the finding of no
23 significant adverse impact on energy resources. We
24 actually have over 80 years of experience in providing
25 electric service. We have extensive experience in our

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1 cont.

1 region -- regional electricity grid and electric markets.

2 As mentioned in the draft EIS, electric load
3 forecasts show increasing electric usage to address
4 climate change through electrification, among other
5 things. Klickitat PUD believes that integrating the
6 necessary renewable resources will require long duration
7 pump hydro storage in addition to the other technologies
8 and strategies to ensure our electric grid is both
9 reliable and affordable.

10 The supply of electricity is of critical importance
11 to our residents' safety during extreme weather events
12 for heating, air conditioning, water supply, and other
13 life sustaining uses. Klickitat PUD believes this
14 project offers safety and environmental benefits that are
15 significant, and should be considered in the draft EIS
16 analysis.

2

17 In addition to the benefits already mentioned, the
18 project will also provide significant revenues to the PUD
19 for providing water and electricity service, and hence,
20 will provide significant additional benefits to the
21 residents of our county. The project has been deemed a
22 project of state-wide significance as a result of these
23 societal benefits.

1 cont.

24 As a general matter, the PUD is very impressed and
25 supportive with the information that was included in the

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1 draft EIS analysis, and the PUD appreciates the obvious
2 careful thought that went into creating a document of
3 this depth. We do, however, have meaningful concerns
4 about the conclusions reached in the tribal resource
5 analysis. While we respect the input and the information
6 that's being consider on these important issues, the PUD
7 does not believe there has been adequate showing that
8 supports the preliminary determination that any adverse
9 impacts cannot be successfully mitigated.

10 We will be providing more detail written comments by
11 the deadline, and perhaps on these issues and other
12 issues within the draft EIS. We appreciate the
13 opportunity to comment. Thank you.

14 HEARING OFFICER: Thank you.

15 Tim O'Donnell, David Myers, and then Mark Riker.

16 TIM O'DONNELL: In the interest of
17 everybody's time, I'm will pass. I'm Tim O'Donnell, and
18 I'll submit my comments in writing.

19 HEARING OFFICER: Thank you.

20 David Myers.

21 DAVID MYERS: All right. Good
22 evening. My name is David Myers, and I'm an
23 international rep for the IBW. The international
24 Brotherhood of Electrical Workers represents over 20,000
25 electricians statewide, and over 700,000 nationally. I

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_IBEW
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Cont.

1 am here today to give comments in strong support of the
2 proposed Goldendale Energy Storage Project.

1 cont.

3 This nation is challenged with energy production, as
4 well as ways to store the energy that is produced. The
5 Goldendale Project and the technology it utilizes is an
6 answer to solving some of the energy storage issue.

7 This project will also create construction jobs and
8 bring revenue to the area that will benefit the local
9 surrounding areas, as well as Washington State as a
10 whole. Family-wage jobs and the opportunity to start an
11 apprenticeship as a craftsperson are some of the benefits
12 of the construction of this project, as well as many more
13 full-time jobs in the region to maintain the facilities.

2

14 There are so many socioeconomic benefits to this
15 project that may not be represented in the draft EIS. I
16 feel we should be looking for solutions to our energy
17 needs, and taking the opportunities to act on those
18 projects help us get there. I believe the Goldendale
19 Project is one of those projects that can help us all get
20 there, and we should be moving forward on this project as
21 soon as possible.

1 cont.

22 Thanks for your time.

23 HEARING OFFICER: Thank you.

24 Mark Riker, and then Marshall McGreed?

25 MARSHALL MCGRADY: McGrady.

1 HEARING OFFICER: McGrady. And then
2 Mike Bridges.

3 MARK RIKER: Thank you. Good evening.
4 My name is Mark Riker. I'm the Executive Secretary of
5 Washington State Building and Construction Trades
6 Council, representing approximately 80,000 construction
7 workers from all crafts here in Washington State.

8 I'm here today in strong support on their behalf for
9 this project. One of the challenges that we faced when
10 we supported the Clean Energy Transformation Act is the
11 transition away from fossil fuels, and this was the exact
12 type of project that we envisioned when we supported that
13 piece of legislation and transformative legislation. A
14 project like this that will help us transition away while
15 creating approximately 3,000 construction jobs and many
16 apprenticeship opportunities.

17 For those that aren't familiar with the
18 apprenticeship system, apprenticeships generally take
19 between four and five years to complete. So 3,000
20 project -- a 3,000-person project offering approximately
21 450 -- 450 opportunities for apprentices can darn near
22 finish your entry level into a really good family-wage
23 career.

24 The economic generation that a project like this can
25 bring to a rural community is exactly what we're looking

ORG-013
_WSBCTC

1 for when we're trying to get away from fossil fuel sector
2 supply. A project like this is an appropriate place for
3 the thorough review that Ecology has been doing. We
4 commend you on that.

5 I want to go back to apprenticeship for just a
6 moment, and there's a reason I'm so passionate about
7 apprenticeship. And I echo everything that all of my
8 colleagues have said and everyone here this evening. But
9 apprenticeship is personal to me. I grew up in a farming
10 community, a logging community in Arlington, Washington,
11 in the '70s and '80s. And after my sophomore year in
12 high school, I was a homeless kid in Arlington with no
13 real opportunity. After some troubles and some struggles
14 in, you know, my early years, not being the brightest
15 human being on the planet, I got the opportunity get into
16 an apprenticeship, a construction apprenticeship.

17 And now, not only do I have a middle class
18 lifestyle, my son and my granddaughters have a middle
19 class lifestyle. That's the power of apprenticeship.

20 There's something important about apprenticeship
21 that everybody needs to remember, as well.

22 Apprenticeship starts with a job. To give opportunity,
23 we need opportunity. Our developer partners, our
24 community partners, our governmental partners, all
25 working together to transition away from fossil fuel to a

ORG-013
Cont.

1 clear energy tomorrow, I say let's build our way out of
2 it. Let's give the opportunities to folks in the rural
3 communities. The developer has already agreed to
4 negotiating the terms of a PLA, project labor agreement.
5 You know what those terms of that agreement can -- can
6 include? Local hire. We can give opportunities to
7 ensure that this isn't just constructed by folks from way
8 away from Goldendale. We can build it with folks from
9 Goldendale, from the outlying regions near Goldendale.
10 Give opportunity while we're building it here.

11 So I'm just asking you for strong support of this
12 project. Let's get this built. Thank you.

13 HEARING OFFICER: Thank you.

14 Marshall McGrady, then Mike Bridges.

15 MARSHALL MCGRADY: Good evening,
16 everyone. My name is Marshall McGrady. I represent IBEW
17 Local 48 with members in Portland, Oregon, and Southwest
18 Washington. I currently serve as their political
19 director there, but I also hold a signing supervisor's
20 electrical license in the State of Oregon, and a general
21 journeyman's license here in the State of Washington.

22 First, I want to comment on your EIS report that you
23 presented tonight. In my years of field experience
24 working as a superintendant, there was really little in
25 that report that I did not feel could be overcome very

1 easily by construction people in the field. We know how
2 to mitigate environmental hazards, and we are well
3 prepared to do so.

4 The one item of concern on there, and I think it is
5 something we do need to be sensitive to, is the tribal
6 concerns. But I believe that a project of this magnitude
7 has the ability to include an economic boom to the
8 tribes. So I believe that there can be a solution found
9 on that.

10 I do want to state briefly about probably the most
11 important element to this whole process, and it's climate
12 change, and climate change is a reality that we all face
13 here today. I have lived in the same home for 19 years.
14 In that 19-year time, I never once in my life needed a
15 generator -- an electrician that doesn't need a
16 generator. Sounds pretty crazy -- until the winter of
17 2021. We had an ice storm that knocked our power out for
18 over two weeks at my home.

19 If we don't change how we are generating energy, how
20 we are distributing energy, and how we are responding to
21 climate change, the reality is, we're all going to need a
22 bunch of generators, but we're not going to have the fuel
23 for them.

24 So I urge everyone here tonight to support this
25 project. I believe it's going to be good for the

ORG-014
Cont.

ORG-014
Cont.

1 community and good for both the State or Oregon and
2 Washington. Thank you so much.

3 HEARING OFFICER: (Indiscernible).

4 MIKE BRIDGES: Good evening. For the
5 record, my name is Mike Bridges, and I live in Longview,
6 Washington. As current president of Longview Council
7 Building and Construction Trades Council and business
8 representative for IBW Local 48 representing thousands of
9 members in Southwest Washington and Oregon, I appreciate
10 the opportunity to be able to comment in support of
11 thorough work done by the Department of Ecology on the
12 draft EIS on this important and monumental project.

13 We are excited to share that both the project owner
14 and developer have signed a memorandum of agreement with
15 the Washington State Building and Construction Trades
16 Council to construct the project under a PLA,
17 guaranteeing over 3,000 family-wage jobs would go to the
18 region's tradespeople.

19 In May of 2018, myself and a large, broad group of
20 stakeholders were able to visit to the location of
21 proposed facility, which painted a clear picture, and
22 helped me understand the reason why this site was chosen.
23 This projects represents the culmination of decades of
24 work at both the local and state level to encourage a
25 renewable energy future for Washington.

ORG-015
_LCBCTC

1 Mr. Bridges.

2 Next, we have -- next we have Tom Wishard, and then
3 Kevin Lux.

4 TOM WISHARD: Good evening. My name's
5 Tom Wishard. I'm a resident of Kelso, Washington. Also,
6 I'm the business agent for Local 701 Operating Engineers.
7 On behalf of about 3,000 operators, we're for this
8 project. I appreciate it. Thank you.

9 HEARING OFFICER: Thank you.

10 Kevin Lux.

11 And then Joy, if there's any other lists back there?
12 Thank you.

13 KEVIN LUX: Good evening. My name is
14 Kevin Lux. I'm the union electrician and member of the
15 International Brotherhood of Electrical Workers Local 48.

16 Good evening, staff and Department of Ecology,
17 members of the public, and I'd like to thank the
18 residents of the greater Goldendale community. What a
19 lovely bunch of people, and beautiful surroundings we
20 enjoy outside.

21 Now, it is great to be wearing slacks tonight, not
22 the drywall dust that I'm used to.

23 I'd like to start with a quote from the great --
24 late, great Woody Guthrie; activist, musician, and lover
25 of mother nature. In the 1940s, he traveled to the

1 Pacific Northwest, saw our beautiful Columbia River, and
2 wrote a handful of songs. In one, he spoke to making use
3 of natural resources saying, "Roll Columbia River roll
4 wild and free. As long as you're rolling, won't you do
5 some work for me." In praise of the great work of the
6 hydroelectric dams being put in and continuing to be put
7 in at the time, making our state great.

8 Now, could he have imagined now that we would be
9 putting wind and solar to work, as well? You know, what
10 an amazing time we are living in.

11 But we face a serious problem with power generation
12 at this time. The Pacific Northwest currently has a
13 deficit of 1.2 gigawatts. That's more than the demands
14 of Seattle. This deficit is growing, and especially as
15 we take coal and natural gas offline a result of stricter
16 CETA regulations.

17 At this very moment, power projects that we hope to
18 build between now and 2030 won't even keep pace with
19 growing demands. We currently have 64 gigawatts of
20 nameplate power. Between now and 2045, we need to build
21 100 gigawatts of new renewable power to keep the lights
22 on and meet our climate goals.

23 We see what's going on with California with
24 blackouts and brownouts, and we can't afford these
25 threats here, especially as we face more and more

PUB-041
_Lux
1 wildfires. We know that greatest threat to salmon,
2 steelhead, orcas, and all of wildlife is climate change.
3 I don't think that the EIS fully accounts for or places
4 proper emphasis on the impacts that this project can make
5 for reducing -- for making our planet better and our
6 lungs happier.

2
7 Wind and solar rely on a solid foundation of
8 dispatchable power to be viable. The wind doesn't always
9 blow, as we know right here. Sometimes it blows too
10 hard. The sun sets, and battery technology is still far
11 away from meeting our demands. This project will make
12 more wind and solar projects viable, a means for
13 smoothing out our demands for efficient power. It's
14 going to keep up with our pace of demands and offer us an
15 opportunity to power -- to sell excess power to
16 California, and keep our power rates low while meeting
17 our CETA goals, transitioning to a greener economy.
18 Fighting forest fires in the real way; fighting climate
19 change itself, at the source.

1 cont.
20 All people can benefit from a happier planet, and
21 this EIS needs to put greater emphasis on these current
22 realities and a future promise. Thank you.

23 HEARING OFFICER: Rodger Nichols.

24 RODGER NICHOLS: Forgive my slow
25 progress. Bad knees.

1 Thank you. My name is Rodger Nichols. I and the
2 news media have been covering this story for over a
3 decade, and I have a couple of quick question that you
4 may not be able to answer now, but I wanted to add in the
5 record.

6 I'm a little concerned or confused, maybe, about
7 where this wetlands is that had to be studied. I mean,
8 this isn't wetland territory. I couldn't see -- I was
9 out looking at it just the other day. Didn't find a
10 wetland any where. So I would be interested to see where
11 that is.

12 Also, I'm a little confused about tribal cultural
13 things, because the lower part of it was already
14 developed by the Goldendale plant, and the upper part is
15 just burned, flat ground. So I don't see any cultural
16 resources there, and if there are any, I would think it
17 would be appropriate to talk about them. I'm very
18 concerned that something I don't know is there might hold
19 up the project.

20 Thank you very much.

21 HEARING OFFICER: Thank you. I have
22 a -- somebody who said they might want to testify.

23 Randy McKinney, would you like to testify?

24 Is there anybody else who would still like to
25 testify?

1 JONATHAN LEWIS: I signed up to be on
2 there. Jonathan Lewis.

3 HEARING OFFICER: Oh, sorry. I must
4 have missed you.

5 JONATHAN LEWIS: That's all right.

6 HEARING OFFICER: Come on up.

7 JONATHAN LEWIS: I'd like to thank the
8 Department of Ecology for hearing comments from our
9 community. I'm here representing three interests. The
10 first be myself, as a resident of Goldendale. My bedroom
11 window looks out at Juniper Point, so I see the site, and
12 I'm very excited about the vibrancy that this project
13 could bring with jobs and other potential.

14 I also am the Director of Support Services for
15 Klickitat Valley Health, the local hospital. And the
16 hospital was built in 1947, and we have a lot of capital
17 needs, so the tax base interest of this project is very
18 great, so the hospital and the board of the hospital
19 is -- is in full support of this project.

20 I'm also on the board of the Mid-Columbia Economic
21 Development District. MCEDD represents five counties in
22 the Gorge area region. The Executive Director is on
23 vacation this week, so she asked me to represent MCEDD
24 here. MCEDD develops a comprehensive economic
25 development strategy every five years, and this project

PUB-043
_Lewis

ORG-017
_KVH

ORG-018
_MCEDD

ORG-018
Cont.

1 has been at the top of that list for the last two cycles.
2 MCEDD sees it as extremely important in the economic
3 vitality of the whole Gorge region and supports it for
4 all the reasons that everybody has said tonight.

5 So thank you for listening to us tonight.

6 HEARING OFFICER: Is there anybody
7 else who would like to make a comment?

8 I don't see anybody else.

9 And if you'd like a make written comments, please
10 remember that they are due postmarked by 11:59 p.m. on
11 August 9, 2022. And you can send them to -- I've got to
12 read this, but you can come to me later and I can write
13 it down for you.

14 Central Regional Office, 1250 West Alder Street,
15 Union Gap, Washington 98903.

16 And you can also submit comments online -- and,
17 again, I'll write this down for you if you ask me --
18 ecology.wa.gov/Goldendale-Energy-EIS-comments.

19 Okay. If you pick up one of these, on the back it
20 has all that information, so thank you.

21 Checking the time here for a second.

22 All testimony received at this hearing, as well as
23 online hearings, along with all written comments
24 postmarked no later a 11:59 p.m. on August 9, 2022 will
25 be part of the official hearing record for this proposal.

1 After the comment period closes, the next step in
2 the process will be to consider the public comments, the
3 response to comments, other appropriate documentation,
4 and staff recommendations before finalizing the EIS.

5 We will send the notice about the availability of
6 the responses to comments to everyone that provided
7 written or oral comments on this draft EIS who
8 provided -- who also provided contact information, and
9 other interested parties on the interested party list for
10 the proposal.

11 If you want to receive the notice about the
12 availability of the response to comments, please make
13 sure to indicate it on the sign-in sheet at the entrance
14 table -- there's still some back there -- and we'll make
15 sure that you get on the list.

16 Let the record show that this hearing is adjourned
17 at 7:45 p.m. Thank you.

18 UNIDENTIFIED SPEAKER: Thank you.

19 UNIDENTIFIED SPEAKER: Thank you.

20 (End of recording.)
21
22
23
24
25

C E R T I F I C A T E

I, Trina Michael, certify that the foregoing transcript is a full, true and accurate transcription of the proceedings and testimony taken in the matter of the above-entitled cause.

That the foregoing was transcribed from audio recording. The foregoing was transcribed to the best of my ability, taking into consideration poor sound quality, simultaneous speaking, background noise, quality of second-party telephone, audio, video recordings.

That I am not a relative, employee, attorney or counsel of any party to this action, or relative or employee of any such attorney or counsel, and that I am not financially interested in the said action or the outcome thereof;

IN WITNESS WHEREOF, I have hereunto set my signature on the 13th day of July, 2022.



Trina Michael
CET-1390

Proposed Goldendale Energy Storage Project

Draft SEPA Environmental Impact Statement public hearing transcript

June 30, 2022

I'm Angela Fritz, hearings officer for this event. This morning we are conducting a hearing on the draft State Environmental Policy Act Environmental Impact Statement, or SEPA EIS, for the proposed Goldendale Energy Storage Project in Klickitat County.

Let the record show it is 10:28 a.m. on June 30, 2022, and this hearing is being held online by webinar.

The legal notice of this hearing was published in the Tri-City Herald and the Columbian on June 6, 2022, and the Goldendale Sentinel on June 7, 2022.

In addition to this, notice of the hearing was sent by mail and email to about 530 interested people and organizations, and published on Ecology's website.

If you would like to provide oral comment, please raise your webinar hand now, if you haven't already, or let us know in the chat box. If you called in, you raise your webinar hand by pressing *9 on your phone.

I will call on people to provide oral testimony based on the order that your hand shows up in the webinar. Once everyone who has indicated that they would like to testify has had the opportunity, I will open it up for any others.

When I call your name and we 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 a response to your comment or let you know about our final decision.

Once unmuted, please make sure you speak clearly, so that we can get a good recording of your testimony.

We will start with either Dara [Dare-a] or Dara [Dah-ra], and that's the only hand I see right now, but your absolutely welcome to raise your hand in addition.

Tim, would you please unmute Dara [Dare-a] or Dara [Dah-ra]. And you might have to accept being unmuted.

Tim: she's unmuted.

Dara: Can you hear me?

Angela: I can, yes, thank you.

Dara: Good morning. My name is Dara Williams-Worden. Do you need me to say my contact? Or, just, I can just put it in the chat, if that's ok? Ok. My comment or question is where are you

1 cont.

in the permitting process right now? And have you had any issues with what permits you may have received or been denied so far?

Angela: Ok. Thank you. Tim, if you could please mute.

Is there anyone else who wishes to provide testimony? Go ahead and raise your hand. Again, if you called in, you can press *9 and we'll go ahead and unmute you, work with you to unmute.

Ok, I'm not seeing any other hands raised. Tim, is there anyone in the chat box who's indicated they'd like to comment?

Tim: No, there isn't.

Angie: Ok. If you would like to send Ecology written comments, please remember that they are due or postmarked by 11:59 p.m. on August 9, 2022.

We accept written comments by mail, and online using our online comment form. This information is available on Ecology's website. After the hearing, you can find instructions on how to comment in writing either by visiting the website or you can contact Ecology's project manager, Meg Bommarito and she will send you that information on where to comment online and in writing. And also, I think we have a slide with that information on it, so I'm going to put it up there now.

All oral testimony along with written comments received online or postmarked by 11:59 p.m. on August 9, 2022 will be part of the official record for this draft EIS.

After the comment period closes, the next step in the process will be to consider the public comments, the Response to Comments, other appropriate documentation, and staff recommendations before finalizing the EIS.

We will send notice about the availability of the Response to Comments to everyone that provided written or oral comments on this draft EIS who also provided contact information, and other interested parties who are on the interested party lists for proposal.

The Response to Comments will contain our response to questions and issues of concern raised during the public comment period. If you would like to receive notice about its availability but you don't think that we have your contact information, please either share that with us in the chat box or contact Meg Bommarito after the hearing.

If we can be of further help to you, please let us know. On behalf of the Department of Ecology, thank you for joining us, and I appreciate your cooperation and and your courtesy.

Let the record show this hearing is adjourned at 10:34 a.m.

July 27, 2022

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002.

Re: Goldendale Pumped Storage Project Violates Yakama Nation's Sovereign Rights

Dear Honorable Governor Inslee:

1 | We Treaty Tribal Leaders stand with the Yakama Nation in their fight to protect their cultural and natural resources. The pumped storage project proposed at Juniper Point, *Pushpum* in Goldendale, is a violation of Yakama's Treaty rights and would destroy an irreplaceable sacred site.

Our medicines, foods, lands, and waters are sacred to us. For too long, these sacred places where we gather our foods and hold our ceremonies, have been threatened by development without consultation with, or consent from, our sovereign tribes. This is unacceptable.

2 | Our ancestors signed Treaties with the United States, often under threat of violence and death, in exchange for our ancestral lands and sacred places. Through these treaties, we retain the rights to practice and live in our traditional ways in these places. Yet, the promises made by the government have been broken time and time again. Development and industry have threatened our ways of life for hundreds of years and continues to do so today. Our salmon populations are near extinction. Our ancient villages and ceremonial sites have been flooded. Our ways of life are under constant threat from development and climate change. We must protect our sacred places for our future generations.

1 cont. | We call on the state and federal governments to do better. Uphold the Treaties and respect the rights of our Sovereign Nations. Deny the permits for the Goldendale pumped storage project on Yakama Nation's sacred lands.

Sincerely,

Leonard Forsman
Tribal Council Chairman
Suquamish Tribe

Steve Edwards
Tribal Senate Chairman
Swinomish Indian Tribal Community

Nino Maltos
Tribal Council Chairman
Sauk-Suiattle Indian Tribe

Douglas Woodruff, Jr.
Tribal Council Chairman
Quileute Tribe

Frances G. Charles
Business Committee Chairwoman
Lower Elwha Klallam Tribe

Kris Peters
Tribal Council Chairman
Squaxin Island Tribe

Guy Capoeman
Tribal Council President
Quinault Indian Nation

Rosemary LaClair
Tribal Council Chair
Nooksack Tribe

Willie Frank, III
Tribal Council Chairman
Nisqually Indian Tribe

Cc:

Director Laura Watson, Department of Ecology
Chief of Staff Jamila Thomas
Governor General Counsel Katheryn Leathers
Executive Policy Director Nick Streuli
Governor's Office of Indian Affairs Director Craig Bill
Washington Fish and Wildlife Director Kelly Susewind
Senator Patty Murray
Senator Maria Cantwell
Congressman Dan Newhouse

W. Ron Allen
Tribal Council Chairman
Jamestown S'Klallam Tribe

Teri Gobin
Board of Directors Chairwoman
Tulalip Tribes

Timothy J. "TJ" Greene, Sr.
Tribal Council Chairman
Makah Tribe

Charles "Guy" Miller
Tribal Council Chairman
Skokomish Indian Tribe

Bill Sterud
Tribal Council Chairman
Puyallup Tribe of Indians

Jaison Elkins
Tribal Council Chairman
Muckleshoot Indian Tribe

William Jones Jr.
Tribal Council Chairman
Lummi Nation

Jeromy Sullivan
Tribal Council Chair
Port Gamble S'Klallam Tribe

Dara Williams-Worden

- 1 The CTUIR Cultural Resources Protection Program (CRPP) has reviewed the Goldendale Energy Storage Project Draft Environmental Impact Statement, as well as attended a public forum meeting over said draft EIS. This project is within an area traditionally used by the CTUIR. In addition to the Warm Springs Tribe and Yakama Nation, the CRPP is also concerned with the potential loss of resources through damage and destruction by construction activities that could significantly impact the integrity and cultural significance of the area. The findings in the EIS left out the CRPP's crucial concerns regarding the adverse effects to both the project area and surrounding areas.
- 2 The CTUIR's Traditional Use Study identified several important Historic Properties of Religious and Cultural Significance to Indian Tribes (HPRCSIT) to the CTUIR within the project area that are recommended to be eligible under National Register criteria: (a), (b), (c), and (d).

We look forward to continuing coordination and consultation with the developers and affected tribes to ensure adverse effects can be avoided, minimized, or mitigated.

Anthony Aronica

1

YAKAMA NATION COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED GOLDENDALE ENERGY STORAGE PROJECT (PUBLICATION NO. 22-06-006/P-14861-002).



August 9, 2022

FILED ELECTRONICALLY

Sage Park
Washington Department of Ecology
Central Region Office
Attn: Goldendale Energy DEIS
1250 W. Alder Street
Union Gap, WA 98903-0009

RE: YAKAMA NATION COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED GOLDENDALE ENERGY STORAGE PROJECT (PUBLICATION NO. 22-06-006/P-14861-002).

Dear Regional Director Park,

Included herein are comments on behalf of the Confederated Tribes and Bands of the Yakama Nation (“Yakama Nation”) on State Environmental Policy Act Draft Environmental Impact Statement (“DEIS”), Publication No. 22-06-006, issued by the Washington Department of Ecology (“Ecology”), on June 6, 2022. This letter preserves, incorporates, and reasserts the Yakama Nation’s concerns regarding the Project made known to Ecology, the Federal Energy Regulatory Commission (“FERC”), and the Free Flow Power Project 101, LLC (“Project Applicant(s)” or “Rye Development”) through previous communications.¹ The Project Applicants propose to construct 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 (“Project”). This letter further agrees with and incorporates corresponding comments submitted by the Columbia Riverkeeper on the DEIS.

1 cont.

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.² The Treaty further designated reserved rights for Yakamas to exercise “in common with”

¹ See Exhibit A - Letter From Yakama Tribal Council Chairman To FERC Secretary (May 23, 2022).

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

1 cont.

citizens of the United States at all usual and accustomed places within the Treaty Territory.³ A federal treaty is considered the supreme Law of the Land under the U.S. Constitution.⁴ 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, which has also been recognized by federal courts,⁵ 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 49th 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, root plants, natural 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.

2

The Yakama Nation is alarmed and concerned for the irreversible harmful impacts threatened by the Project. Previously, the Yakama Nation opposed similar project proposals at this location due to the numerous natural and cultural resources that are incompatible with industrial-scale development, including but not limited to: destruction of Traditional Cultural Properties that can never be mitigated or replaced; loss or degradation to streams and aquatic resources; increased deaths within the golden eagle population; and, existing soil and groundwater contamination from the former Columbia Gorge Aluminum smelter site.

II. Project Description.

3

The Project would include the following new facilities: (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; (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; (3) an underground conveyance tunnel system connecting the two reservoirs consisting of a 2,200-foot-long, 29-foot-diameter concrete-lined vertical shaft, a 3,300-foot-long, 29-foot-diameter concrete-lined high pressure tunnel, a 200-foot-long, 22-foot-diameter high pressure manifold tunnel, three 600-foot-long, 15-foot-diameter steel/concrete penstocks, three 200-foot-long, 20-foot-diameter steel-lined draft tube tunnels with bonneted slide gates, a 200-foot-long, 26-foot-diameter concrete-lined low-pressure tunnel, and a 3,200-foot-long, 30-foot-diameter concrete-lined tailrace tunnel; (4) an underground powerhouse located between the upper and lower reservoir in a 0.83-acre powerhouse cavern containing three, 400-megawatt (“MW”) Francis-type pump-turbine units for a total installed capacity of 1,200 MW; (5) a 0.48-acre underground transformer cavern adjacent to

1 cont.

³ See *Id.* at art. III, cl. 2.

⁴ See U.S. Const. art. VI, cl. 2.

⁵ 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).

3 cont.

the powerhouse containing intermediate step-up transformers that will step up the voltage from 18 kilovolts (kV) to 115 kV; (6) two 30-foot-diameter tunnels for accessing the powerhouse and transformer caverns; (7) a 0.84-mile-long, 115-kV underground transmission line extending from the transformer gallery through the combined access/transmission tunnel to where it emerges aboveground near the west side of the lower reservoir and extending an additional 0.27 miles to an outdoor 7.3-acre substation/switchyard where the voltage would be stepped up to 500 kV; (8) a 3.13-mile-long, 500-kV transmission line routed from the substation/switchyard south across the Columbia River and connecting to Bonneville Power Administration’s existing John Day Substation in Sherman County, Oregon; (9) a buried 30-inch-diameter water fill line leading from a shut-off and throttling valve within a non-project water supply vault owned by Klickitat Public Utility District (“KPUD”) to an outlet structure within the lower reservoir to convey water to fill the reservoirs; and (10) appurtenant facilities. The Project would also include an existing 0.7-mile road for accessing the lower reservoir site and an existing 8.6-mile-long road for accessing the upper reservoir site both of which may be modified to provide access for construction vehicles.

The water supply used to initially fill the lower reservoir as well as to provide make-up water would be purchased from KPUD and would be obtained from KPUD’s existing intake pond on the Columbia River. The Project water fill line would connect to a new KPUD-owned flanged water supply service connection in a water supply vault located near the lower reservoir. Within the vault, and just downstream of the service connection, there would be a project shut-off and throttling valve to control the initial fill and make-up water flow rate into the lower reservoir. 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 (maximum flow rate available is 35 cubic feet per second). It is estimated that the Project would need 360 acre-feet of water each year to replenish water lost through evaporation and seepage.

III. State Environmental Policy Act.

The State Environmental Policy Act (“SEPA”) is Washington’s core environmental policy and review statute. Like its federal counterpart, the National Environmental Policy Act (“NEPA”), SEPA broadly serves two purposes: first, to ensure that government decision-makers are fully apprised of the environmental consequences of their actions and, second, to encourage public participation in the consideration of environmental impacts.⁶

4

SEPA was enacted to “encourage productive and enjoyable harmony between humankind and the environment” and to “prevent or eliminate damage to the environment and biosphere.”⁷ Thus in adopting SEPA, the Washington legislature declared the protection of the environment to be a core state priority, “recognize[ing] 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

4 cont.

⁶ See *Norway Hill Preservation and Prot. Ass’n v. King Co*, 87 Wn.2d 267, 279 (1976).

⁷ See RCW § 43.21C.010.

environment.”⁸ This policy statement, which is stronger than a similar statement in the federal counterpart of NEPA, “indicates in the strongest possible terms the basic importance of environmental concerns to the people of the state.”⁹

4 cont.

SEPA is more than a purely “procedural” statute that encourages informed and politically accountable decision-making. SEPA requires agencies to integrate environmental concerns into their decision-making processes by studying and explaining environmental consequences before decisions are made.¹⁰ In enacting SEPA, the state legislature gave decision-makers the affirmative authority to deny projects where environmental impacts are significant, cannot be mitigated, and collide with local rules or policies. SEPA provides substantive authority for government agencies to condition or even deny proposed actions – even where they meet all other requirements of the law—based on their environmental impacts.¹¹ The Yakama Nation calls on Ecology to exercise its SEPA authority and its responsibility to preserve the natural and cultural environment by only accepting a “No Action Alternative” for this Project as the only reasonable way to ensure the existence of environmental resources.

IV. Direct Project Impacts to Yakama Nation Treaty Resources.

i. Appendix H – Traditional Cultural Properties

5

Only “No Action Alternative” will preserve and protect the Yakama Nation’s Traditional Cultural Properties (“TCP’s”), including the documented and National Register of Historic Places-eligible (“NRHP”) TCPs. Only the Yakama Nation can determine what is culturally significant to its people – these legendary resources will be destroyed through initial construction and ongoing operation of this proposed Project. The Yakama Nation affirms the Ecology’s determination that the Project will cause significant and unavoidable adverse impacts.

6

Yakama ancestors provide oral teachings that tell stories of our people and this land. Yakama teachings instruct us on the value of the resources that have lived on this land for thousands of years in a state of balance. Yakamas who lived with the land also practiced our religion and respected the landforms that have provided resources for sustenance and livelihood. The encroachment of energy development threatens to destroy this Yakama way of life today.

The Yakama teachings describe the connectivity between all life – the water, land and air, and sun that watches over all things. All living animals show interconnectivity and care by providing food, tools, and clothing. Some animals serve as protectors, providing warnings from danger, or provide guidance through Yakama teachings. Our identity as Yakama People is intrinsically interwoven into the cultural resources in the Treaty

⁸ See RCW § 43.21C.020(3).

⁹ See *Leschi v. Highway Comm’n*, 84 Wn.2d 271, 279–80 (1974).

¹⁰ See *Stempel v. Dep’t of Water Resources*, 82 Wn.2d 109, 117–18 (1973).

¹¹ See RCW § 43.21C.060.

4 cont.

Territory. The plants that survive at *Push-pum* uniquely provide Yakama people with important medicines and nourishment. *Push-pum* is known to the Yakama as “the mother of roots” and the culturally significant plants found here are endemic to this region. This is a resource that cannot be replaced because *Push-pum* is the natural seed bank for these plant resources. These plant resources include buckwheats, balsamroots, lomatiums, yarrow, sumac, lupin, dogbane, rose, onion, thistle, serviceberry, sagebrush, junipers, and many others. These plants and combinations of them are used by Yakama People to treat illness in the body and spirit. These plants have served for thousands of years as poultice, tea, bandages, pacifiers, drums, needles, rope, nets, and food. They are important to traditional ceremonies and religious practices.

6 cont.

All the birds have a purpose and sacredness about them in Yakama beliefs. The birds carry messages to the Creator and the presence of feathers can be seen as interpretations of great spiritual significance. Raptors have unique significance where every bone and feather has a purpose and traditional use. Yakamas use every bone, feather, beak, and talon. Eagle remains are sacred and are ceremonially gifted for both spiritual purposes and as a great honor and achievement in a person’s life.

Juniper Point is associated with several Yakama TCPs that each tell stories and provide geophysical references for passing knowledge on to future generations. These teachings pertain to traditional foods and medicine, legendary events, legendary figures, and important teachings. Standing on Juniper Point, the viewshed includes other sacred sites that provide teachings and cultural orientation to the traditional cultural landscape (now Washington and Oregon). This view is expansive and focuses on the legendary aspects of the mountains and their connectivity.

7

The Project threatens all of these TCPs of legendary cultural importance to the Yakama Nation. The Project would result in visual and aesthetic impacts on the landscape that need to be discussed in section 4.8 in connection with the impacts on TCPs. This Project would permanently damage or destroy nine culturally significant sites. There is no mitigation that can replace the destruction of Yakama ancestral sites still in use today to observe ceremonial and cultural practices.

a. Unacceptable Limits On Cultural Use And Access.

8

The Project development would impede and disrupt on-going root and plant gathering access by Yakama members.¹² Yakama members regularly access the Project area for root and medicine gathering, and to practice religious and cultural ceremonies. The Programmatic Agreement preserves and recognizes the critical archaeological and cultural resources within the Project site.

9

b. Potential For Slope Failure.

8 cont.

¹² See Exhibit D – Programmatic Agreement Among The Bonneville Power Administration, The Washington State Historic Preservation Officer, And The Advisory Council On Historic Preservation (May 1997).

9

Geologic mapping conducted by Phillips and Walsh (1987) shows evidence of a past landslide(s) adjacent to the proposed project.¹³ The project occurs within an area further patterned by faulting along the boundary of the proposed project footprint. Please discuss the potential for slope failure through a formal slope susceptibility study that includes the DEIS impacts in sections 4.1, 4.8, and 4.9. Specifically, the are factors involved in the Project construction and implementation phases that should be considered in terms of how they affect slope susceptibility. Activities such as excavation, drilling, boring, and blasting for underground infrastructure along the oversteepened, horizontally bedded, and tilted strata created enhanced risks to environmental and cultural resources.

ii. Appendix F – 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. 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.

10

Effects of construction of the upper reservoir on waterbodies would result in degradation of ecological function of the aquatic habitat, including native animal and plant diversity in the riparian areas, water temperature regulation, erosion control, water infiltration, and organic inputs to the aquatic food web. Impacts to these waterbodies would reduce wetland functions and aquatic habitat and result in degradation of ecological functions in downstream waters. Please add a discussion of these impacts to section 4.6. Further, the excavation and backfilling in streams, ponds, and wetlands may cause mortality, injury, or disturbance to the normal behavior of amphibians or turtles using these habitats. Please add a discussion of these impacts to section 4.6.

The Project’s upper reservoir will permanently destroy several ephemeral waterbodies including approximately 965 linear feet of streams. The loss of these streams negatively impacts the active and contemporary hunting and gathering activities of Yakama Nation members and should be discussed as impacts in section 4.6 in addition to section 4.9.

iii. Appendix G – Plant and Animal Resources

11

Construction of the reservoirs will result in loss of terrestrial species and habitats, as well as lost habitat for plant species important to the Yakama Nation and hunting and gathering activities. Please add a discussion of these impacts to section 4.7.

Combined, the two proposed reservoirs would result in over 120 acres of surface water body attraction to birds and bats which may result in more interactions with wildlife

9 cont.

¹³ See Exhibit E – William M. Phillips and Timothy J. Walsh, Geologic Map of the Northwest Part of the Goldendale Quadrangle, Washington, Washington Division of Geology and Earth Resources, Open File Report 87-13 (Nov. 1987).

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. In its comment on the FERC Ready for Environmental Analysis, the U.S. Department of Interior identified that golden eagles are known to occur within the project boundary and in the project vicinity within the John Day Dam territory, with up to three historic golden eagle nest locations documented by Washington Department of Fish and Wildlife (“WDFW”) within the project area west of the proposed lower reservoir on the cliff face between the proposed reservoirs. Additionally, to the three historic golden eagle nest locations, there are four historic nest locations to the east of the project boundary and just below the access road.

Known golden eagle nest locations within the project boundary were surveyed by WDFW in June 2013, where they noted that one hunting adult was present with an unrepaired nest (WDFW 2014); surveys also occurred in 2014 and observations included one adult flying and the nest was unrepaired. Detailed analysis of home range use of a male golden eagle showed use largely within remaining open habitats including the proposed lower reservoir project area (WDFW 2015). The likelihood of increased golden eagle takings impacts Yakama traditional and cultural activities in a way that connects sections 4.7 and 4.9.

The DEIS states that shade balls will be used in the reservoirs to reduce evaporation and deter birds, but there is still a concern that the reservoirs will be an attractive nuisance to congregating birds and bats. The project is close to wind farms located on the Columbia Hills and the turbines present a collision risk. Additional mitigation is needed to prevent bird strikes.

iv. Appendix I - Columbia Gorge Aluminum Smelter Cleanup

a. Water Resources.

Under Table S-1, Water Resources – Summary Description and section 4.2, a portion of the lower reservoir would be located within the West Surface Impoundment (“WSI”), an area associated with the former Columbia Gorge Aluminum (“CGA”) smelter. Precipitation infiltration will be reduced due to rainwater intercepted within the footprint of the proposed lower reservoir project area. This will alter the surface water hydrology and negatively impact downgradient wetlands. Please respond to how the DEIS will require a better description of how capture of precipitation will not substantially alter surface water hydrology.

Project plans call for the pumped-water storage system’s lower reservoir and conveyance piping to be filled once at the end of construction, and then periodic fills to recharge the system (i.e., make-up water) as needed to offset evaporative and leakage losses from the system. Leakage from the reservoir and conveyance tunnels would impact the existing West Spent Pot Liner (“SPL”), remaining contaminated soils, or contaminated soils/fill material used in embankments. Water contributing to this leakage would likely have degraded water quality and could adversely impact downgradient wetlands. Please respond to how the DEIS will address these impacts in the summary Table S-1 under Water Resources – Summary Description and address in DEIS section 4.2.

Under section 4.2.2.1 Water Resources – Impacts from Construction, the DEIS states that dewatering will be required for construction and there is a potential for surface water to infiltrate into the tunnels as they are being constructed and that this could drain wetlands and streams on the overlying surface. Water loss through infiltration could continue beyond the construction phase into the operations phase of the project and result in loss of wetlands, buffers, habitat, and plants and aquatic species. Please add a discussion of this impact to section 4.2.1. Further under section 4.2.2.2 Water Resources – Impacts from Operation, the DEIS mentions full removal of contaminated materials from the WSI and confirmation groundwater monitoring. However, the DEIS does not present a plan for further characterization and groundwater remediation of the plume in the vicinity of the WSI, SPL, and Drainage Ditch, except that the Smelter Potentially Liable Person (“PLPs”) will conduct that work. Please add to section 4.2.2.2 a discussion of how groundwater remediation will occur in conjunction with removal of the WSI and how that work and schedule will be coordinated. Additionally, under section 4.2.1 the DEIS identifies that both reservoirs will intercept precipitation within their footprints that would otherwise contribute to recharge of surface water and groundwater. Alteration of surface water hydrology will negatively impact existing wetlands A, B, C, and D and Spring 6 during times of drier conditions and cause loss of function, habitat loss, and potential mortality to amphibians, turtles, and other wetland species. Please address this impact to section 4.2.1.

13 cont.

Under section 2.3.1.1 Reservoirs, the DEIS states that both reservoirs would be lined with concrete to reduce leakage, seepage, and evaporation, and that the lower reservoir is anticipated to include a double liner system to further minimize the potential for leakage. There is no mention of installing an impermeable synthetic liner in the upper reservoir. There is concern that leakage from both reservoirs as well as from the three tunnels could result in significant changes to the groundwater regime that could mobilize and/or cause the spread of contaminants in soil and groundwater in the vicinity of the WSI, SPL, or other areas at the CGA smelter site. Please confirm that both reservoirs would be lined with an impermeable synthetic liner and if not, how will the system ensure that failure or leakage loss does not impact the existing groundwater regime.

The proposed upper reservoir would capture precipitation and groundwater recharge that would otherwise flow to the Swale Creek watershed. However, the DEIS states that due to underground leakage from the water conveyance infrastructure between the two reservoirs, there would be a net gain in water flow to the Swale Creek watershed. section 4.2.2.2 states that degradation of water quality is anticipated for the proposed project based on the concentration of water quality constituents from evaporation in the proposed reservoirs over time. Given that the amount of leakage cannot be fully understood until after the project is built, and operational water quality will degrade over time, water quality should be addressed through treatment in the reservoir. Please add a discussion of these impacts to section 4.6.

b. Soils and Geology.

14

Under section 4.1 Soils and Geology, the DEIS states that there is uncertainty related to geologic conditions, but there is a possibility that construction activities could moderately increase geologic and seismic hazards, including the potential for landslides. There is a concern that those landslides could cause damage or a breach of the lower reservoir. Additional soil analysis is needed before design to better understand the distribution of contaminants, how they could move during a seismic event or landslide, and how likely it is that such an event could damage or breach the lower reservoir. Please also address the risk of a breach of the upper reservoir causing a landslide on the slope above the lower reservoir.

15

The DEIS further states that during Project operations, a local or regional earthquake could cause liquefaction in the vicinity of the lower reservoir, potentially resulting in damage to the reservoir embankment or other project elements. The DEIS does not include mitigation for this potential effect. Please include additional mitigation information that will address this potential effect.

Additionally, the DEIS states that the Project could encounter multiple areas of instability in both the above- and below-ground portions of the study area. Most of those areas are associated with uncertain conditions in the underlying basalt formation layers, particularly in those locations where faults cross the study area and in locations where unconsolidated deposits occur. The DEIS does not discuss mitigation measures to address potential conveyance failures due to uncertain underlying basalt formations. Please include additional mitigation information that will address this potential failure.

c. Climate Change.

16

Another area of water quality uncertainty is the magnitude of the future effects of climate change and how the changing climate will affect water availability in the Columbia River and supply to the reservoirs. Historic drought conditions and recent rapid declines in water levels are being observed in Lake Mead, Lake Powell, the Great Salt Lake, and other water resources in the Western United States. Current methods of assessing the impacts of climate change are likely no longer sufficient given that the United States has been unable to meet its greenhouse gas emissions reduction goals. Please revise the discussion of climate change to include increased uncertainty.

d. Public Services and Utilities.

17

Under section 4.5.2.2 Public Services and Utilities – Impacts from Operations, the DEIS states that an emergency action plan will include inundation maps identifying high-water areas downstream of the proposed project in the event of a catastrophic structure failure. However, the DEIS does not explain how a catastrophic failure of either the upper or lower reservoirs would impact contaminants at the CGA smelter site. There is a potential for significant erosion of contaminated materials left behind at the WSI, SPL, Plant Construction Landfill, or other parts of the site (if contaminated material has not been fully excavated and removed offsite) that could transport contamination to the Columbia River. Please add a discussion of this impact to section 4.5.2.2.

e. Environmental Health.

Under section 4.10 – Environmental Health, Breaches of either of the reservoirs’ large above-grade embankments (175 feet high for upper reservoir, 205 feet high for lower reservoir) would release water that would be expected to flow down the outer face of the embankment. For low rates of discharge, water would infiltrate to shallow groundwater, and for higher rates of discharges that overwhelm the surrounding soils’ infiltration capacity, the runoff would be stormwater. Because the water quality within the reservoirs is expected to degrade gradually as operations proceed per section 4.2, the discharge of water from a breached embankment could adversely impact the quality of groundwater and wetlands downstream of the breach location.

18 In the area surrounding the upper reservoir, shallow and disconnected groundwater conditions mean that a breach would not result in a significant adverse impact to water quality. However, in the area surrounding the lower reservoir, the existing groundwater is contaminated (Area of Concern 2). Therefore, in the event of a low-volume discharge from a breach of the lower reservoir, the primary impact would be temporarily altered flow direction of the existing contaminated groundwater, potentially toward the Columbia River. A higher-volume discharge from a larger breach of the reservoir embankments would be expected to run off to adjacent intermittent stream channels, eventually flowing into Swale Creek from the upper reservoir area or the Columbia River from the lower reservoir area.

In either location, the degree of impact would depend on the rate of discharge entering a surface waterbody. High rates of breach discharge would scour and erode surface soils adjacent and downstream of the breach, delivering high levels of suspended solids (turbidity) to the receiving waters that, depending on specific conditions, could constitute a significant water quality impact to aquatic species, even if temporary.

Depending on where in the lower reservoir embankment a large breach might occur, the erosion may entrain and transport contaminated surface soils associated with the historical smelter operations, which could result in significant temporary water quality impacts to aquatic species and long-term impacts to Columbia River sediments.

v. *Appendix J – Environmental Justice Report.*

a. *Notice of Insufficient Consultation.*

19 The Yakama Nation clarifies the DEIS assertions regarding government-to-government consultation. The Yakama Nation defines effective consultation to be a process that is agreed upon by Yakama Nation Tribal Council as the governing body of a sovereign tribal entity. Further the regulatory body for the full Project application, FERC, has a federal trust responsibility to the Yakama Nation. These elements of the government-to-government consultative process cannot be delegated to the Project applicant over the Yakama Nation’s objections. This comment provides notice to Ecology that the consultation described herein has not occurred and the Yakama Nation maintains an ongoing dispute with the FERC about its obligation to consult.¹⁴

¹⁴ See Exhibit B – Communication From The Federal Energy Regulatory Commission To The Yakama Tribal Council Chairman.

20

The Yakama Nation disagrees with the DEIS assertion that mitigation has been proposed by the applicant and the consulting parties or tribes have not yet identified that it is acceptable. To be clear, effective consultation with the FERC has not occurred for this Project. Not only does the Yakama Nation find this to be inappropriate, but it further rejects the Project Applicant's proposed measures for a management plan as a means to mitigate effects on the cultural resources that will surely be destroyed during the Project construction phase.

The Washington Department of Archaeology and Historic Preservation notified the Project Applicant mitigation measures are premature under the sequential process required by Section 106 and 36 CFR 800.¹⁵ As previously mentioned, Yakama Nation finds that this project cannot be mitigated and is opposed to the project due to the irreparable harm that it will cause to its people, culture, and future generations.

21

The Yakama Nation is opposed to the Project and no mitigation can replace this resource or the impacts of the project. The Project adds to the cumulative sacrifice zone that has burdened the Yakama Nation's resources for nearly a century for the advancement of energy development. Other energy infrastructure, including the hydro-electric dam system, the Hanford Nuclear Site, and many distinct utility-scale wind turbine and solar facilities have flooded, contaminated, or restricted access to traditional fishing sites, villages, burial sites, ceremonial gathering places, root and medicine harvests, and cultural landmarks up and down the Columbia River.

V. 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 top of a culturally and environmentally sensitive area. The Project does not protect Yakama Nation's Treaty resources or the Yakama members who rely these resources.

¹⁵ See Exhibit C – Communication From Robert Whitlam, State Archaeologist, To Mike Trust And Erik Steimle.

20 cont.

For further comments or questions please contact Phil Rigdon, Interim Tribal Administrative Director, at phil_rigdon@yakama.com, (509) 865-5121, ext. 4655 and Jerry Meninick, Deputy Director of Cultural Services, jerry_meninick@yakama.com, (509) 865-5121, ext. 6007.

Respectfully,



f. DELANO SALUSKIN, CHAIRMAN
YAKAMA NATION TRIBAL COUNCIL

cc: Kimberly Bose, Secretary, Federal Energy Regulatory Commission
Rob Whitlam, State Archaeologist, Washington Department of Archaeology &
Historical Preservation
Dennis Griffin, State Archaeologist, Oregon State Historic Preservation Office
William Dancing Feather, ACHP Native American Program Analyst

EXHIBIT A

Letter From Yakama Tribal Council Chairman To FERC Secretary (May 23, 2022)

Exhibit Coversheet Only.

[Paginated separately.]



May 23, 2022

FILED ELECTRONICALLY

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, D.C. 20426

RE: YAKAMA NATION COMMENT(S), RECOMMENDATION(S), AND PRESCRIPTION(S) TO
NOTICE OF APPLICATION READY FOR ENVIRONMENTAL ANALYSIS FOR THE
GOLDENDALE ENERGY STORAGE PROJECT (P-14861-002).

Dear Secretary Bose,

The Confederated Tribes and Bands of the Yakama Nation (“Yakama Nation”), an inherently sovereign Native Nation that is federally recognized pursuant to the Treaty with the Yakamas, U.S. – Yakama Nation, June 9, 1855, 12 Stat. 951 (“Treaty”), is responding herein to the Federal Energy Regulatory Commission’s (“FERC”) Notice of Application Ready for Environmental Analysis (“REA”), dated March 22, 2022, regarding Project No. 14861-002 (“Project”). The following comment(s), recommendation(s), and/or prescription(s) to the REA are based on the Yakama Nation’s strong objection to the issuance of a license for the Project and the preliminary information provided by the Project Applicant, such that the Yakama Nation reserves the right to amend this response based on the results of additional information and conclusions developed during the FERC’s Project Application review.

The Yakama Nation preserves, incorporates, and reasserts its previous written concerns regarding this Project.¹ This letter further agrees with and incorporates corresponding comments submitted by the Columbia Riverkeeper on the Project REA.

I. Yakama Protection Of Resources At *Pushpum*.

The Treaty reserved a 1.3 million acre Reservation “for the exclusive use and benefit” of the Yakama people.² 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.³ A federal treaty is considered the supreme Law of the

¹ See Exhibit A – Letters from the Yakama Nation regarding Project comments and concerns.

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

³ See *Id.* at art. III, cl. 2.

Land under the U.S. Constitution.⁴ 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,⁵ for the protection of environmental resources in Yakama Nation’s Treaty Territory. The Yakama Nation’s inherent right has existed since time immemorial and is still a Treaty-reserved right for Yakama members to exercise the root gathering, fishing, practice of ceremony, and passing on cultural tradition at *Pushpum* (Juniper Point), where the Project proposes to permanently destroy legendary Yakama cultural resources. The Yakama Nation opposes the Project “development at *Pushpum* to avoid irreparable damage and destruction to the Yakama Nation’s cultural resources and Treaty-reserved root gathering rights.”⁶

II. Project Description.

The Project consists of proposed development of: a 61-acre upper reservoir formed by a 175-foot-high, 8,000-foot-long rockfill embankment dam; a 63-acre lower reservoir formed by a 205-foot-high, 6,100-foot-long embankment; and an underground conveyance tunnel system connecting the two reservoirs consisting of a 2,200-foot-long, 29-foot diameter, vertical shaft. Additional tunnels include: a 3,300-foot-long, 29-foot-diameter, tunnel; a 200-foot-long, 22-foot-diameter, manifold tunnel; three 600-foot-long, 15-foot-diameter, penstocks; three 200-foot-long, 20-foot-diameter, draft tube tunnels; a 200-foot-long, 26-foot-diameter, low-pressure tunnel; and a 3,200-foot-long, 30-foot-diameter tailrace tunnel. Additionally, there is a proposed underground powerhouse and a 0.48-acre underground transformer cavern adjacent to the powerhouse connected to a 0.84-mile-long, 115-kV underground transmission line that emerges to an outdoor 7.3-acre substation/switchyard. The voltage would be stepped up to a 3.13-mile-long, 500-kV transmission line routed from the substation/switchyard south across the Columbia River and connecting to Bonneville Power Administration’s existing John Day Substation.

III. Recommend Suspending The REA To Cure Procedural And Technical Deficiencies.

i. Recommendation To Give ‘Equal Consideration’ To Environmental Concerns

Justification. Under 16 U.S.C. §§ 797(e) and 803(a) the FERC “shall give equal consideration to the purposes of . . . the preservation of other aspects of environmental quality.” Equal consideration is provided under those statutes for recommendations from resource agencies to weigh concerns of environmental quality on balance with a Project Application’s power and development purpose. To be clear, only the Yakama Nation can determine the significance of its cultural resources. However, consistent with the FERC’s deference to the specific expertise of resource agencies, the Washington Department of Archaeology & Historic Preservation (“SHPO”) informed the Project Applicant in writing on

⁴ See U.S. Const. art. VI, cl. 2.

⁵ 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).

⁶ See Yakama Tribal Council Resolution T-089-21 (May 24, 2021).

January 5, 2022 that current Section 106 document(s) are “incomplete and does not provide the federal agency determination of eligibility nor the tribes’ concurrence and signature for documentation and release to [the SHPO].”⁷ The SHPO further asserts a prior “concur[ance] with an Adverse Effect Determination and the next step should be a collaborative consultation effort to develop a Programmatic Agreement with specific stipulations tailored to the particular historic, cultural, and archaeological properties . . .”⁸

The Yakama Nation has consistently expressed Project concerns that this Project will cause direct and irreversible harm to the environmental quality since the Project Application was filed. The Yakama Nation also expressed consistent public concern for a prior project proposal of a similar nature at this location. The Washington SHPO, a state agency with archaeological expertise, concurs with concerns that sequential steps prescribed in 36 C.F.R. 800 have not been followed by the Project Applicant. The procedural deficiency, as identified, equates to a less-than-equal consideration of environmental qualities at *Pushpum* by skipping conditions precedent to the REA and in conflict with 16 U.S.C. §§ 797(e) and 803(a).

ii. Recommendation That FERC Conduct Government-To-Government Consultation

Justification. Under 36 C.F.R. § 800.2(c)(4), the “agency official may authorize an applicant or group of applicants to initiate consultation with the SHPO/THPO and others, *but remains legally responsible for all findings and determinations* charged to the agency official . . . [f]ederal agencies that provide authorizations to applicants *remain responsible for their government-to-government relationships with Indian tribes.*” (emphasis added). Further under 18 C.F.R. § 2.1c the FERC acknowledges that it has a trust responsibility to tribes on a government-to-government basis. The Yakama Nation asserts that FERC has a government-to-government consultation obligation under express law and the principles of Trust responsibility unique to the federal-tribal relationship. The FERC has failed to accommodate government-to-government consultation, and has improperly attempted to deputize a private archaeological consultant to satisfy federal obligations – the result is that the Yakama Nation is still waiting for government-to-government consultation as a precondition to consideration of the REA.

On September 13, 2021, the Yakama Nation responded to the FERC’s August 13, 2021 letter addressed to Cristine Curran with the Oregon Parks and Recreation Department regarding FERC’s designation of the Project Applicant as the National Historic Preservation Act (“NHPA”) Section 106 consultation lead. The Yakama Nation disputed this designation of the Project Applicant in writing as impermissible under 36 C.F.R. § 800.2(c)(4), Yakama consultation law, and the FERC’s Trust responsibility. On December 9, 2021, following a public discussion on November 10, 2021 between FERC staff and Yakama Nation staff, the FERC provided written declination of the Yakama Nation’s government-to-government consultation request under Rule 2201 prohibiting off-the-record communications. Following that notice, the FERC has yet to provide the Yakama Nation

⁷ See Exhibit B – Letter from Robert G. Whitlam to Erik Steimle regarding Goldendale Energy Storage Project (Jan. 5, 2022).

⁸ See *Id.*

with a government-to-government consultative platform that protects the privileged and confidential cultural resources raised by the Yakama Nation since the Project's inception. The FERC has not equally considered cultural resource impacts as a result of failing to achieve the prescribed NHPA Section 106 consultation, and furthermore the Project Applicant's submission of a Historic Properties Management Plan cannot be completed for the Project Application.

iii. *Recommendation For Enforcement Of Programmatic Agreement For Access*

Justification. The avian and plant resources that would be negatively impacted by the proposed Project, specifically disturbance of traditional root fields and increased Golden Eagle mortalities, are intertwined and amplified in combination with their cultural significance to Yakama traditional and ceremonial practices. The right to exercise these practices is reserved under the Treaty. That reserved right was further observed by the State of Washington and the Bonneville Power Authority for on-going root and plant gathering access by Yakama members.⁹ 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 area of potential effect.

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. The FERC is subject to a higher standard of consideration for these cultural resources than it has currently undertaken and the land at this proposed Project site is subjugated to higher federal Trust duty by virtue of being the Yakama Nation's Treaty Territory.

For further comments or questions please contact the Interim Tribal Administrative Director, Phil Rigdon, at phil_rigdon@yakama.com or at (509) 865-5121, ext. 4655.

Respectfully,



DELANO SALUSKIN, CHAIRMAN
YAKAMA NATION TRIBAL COUNCIL

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

⁹ See Programmatic Agreement Among The Bonneville Power Administration, The Washington State Historic Preservation Officer, And The Advisory Council On Historic Preservation (May 1997).

EXHIBIT A

LETTERS FROM THE YAKAMA NATION REGARDING PROJECT CONCERNS

Exhibit Coversheet Only. [Paginated separately.]

1. Letter from the Yakama Nation Tribal Council Chairman to the Advisory Council on Historic Preservation regarding FERC concerns (Feb. 16, 2022).
2. Letter from the Yakama Nation Tribal Council Chairman to the Advisory Council on Historic Preservation regarding Project opposition (Jan. 4, 2022).
3. Letter from the Yakama Cultural Resource Program Manager to FERC regarding Section 106 Consultation (Sep. 13, 2021).
4. Letter from the Yakama Deputy Director for Cultural Resources to Washington Department of Ecology regarding comments for Environmental Impact Statement (Feb. 12, 2021).
5. Letter from the Yakama Nation Tribal Council Chairman to the Washington State Legislature regarding opposition to the Project (Jan. 20, 2021).
6. Letter from the Yakama Nation Superintendent of Natural Resources to FERC Secretary regarding comments on NEPA Scoping Document No. 1 (Dec. 28, 2020).
7. Letter from the Yakama Nation Superintendent of Natural Resources to Breean Zimmerman regarding comments on Application for Section 401 Water Quality Certification (Nov. 6, 2020).
8. Letter from the Yakama Nation Tribal Council Chairman to FERC Secretary regarding comments and recommendations for Additional Study (Mar. 11, 2020).
9. Letter from the Yakama Nation Tribal Council Chairman to FERC Secretary regarding Notification of Intent and Pre-Application (Feb. 21, 2019).
10. Letter from the Yakama Nation Deputy Director for Cultural Resources to Rye Development regarding Project Application (Feb. 14, 2018).

EXHIBIT B
LETTER FROM ROBERT G. WHITLAM TO ERIK STEIMLE REGARDING
GOLDENDALE ENERGY STORAGE PROJECT (JAN. 5, 2022)

Exhibit Coversheet Only.

[Paginated separately.]

1. Letter from the Yakama Nation Tribal Council Chairman to the Advisory Council on Historic Preservation regarding FERC concerns (Feb. 16, 2022).

[Coversheet Only. Paginated separately.]



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

February 16, 2022

Sent via U.S.P.S. and Electronic Mail

Reid J. Nelson
Acting Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Alyson Brooks
Washington State Archaeologist
Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Valerie J. Grussing
Executive Director
National Association of Tribal Historic Preservation Officers
1255 22nd St. NW
No. 19189
Washington, DC 20036

SUBJECT: REGARDING THE YAKAMA NATIONS LIST OF FERC CONCERNS ON THE GOLDENDALE
PUMP ENERGY STORAGE PROJECT

Dear Mr. Nelson, Ms. Brooks, and Ms. Grussing:

The Yakama Nation appreciates the time and dedication from the ACHP and DAHP staff to understand the issues Yakama Nation is experiencing in the pursuit to protect our sacred resources. We have been navigating the National Environmental Policy Act (NEPA), National Historic Preservation Act (NHPA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), State Environmental Policy Act (SEPA), and Environmental Impact Statement (EIS) processes occurring simultaneously for the Goldendale Pump Energy Storage Project. Yakama Nation is dedicated to protecting this land where our resources have maintained a uniquely sacred connection to

us for thousands upon thousands of years. We do this not only for the future and well-being of our people today, but for those generations yet unborn. It is our understanding that if we do not continue to protect this resource we will face consequences from the Creator.

While a great deal of documentation has been accomplished at this location to show the significance of the archaeological and Traditional Cultural Properties (TCPs), we have additional TCP knowledge that we believe will add to the significance of this property and allow for further explanation of Yakama Nation's concerns. However, we have not been afforded the appropriate mechanism or federal trust responsibility by a lead federal agency to do so. In addition, we have compiled a bullet list of specific concerns with the project, highlighting the misapplication of NHPA by the involved parties who are subject to its procedures for Section 106 compliance. Please see the bullet list of issues below.

- **The Delegation of Consultation to Rye Development (the developer)**

In a letter dated September 23, 2021 FERC identifies: *"36 § C.F.R. 800.2(c)(4) allows agencies to authorize license applicants to initiate consultation as long as the agency notifies the SHPO or THPO of such authorization"*

However, 36 § C.F.R. 800.2(c)(4) specifically states: *"Applicants for Federal assistance, permits, licenses, and other approvals. An applicant for Federal assistance or for a Federal permit, license, or other approval is entitled to participate as a consulting party as defined in this part. The agency official may authorize an applicant or group of applicants to initiate consultation with the SHPO/THPO and others, but remains legally responsible for all findings and determinations charged to the agency official. The agency official shall notify the SHPO/THPO when an applicant or group of applicants is so authorized. A Federal agency may authorize all applicants in a specific program pursuant to this section by providing notice to all SHPO/THPOs. Federal agencies that provide authorizations to applicants remain responsible for their government-to-government relationships with Indian tribes."*

We believe that FERC's September 23, 2021 letter provides an interpretation that is not accurate and fails to address all of the responsibilities under 36 § C.F.R. 800.2(c)(4) and more specifically 36 § C.F.R. 800.2(2)(ii) and Section 101(d)(6)(B) which pertains to consultation with Indian Tribes and Native Hawaiian Organizations with historic properties of significance. These provisions require: *"...the agency official to consult with any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking. This requirement applies regardless of the location of the historic property."*

- **Resolving Adverse Effects**

The Department of Archaeology provided a letter which concurred with the APE, determinations of eligibility, and determination of Adverse Effect on September 30th 2021. Yakama Nation responded on November 29th 2021 notifying DAHP that no amount of mitigation could ever address the effect of this undertaking. Yakama Nation further identified that an effective mode of consultation had not been identified and indicated the knowledge of additional impacts which have not been understood. However, Historical Research Associates on behalf of Rye Development submitted HPMP plans to Yakama Nation December 15, 2021. The HPMP included an assessment of effects to resources and TCPs that is completely devoid of effective consultation with Yakama Nation and has does not appear to have input from the lead federal agency. In the absence of meaningful consideration to Yakama Nation's outright opposition of this project this was extremely premature. Rye Development and Historical Research Associates have no authority in this process to jump ahead into an HPMP. We do not feel that an HPMP has ever been contemplated nor has a meaningful discussion of the impacts occurred with FERC.

We feel that it is clear that 36 § C.F.R. 800.2(2)(ii)(a) applies to FERC which details: *"the agency official shall ensure that consultation in the section 106 process provides the Indian tribe or Native Hawaiian organization a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, articulate its views on the undertaking's effects on such properties, and participate in the resolution of adverse effects...."*

- **Issue with FERCs Public Forum for Consultation.**

FERC has indicated that they recognize 18 § C.F.R. 2.1(c) acknowledges trust responsibility and endeavors to work with Tribes on a gov. to gov. basis to address effects to tribal rights and resources in consultation. However, they indicate that they have limitations on the nature and type of consultation that the Commission may engage in during contested hearings.

Specifically FERC cites to Rule 2201 of the Commission's Rules and Practice Procedure (18 § C.F.R. 385.2201) to explain why they are *"prohibited from off the record communications by or with staff discussing matters relevant to the merits of a contested proceeding that do not include all parties to the*

proceeding.” They further discuss how the filing requirements do not allow a nonpublic file protections. Instead, it is suggested that for sensitive cultural resource information a non-disclosure agreement is established early on in the process or sensitive information is redacted. These options are far from the requirements of NHPA or in line with the trust responsibility that the Federal Agency has to Yakama Nation. It appears that FERC selected and interpreted individual components of federal regulation to infer its obligations which indirectly impact Yakama Nation. For example 18 § C.F.R. 2.1(c) states “*The Commission will endeavor to work with Indian tribes on a government-to-government basis... and will seek to address the effects of proposed projects on tribal rights and resources through consultation pursuant to ...section 106 of the National Historic Preservation Act, and in the Commission's environmental and decisional documents.*”

In regards to NHPA 36 § C.F.R. 800.2(2)(ii)(a) states “*...It is the responsibility of the agency official to make a reasonable and good faith effort to identify Indian tribes and Native Hawaiian organizations that shall be consulted in the section 106 process. Consultation should commence early in the planning process, in order to identify and discuss relevant preservation issues and resolve concerns about the confidentiality of information on historic properties.*” It is clear that this was not met by FERC.

- **Protection of Sacred Information**

FERCs December 9th letter describes a process that does not protect information that is sacred and sensitive from disclosure. The commissions regulations under the Federal Power Act 18 § C.F.R. 388.112 is described to limit the ability for Yakama Nation to submit sacred information. Specifically they state: “*once the request is made, the Secretary of the Commission will place the document in a nonpublic file. If someone requests access to a document in a nonpublic file (for example through a Freedom of Information Act request), the Commission, in deciding whether to release the information, will first notify the person who submitted the document.*” This statement does not inspire confidence or represent a reasonable process for Yakama Nation to protect sacred and sensitive information. However, it does not preclude the Commission from a proper process which respects Yakama Nations sacred and sensitive information by denying the release of sacred information (see E.O.13007 and 5 U.S.C. § 552(b)(4)).

We find that the above list expresses a failure for FERC to conduct NHPA consultation. Further, the structure of NHPA consultation being utilized has occurred absent of input

from Yakama Nation and therefore, cannot effectively address adverse effects to our resources. The NHPA process should be halted until such time that FERC and Yakama Nation can satisfy a format, method, and projected timeline for initial consultation. The formation of appropriate steps to consider affects to cultural resources should therefore be conceived with input from Yakama Nation. No further consultation from the developer, contracted archaeologist, or otherwise should occur until this important piece of NHPA is satisfied. We find that contractors and developers do not have a place in our Nations federal consultation. This vital consultation is our opportunity to meaningfully address traditional concerns. In this case, it is our ability to express why this project should not proceed. We need to be meaningfully incorporated in a decision making process with the U.S. Government who has a legal and moral obligation to uphold, including the protection of valuable and sacred information.

We thank you for your valued attention to these concerns and look forward to continued consultation on this important cultural resource matter.

Sincerely,



f. DELANO SALUSKIN, CHAIRMAN
YAKAMA NATION TRIBAL COUNCIL

Cc: Yakama Nation Cultural Committee

Jerry Meninick, Yakama Nation Deputy Director of Culture

Phil Rigdon, Yakama Nation Deputy Director DNR

Noah Oliver, Yakama Nation Cultural Resource Program Archaeologist

Jessica Lally, Yakama Nation Cultural Resource Program

Anthony Aronica, Yakama Nation Office of Legal Counsel

William Dancing Feather, ACHP Native American Program Analyst

Rob Whitlam, Washington State Department of Archaeology and Historic Preservation

2. Letter from the Yakama Nation Tribal Council Chairman to the Advisory Council on Historic Preservation regarding Project opposition (Jan. 4, 2022).

[Coversheet Only. Paginated separately.]



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

January 4th, 2022

Sent via U.S.P.S. and Electronic Mail

Reid J. Nelson
Acting Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Alyson Brooks
Washington State Archaeologist
Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

**SUBJECT: REGARDING THE YAKAMA NATION'S OPPOSITION TO THE GOLDENDALE PUMP
ENERGY STORAGE PROJECT**

Dear Mr. Nelson and Ms. Brooks:

I write on behalf of the Confederated Tribes and Bands of the Yakama Nation ("Yakama Nation") to inform you of a deeply concerning situation. Yakama Nation is strongly opposed to the Goldendale Energy Storage Project (see attached). This project is occurring in our sacred lands vital to our culture and way of life. No amount of mitigation could ever address the impacts of this project to our culture today or for our future generations.

A great number of resources, archaeological sites, and traditional cultural properties have been identified and documented not only by our staff and tribal elders, but by outside contract archaeological firms over the years. Due to the sacredness of this resource this development would destroy the lives of our tribal members.

We are engaged in a complicated series of state and federal procedural processes that are running in tandem and without proper or meaningful consultation. FERC has delegated

consultation to the developer and in addition consultation has been received from Historical Research Associates (HRA) despite our objection to the delegation of this federal consultation responsibility and our attempts to redirect. We have been forced to participate in a public forum to discuss our concerns with FERC. All of this is occurring during a global pandemic and at a time when the Yakama Nation's Ceded Lands are experiencing record growth and development. We are therefore requesting your attention to this matter and would greatly appreciate a follow up meeting with our Cultural Resource Program to discuss our concerns.

Sincerely,



DELANO SALUSKIN, CHAIRMAN
YAKAMA NATION TRIBAL COUNCIL

Cc: Yakama Nation Cultural Committee
Jerry Meninick, Yakama Nation Deputy Director of Culture
Phil Rigdon, Yakama Nation Deputy Director DNR
Noah Oliver, Yakama Nation Cultural Resource Program Archaeologist
Jessica Lally, Yakama Nation Cultural Resource Program
Anthony Aronica, Yakama Nation Office of Legal Counsel
Rob Whitlam, Washington State Department of Archaeology and Historic Preservation



ititamapama

Yakama Nation Cultural Resource Program

Na-Mi-Ta-Man-Wit Nak-Nu-Wit Owt-Nee At-Tow

Confederated Tribes and Bands of the Yakama Nation

Post Office Box 151

Toppenish, WA 98948

MEMORANDUM

To: Yakama Nation Culture Committee

Through: Jerry Meninick, Deputy Director of Cultural Services

From: Casey Barney, Cultural Resource Program Interim Manager
Casey Barney

Date: January 4th, 2022

Letter to ACHP and DAHP on Goldendale Pump Storage Energy Project

A letter was prepared to clearly or bluntly indicate our opposition to the proposed Goldendale project. We hope that through this letter and through discussions with ACHP and DAHP we can gain additional support in our fight against the development. Please review the attached.



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

For immediate release:

October 6, 2021

YAKAMA NATION ADVOCATES FOR PROTECTION OF CULTURAL SITES; OPPOSES PROPOSED GOLDENDALE PUMP STORAGE PROJECT

YAKAMA NATION AGENCY, YAKAMA RESERVATION – On Wednesday, October 6, 2021, the Confederated Tribes and Bands of the Yakama Nation (“Yakama Nation”) met with Rye Development company, proponents of the proposed Goldendale Pump Storage Project (“Project”) to advocate for the protection of Yakama cultural, ceremonial, and traditional resources at Juniper Point. The Project’s proposed construction in the area known as *Pushpum* has exceptional cultural importance to the Yakama Nation, including nine archaeological sites, two of which are National Register of Historic Places-eligible and one multiple property documentation. “*Pushpum* has been a sacred site for Yakama ceremonies, legend, and the gathering of traditional roots and medicines since time immemorial” stated Tribal Council Cultural Committee Chair George Selam. The proposed Project includes two reservoirs exceeding 120 acres in surface area and 14,000 linear feet of rockfill embankment. The industrial-scale Project anticipates a generating capacity of 1,200 megawatts.

Yakama members continue annual gathering practices in the proposed development area for traditional foods and medicines. “For generations, regional utility infrastructure has been developed in the Yakama Nation’s Treaty-territory, blasting customary fishing sites, flooding traditional villages, and seeping radioactive pollution into subsistence and medicinal root fields” said Yakama Tribal Councilman Jeremy Takala. The Yakama Nation Treaty of 1855 with the United States reserved a 1.3 million acre Reservation for the exclusive use and benefit of the Yakama people and reserved rights to exercise usual and accustomed fishing, hunting, and gathering across the more than 10 million acre Treaty-territory of the Pacific Northwest region. Councilman Takala further commented, “For thousands of years Yakama culture and religion has balanced human stewardship of the land for generations yet unborn.”

Yakama Tribal Council Vice Chairman Virgil Lewis chaired the discussion, further noting “In the next ten years, the Pacific Northwest will be pressured by a multi-billion dollar energy industry for more infrastructure development. This new technology must be developed ethically without destroying the cultural resources and gathering sites that are part of the Yakama way of life.” The proposed Project license application was accepted by the Federal Energy Regulatory Commission in June 2020 with anticipated regulatory review until 2023.

For additional information or comment, please contact Yakama Nation Cultural Resources Director Jerry Meninick at (509) 865-5121, or Lead Attorney Ethan Jones at (509) 865-7268.

///



RESOLUTION

WHEREAS, the Confederated Tribes and Bands of the Yakama Nation is a federally recognized Nation pursuant to the Treaty of 1855 (12 Stat. 951); and

WHEREAS, the Yakama Tribal Council is the governing body of the Confederated Tribes and Bands of the Yakama Nation, by the authority delegated by the Resolution of February 1944 and Resolution T-38-56; and

WHEREAS, the Tribal Council has the duty and responsibility according to the Resolution T-38-56 and T-10-61 to protect and preserve the Treaty Rights of the Yakama Nation, and

WHEREAS, centuries of oppression by the United States against Native Nations under the Doctrine of Discovery, affirmed by United States Supreme Court through *Johnson v. M'Intosh*, and implemented through Congressional policies of allotment and termination, have cost Native Nations hundreds of millions of acres of homelands of ancestral, spiritual, and ceremonial significance; and

WHEREAS, *Pushpum*, known as Juniper Point, is within the Yakama Nation's Treaty territory under Article I of the Treaty of 1855 and has been a site of religious, ceremonial, and cultural importance to the Yakama People since time immemorial; and

WHEREAS, *Pushpum* is a place where Yakama People continue to exercise Treaty-reserved rights to gather traditional roots and medicines under Article III of the Treaty of 1855 and has been a site of sovereign food gathering since time immemorial; and

WHEREAS, Rye Development proposes to construct an industrial-scale pump storage project at Juniper Point, including the construction of two reservoirs totaling 124-acres of surface area and more than 14,000 linear feet of rockfill embankments; and

WHEREAS, the proposed pump storage development violates the Yakama Nation's inherent sovereignty and Treaty-reserved rights through direct, permanent, and adverse destruction of nine Traditional Cultural Properties of religious and ceremonial significance, and the reduction and elimination of access to gather food and medicine roots, which results in an irreplaceable loss of cultural resources and negative environmental degradation to several ephemeral waterbodies, and aquatic and terrestrial resources.

NOW, THEREFORE, BE IT RESOLVED, by the Executive Committee of the Yakama Tribal Council, acting under authority delegated by Section III-A of the Rules of Procedures, approved by Yakama Nation Tribal Council Resolution T-10-61, dated July 13, 1960, and meeting at the Governmental Headquarters of the Yakama Nation, that the Yakama Nation opposes pump storage development at *Pushpum* to protect sacred religious and ceremonial places of inherent importance to Yakama culture.

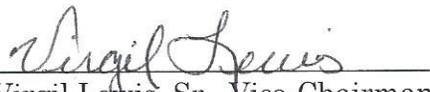
BE IT FURTHER RESOLVED, that the Yakama Nation opposes pump storage development at *Pushpum* to avoid irreparable damage and destruction to the Yakama Nation's cultural resources and Treaty-reserved root gathering rights.

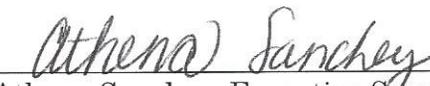
BE IT FURTHER RESOLVED, that the Yakama Nation opposes all federal or state actions that authorize, approve, or permit extractive and exploitative energy technology that threatens to, or is likely to, damage or destroy Traditional Cultural Properties in the Yakama Nation's Treaty territory, including, but not limited to, on usual and accustomed lands and open and unclaimed lands where the Yakama Nation reserved and exercises its Treaty-reserved rights.

BE IT FINALLY RESOLVED, that the Yakama Nation does not waive, alter, or otherwise diminish our Sovereign Immunity, whether expressed or implied, by virtue of this resolution for any and all administrative or legal action which may arise directly or indirectly from the same; nor does the Yakama Nation waive, alter, or otherwise diminish our rights, privileges, remedies or services guaranteed by the Treaty of 1855.

DONE AND DATED on this 24th day of May, 2021, by the undersigned members of the Executive Committee of the Yakama Tribal Council.


Delano Saluskin, Chairman
Yakama Nation Tribal Council


Virgil Lewis, Sr., Vice-Chairman
Yakama Nation Tribal Council


Athena Sanchey, Executive Secretary
Yakama Nation Tribal Council

Cc: File
Cultural Ca#071-2021-10



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

Statement From Councilman Takala:

June 22, 2021

**YAKAMA NATION OPPOSES PROPOSED GOLDENDALE PUMP STORAGE;
APPLAUDS WATER QUALITY CERTIFICATION DENIAL**

YAKAMA NATION AGENCY, YAKAMA RESERVATION – “As a member of the Yakama Nation Tribal Council Fish & Wildlife Committee, I applaud the Washington State Department of Ecology's denial of a water quality certification for the Goldendale Pumped Storage Project. While marketed as "green energy," the Goldendale Pumped Storage Project represents large-scale resource exploitation that directly threatens our Yakama Nation Treaty-reserved cultural and archaeological sites, and food and medicine gathering sites. The Yakama Nation Tribal Council passed a Resolution strongly opposing this project, and we will continue to stand against this project through all available avenues to protect our culture and environment for future generations.” – Councilman Jeremy Takala

For additional information or comment, please contact Yakama Nation Tribal Councilman Jeremy Takala at (509) 865-5121, or Lead Attorney Ethan Jones at (509) 865-7268.

///

3. Letter from the Yakama Cultural Resource Program Manager to FERC regarding Section 106 Consultation (Sep. 13, 2021).

[Coversheet Only. Paginated separately.]



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

September 13, 2021

Suzanne Novak, Cultural Resources Coordinator
Office of Energy Projects
Division of Hydropower Licensing
Federal Energy Regulatory Commission
Washington D.C. 20426

David Turner, Northwest Branch Chief
Office of Energy Projects
Division of Hydropower Licensing
Federal Energy Regulatory Commission
Washington D.C. 20426

Regarding: Section 106 Consultation Authorization, Goldendale Energy Storage Project (P-14861)

Dear Ms. Novak and Mr. Turner,

We received your letter addressed to Cristine Curran with the Oregon Parks and Recreation Department dated August 13, 2021. The letter attempts to notify consulting parties and the developer of a designation and authorization pertaining to the Goldendale Energy Storage Project (P-14861). The Yakama Nation objects to this Section 106 consultation authorization for the Goldendale Energy Storage Project (P-14861). Consultation regarding a proposed authorization has not occurred with Yakama Nation. The Federal Energy Regulatory Commission (FERC) does not have the authority to authorize the FFP Project 101, LLC as a consultation lead. The FERC has a trust responsibility to Yakama Nation. Under the provisions set forth in the National Historic Preservation Act (NHPA), an agency may not delegate consultation with Indian tribes to an applicant unless the affected tribes have agreed to such an arrangement in advance. Yakama Nation has not and does not agree to this presumed authorization. Appropriate consultation has not occurred.

Under 36CFR800.7(c)(4) of the NHPA regulations require FERC as the lead agency to take comments and information into account in reaching a final decision on the undertaking. As a requirement of Section 110(a)(1) of NHPA, you may not delegate this responsibility.

If you have any questions or concerns please contact Anthony Aronica with the Yakama Nation Office of Legal Counsel by phone at (509) 833-9350 or by e-mail to anthony@yakama-olc.org. Thank you for your time and understanding regarding this important matter.

Sincerely,

Handwritten signature of Casey Barney in cursive script.

Casey Barney, Manager
Yakama Nation Cultural Resource Program

CC: Delano Saluskin, Yakama Nation Tribal Council Chairman
Yakama Nation Tribal Council Cultural Committee
Jeremy Takala, Yakama Nation Tribal Council Member
Jerry Meninick, Yakama Nation Director of Cultural Services
Ethan Jones, Yakama Nation Office of Legal Council
Allyson Brooks, Department of Archaeology and Historic Preservation
Rob Whitlam, Department of Archaeology and Historic Preservation

4. Letter from the Yakama Deputy Director for Cultural Resources to Washington Department of Ecology regarding comments for Environmental Impact Statement (Feb. 12, 2021).

[Coversheet Only. Paginated separately.]



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

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.¹ This letter further agrees with and incorporates corresponding EIS comments submitted by the Columbia Riverkeeper.

¹ 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.² 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.³ A federal treaty is considered the supreme Law of the Land under the U.S. Constitution.⁴ 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,⁵ 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 49th 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.

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

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

³ See *Id.* at art. III, cl. 2.

⁴ See U.S. Const. art. VI, cl. 2.

⁵ 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.⁶ 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

⁶ 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.⁷ 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

⁷ 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).**

Exhibit Coversheet Only.

[Paginated separately.]



December 28, 2020
Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, D.C. 20426

Submitted electronically via: <https://ferconline.ferc.gov/FERCOOnline.aspx>.

RE: NEPA Scoping Comments on the Proposed Goldendale Pumped Storage Project (P-14861-002).

Dear Secretary Bose,

The following comments are submitted on behalf of Columbia Riverkeeper, Friends of the White Salmon River, and Washington Chapter of the Sierra Club (together “Commenters”) in response to the Federal Energy Regulatory Commission’s (FERC) request to assist the agency in identifying issues that must be addressed during the environmental review process. On October 29, 2020, FERC issued a Notice Soliciting Scoping Comments for the Goldendale Pumped Storage Project (FERC No. 14861-002) (hereinafter “Scoping Document”) pursuant to the National Environmental Policy Act (NEPA). 40 C.F.R. §§ 1500-1508. For reasons described below, this scoping process is premature and FERC must conduct an Environmental Impact Statement (EIS) for this development.

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

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 Development (Rye), dba

Free Flow Power 101, LLC's proposed Goldendale Energy Storage Hydroelectric Project (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).

Commenters appreciate the opportunity to provide these comments and supporting materials, including the Appendices with this letter. Our expectation is that the relevant documents, included in with this comment, will also be included in the administrative record for this decision.

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 14.¹

¹ 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).

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) (Appendix 1). 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 FERC’s NEPA process.

Like many people in the Pacific Northwest and nationally, Riverkeeper is 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. FERC’s Application of the New CEQ Regulations is Premature.

According to FERC’s Scoping Document, FERC intends to apply the Council of Environmental Quality (CEQ) new final rule, issued on July 15, 2020, revising the regulations under 40 C.F.R. §§ 1500-1508 that federal agencies use to implement NEPA (New CEQ Regulations). *See* Scoping Document at FN 3. The use of the new NEPA regulations is premature and not necessary for this project. FERC holds the authority to determine whether or not to apply the new CEQ Regulations to any ongoing activities begun before September 14, 2020, such as the Project. *See Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act*, 85 Fed. Reg. 43,304 § 1506.13. However, FERC has yet to issue publicly available guidance on how it intends to apply the New CEQ Regulations, making the application of the New CEQ Regulations in this process unnecessarily vague. FERC guidance on the New CEQ Regulations is necessary and extremely helpful in the NEPA review process because it allows stakeholders the opportunity to provide FERC with the information that FERC interprets as necessary and vital to the NEPA process. It also allows stakeholders insight into how FERC will apply the New CEQ Regulations and how that application is different or similar to FERC’s application of past CEQ Regulations. Without this new FERC guidance, stakeholders are in the dark when it comes to FERC’s application of the

New CEQ Regulations, making this NEPA process unnecessarily vague. The New CEQ Regulations do not automatically apply to the Project, which has been in the FERC docket since 2017. Given the lack of clarity set forth by FERC on how it plans to follow NEPA, application of the New CEQ Regulations is premature.

Furthermore, it is not practicable to begin scoping at this time for three reasons. First, as discussed above, FERC's push to use the New CEQ Regulations during this scoping process is premature. These new rules have not been in effect for more than six months and the current transition of Presidential administrations begs the question of whether these regulations will be in effect for the rest of the year. This Project commenced prior to these regulations and its NEPA scoping process should not proceed with the New CEQ Regulations. Given that the Project is not sufficiently developed at this time, it is impractical to begin scoping now and even more impractical to begin scoping under New CEQ regulations that are vague at best, and temporary at worst.

Second, the COVID-19 pandemic continues to devastate tribal governments, Indigenous people, and communities with a direct stake in the area where the project is proposed to be built. For example, the Yakama Nation Reservation and surrounding ceded lands have been devastated by the pandemic, with tribal resources and attention directed to relief response. In Yakima County, there have been 19,981 cases of COVID-19 reported and 310 deaths.² Under 40 C.F.R. § 1501.9(c), "As part of the scoping process the lead agency may hold a scoping meeting or meetings, publish scoping information, or use other means to communicate with those persons or agencies who may be interested or affected, which the agency may integrate with any other early planning meeting." For this process FERC decided that, "[d]ue to concerns with large gatherings related to COVID-19, we do not intend to conduct a public scoping meeting and site visit in this case." Scoping Document at 2. FERC offers no alternative to this public meeting, such as a virtual meeting for stakeholders. If COVID-19 proves enough of a concern to limit FERC's communications with the public on this Project, it also proves enough to make the scoping process impracticable at this time.

Third, the Project was recently bought by Copenhagen Infrastructure Partners (CIP), with Rye continuing to lead development of the Project until construction begins. Kelly Bork, COPENHAGEN INFRASTRUCTURE PARTNERS, *CIP acquires Swan Lake and Goldendale, 393 MW and 1,200 MW pumped storage hydro projects located in Oregon and Washington, USA*, (Nov. 11, 2020) (Appendix 2). So far this update has not been put into the FERC docket, nor has Rye informed Project stakeholders. It is unclear how this change of ownership will alter the Project or the environmental and energy issues at stake. It is further unclear how an environmental analysis can move forward when the Project's new owner and operator is not

² View current Washington statistics here: <https://www.google.com/search?q=yakima+county+covid+19+cases&oq=Yakima+County+Covid&aqs=chrome.1.0l8.4503j0j7&sourceid=chrome&ie=UTF-8> (last visited Dec. 28, 2019).

involved in the FERC process. Any commitments made by Rye, at this point or until the start of construction, may not hold CIP accountable in the future. FERC must address how this change of ownership impacts the FERC licensing process and how CIP will be held accountable moving forward with Project construction.

III. Rye's Final License Application is Not Sufficiently Developed for Agency Consideration at This Time.

The Project is not sufficiently developed for agency consideration at this time to allow for a thorough identification of significant and non-significant issues. Under 40 C.F.R. § 1501.9(a), “[s]coping may begin as soon as practicable after the proposal for action is sufficiently developed for agency consideration.” Several reasons exist as to why the Project is not sufficiently developed. Numerous archeological and cultural resource surveys of the area have yet to be conducted, finished, and filed with FERC.

First, the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation), who have been actively involved in the project since 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.³ 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 four Columbia River Treaty 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 scoping process now will undermine these surveys because without them it is near impossible that FERC will be able to identify all significant issues that the Yakama Nation, CTUIR, Nez Perce, and Warm Springs will raise.

IV. An EIS is Required for the Project.

A. The National Environmental Policy Act.

³ 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.

Section 102(2)(C) of the National Environmental Policy Act establishes an “action-forcing” mechanism to ensure “that environmental concerns will be integrated into the very process of agency decisionmaking.” *Andrus v. Sierra Club*, 442 U.S. 347, 350 (1979). Pursuant to that statutory provision, “all agencies of the Federal Government shall ... include in every recommendation or report on ... major Federal actions significantly affecting the quality of the human environment, a detailed statement” known as an environmental impact statement (“EIS”) addressing “the environmental impact of the proposed action, any adverse environmental impacts which cannot be avoided ..., alternatives to the proposed action,” and other environmental issues. 42 U.S.C. § 4332.

NEPA has two fundamental purposes: (1) to guarantee that agencies take a “hard look” at the consequences of their actions before the actions occur by ensuring that “the agency, in reaching its decision, will have available, and will carefully consider, detailed information concerning significant environmental impact,” *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989); and (2) to ensure that “the relevant information will be made available to the larger audience that may also play a role in both the decisionmaking process and the implementation of that decision,” *id.* at 349. NEPA “emphasize[s] the importance of coherent and comprehensive up-front environmental analysis to ensure informed decision making to the end that ‘the agency will not act on incomplete information, only to regret its decision after it is too late to correct.’” *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1216 (9th Cir. 1998).

B. FERC 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 NEPA 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. 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).

1. The Purpose and Need.

“The stated goal of a project necessarily dictates the range of reasonable alternatives and an agency cannot define its objectives in unreasonably narrow terms.” *Carmel by the Sea v. U.S. Dept. of Trans.*, 123 F.3d 1142, 1155 (9th Cir. 1997). Thus, the first step in the NEPA process is for the agency to “briefly specify the underlying purpose and need for the proposed action.” 40 C.F.R. § 1502.13. Here, the purpose and need must be based on the “the goals of the applicant and the agency’s authority.” *Id.*

According to Rye, the purpose of and need for this project 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. Commenters agree this laudable goal is the true purpose of this project. As such, FERC 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 FERC 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.* FERC is 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.

NEPA requires federal agencies to “study, develop, and describe appropriate alternatives to recommended courses of action.” 42 U.S.C. § 4332(2)(E). This provision applies whether an agency is preparing an EIS or an EA. *Native Ecosystems Council v. US Forest Serv.*, 428 F.3d 1233, 1245 (9th Cir. 2005). Viable alternatives are those that are feasible and either meet the stated goals of the project, or are reasonably related to the purposes of the project. First, as required by the law and to establish the baseline against which any environmental impact of any specific alternative can be compared, FERC must consider a no action alternative. Next, given Rye’s broadly stated project goal, FERC 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, FERC 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.

FERC must define and explain impacts of not licensing this project, or any project, at this location. This the no action alternative. *See* 40 C.F.R. § 1501.7(e)(2) and § 1502.14(c). The NEPA regulations require the agency to “present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis

for choice among options by the decisionmaker and the public.” 40 C.F.R. § 1502.1. 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 NEPA process. To be meaningful the NEPA 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 not action alternative is not permitting this project to go forward. Thus, FERC 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.

FERC 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 3). 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, FERC 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, FERC 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 4). 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, FERC 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 FERC must answer: what other “viable, least-cost energy storage options” are available? The answer to this question must be found in FERC’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, FERC 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 FERC 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. FERC 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). 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 FERC must look at alternative sites for the Project.

v. FERC must consider alternative project designs.

Finally, FERC 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 NEPA. 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, FERC 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. FERC must consider and disclose the impacts for alternative designs and layouts.

In addition, FERC 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. FERC must require the development of alternative operational patterns and reveal and discuss the potential resulting impacts to the environment.

Finally, FERC 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.

C. FERC Must Prepare an EIS for the Project because it will Significantly Affect the Quality of the Human Environment.

FERC must prepare an EIS for the Project. “NEPA requires that agencies “prepare an EIS for federal actions that will ‘significantly affect the quality of the human environment.’” *Columbia Riverkeeper v. United States Army Corp of Eng’rs*, 2020 U.S. Dist. LEXIS 219535, *4 (W.D. Wa. Nov. 23, 2020) (quoting *Bark v. United States Forest Serv.*, 958 F.3d 865, 868 (9th Cir. 2020)(quoting *League of Wilderness Defs./Blue Mountains Biodiversity Project v. Connaughton*, 752 F.3d 755, 763 (9th Cir. 2014). Under 40 C.F.R § 1501.5(a), an Environmental Assessment (EA) is only appropriate, “for a proposed action that is not likely to have significant effects or when the significance of the effects is unknown.” Here, the Project will have significant effects which are known. According to NEPA, “both the context and intensity of the action must be considered when an agency is considering whether a proposed action significantly affects the environment.” *Umpqua Watersheds v. United States Forest Serv.*, 725 F. Supp. 2d 1232, 1241 (OR Dist. Ct. 2010), *see* 40 C.F.R. § 1508.27. Context refers to the area of “the affected region, the affected interests and the locality.” 40 C.F.R. § 1508.27(a). “In evaluating intensity, the NEPA regulations require that an agency consider ten significance factors.” *Umpqua Watersheds*, 725 F.Supp. 2d at 1241. The factors include the following:

1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.
2. The degree to which the proposed action affects public health or safety.
3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.
6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.
8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.
9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

40 C.F.R. §§ 1508.27(b)(1)-(b)(10). Courts have stated that, “**If any** of these factors [are] present, an **EIS is required**,”[emphasis added] and have furthered explained that “Intensity “refers to the severity of the impact” and is evaluated based on a number of “significance” factors.” *Umpqua Watersheds*, 725 F.Supp. 2d at 1241, *Or. Natural Dessert Ass’n v. BLM*, 2014 U.S. Dist. LEXIS 143403, *70 (Or. Dist. Ct. Mar. 17, 2014). But that “A court may find a substantial risk of a significant effect based on just one of these factors.” *Or. Natural Dessert Ass’n*, U.S. Dist. LEXIS 143403, *70 citing *Ocean Advocates v. U.S. Army Corps of Eng’rs*, 402 F.3d 846, 865 (9th Cir. 2004). Several of these significance factors are present with this Project and therefore compel an EIS.

The intensity, or severity of the impacts from this Project are high, with several significance factors present. Given the extraordinary cultural and archeological resource issues at stake with the Project, limited and deficient information in the FLA⁴, the highly controversial nature of the Project, the Project’s obliteration of numerous sites eligible for inclusion in the National Register, and future implications, there is a substantial risk of significant effect on the human environment from this Project. Commenters urge that the Commission conduct an EIS. Section VI , below outlines the pertinent issues that FERC must analyze as part of its

⁴ See Letter from FERC to Erik Steimle (Dec. 17, 2020), In FERC Docket No. 14861 (stating that the request to use the Expedited Licensing Process is denied due to deficient information in the FLA and failure to provide information in response to FERC request.).

environmental review and support the Commission preparing an EIS for this Project because of the significant effects to the environment.

V. FERC is Legally Obligated to Evaluate Direct, Indirect, and Cumulative Impacts as part of the EIS.

Under NEPA, an EIS must consider direct effects, indirect effects, and cumulative effects. “Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative.” 40 C.F.R. § 1508.8. The direct effects of an action are those effects “which are caused by the action and occur at the same time and place.” 40 C.F.R. § 1508.8(a). The indirect effects of an action are those effects “which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.” 40 C.F.R. § 1508.8(b). For example, “[i]ndirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.” *Id.* These types of growth-inducing impacts must be analyzed, even when they are characterized as “secondary.” *City of Davis v. Coleman*, 521 F.2d 661, 676 (9th Cir. 1975) (requiring EIS to address growth-inducing impacts of freeway interchange planned in agricultural area on the edge of urban development). Section VI, below outlines the direct, indirect, and cumulative impacts that FERC must evaluate as part of the EIS.

VI. Specific and Pertinent Issues to Address in the NEPA Document.

A. Tribal Archaeological and Cultural Resources.

FERC 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 5).

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.⁵ 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. Rye's

⁵ The Yakama Nation is still in the process of completing their 2020 Cultural Resources Survey of the Project area.

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 letters submitted by CTUIR have been filed confidentially to protect tribal cultural resources,⁶ the Tribe has publicly said that “the proposed undertaking is within a historic property of cultural and religious significance,” and are poised to conduct their own cultural resources survey of the area. 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.

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 III.

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 intensity, or severity of the impacts are high, with several significance factors present. Including the destruction of TCPs unique to this geographic location, the destruction of TCPs

⁶ *See* Appendix 6 and 7, 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.

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, and the future implications that developing this Project will have on this site, including opening the area to more development. 40 C.F.R. § 1508.27(b)(2), (3), (4), (5), (6), (7), (8). The effects of this Project are highly controversial and must be analyzed by FERC in an EIS. *See generally, Umpqua Watersheds*, 725 F.Supp. 2d at 1241.

FERC 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. FERC'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. *See infra* at Section IV.C.

B. 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). FERC must analyze the water quality issues identified in Columbia Riverkeeper et al.'s 401 certification comments in the EIS.

C. 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 Washington Department of Fish and Wildlife (WDFW) collectively identified four threatened, endangered, candidate, or proposed species, as well as one critical habitat within the project boundary.⁷ 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 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,

⁷ 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.

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).

FERC'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.

D. 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 FERC in their environmental review because they involve unique risks on the environment in this geographic location. *See* 40 C.F.R. § 1508.27(b)(5).

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 FERC because the presence of the wind turbines create and involve unique risks if this Project is implemented, including risks that would impact wildlife.

E. Aluminum Smelter Cleanup Site

According to the 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, FERC 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, FERC 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. 40 C.F.R. § 1508.27(b)(10). Both of these are significant factors that FERC must consider and further support the Commission conducting an EIS for this Project.

F. Other Issues to Evaluate in the EIS

FERC 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.

VII. Conclusion.

Commenters respectfully reiterate that, for reasons described above, the scoping process is premature at this time. If FERC proceeds with the NEPA review, FERC must conduct an EIS

for this development because the Project will significantly affect the quality of the human environment. Commenters identify pertinent issues that FERC 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. The severity of impacts from this Project necessitate an EIS and Commenters respectfully request that FERC conduct an EIS on this highly controversial Project.

Sincerely,



Simone Anter
Staff Attorney
Columbia Riverkeeper
simone@columbiariverkeeper.org



Lauren Goldberg
Legal and Program Director
Columbia Riverkeeper
lauren@columbiariverkeeper.org



Andrew Hawley
Staff Attorney
Western Environmental Law Center
On behalf of Columbia Riverkeeper



Patricia L. Arnold
President
Friends of the White Salmon
pat.arnold@friendsofthewhitesalmon.org



Margie Van Cleve
Sierra Club - Washington State Conservation Chair

EXHIBIT B

Communication From The Federal Energy Regulatory Commission To The Yakama Tribal Council Chairman

Exhibit Coversheet Only.

Includes:

1. Letter from Vince Yearick, Director Division of Hydropower Licensing, to Yakama Tribal Council Chairman Delano Saluskin. (Dec. 9, 2021)
2. Letter from Vince Yearick, Director Division of Hydropower Licensing, to Yakama Tribal Council Chairman Delano Saluskin. (Jun. 28, 2022)

[Paginated separately.]

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON D.C. 20426
(December 9, 2021)

OFFICE OF ENERGY PROJECTS

Project No. 14861-002 – Washington
and Oregon
Goldendale Energy Storage Project
FFP Project 101, LLC

VIA USPS First Class Mail

Delano Saluskin, Chairman
Confederated Tribes and Bands of
The Yakama Nation
401 Fort Road
P.O. Box 151
Toppenish, Washington 98948

RE: Information About Off-the-Record Communications and Filing Confidential Information

Dear Chairman Saluskin and Councilmembers:

On November 10, 2021, Commission staff met with representatives of the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) regarding the licensing of FFP Project 101, LLC's Goldendale Energy Storage Project No. 14861. During the meeting, we discussed the Commission's rules prohibiting off-the-record, or ex parte, communications and the requirements for filing confidential and sensitive cultural resources information as privileged in the Commission's record for the licensing proceeding. Yakama Nation's legal counsel requested a letter from Commission staff explaining the Commission's ex parte rules and requirements for filing confidential and sensitive cultural resources information.

As provided in the Commission's policy statement on consultation with Tribes (18 C.F.R. § 2.1c), the Commission acknowledges that it has a trust responsibility to Tribes and endeavors to work with Tribes on a government-to-government basis to address the effects of proposed projects on tribal rights and resources through consultation. As discussed below, the Commission's status as an independent regulatory agency places some limitations on the nature and type of consultation that the Commission may engage in during a contested proceeding. Nevertheless, the Commission endeavors, to the extent

authorized by law, to reduce procedural impediments to working directly and effectively with tribal governments.

Off-the-Record Communications

Rule 2201 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2201), which implements section 557(d) of the Administrative Procedure Act, prohibits Commission staff from engaging in off-the-record communications in any contested on-the-record proceeding. Specifically, the rule prohibits communications by or with staff discussing matters relevant to the merits of a contested proceeding that do not include all parties to the proceeding. The rule does not prohibit staff from addressing procedural inquiries. Matters are relevant to the merits of the proceeding if the information discussed could affect the outcome of the proceeding, influence a decision, or provide an opportunity to influence a decision on any issue in the proceeding. The rule defines contested proceeding, in relevant part, as any proceeding before the Commission to which there is a right to intervene and in which an intervenor disputes any material issue. Where it applies, the prohibition on ex parte communications in licensing proceedings remains in effect until the Commission issues an order acting on a license application and the 30-day period for filing a request for rehearing of that order has passed with no rehearing request being filed, or the Commission has acted on the merits of any rehearing request. Because this licensing proceeding is one in which an intervenor has disputed a material dispute, it is considered contested and the Commission's prohibition on ex parte communications applies.

Basic Filing requirements under the Federal Power Act

Under the Commission's regulations (18 C.F.R. § 388.112), any person, including a Tribe, that submits a document to the Commission may request privileged treatment by claiming that some or all the information in the document should be withheld from public disclosure. The regulations explain the procedures for making a request for privileged treatment. Once the request is made, the Secretary of the Commission will place the document in a nonpublic file. If someone requests access to a document in a nonpublic file (for example through a Freedom of Information Act request), the Commission, in deciding whether to release the information, will first notify the person who submitted the document.

Information involving sensitive cultural resources matters is often treated as confidential and placed in a nonpublic file. If the information concerns cultural resources that are eligible or listed historic properties in the National Register of Historic Places, Section 304 of the National Historic Preservation Act and its implementing regulations require the Commission to keep the information confidential if specified conditions are met. As discussed above, the Commission's ex parte rules forbid the Commission from receiving information regarding the merits of a contested proceeding that is not available

to other parties to the proceeding. Therefore, information in the nonpublic file may need to be shared with persons on a restricted service list established by the Commission for the proceeding or otherwise made available to a limited number of the parties' representatives. In other words, the information will be disclosed only to state and federal agencies with responsibilities for protecting cultural resources and to the applicant and any other entities on a "need to know" basis. Thus, if a person files sensitive cultural resource information that it wants the Commission to consider in reaching a decision, that information must be shared with at least some participants in the proceeding.

Options for Filing Sensitive Cultural Resources Information

If any cultural resources information to be filed with the Commission is deemed sensitive, the filer can request that any person seeking access to the information must first sign a non-disclosure agreement, in which the person will agree to keep the information confidential and to use it only for the purpose of the proceeding. It is preferable that the entities involved in a proceeding negotiate the terms of a non-disclosure agreement early in a proceeding before any sensitive information is likely to be filed.

Another option would be for the filer to redact sensitive information from a filing. Redaction would allow a filer to protect such things as site-specific information but would also mean that the Commission would not be able to consider the more detailed information in reaching a decision.

Finally, an entity could choose to withhold any information it feels is too sensitive to be revealed to any other stakeholders. In such circumstances, the Commission would be unable to take the information into account in reaching its decision.

We look forward to our continued consultations with the Yakama Nation regarding the potential licensing of the Goldendale Energy Storage Project. If you have any further questions regarding the handling of confidential information or any other issue related to the licensing process for the project, please contact Michael Tust at (202) 502-6522 or michael.tust@ferc.gov.

Sincerely,

Vince Yearick
Director
Division of Hydropower Licensing

cc: **VIA Electronic Mail**

Anthony Aronica
Office of Legal Counsel
Yakama Nation
anthony@yakama-olc.org

Carl Merkle
Department of Natural Resources
Confederated Tribes of the Umatilla
Indian Reservation
carlmerkle@ctuir.org

Patrick Baird
Tribal Historic Preservation Officer
Nez Perce Tribe
keithb@nezperce.com

Allyson Brooks
State Historic Preservation Officer
Washington Department of Archaeology
and Historic Preservation
Allyson.Brooks@DAHP.WA.GOV

Christine Curran
Deputy State Historic Preservation Officer
Oregon Parks and Recreation Department
Chrissy.curran@oregon.gov

cc: **VIA FERC Service**

Erik Steimle
Vice President
Rye Development
745 Atlantic Avenue
Boston, Massachusetts 02111

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON D.C. 20426
(June 28, 2022)

OFFICE OF ENERGY PROJECTS

Project No. 14861-002 – Washington
and Oregon
Goldendale Energy Storage Project
FFP Project 101, LLC

VIA USPS First Class Mail

Delano Saluskin, Chairman
Confederated Tribes and Bands of
The Yakama Nation
401 Fort Road
P.O. Box 151
Toppenish, Washington 98948

RE: Response to May 23, 2022 Comments

Dear Chairman Saluskin and Councilmembers:

Thank you for your May 23, 2022 letter requesting that the Commission suspend its March 24, 2022 Notice of Acceptance and Ready for Environmental Analysis (REA) for the licensing of FFP Project 101, LLC's proposed Goldendale Energy Storage Project No. 14861-002 (Goldendale Project) to cure procedural and technical deficiencies.

We value your input and appreciate the nature of your concerns and the details expressed in the letter, which we attempt to summarize here. According to your letter, the Yakama Nation states that the project would adversely affect cultural sites important to the Tribe and prevent Tribal members from gathering roots and plants as provided by their treaty rights. The Tribe asserts that by issuing the REA before completing government-to-government consultation with the Yakama Nation, the Commission has not given equal consideration to the preservation of other aspects of environmental quality, including cultural resources, as required by the Federal Power Act.¹ The

¹ 16 U.S.C. §§ 797(e) ("In deciding whether to issue any license under this subchapter for any project, the Commission, in addition to the power and development purposes for which licenses are issued, shall give equal consideration to the purposes of

Project No.14861-002

Yakama Nation states it is still waiting for the Commission to offer government-to-government consultation in a manner that protects the privileged and confidential cultural resources information that the Tribe wishes to provide and that should be considered by the Commission in making its decision. Therefore, the Yakama Nation again recommends that the Commission conduct government-to-government consultation with the Yakama Nation and enforce measures outlined in a May 1997 Programmatic Agreement (PA) among the Bonneville Power Administration, the Washington State Historic Preservation Officer, and the Advisory Council on Historic Preservation (1997 PA) for root and plant gathering access by Tribal members. This letter responds to those comments.

Commission staff recognize the Yakama Nation's concerns regarding the potential for the project to impact sensitive archaeological and Traditional Cultural Properties (TCP) important to the Tribe as well as the potential for the project to affect the ability of Tribal members to exercise traditional practices and treaty rights, as we have previously detailed in our September 23 and December 9, 2021 letters and during a November 10, 2021 meeting with Yakama Nation representatives.

In response to your most recent letter, we are providing the following update on where the proceeding stands and next steps. Pursuant to Commission regulations, the next step in the proceeding is for the Commission to issue a draft Environmental Impact Statement, which is scheduled to be completed by January 2023, that will consider comments filed on the REA notice, including any proposed and recommended measures, terms and conditions, and prescriptions. To the extent possible with available information, Commission staff will address the Yakama Nation's concerns in its draft Environmental Impact Statement. That analysis will consider the provisions of BPA's 1997 PA, the applicant's TCP evaluation and assessment reports prepared in consultation with the Yakama Nation and other Tribes, archaeological testing reports, and proposed measures to mitigate impacts to cultural resources. Should Commission staff decide in its analysis that a PA is necessary, Commission staff will draft a PA and invite parties to consult on it. The Commission will then decide whether to issue a new license and, if it does so, which conditions to include in the license. It is in this licensing decision that the Commission will, as required by the Federal Power Act, give equal consideration to the preservation of other aspects of environmental quality, including cultural resources.

Further, Commission staff are aware from our prior conversations that the Yakama Nation has additional knowledge that it wishes to share with only the Commission in a manner that is confidential and does not include the presence of the applicant or other

energy conservation, the protection, mitigation of damage to, and enhancement of, fish and wildlife (including related spawning grounds and habitat), the protection of recreational opportunities, *and the preservation of other aspects of environmental quality.*" (emphasis added)).

Project No.14861-002

parties to the proceeding. However, as we have discussed, the nature and type of consultation that the Commission is permitted to engage in during an open, contested proceeding is limited by its ex parte rules. While we understand this may be challenging, our ex parte rules ensure an open, transparent decision-making process that protects all parties by ensuring that each party to the proceeding has access to the same information. Because this licensing proceeding is one in which an intervenor has disputed a material issue, under Commission rules, it is considered contested and the Commission's prohibition on ex parte communications² applies. The ex parte rules will remain in effect until the Commission issues an order acting on a license application and the 30-day period for filing a request for rehearing of that order has passed with no rehearing request being filed, or the Commission has acted on the merits of any rehearing request.

Despite these limitations, we continue to hold in high regard the Commission's trust responsibility to the Yakama Nation and other Tribes and will endeavor to work together on a government-to-government basis to address the effects of the proposed project on Tribal rights and resources through consultation to the greatest extent we can, consistent with our ex parte limitations. Therefore, we would be happy to meet with representatives of the Yakama Nation again to further discuss these issues; however, we reiterate that Commission staff cannot engage in discussions relevant to the merits of the proceeding unless we invite all parties to the proceeding to attend. We are free to discuss any procedural inquiries without the need to invite other parties.

If the Yakama Nation wishes to submit a document to the Commission with more details regarding the resources of concern to the Yakama Nation, it may do so by requesting that the information be treated as privileged and that some or all the information in the document be withheld from public disclosure. Alternatively, the Yakama Nation could redact sensitive information from a filing. Redaction would protect such things as site-specific information but would also mean that the Commission would not be able to consider the redacted information in reaching a decision. If the Yakama Nation chooses to withhold any information it feels is too sensitive to be revealed to any other stakeholders, the Commission will be unable to take the information into account in reaching its decision.

Therefore, for the reasons explained above, we will not suspend the commenting procedures set forth in Commission staff's March 24, 2022 REA, as requested by the Yakama Nation, as we see no basis for delaying the evaluation of the license application.

Thank you again for your letter and your ongoing willingness to communicate with the Commission. If the Yakama Nation has any further questions regarding the

² See 18 C.F.R. § 385.2201 (2021) (prohibiting communications by or with staff discussing matters relevant to the merits of a contested proceeding that do not include all parties to the proceeding).

Project No.14861-002

handling of confidential information or any other issue related to the licensing process for the project or would like to meet again with Commission staff, please know that we stand ready to engage – please contact Michael Tust at (202) 502-6522 or michael.tust@ferc.gov. You may also reach out to the Commission's Tribal Liaison, Elizabeth Molloy, at 202-502-8771 or elizabeth.molloy@ferc.gov.

Sincerely,



Vince Yearick
Director
Division of Hydropower Licensing

cc: **VIA Electronic Mail**

Phil Rigdon
Interim Tribal Administrative Director
Confederated Tribes and Bands of the Yakama Nation
phil_rigdon@yakama.com

John T. Eddins
Office of Federal Agency Programs
Advisory Council on Historic Preservation
jeddins@achp.gov

Allyson Brooks
State Historic Preservation Officer
Washington Department of Archaeology
and Historic Preservation
Allyson.Brooks@DAHP.WA.GOV

Christine Curran
Deputy State Historic Preservation Officer
Oregon Parks and Recreation Department
Chrissy.curran@oregon.gov

cc: **VIA FERC Service**

Erik Steimle

EXHIBIT C

Communication From Robert Whitlam, State Archaeologist, To Mike Trust And Erik Steimle.

Exhibit Coversheet Only.

Includes:

1. Letter from Robert Whitlam, State Archaeologist, to Erik Steimle. (Dec. 15, 2021)
2. Letter From Robert Whitlam, State Archaeologist, To Mike Trust And Erik Steimle. (Jan. 5, 2022)

[Paginated separately.]



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

December 15, 2021

Mr. Erik Steimle
Rye Development
220 NW 8th Ave.
Portland, OR 97209

Re: Goldendale Energy Storage Project
Log No. : 2020-08-05202-FERC

Dear Mr. Steimle:

We are in receipt of the draft Historic Properties Management Plan (HPMP) for the proposed Goldendale Energy Storage Project, Klickitat County, Washington.

We are concerned this draft has been created in the absence of any consultations or collaboration between the consulting parties. The Section 106 process details a sequential step wise process in 36 CFR 800 that requires meaningful consultations between the parties and the federal agency.

In this specific case that has not happened. We have previously concurred with an Adverse Effect Determination and the next step should be a collaborative consultation effort to develop a Programmatic Agreement with specific stipulations tailored to the particular historic, cultural, and archaeological properties effected by this undertaking. A Historic Properties Management Plan is an product of that consultations and it is developed from an outline that the consulting craft as part of the ongoing Section 106 process. That has not happened.

We believe it is important for the FERC to establish the consultative and collaborative forum so the legal required Agreement documents may be crafted in the proper sequence. This requires FERC to require and host a meeting for all the parties to participate in an informed consultation.

We would also request receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4). These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and we look forward to further consultation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rob Whitlam', with a long horizontal line extending to the right.

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 890-2615
email: rob.whitlam@dahp.wa.gov







Allyson Brooks Ph.D., Director
State Historic Preservation Officer

January 5, 2022

Mr. Erik Steimle
Rye Development
220 NW 8th Ave.
Portland, OR 97209

Mr. Mike Tust
FERC
888 First Street
Washington, DC 20426

Re: Goldendale Energy Storage Project
Log No. : 2020-08-05202-FERC

Dear Mr. Steimle and Mr. Tust:

We are in receipt of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Traditional Use Study for the proposed Goldendale Energy Storage Project, Klickitat County, Washington.

As we stated in our letter to Mr. Steimle of December 15, 2021, the Section 106 process details a clear sequential step wise process stipulated in 36 CFR 800 that requires meaningful consultations between the parties and the federal agency, and the submission of supporting documents and determinations in a specific sequence.

This document, without benefit of a cover letter from the lead federal agency, and missing any official signature from either the federal agency or tribal government, continues an unacceptable and knowing pattern of ignoring federal law and regulations stipulated in 36CFR800.

The current document is incomplete and does not provide the federal agency determination of eligibility nor the tribes' concurrence and signature for documentation and release to our Department. We have worked collaboratively with concerned tribal governments to create a secure and digital Traditional Cultural Places template to assure all legal protocols are followed. The current document drop does not confirm to those requirements.

This current document drop continues a pattern of providing incomplete submissions without a cover letter and any official determination as required by federal law.

We have previously concurred with an Adverse Effect Determination and the next step should be a collaborative consultation effort to develop a Programmatic Agreement with specific stipulations tailored to the particular historic, cultural, and archaeological properties, and now CTUIR traditional cultural properties effected by this undertaking.

This current document clearly has significance information and implications for decision making and a Historic Properties Management Plan that is a product of that consultations and it is



developed from an outline that the consulting craft as part of the ongoing Section 106 process. That has not happened.

We believe it is important for the FERC to establish the consultative and collaborative forum so the legal required Agreement documents may be crafted in the proper sequence. This requires FERC to require and host a meeting for all the parties to participate in an informed consultation.

Also, considering the Executive Order on Sacred Sites recently issued by the current Administration, it is even more imperative that FERC hold government to government meetings with the consulting tribes.

The Federal government has a Trust responsibility to tribal nations and as a federal agency FERC has a paramount obligation to uphold the unique federal-tribal relationship that is distinct and separate from consultation with the general public

We would also request receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4). These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and we look forward to further consultation.

Sincerely,



Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 890-2615
email: rob.whitlam@dahp.wa.gov



EXHIBIT D

Programmatic Agreement Among The Bonneville Power Administration, The Washington State Historic Preservation Officer, And The Advisory Council On Historic Preservation (May 1997)

Exhibit Coversheet Only.

[Paginated separately.]

MAY 05 1997

Historic Preservation

**PROGRAMMATIC AGREEMENT AMONG
THE BONNEVILLE POWER ADMINISTRATION,
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**

Regarding the Power Purchase Agreement
before the Bonneville Power Administration
for the Conservation and Renewable Energy System
Columbia Wind Farm #1
located in the Columbia Hills,
Klickitat County, Washington

WHEREAS, the Bonneville Power Administration (BPA) may enter into a Power Purchase Agreement with Conservation and Renewable Energy System (CARES) for the Columbia Wind Farm #1 (the Project);

WHEREAS, BPA, pursuant to 36 CFR 800.4(a) has determined that the Area of Potential Effect (APE) of the Project, as defined in 36 CFR 800.2(c), is that geographic area encompassed by the proposed Project boundary shown on Figure 1 in Appendix A and includes Juniper Point;

WHEREAS, BPA has determined that the Project may affect historic properties, including the Juniper Point traditional cultural property;¹

WHEREAS, BPA has conducted a historic sites assessment of the APE contained in a report by Archaeological and Historical Services, Eastern Washington University, dated February 1995;

WHEREAS, BPA has afforded the Confederated Tribes and Bands of the Yakama Indian Nation (CYN) opportunities for consultation and has invited the CYN to concur in this Programmatic Agreement;²

WHEREAS, BPA has consulted with the Washington State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to the regulations, 36 CFR 800.13, implementing Section 106 of the National Historic Preservation Act, 16 USC 470f (Section 106); and

WHEREAS, Klickitat County has issued a permit to CARES for the Project under Conditional Use Application CU-95-09, which includes Conditions of Approval (CUP) as shown in Appendix B;

¹ "Traditional" Yakama Peoples consider the term "cultural resources" to include the intermeshed physical, spiritual, and cultural components of the entire landscape--rocks, water, fish, roots, and other resources. The non-Yakama legal use of the term primarily designates prehistoric, historic, and traditional cultural sites and objects. The term "cultural sites" is used herein to indicate archaeological, historical, and traditional cultural properties, the last as defined in National Register Bulletin 38 (produced by the National Park Service, 1990).

² Boreson, Keo, Fred Crisson and Craig Holstine. February 1995. *A Cultural Resources Study of the Proposed CARES Columbia Wind Farm #1, Klickitat [sic] Washington*. Short Report 444. Archaeological and Historical Services, Eastern Washington University, submitted to Jones and Stokes Associates, Bellevue, Washington.

³ Indigenous human cosmologies often consider animals and plants to be "Native Americans" or "Peoples". This Programmatic Agreement will use the term "Native Americans" to refer to human beings.

NOW, THEREFORE, the BPA, the SHPO, and the Council agree that the Project will be implemented with the following stipulations in order to take into account the effects of the Project on archaeological, historical, and traditional cultural sites.

STIPULATIONS

BPA will carry out the following measures or ensure through its Power Purchase Agreement with CARES that the following measures are carried out:

1. ADDITIONAL CULTURAL SITES SURVEY

- 1.1. The Project 115-kV transmission line location has not yet received a cultural sites survey. Following Section 3.1 of the CUP, CARES will conduct a cultural sites survey of the transmission line corridor that follows the survey procedures documented in *A Technical Report: A Cultural Resources Study of the Proposed CARES Columbia Wind Farm #1, Klickitat [sic] County, Washington.*²
- 1.2. The survey will include a preliminary evaluation of the eligibility of any identified cultural sites for listing in the National Register of Historic Places. This preliminary evaluation will eliminate cultural sites that clearly do not appear to be eligible for National Register listing based on information collected during the background research for the Project and during the cultural sites survey. Cultural sites not eliminated will be considered potentially eligible for listing in the National Register.
- 1.3. Following Section 12.4.3 of the CUP, CARES will attempt to locate construction areas to avoid cultural sites considered potentially eligible for listing in the National Register. If construction cannot avoid effects on these sites, CARES will, following Section 3.2 of the CUP, conduct additional investigations as needed to determine whether the sites are eligible for listing. BPA will conduct the Determination of Eligibility in consultation with the SHPO, following 36 CFR 800.4 (c) (1 through 5).
- 1.4. These investigations could include historical research, oral interview, archaeological testing, or some combination of these methods. BPA recognizes that the CYN objects to archaeological testing, and BPA will attempt to minimize the use of this method. BPA will also ask the CYN about its views on the National Register eligibility of the sites and include the information it provides in the Determination of Eligibility.
- 1.5. BPA will submit the Determination of Eligibility to the SHPO for review in accordance with 36 CFR Section 800.4(c) and will obtain SHPO consensus on Determinations of Eligibility for potentially eligible cultural sites where adverse effects cannot be avoided.

2. ASSESSMENT OF PROJECT EFFECTS ON NATIONAL REGISTER-ELIGIBLE CULTURAL SITES

BPA will apply the Criteria of Effect and Adverse Effect in 36 CFR 800.9 to any National Register-eligible cultural sites that have not been previously evaluated for Project effects.

BPA will also ask CYN about its views on Project effects on National Register-eligible cultural sites and include the information it provides in the assessment of effects. BPA will afford the SHPO, CYN, and Council an opportunity to review and comment on the findings of effect.

For any portion(s) of the Project where construction will have no direct effect on any National Register-eligible cultural site, BPA may provide authorization to proceed with construction in such area(s), subject to the conditions of the Monitoring Plan (see Stipulation 4).

3. TREATMENT

- 3.1. BPA, in consultation with SHPO and CYN, will develop a Treatment Plan for the treatment of historic properties within the Project's Area of Potential Effect. BPA will submit the draft Treatment Plan to the SHPO, CYN, and Council for review and comment on how accurately and completely the substance of the Treatment Plan reflects this stipulation. SHPO, CYN, and Council will have 30 days to review the draft Treatment Plan, after which BPA will produce a final Treatment Plan that takes SHPO, CYN, and Council comments into consideration. BPA will ensure that CARES implements the Treatment Plan.**
- 3.2. The signatories to this Programmatic Agreement recognize that, where feasible, preservation in place is the preferred treatment for cultural sites that are eligible for listing in the National Register, and the Treatment Plan will reflect this perspective.**
- 3.3. The Treatment Plan will be consistent with the Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716et seq.) and the Advisory Council's Handbook on the Treatment of Archaeological Properties. The Treatment Plan will provide for a research design and site-specific data recovery plans for data recovery efforts, including analysis and reporting.**
- 3.4. BPA shall ensure that CARES makes a good-faith effort to acquire an access easement on private lands in the APE from the landowner where construction occurs to allow members of the CYN to conduct traditional plant gathering activities and other traditional uses. BPA will inform SHPO, Council, and the CYN of progress made in this regard. Any access agreement developed for this purpose will be submitted to each signatory and attached to this PA upon implementation.**
- 3.5. As required by the CUP, CARES will develop a Decommissioning Plan for the Project. This Plan will provide for the removal of towers and foundations up to 4 to 6 inches below grade level, restoration of the topography, and reseeded with plants. The plants, to be approved by Klickitat County, will include species similar to the dominant native species within the plan communities on the Project site.**
- 3.6. Any disputes that arise regarding preparation and implementation of the Treatment Plan will be resolved in accordance with Stipulation 8 of this Agreement.**

4. CONSTRUCTION MONITORING

- 4.1.** As part of its Construction Environmental Protection and Monitoring Plan, required under Section 6 of the CUP, CARES, in consultation with the SHPO and CYN, will prepare a Cultural Sites Monitoring Plan. BPA will submit the draft Monitoring Plan to the SHPO, CYN, and the Council for review and comment on how accurately and completely the substance of the Plan reflects this stipulation. SHPO, CYN, and Council will have 30 days to review the Plan, after which BPA will produce the final Plan that takes the SHPO, CYN, and Council comments into consideration.
- 4.2.** The Monitoring Plan will specify construction areas that will be monitored. The Monitoring Plan will also address actions to be taken if previously unidentified cultural sites or Native American burials are discovered during construction. The Monitoring Plan will set forth the means by which the immediate area of the find will be secured from construction and other disturbance, who is responsible for notifying SHPO and CYN, how much time these parties have to consult, how much time will be made available to treat the find, and when construction can move forward.
- 4.3.** The Monitoring Plan will specify the location of the National Register-eligible cultural sites to be avoided and the means by which they will be marked and avoided. Following Section 2.2 of the CUP, CARES will precisely locate any cultural sites considered eligible for listing in the National Register, which are identified during the work outlined in Stipulation 2 above using property surveys or other means so that the final design of roads along the turbine strings and placement of the turbines can avoid the identified sites and isolates where feasible. Disturbance of identified sites or isolates, or any additional sites or isolates discovered during construction activities, will not occur until Stipulations 2 and 3 have been met.
- 4.4.** Following Section 6.3 of the CUP, CARES will train construction workers on the importance of cultural sites, how to identify cultural sites, the need to avoid damage to cultural sites, and procedures to follow if previously unidentified cultural sites, including Indian graves, are encountered during construction. Trainers will include one or more archaeologists qualified under the Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716 *et seq.*) and one or more members of the CYN, if it chooses to participate.
- 4.5.** Following Section 6.2 of the CUP, CARES will use Klickitat County and BPA-approved cultural sites specialists and one or more tribal monitors, if appointed by the CYN, as independent cultural sites monitors to ensure that flagged cultural sites are avoided.
- 4.6.** The Monitoring Plan will set forth the methods and interval(s) for long-term monitoring of cultural sites in the APE considered eligible for National Register listing to confirm that Project operation will have no adverse effects on them. If monitoring reveals adverse effects, BPA will ensure that CARES takes any actions that may be needed to confirm that affected sites are eligible for the National Register, to evaluate Project effects on such sites, and to mitigate adverse effects in accordance with the Treatment Plan.

4.7. In the case of inadvertent discovery of Native American burials or Native American human remains during construction, archaeological fieldwork, or laboratory analysis, CARES will halt construction activities in the immediate area of the discovered deposit, take reasonable action to secure such area, and promptly notify the BPA, SHPO, Council, and CYN. BPA will consult with the SHPO, Council, and include the CYN, if such archaeological deposits are related to Native Americans or if the source of the archaeological deposits is unknown, regarding evaluation and treatment of the deposits in accordance with 36 CFR 800.11.

4.8. Any disputes that arise regarding preparation of the Cultural Sites Monitoring Plan will be resolved in accordance with Stipulation 8 of this Agreement.

5. REPORTING

5.1. BPA will produce one or more reports as needed on the additional cultural sites survey, Determination of Eligibility, assessment of Project effects, treatment of cultural sites, and construction monitoring. The report(s) will discuss the methods and results of the work that is the subject of the report. If archaeological testing, data recovery excavations, or salvage excavations are needed at more than three cultural sites, BPA will produce a final synthetic report for the Project for submittal to appropriate repositories for cultural sites professionals and the public.

5.2. The report(s) will follow the Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716 *et seq.*) and the Advisory Council's *Handbook on the Treatment of Archaeological Properties*. BPA will submit draft reports to the SHPO, CYN, and Council for review and comment on how accurately and completely the substance of the report reflects the Programmatic Agreement stipulation or plan under which the report was prepared. SHPO, CYN, and Council will have 30 days to review each draft report, after which BPA will produce final reports that take SHPO, CYN, and Council comments into consideration. All final reports will be completed within eight months after the completion of the construction monitoring set forth in Stipulation 4.

5.3. Any disputes that arise regarding preparation of the Project reports will be resolved in accordance with Stipulation 8 of this Agreement.

6. CURATION

BPA will ensure that the records and materials resulting from identification and data recovery efforts are curated according to the Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716 *et seq.*) and the Advisory Council's *Handbook on the Treatment of Archaeological Properties*, taking into consideration 36 CFR Part 79. Human skeletal remains and associated artifacts are to be reburied at the discretion of the CYN after consultation among BPA, SHPO, and CYN regarding the need for any basic forensic analysis. BPA designates the CYN Heritage

Center, as an institution qualified under 36 CFR Part 79, as the repository for curating records and materials on cultural sites for the Project.

7. AMENDMENT OF THE PROGRAMMATIC AGREEMENT

If a signatory to this Programmatic Agreement determines that the terms of the Programmatic Agreement cannot be met or believes a change is necessary, such party may request the signatories to consider an amendment to the Programmatic Agreement in accordance with 36 CFR 800.5(c)(5). Such an amendment will be executed in the same manner as the original Programmatic Agreement; parties invited to concur in the Programmatic Agreement will be invited to concur in any such amendment.

8. DISPUTE RESOLUTION

Should any party to this agreement object within 30 days to any plans provided for review or actions proposed pursuant to this Agreement, the BPA shall consult with the objecting party to resolve the objection. If the BPA determines that the objection cannot be resolved, the BPA shall forward documentation relevant to the dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:

1. provide the BPA with recommendations, which the BPA shall take into account in reaching a final decision regarding the dispute; or
2. notify the BPA that it will comment pursuant to 36 CFR Section 800.6(b), and proceed to comment. Any Council comment provided in response to such a request will be taken into account by the BPA in accordance with 36 CFR Section 800.6(c)(2) with reference to the subject of the dispute.
3. Any recommendation or comment provided by the Council will be understood to pertain only to the subject of the dispute; the BPA's responsibility to carry out all actions under this agreement that are not the subjects of the dispute will remain unchanged.
4. At any time during implementation of the measures stipulated in this agreement, should an objection to any such measure or its manner of implementation be raised by any member of the public, the BPA will take the objection into account and consult as needed with the objecting party, the SHPO, or the Council to resolve the dispute. In no event shall such objection and consultation provide grounds for postponing or delaying the conduct of the undertaking or the terms of this agreement.

9. **TERMINATION**

BPA, the SHPO, or the Council may terminate this Programmatic Agreement by providing thirty (30) days' prior written notice to the other signatories; provided, however, that during the thirty-day period, the signatories will consult to seek agreement or amendment or other actions that would avoid termination of the Programmatic Agreement. In the event the parties are unable to avoid termination, BPA will comply with 36 CFR 800.4 through 800.6 with regard to any elements of the Project that have not previously been taken into account by BPA.

CONCLUSION

Execution of this Programmatic Agreement by the BPA, the SHPO, and the Council, and implementation of its terms are evidence that BPA has taken into account the effects on cultural sites of the CARES Columbia Wind Farm #1 in accordance with Section 106 of the National Historic Preservation Act.

Signatory Parties:

BONNEVILLE POWER ADMINISTRATION

By: *Margaret A. Smith* Date: 3/13/97

WASHINGTON STATE OFFICE OF ARCHAEOLOGY AND HISTORIC PRESERVATION

By: *[Signature] ACTING SHPO* Date: 5.12.97

THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: _____ Date: _____

Concurring Party:

CONFEDERATED TRIBES AND BANDS OF THE YAKAMA INDIAN NATION

By: _____ Date: _____

EXHIBIT E

William M. Phillips and Timothy J. Walsh, Geologic Map of the Northwest Part of the Goldendale Quadrangle, Washington, Washington Division of Geology and Earth Resources, Open File Report 87-13 (Nov. 1987).

Exhibit Coversheet Only.

[Paginated separately.]

WASHINGTON DIVISION OF GEOLOGY AND EARTH RESOURCES
Raymond Lasmanis, State Geologist

GEOLOGIC MAP OF THE NORTHWEST PART OF THE GOLDENDALE QUADRANGLE, WASHINGTON

Compiled by

WILLIAM M. PHILLIPS and TIMOTHY J. WALSH

WASHINGTON DIVISION OF GEOLOGY AND EARTH RESOURCES

OPEN FILE REPORT 87-13

1987

(Revised Nov. 1987)

This report has not been edited or reviewed for conformity with
Division of Geology and Earth Resources standards and nomenclature.



WASHINGTON STATE DEPARTMENT OF
Natural Resources

Brian Boyle · Commissioner of Public Lands
Art Slearns · Supervisor

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GEOLOGIC MAP OF THE NORTHWEST PART OF THE GOLDENDALE QUADRANGLE, WASHINGTON

Compiled by
William M. Phillips and Timothy J. Walsh

INTRODUCTION

This map is one of a series of 1:100,000-scale geologic maps compiled by staff geologists of the Division of Geology and Earth Resources. Other maps in the series are available for all 1:100,000-scale quadrangles within the southwest quadrant, that is, south of 47°15' north latitude and west of 120°30' west longitude, except for the Wenatchee and Snoqualmie Quadrangles which are available as U.S. Geological Survey Maps.

The 1:100,000-scale maps in this series that have been released to date are:

Korosec, M. A., compiler, 1987, Geologic map of the Mount Adams quadrangle, Washington: Washington Division of Geology and Earth Resources Open File Report 87-5, 41 p., 1 pl., scale 1:100,000

Korosec, M. A., compiler, 1987, Geologic map of the Hood River quadrangle, Washington and Oregon: Washington Division of Geology and Earth Resources Open File Report 87-6, 42 p., 1 pl., scale 1:100,000

Logan, R. L., compiler, 1987, Geologic map of the Chehalis River and Westport quadrangles, Washington: Washington Division of Geology and Earth Resources Open File Report 87-8, 18 p., 1 pl., scale 1:100,000

Logan, R. L., compiler, 1987, Geologic map of the south half of the Shelton and the south half of the Copalis Beach quadrangles, Washington: Washington Division of Geology and Earth Resources Open File Report 87-9, 17 p., 1 pl., scale 1:100,000

Phillips, W. M., compiler, 1987, Geologic map of the Mount St. Helens quadrangle, Washington and Oregon: Washington Division of Geology and Earth Resources Open File Report 87-4, 63 p., 1 pl., scale 1:100,000

Phillips, W. M., compiler, 1987, Geologic map of the Vancouver quadrangle, Washington and Oregon: Washington Division of Geology and Earth Resources Open File Report 87-10, 32 p., 1 pl., scale 1:100,000

Phillips, W. M.; Walsh, T. J., compilers, 1987, Geologic map of the northwest part of the Goldendale quadrangle, Washington: Washington Division of Geology and Earth Resources Open File Report 87-13, 9 p., 1 pl., scale 1:100,000

Schasse, H. W., compiler, 1987, Geologic map of the Centralia quadrangle, Washington: Washington Division of Geology and Earth Resources Open File Report 87-11, 27 p., 1 pl., scale 1:100,000

Schasse, H. W., compiler, 1987, Geologic map of the Mount Rainier quadrangle, Washington: Washington Division of Geology and Earth Resources Open File Report 87-16, 43 p., 1 pl., scale 1:100,000

Walsh, T. J., compiler, 1986, Geologic map of the west half of the Toppenish quadrangle, Washington: Washington Division of Geology and Earth Resources Open File Report 86-3, 8 p., 1 pl., scale 1:100,000

Walsh, T. J., compiler 1986, Geologic map of the west half of the Yakima quadrangle, Washington: Washington Division of Geology and Earth Resources Open File Report 86-4, 12 p., 1 pl., scale 1:100,000

Walsh, T. J., compiler, 1987, Geologic map of the Astoria and Ilwaco quadrangles, Washington and Oregon: Washington Division of Geology and Earth Resources Open File Report 87-2, 30 p., 1 pl., scale 1:100,000

Walsh, T. J., compiler, 1987, Geologic map of the south half of the Tacoma quadrangle, Washington: Washington Division of Geology and Earth Resources Open File Report 87-3, 12 p., 1 pl., scale 1:100,000

Igneous rocks are classified according to Travis (1955). If geochemical data are available, volcanic rocks are classified according to the current classification of the International Union of Geological Sciences (Zanettin, 1984).

The geologic time scale for this map is basically that used for the "Correlation of Stratigraphic Units of North America (COSUNA)" project of the American Association of Petroleum Geologists (Salvador, 1985). Additions and modifications were made following Armentrout and others (1983), Montanari and others (1985), Prothero and Armentrout (1985), and Aguirre and Pasini (1985). These modifications entailed addition of regional floral and faunal zonations, placing the Eocene-Oligocene boundary at 35.7 m.y.b.p. and within the Refugian foraminiferal stage, and setting the Pliocene-Pleistocene boundary to 1.6 m.y.b.p.

**DESCRIPTION OF MAP UNITS
OF THE NORTHWEST PART OF THE
GOLDENDALE QUADRANGLE, WASHINGTON**

Quaternary Unconsolidated Deposits

Qa1

Alluvium (Holocene)--River and stream deposits of silt, sand and gravel. Along the Columbia River, composed of mixed lithologies. Along sidestreams, composed almost entirely of basalt with rare to abundant reworked clasts of quartzite (Anderson, 1983, 1986).

Qaf

Alluvial fan deposits (upper Pleistocene to Holocene)--Sand, gravel and boulders, mainly of basaltic composition. Includes layers of reworked loess and debris flows. Mostly younger than flood deposits (unit Qf) (Anderson, 1983, 1986).

Qls

Landslide deposits--Basalt and lesser sedimentary rock blocks in a matrix of finer debris. Blocks up to hundreds of meters long. Top of Grande Ronde Basalt is the most common basal slip surface. Maximum thickness approximately 70 m (Anderson, 1983; 1986). Also includes angular, unconsolidated basaltic talus deposited at the base of cliffs (Anderson, 1986).

Qlo

Loess--Pale orange to brown silt and fine sand. Contains some caliche and ash layers. Thickness highly variable. Includes the Palouse Formation and all younger loess (Anderson, 1986).

Qf

Missoula flood deposits, undifferentiated (upper Pleistocene)--Loosely to semi-consolidated silt, sand, and gravel of diverse composition. Consists of high-energy foreset-bedded gravel and sand deposits, and low energy (slackwater) parallel bedded silt and sand deposits. Includes eolian dune sand derived from these deposits (Anderson, 1986). Deposited by multiple catastrophic floods caused by rapid draining of glacial Lake Missoula.

QTg

Older alluvium (upper Miocene ? to lower Pleistocene)--Light brown to yellowish-gray gravel, sand, silt, clay and tuff. Consists of weakly to moderately indurated fluvial and locally paludal deposits containing basaltic, andesitic, metamorphic, and quartzo-feldspathic clasts. Maximum thickness greater than 60 m (Anderson, 1983).

Simcoe Mountains Volcanics (Pliocene to lower Pleistocene)

QTsr

Rhyolite and associated volcanoclastic deposits--Light to dark gray or light brown, flow banded, porphyritic rhyolite. Includes domes, flows, debris flows, breccia, and tuff. Erupted from vents in the Indian Rock area. Interstratified with olivine basalt (unit QTsb). Maximum exposed thickness greater than 500 m (Anderson, 1983).

QTsd

Dacite--Light to dark gray, flow-banded, glassy, porphyritic dacite. Contains phenocrysts of plagioclase, olivine, clinopyroxene, hypersthene, and oxyhornblende (Sheppard 1960, 1967). Overlies flows of olivine basalt (unit QTsb) and rhyolite deposits (unit QTsr). Erupted from a single dome (Anderson, 1983).

QTsb

Olivine basalt--Medium-gray to medium dark-gray, fine-to medium-grained plagioclase- and olivine-phyric basalt. Occurs in stacked flow sequences or intracanyon flows. Contains minor interstratified volcanoclastic deposits. Age spans the Pliocene (whole rock K/Ar dates of 3.77, 3.87, 4.06, and 4.79 m.y.b.p.) to early Pleistocene (K/Ar age of 0.9 m.y. for Haystack Butte flow)(Anderson, 1986).

QTsv

Vent facies--Red to dark gray, unconsolidated and poorly sorted basaltic cinder and scoria produced by near-vent and vent eruptive processes. Includes bombs, spatter, cowpie pahoehoe, breccia and agglutinate. Occurs in cinder cones as much as 50 m high (Anderson, 1986).

Tertiary Sedimentary Rocks

Td1

The Dalles Formation (lower to middle Pliocene)--"Thickly bedded gray and buff volcanic-sedimentary and sedimentary deposits of agglomerate, pumiceous tuff, tuff breccia, tuff, volcanic ash, conglomerate, sandstone, siltstone, and shale....Maximum thickness about 660 m" (Newcomb, 1969, plate 1).

Te1

Ellensburg Formation (upper Miocene)--Light brown to yellowish gray, weakly to moderately indurated gravel or conglomerate, sand, silt, and clay. Gravel is most abundant and consists of basaltic, andesitic, and metamorphic clasts including quartzite. Conglomerate contains a sandy matrix that is locally micaceous. Maximum thickness about 15 m. Unit was deposited by ancestral Columbia River and tributary streams. Conformably overlies Columbia River Basalt Group and is unconformably overlain by olivine basalt of the Simcoe Volcanics (Anderson, 1983).

Columbia River Basalt Group

Yakima Basalt Subgroup

Wanapum Basalt (middle Miocene)

Twp

Priest Rapids Member--Gray black, rusty-brown weathering, medium- to coarse-grained basalt. Very sparsely phyrlic with rare plagioclase glomerocrysts 0.5-1.0 cm long. Typically forms blocky columns or vertical platy joints. Locally pillowed at base. Possesses reversed magnetic polarity. Two flows present locally, including the Rosalia chemical type and Lolo chemical type. Age approximately 13.6 m.y. (Anderson, 1983).

Twr

Roza Member--Medium dark gray, pale brown to yellowish gray weathering, fine- to medium-grained basalt with abundant plagioclase phenocrysts up to 1.0 cm in length. Flow top is locally aphyric. Locally pillowed at base. Typically has well-developed colonnade; locally possesses an entablature near flow margins. Closely resembles the basal Frenchman Springs flow. Possesses transitional magnetic polarity (Anderson, 1983).

Twf

Frenchman Springs Member, undivided--Consists of three flow types distinguishable on the basis of phenocryst distribution and geochemistry. The flow types follow the usage of Beeson and others (1985) and are arranged from stratigraphically highest to lowest below.

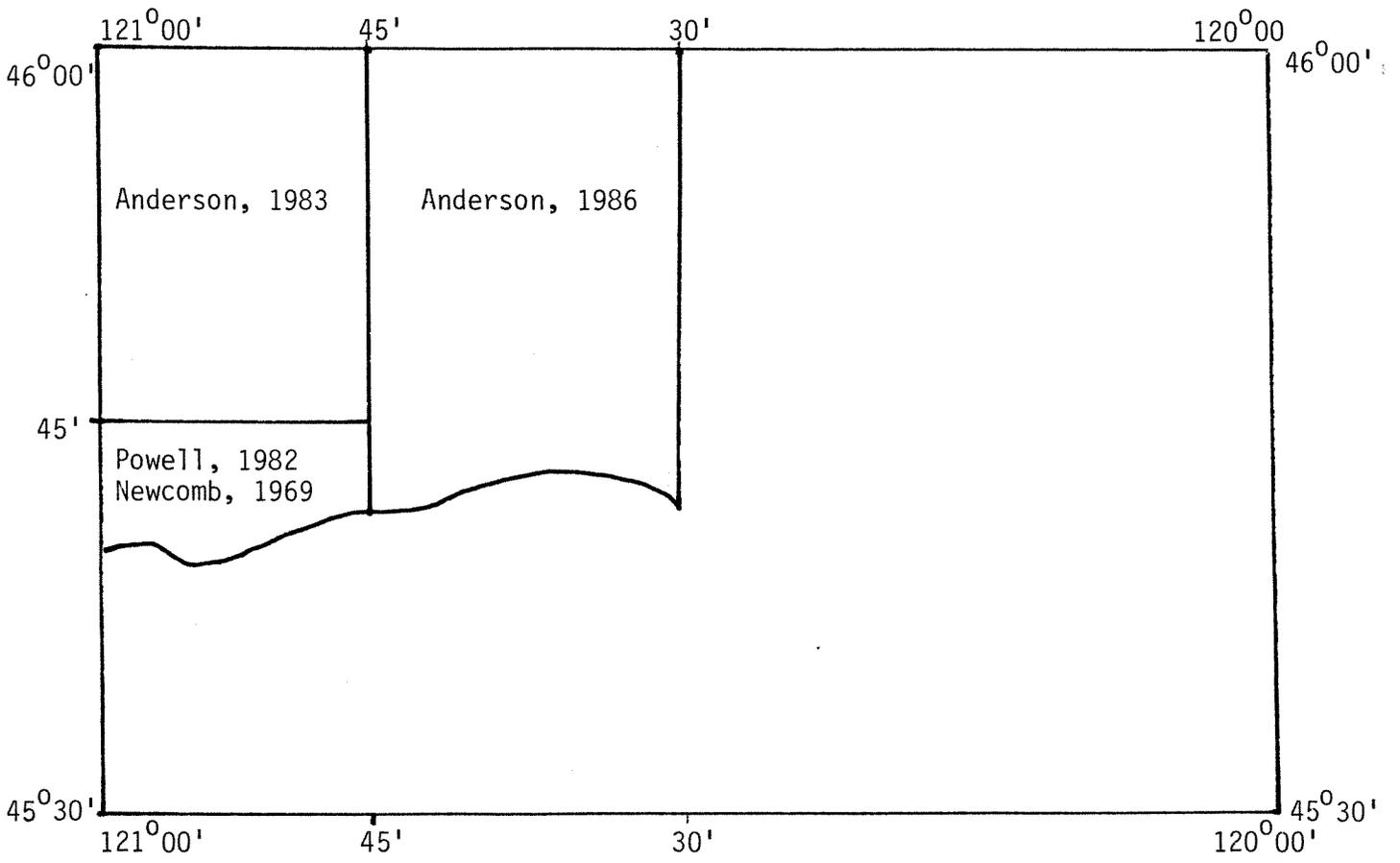
Sentinal Gap flow type is medium dark gray, fine to coarse grained, generally aphyric basalt with irregular columnar to vertical platy jointing. Rare plagioclase phenocrysts up to 1.5 cm in length are present.

Sand Hollow flow type is medium dark gray, medium-grained, aphyric to plagioclase-phyric basalt. Phenocrysts are rare to abundant with individual crystal clusters up to 2.5 cm in diameter. Commonly has well-developed blocky to platy lower colonnade. The center of flows often contain vertical platy jointing. Maximum thickness is about 60 m (Anderson, 1983; 1986).

Ginkgo flow type is medium dark gray basalt with abundant plagioclase phenocrysts or glomerocrysts 1 to 1.5 cm in diameter. Typically consists of one flow but locally two are present. Thickness of the Ginkgo flow or flows is about 60 m. In many places overlies sedimentary interbeds of the Vantage Member of the Ellensburg Formation (not mapped separately) and is commonly pillowed at base.

Tgn₂, Tgr₂

Grande Ronde Basalt (middle Miocene)--Dark gray, fine- to very fine grained, aphyric to very sparsely plagioclase-phyric basaltic andesite. Possesses uniform lithologic and petrologic characteristics within the map area. Divisible informally on the basis of MgO content and paleomagnetic polarity. Only high-MgO chemical type Grand Ronde Basalt is present within the map area. Magnetostratigraphic units present are: N₂ magnetostratigraphic unit (Tgn₂) and R₂ magnetostratigraphic unit (Tgr₂).



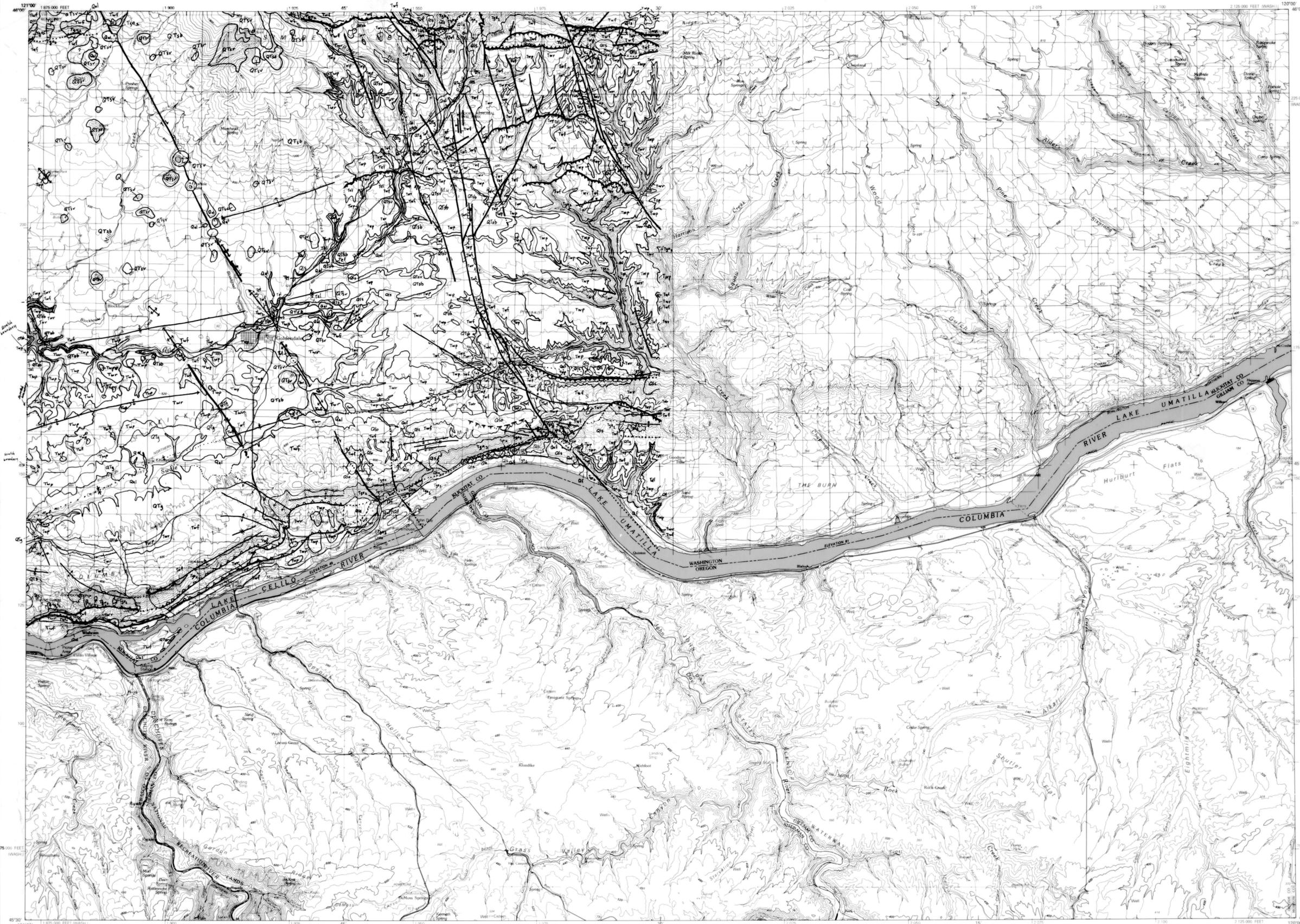
Sources of Geologic Map Data

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Goldendale
 WASHINGTON-OREGON



EXPLANATION

Quaternary Unconsolidated Deposits

Qal alluvium
 Qaf alluvial fan deposits
 Qls landslide deposits
 Qlo loess
 Qf Missoula flood deposits
 QTg older alluvium

Simcoe Mountains Volcanics

QTsr rhyolite and associated volcaniclastic deposits
 QTsd dacite
 QTsb olivine basalt
 QTsv vent facies

Tertiary Sedimentary Rocks

Tdl Dalles Formation
 Tel Ellensburg Formation

Columbia River Basalt Group
Yakima Basalt Subgroup

Wanapum Basalt

Twp Priest Rapids Member
 Twr Rosa Member
 Twf Frenchmen Springs Member

Grande Ronde Basalt

Tgn2 N₂ magnetostratigraphic unit
 Tgr2 R₂ magnetostratigraphic unit

⊕ Horizontal beds
 27 \ Strike and dip of beds
 --- Contact, dotted where uncertain or concealed
 --- Anticline, showing plunge; dashed where uncertain, dotted where concealed
 --- Syncline, showing plunge; dashed where uncertain, dotted where concealed
 --- Fault, showing sense of displacement; dotted where inferred or concealed
 --- Thrust fault, barbs on upper plate, dotted where inferred or concealed

scale 1:100,000

GEOLOGIC MAP OF THE NORTHWEST PART OF THE GOLDENDALE QUADRANGLE, WASHINGTON

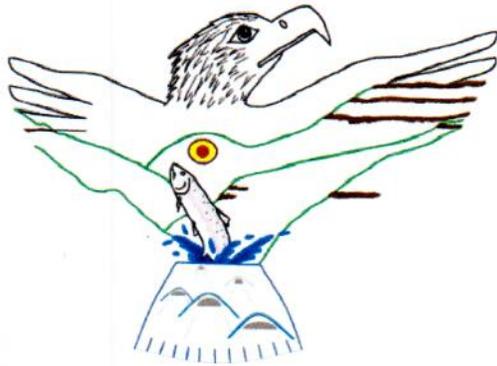
Compiled by

WILLIAM M. PHILLIPS and TIMOTHY J. WALSH

1987

Bronsko Jim

- 1 | Comment letter by Bronsco Jim Jr., Kahmiltpah Band leader



Bronsko Jim Jr.
PO Box 751
Goldendale, WA 98620
(509)250-1520
bronscojj@gmail.com

August 9, 2022

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

Dear Ms. Park,

I am the designated chief of the Kah-Milt-Pah (Rock Creek) Band of this area. I am writing in regards to this proposed Goldendale Pump Storage Project in Goldendale, Washington near the John Day Dam at the bottom and at the top of Juniper Point. I understand this is a draft environmental Impact Statement for this project. I was designated by the elders to be a leader on behalf of the Kah-Milt-Pah Band and I write this letter on behalf of the Band members and our future generations.

1 cont.

This land where this proposed project is planned is within our sacred site called "Put-a-lish" where we continue to gather our First Foods and medicines along the ridge and we fish at the valley toe of this ridge. Amongst the Yakama Nation, there are other language dialects and the Yakama Nation call this site "Pushpum." I wanted to make this clarification so there will be no confusion. The local tribal ancestral names of Juniper Point are Put-a-lish and Pushpum. This area is a very sacred site for our people who continue to reside in our ancestral lands. We continue to live here within the Goldendale Community and we have our longhouse at the Rock Creek canyon. We gather our traditional foods from all these lands in this area just as our ancestors have for many generations and time immemorial.

2

I understand the plan is to drill a 20-30 feet diameter tunnel through our sacred site and construct a powerhouse and two reservoirs (~60 acres) at the top and bottom. I have concern with this project and the total desecration to our sacred mountain, First Foods, and medicines. I have concerns for the potential negative impacts to the water, fish, wildlife, birds and native plants of this land. I have a grave concern for the Aluminum Plant site since that is a toxic waste site and has not been cleaned up for many years, yet this project is planning to proceed. I am concerned for further contamination to the land and water resources from these poisonous material left behind from this old industrial site.

3

Our people have already survived the construction of the Dalles and John Day dams which literally removed our people from various village sites permanently. We lost fishing sites (including Celilo Falls), home sites, burial grounds, archeological sites, and other sacred sites to "green energy." Today, our salmon populations continue to decline because of the Columbia River dams fish passage impediments, turbines, and warming waters. Then in the 1990s, there was a "green energy" movement for industrial wind. Again, more of our First Food gathering lands were lost to wind energy and many of the lands that were converted to wind farms totally exclude our Band members from entering their property. Only one landowner allows us to access their lands to gather our First Foods annually.

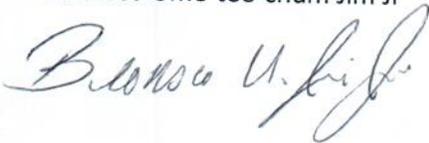
Green energy is not new to us. Our people experienced first-hand, the impacts that the Columbia River dams had on the fish resources and loss of homes. We experienced the effects of wind energy to our lands and wildlife. We are now seeing the expansion of industrial solar in our ancestral lands of Pow-un-putt (Pine Creek) lands near Roosevelt, Washington. Green energy has impacted our life from the start and we continue to endure the burden of green energy. We receive no benefits from green energy. The Klickitat PUD commissioners stated they purchase power from a hydro source and will continue to do so. The green energy produced in this county is destined to other regions and states, yet we have to endure the burden of these projects. The permanent jobs after all of these green energy projects are constructed will be minimal.

2 cont.

Once again, I am writing this letter to ensure we are being counted while voicing our concern from our people of Kah-Milt-Pah and the surrounding areas along N'chi Wana (Columbia River). We are still here and practice our ways such as our ancestors did for thousands of years. We are in opposition of this project to proceed since it will directly desecrate our sacred site and cultural resources.

Thank you,

Bronsko Ume-tee-chum Jim Jr





Goldendale School District #404
Dr. Ellen Perconti, Superintendent **Dean Schlenker, Business Manager**
604 E. Brooks St., Goldendale, WA 98620, phone (509) 773-5177, fax (509) 773-6028

June 5, 2022

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

Re: Goldendale Energy Storage Project

Dear Ms. Park,

On behalf of the Goldendale School District, I am writing to share our support for the proposed Goldendale Energy Storage Project. Klickitat County is home to many renewable energy projects, which contribute significantly to our tax base while also providing benefits to our power system. The Goldendale Project will enable our region to harness the power of renewable resources so that homes, businesses and schools have access to power when they need it.

The Goldendale Project has the potential to generate up to 3,000 high-quality, family-wage jobs over its four-year construction period. Our community will benefit from the economic activity those jobs will bring. Many of those workers may relocate to Goldendale and surrounding areas, contributing to our local economy in many ways. In addition to the additional jobs, an economic analysis by our local chamber of commerce indicates that the project could contribute \$3 million to our local schools in annual property taxes. These additional funds would be used to improve our buildings and fund important programs such as expanding our Science, Technology, Engineering, and Math (STEM) opportunities for students. Currently, our STEM offerings are limited by our facilities and ability to recruit staff.

The impact of the Goldendale Project will be broader than just our schools. Klickitat County families will also benefit from another \$11 million in annual property taxes the project will generate for roads, emergency services, parks, our library, our local hospital and more.

I am very encouraged to see this project coming to fruition.

Sincerely,

A handwritten signature in black ink, appearing to read "Ellen S. Perconti". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ellen S. Perconti



BOARD OF COUNTY COMMISSIONERS

511 Washington St, Ste. 101 • The Dalles, OR 97058
p: [541] 506-2520 • f: [541] 506-2551 • www.co.wasco.or.us

Pioneering pathways to prosperity.

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

June 9, 2022

Re: Goldendale Energy Storage Project

Dear Ms. Park,

I am writing to show support for the Goldendale Energy Storage Project in Washington State. I recognize the important role the project will play in creating a more resilient electric grid as both Oregon and Washington transition to 100% renewable energy. It's important to have options to efficiently and cost effectively harness the power produced by local wind and solar resources for later use, which the Goldendale Project does.

Wasco County is located just across the Columbia River about 25 miles from the Goldendale Project and will greatly benefit from the economic activity the project will bring. Many of the 3,000 workers who will construct the project over four years will live in Wasco County. They will spend money on housing, groceries, medical care, and other goods and services in our communities, many of which have been negatively impacted by the health and economic crisis caused by the COVID-19 pandemic.

Wasco County is also home to Columbia Gorge Community College, which has renewable energy, electrical engineering technology, and electro-mechanical technology programs. As graduates of these programs have benefitted from previous renewable energy development in the Gorge, future graduates will be able to access high-quality local job opportunities offered by the Goldendale Project upon graduating from these programs.

The Goldendale Project is the No. 1 priority Washington project in the Mid-Columbia Development District's Comprehensive Economic Development Strategy—a strategy that involved numerous stakeholders from the five-county region of the Gorge. As a representative of a County that participates in that process, I am in support of this project.

Sincerely,

A handwritten signature in black ink, appearing to be 'S. Hege', written over a horizontal line.

Scott C. Hege, County Commissioner



BOARD OF COUNTY COMMISSIONERS

511 Washington St, Ste. 101 • The Dalles, OR 97058
p: [541] 506-2520 • f: [541] 506-2551 • www.co.wasco.or.us

Pioneering pathways to prosperity.

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

June 8, 2022

Re: Goldendale Energy Storage Project

Dear Ms. Park,

I am writing to show support for the Goldendale Energy Storage Project in Washington State. I recognize the important role the project will play in creating a more resilient electric grid as both Oregon and Washington transition to 100% renewable energy. It's important to have options to efficiently and cost effectively harness the power produced by local wind and solar resources for later use, which the Goldendale Project does.

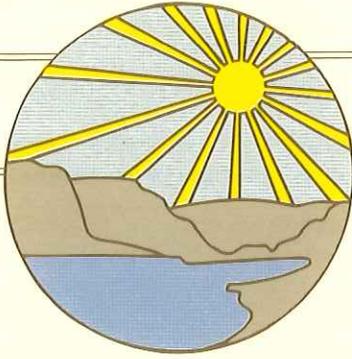
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The Goldendale Project is the No. 1 priority Washington project in the Mid-Columbia Development District's Comprehensive Economic Development Strategy—a strategy that involved numerous stakeholders from the five-county region of the Gorge. As a representative of a County that participates in that process, I am support this project.

Sincerely,

Steven D. Kramer, County Commissioner



CITY OF GOLDENDALE

1103 SOUTH COLUMBUS
GOLDENDALE, WASHINGTON 98620
509-773-3771

July 5, 2022

RECEIVED

JUL 25 2022

**Dept of Ecology
Central Regional Office**

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

Re: Goldendale Energy Storage Project

Dear Ms. Park,

As the City Administrator of Goldendale, I am writing to express the City's support of the proposed Goldendale Energy Storage Project. The City of Goldendale is the closest incorporated community to the proposed project. City leaders have long supported the cleanup and redevelopment of the Columbia Gorge Aluminum Smelter site, which once provided valuable, family-wage jobs for our working families. The Goldendale Energy Storage Project is not only a *good* way to re-use this site—it's the *ideal* way to re-use this site, taking advantage of the geology and geography needed for pumped storage and taking advantage of the grid access and proximity to wind and solar projects to make it cost-effective.

Located in one of the country's best areas for wind energy development, our community recognizes the important role pumped storage stands to play in our renewable energy system. Many days, we produce more wind than the grid can take. We need a safe, reliable way to store that intermittent energy so that our homes, businesses, schools, hospitals and other end users have reliable power when they need it.

With the passing of the Clean Energy Transformation Act, the Goldendale Energy Storage Project demonstrates how partnership between rural and urban communities can help ensure the state meets its policy goals. Numerous studies have concluded that this site is ideal for pumped storage. We are fortunate to have this site in our community

and to have a committed developer willing to responsibly bring a pumped storage project to fruition. If built, the project would ensure jobs and tax revenue associated with meeting the goals of the Clean Energy Transformation Act stay within Washington's rural communities rather than getting exported to other states.

The land use impacts of the project's two 60-acre ponds is quite small compared to other alternatives. The design takes into account several considerations, including impacts to aesthetics, air quality, greenhouse gasses and aquatic species. As the draft EIS has concluded, this project can provide valuable service in an environmentally responsible way.

In addition to the benefits this project will provide for grid reliability—for this community and countless others—the project will bring significant short-term and long-term economic benefits to the City of Goldendale. We understand it will create approximately 3,000 high-quality, family-wage jobs during construction, including apprenticeships in the building trades that can only be provided on long-term construction projects.

The estimated \$14 million in annual property taxes will make a huge difference to our community's working families by supporting our schools, emergency services, parks, and roads. I cannot underscore how profoundly this economic activity will benefit residents in the entire county, which has been hit hard by the pandemic.

We are also encouraged by the developer's commitment to invest \$10 million in the cleanup of the site of the former Columbia Gorge Aluminum Smelter. The Goldendale Energy Storage Project is an example of the kind of creative redevelopment of commercial land that we want to see in our community.

The City has long been and continues to be very supportive of this project.

Sincerely,


Michael Canon

Mayor

City of Goldendale

1103 S. Columbus Ave

Goldendale, WA 98620



Honesty | Accountability | Customer Focused

08 August 2022

Sage Park
Regional Director
SEPA Responsible Official
Washington Department of Ecology
Central Regional Office
1250 W. Alder Street
Union Gap, WA 98903-0009

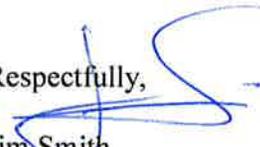
RE: Comments on the Draft Environmental Impact Statement for the
Proposed Goldendale Energy Storage Project

Dear Ms. Park,

Thank you for the opportunity to submit comments regarding the proposed Goldendale Energy Storage Project June 6, 2022 Draft Environmental Impact Statement prepared by the Washington State Department of Ecology.

1 In addition to the comments filed, we are also asking that Ecology more fully inform this environmental impact statement with a fully developed analysis of the environmental benefits associated with this project. This should include the site cleanup that would be completed on the old aluminum smelter site. Given our experience in renewable energy development and as the local electric service provider, our opinion is that these aspects add to the societal benefit of this project in a meaningful way and should be accounted for.

Respectfully,


Jim Smith
General Manager
PUD#1 of Klickitat County

I. INTRODUCTION

2 Public Utility District No. 1 of Klickitat County (KPUD) hereby submits the following written comments in response to the June 2022 Draft Environmental Impact Statement (DEIS) prepared by the Department of Ecology (DOE) for the proposed Goldendale Energy Storage project. This submittal supplements the oral testimony provided by KPUD General Manager Jim Smith at the June 28, 2022 public hearing on the proposal. In sum, KPUD strongly supports the Goldendale Energy Storage project, which if ultimately developed would result in substantial economic and environmental benefits to the Klickitat County area for which KPUD is the primary utility service provider.

On balance, the June 2022 DEIS contains a thorough, objective and accurate description of the Goldendale Energy Storage project and its anticipated environmental impacts. Subject to a few minor clarifications and corrections in the *Surface and Groundwater Hydrology Resource Analysis Report* (Appendix B) and the *Energy Resource Analysis Report* (Appendix E) that are addressed below, KPUD is generally supportive of the methodology and conclusions of the DEIS.

3 The critical exception, however, is the DEIS's analysis of Cultural and Tribal Resources (Section 4.9 and Appendix H). This document states—without apparent objective analysis or empirical evidence—that the Goldendale Energy Storage project would result in significant and unavoidable adverse impacts to Cultural and Tribal Resources that cannot be adequately mitigated.

KPUD is respectful of the Tribe's beliefs as stated, but it strongly disagrees with the DEIS's conclusion and the analysis underlying it. In KPUD's view, no basis has been presented by DOE for this determination other than the Tribes' own objections. Based upon KPUD's review of the DEIS, its understanding of the project, and its deep familiarity with the surrounding environment, KPUD firmly believes that measures are available which would effectively mitigate any impacts of the project to Cultural and Tribal Resources.

II. IDENTITY AND INTEREST OF KPUD

KPUD is a public utility district organized pursuant to Chapter 54.04 RCW. Per KPUD's mission statement, "Public Utility District No. 1 of Klickitat County provides safe, reliable, cost-based utility services at the lowest possible cost consistent with sound business principles." In furtherance of this mission, KPUD furnishes water, wastewater and electrical utility service to thousands of customers within its designated service area in Klickitat County. The proposed Goldendale Energy Storage project is located within KPUD's service area, and it is anticipated that KPUD would supply the water needed for the initial fill of the facility's upper reservoir as well as the electricity for the facility's day-to-day "station service" electric loads.

2 cont. As a public power leader in facilitating renewable energy development, KPUD also believes that the Goldendale Energy Storage project is vitally important to meeting the State of Washington's renewable energy and carbon reduction goals while simultaneously helping to ensure power system reliability and power price affordability as Washington transitions to the lower-carbon energy system of the future. In this regard, the Goldendale Energy Storage project offers substantial safety and environmental benefits that should factor meaningfully in the SEPA analysis for this proposal. As the DEIS itself acknowledges, increasing electricity storage positively affects climate change by reducing carbon emissions. In order to ensure the reliability of the local electric grid and the affordability of electrical energy service to consumers, it is KPUD's position that integrating renewable resources will require long-duration pumped

hydro-storage in addition to other technologies and strategies. Particularly during extreme weather events, the supply of electricity is critically important to the safety of KPUD's residential customers for heating, air conditioning, potable water supply, and other life-sustaining uses.

2 cont.

For these reasons, KPUD strongly supports the Goldendale Energy Storage project. The local investment implicated by this proposal would provide significant economic and tax benefits to Klickitat County. These revenues will flow to hospitals and emergency response organizations (for example, Rural 7 Fire & Rescue and other tax revenue-dependent local agencies), thus providing significant benefits to the local environment and the community's well-being. The proposed facility has been recognized as a *Project of Statewide Significance* in light of these considerations.

III. SUBSTANTIVE COMMENTS ON DEIS

4

KPUD's comments regarding the June 2022 DEIS are grouped into two categories: First, minor factual clarifications to the Water and Energy Resources provisions of the DEIS, and second, more fundamental concerns regarding the conclusions and supporting methodology set forth in the DEIS's evaluation of Cultural and Tribal Resources.

3.1 Water and Energy Resources

5

Through its organizational mission and expertise in public utility matters, KPUD has a particular interest in those components of the DEIS that address water and energy issues. This general interest is underscored by KPUD's role as a utility service provider for the proposed Goldendale Energy Storage project. While KPUD generally concurs in the analysis and conclusions of the DEIS related to these subjects, a few references in the *Surface and Groundwater Hydrology Resource Analysis Report* (Appendix B) and the *Energy Resource Analysis Report* (Appendix E) warrant correction and/or clarification as set forth below.

Surface and Groundwater Hydrology Resource Analysis Report (Appendix B)

- DEIS statement:

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The proposed project would operate as an energy storage project. After the facility is constructed, the initial fill of the pumped-water energy storage system (lower reservoir plus conveyance piping) would be completed through an estimated one-time withdrawal of 7,640 acre-feet of water, at an estimated rate of 21 cfs for approximately 6.5 months. Water for the initial fill would be purchased from KPUD using a KPUD-owned conveyance system and existing water right. This water supply would be sources from KPUD's exiting intake and pump station, off-stream of the Columbia River. . . .¹

KPUD Response: The above statement is accurate. The KPUD has a municipal water right to provide the water for the initial fill subject to maximum annual quantities per year which will require the fill to be over a two-year period.

6 cont.

² DEIS, Appendix B, §3.3 (p. 26).

▪ DEIS statement:

The Applicant plans to purchase water for construction and operation of the proposed project from KPUD. KPUD owns an existing pump station east of the proposed project and a subsurface water conveyance system from the pump station to the project footprint.²

KPUD Response: KPUD does not currently own the referenced pump station. Instead, KPUD holds easements from the U.S. Army Corp of Engineers and has an agreement already in place to purchase the pump station and associated infrastructure.

▪ DEIS statement:

The proposed project's water supply needs include an estimated one-time withdrawal of 7,640 acre-feet of water, at an estimated rate of 21 cfs for approximately 6.5 months, to complete the initial fill of the pumped storage system (HDR 2020).³

KPUD Response: Again, the above statement is accurate provided that the water is utilized over a two-year period and does not exceed quantities permitted by [KPUD's] water right as later stated in the DEIS.

▪ DEIS statement:

KPUD's Cliffs Water System would provide all water supply for project construction under its existing municipal water right (certificate S3-00845C) with a priority date of March 19, 1969. That water right authorizes a maximum instantaneous rate of 35.3 cfs and annual total withdrawal quantity of 13,911 AFY, which includes a maximum consumptive use of 4,861 AFY. This includes the very large initial fill of the system that would occur near the end of the construction period (likely between October to March). The Cliffs water right predates and is senior to the adoption of the Columbia River instream flow rule in 1980. Therefore, water supply for project construction would not result in any new impacts on the Columbia River or other surface waters within the southern study area. This assumes that the initial fill of the proposed project system occurs across a 2-year period to comply with the annual maximum consumptive use quantity of the underlying water right as discussed above.⁴

KPUD Response: Again, the above statement is accurate provided that the water is utilized over a two-year period and does not exceed quantities permitted by [KPUD's] water right as later stated in the DEIS. Further, it should be clarified that water used under the Cliffs water right is solely

6 cont.

² DEIS, Appendix B, §3.3 (p. 26).

³ DEIS, Appendix B, §3.3 (p. 26).

⁴ DEIS, Appendix B, §3.3 (p. 28-29).

6 cont.

from the Columbia River, and, based on the priority date, there will be no impairment to other water rights on the Columbia River, including the instream flow requirements in the state regulations.

- DEIS statement:

Ecology has approved multiple changes requested by KPUD to the original certificate, including a 2002 change expanding the place of use (CS3-00845C@1) and a 2006 change from industrial to municipal purpose, both of which were processed by the Klickitat County Water Conservancy Board. In addition, following placement of the right into the State of Washington's Trust Water Right Program by KPUD, Ecology approved its use for mitigation of impacts to the Columbia River associated with new water budget-neutral water rights. These included S4-35068 issued to the City of White Salmon in 2010, G433184 issued to 101 Bar Ranch LLC in 2016, and G4-35220 issued to Klickitat PUD (Roosevelt groundwater right) in 2015. However, use of the Cliffs municipal water right for mitigation purposes in each of these cases has been cancelled, such that the full quantity of the Cliffs water right is available to meet water supply needs of the proposed project.⁵

KPUD Response: This is not completely accurate. There remains a commitment of 625 ac-ft/year under Water Right Permit G4-33184, under G4-33184(B). Therefore, the full quantity of the KPUD's municipal water right is not currently available. At this time, approximately 4200 ac-ft/year of the total 4,861 ac-ft/year of consumptive water is available. However, if the Applicant ultimately pumps the water over a defined period of time consistent with the terms of the water right in the ac-ft authorized per calendar year, it is unlikely that any additional water rights would be needed for the project. As the DEIS later clarifies, "[t]he Applicant would need to coordinate with KPUD to ensure that, during the year that the initial fill begin, the total quantity of water supplies to the project for project construction plus the initial fill does not exceed quantities permitted by [KPUD's] water right."⁶ KPUD concurs in this important qualifier.

Energy Resource Analysis Report (Appendix E)

- DEIS statement (paraphrased):

The Roosevelt Biogas 1 facility operated by KPUD as a biogas fired generation facility with a generating capacity of 36.5 MW.⁷

- KPUD Response: KPUD continues to utilize the methane from the landfill, but it now produces Renewable Natural Gas rather than electrical energy.

- DEIS statement:

⁵ DEIS, Appendix B, §3.3.1.1.1 (p. 29).

⁶ DEIS, Appendix B, §3.3.1.1.3 (p. 31).

⁷ DEIS, Appendix E, §3.2.1, Table 3 (p.5).

6 cont.

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6 cont.

7 cont.

7 cont.

Public Utility District No. 1 of Klickitat County (KPUD) uses the following energy generating facilities for power resources (KPUD 2021):

- The White Creek Wind Farm and the Roosevelt Biogas 1 facilities (see Table 3).
- The McNary Fishway Hydro Project, owned jointly by KPUD and Northern Wasco Public Utility District. This facility is located on the Columbia River about 180 miles east of Portland, Oregon, and consists of a 10 MW turbine.
- A 230 kilovolt (kV) substation and associated transmission lines to connect to regional power grids.⁸

- KPUD Response: The above is not an exhaustive or complete list of KPUD’s sources for acquiring energy. KPUD also purchases power from the Bonneville Power Administration and from various regional energy markets.

3.2 Cultural and Tribal Resources

8

The comments above regarding the water and energy resources impacts of the Goldendale Energy Storage project are intended to correct a few minor reference errors in the DEIS. KPUD generally concurs in DOE’s analysis concerning these matters, as well as its treatment of the various other elements of the environment that are addressed in the document. On balance the DEIS contains an objective, neutral, and fact-based evaluation of the project’s anticipated impacts, and, where appropriate, it identifies potential mitigation measures that would serve to effectively eliminate those impacts or meaningfully reduce them to acceptable levels. In determining that the Goldendale Energy Storage project would not result in unavoidable, significant adverse impacts to most elements of the environment, the DEIS reflects precisely the type of empirical analysis contemplated by SEPA.

9

KPUD, however, respectfully disagrees with DOE’s analytical approach for evaluating the project’s impacts upon Cultural and Tribal Resources. In a sharp departure from the objective, evidence-based methodology used by DOE to analyze the other elements of the environment, the Cultural and Tribal Resources framework set forth in Section 4.9 of DEIS defers almost entirely to the subjective opinions of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Bands of the Warm Springs Reservation of Oregon, and the Nez Pierce Tribe (collectively, “Tribes”). KPUD is respectful of the thoughts, opinions and beliefs of these Tribes as referenced in the DEIS. But KPUD does not accept the premise that the Tribe’s own opinions regarding the effectiveness of potential mitigation measures should be afforded dispositive weight by DOE without further objective analysis.

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Emblematic of DOE’s approach in this regard is the “Key Findings” summary of the DEIS’s Tribal and Cultural Resources Analysis:

The analysis found the proposed project would result in significant and unavoidable adverse impacts related to Tribal and cultural resources.

It is important to acknowledge the Tribes’ perspectives on the impacts of the proposed project. Some mitigation options for Tribal and cultural

7 cont. ⁸ DEIS, Appendix E, §3.2.1 (p.5).



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cont.

resources have been proposed by the Applicant. However, to date, there is no information available about mitigation proposed by or supported by the Tribes that would reduce the level of impact to less than significant.⁹

11

The import of this using methodology is that DOE will apparently not recognize a particular mitigation measure as adequate in this context unless it has been “proposed by or supported by the Tribes” themselves. DOE’s approach thus defers wholesale to the Tribes’ subjective opinions as to whether the alleged impacts to tribal and cultural resources from the Goldendale Energy Storage project can be effectively mitigated. This is a marked deviation from DOE’s standard analytical method. As the DEIS itself openly acknowledges, “[t]he analysis of impacts to Tribal resources differs in its approach when compared to the impact analysis for other natural resources.”¹⁰ Numerous references in the DEIS’s Tribal and Cultural Resources Analysis follow this methodology, accepting—without objective, empirical supporting evidence—the Tribes’ assertions regarding the significance of project impacts and the adequacy of potential mitigation options.¹¹

This is an extraordinary proposition that is inconsistent with the purpose and framework of SEPA. In light of the extreme deference DOE has afforded to the Tribes, it is not coincidental that Cultural and Tribal Resources are the only elements of environment affected by the Goldendale Energy Storage project that the DEIS determines cannot be adequately protected through mitigation. For the reasons set forth below, KPUD respectfully disagrees with this conclusion and the reasoning underlying it.

A. Applicable SEPA Standards

As a preface to KPUD’s specific responses to the Cultural and Tribal Resources Analysis of the DEIS, KPUD would first reiterate the following benchmark concepts of SEPA review under Washington law:

12

(1) SEPA review is intended to be an empirical, informational exercise based on *objective, evidence-based* analysis. “SEPA establishes a process for evaluating the reasonably foreseeable environmental consequences of proposed projects.”¹² In furtherance of this mandate, “[a]gencies shall to the fullest extent possible. . . . [p]repare environmental documents that are concise, clear, and to the point, and are supported by evidence that the necessary environmental analyses have been made.”¹³

SEPA is a procedural statute designed to ensure that local governments consider the environmental and ecological effects of major actions to the fullest extent. SEPA's purpose is to provide decision-makers with all relevant information about the potential environmental consequences of their actions and to provide a basis for a reasoned judgment that balances the benefits of a proposed project against its potential adverse effects. An EIS is not to be a compendium of every conceivable effect or alternative to a proposed project, but it must include a reasonably

10 cont. ⁹ DEIS, §4.9 (p.157) (emphasis added).

11 cont. ¹⁰ DEIS, §4.9.1 (p.160).

¹¹ DEIS, §4.9 (p.157-165).

12 cont. ¹² *PT Air Watchers v. State, Dept. of Ecology*, 179 Wn.2d 919, 926, 319 P.3d 23 (2014).

¹³ WAC 197-11-030(2)(c) (emphasis added).



thorough discussion of the significant aspects of the probable environmental consequences of the agency's decision.¹⁴

This fundamental pillar of the SEPA framework extends fully to the evaluation of measures that are necessary in order to mitigate the anticipated environmental consequences of a proposal. To this effect, "SEPA mandates that action is to be conditioned or denied only on the basis of specific, proven significant environmental impacts."¹⁵

(2) SEPA contains clear standards for determining whether a particular environmental impact is "probable" or "significant". In the context of environmental review and evaluation, "probable" means "likely or reasonably likely to occur."¹⁶ While the standard for probability is not a strict statistical test, SEPA differentiates "likely" impacts from "those that merely have a possibility of occurring, but are remote or speculative."¹⁷

An impact is "significant" for purposes of SEPA review only if it implicates "a reasonable likelihood of more than a moderate adverse impact on environmental quality."¹⁸ Like the "probable" standard discussed above, the test for significance is not strictly formulaic or quantifiable, but instead is context-dependent and varies with the proposal's physical setting.¹⁹ Under this fluid standard, "[t]he severity of an impact should be weighed along with the likelihood of its occurrence."²⁰

(3) A SEPA lead agency cannot wholly defer its mitigation analysis to another party. The determination of a proposal's impacts, and the extent to which particular impacts can be adequately mitigated, is reserved to the professional judgment of the lead agency itself using the evidence-based framework above.²¹ SEPA does not allow, much less require, the lead agency to defer its own objective evaluation to interested third-parties. This is true not only with respect to "consulted agencies", "other agencies", and members of the public, but also any "affected tribes" that are specifically requested to provide comment during the SEPA review process.²²

SEPA contemplates that the input of such third-parties, including affected tribes, will be actively solicited, meaningfully considered, and ultimately responded to by the lead agency.²³ But no such third-parties, including the Tribes, are intended by SEPA to wield subjective decisional authority over the determination of impact mitigation for a particular proposal. Nothing in the SEPA statute (Chapter 43.21C RCW), the

¹⁴ *City of Des Moines v. Puget Sound Regional Council*, 108 Wn. App. 836, 849, 988 P.2d 27 (1999) (emphasis added) (citation and internal punctuation omitted).

¹⁵ *Nagatani Bros., Inc. v. Skagit County Bd. of Comm'rs*, 108 Wn.2d 477, 482, 739 P.2d 696 (1987) (emphasis added).

¹⁶ WAC 197-11-782.

¹⁷ *Id.*

¹⁸ WAC 197-11-794(1).

¹⁹ WAC 197-11-794(2).

²⁰ *Id.*

²¹ *See, e.g.*, WAC 197-11-420.

²² *See e.g.*, WAC 197-11-360; WAC 197-11-405; WAC 197-11-408; WAC 197-11-455; WAC 197-11-502; WAC 197-11-545; WAC 197-11-550; WAC 197-11-710; WAC 197-11-960.

²³ *See e.g.*, WAC 197-11-360; WAC 197-11-405; WAC 197-11-408; WAC 197-11-455; WAC 197-11-502; WAC 197-11-545; WAC 197-11-550; WAC 197-11-710; WAC 197-11-960. *Cf.* Chapter 43.376 RCW (establishing a government-to-government collaboration framework for tribal relations).

SEPA Rules (Chapter 197-11 WAC), or any other Washington law purports to recognize tribal authority to such an extreme extent. Instead, the SEPA framework consistently affords affected tribes the same or similar rights as other public agencies to receive notice of, be consulted about, and to submit comments concerning, actions that are subject to agency review under SEPA. In sum, SEPA does not excuse or otherwise alter the standard analytic approach for evaluating impacts of a particular proposal merely because the commenting party is an affected tribe.²⁴

In the specific context of EIS preparation, SEPA emphasizes that the lead agency's analysis must be objective and neutral:

An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality.²⁵

This requirement is also reflective of the fundamental, longstanding principle that the subjective displeasure of and/or opposition by a particular party cannot itself form the basis for denial of a land use proposal.²⁶ Indeed, as Washington courts have long recognized, "SEPA should not be used to block construction of unpopular projects."²⁷

(4) SEPA provides a broad range of potential approaches to mitigate the impacts of a proposal. Finally, it is critical to acknowledge the intended role of the project mitigation analysis under SEPA as a deliberately broad, fluid, and flexible concept:

"Mitigation" means:

- (1) Avoiding the impact altogether by not taking a certain action or parts of an action;
- (2) Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts;
- (3) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- (4) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
- (5) Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and/or
- (6) Monitoring the impact and taking appropriate corrective measures.²⁸

²⁴ KPUD acknowledges the unique status of recognized Tribes under Washington law. *See, e.g.*, Chapter 43.376 RCW (establishing government-to-government collaboration mandate in various aspects of agency decision-making); Chapter 70A.65 RCW (providing for Tribal input regarding climate change impacts). However, while this type of separate "legislative preference. . . is a legitimate reference point for a lead agency's consideration, see WAC 197-11-315(6), . . . [it] cannot be read as determinative of any particular project's impact on the environment." *PT Air Watchers*, 179 Wn.2d at 929.

²⁵ WAC 197-11-400(2) (emphasis added).

²⁶ *See, e.g., Maranatha Mining, Inc. v. Pierce County*, 59 Wn. App. 795, 804-05, 801 P.2d 985 (1990).

²⁷ *Cougar Mountain Assoc. v. King County*, 111 Wn.2d 742, 749, 765 P.2d 264 (1988).

²⁸ WAC 197-11-768 (emphasis added).

12 cont.

Consistent with this flexibility, “[t]he law does not require that all adverse impacts be eliminated; if it did, no change in land use would ever be possible.”²⁹ Instead, “SEPA seeks to achieve balance, restraint and control rather than preclude all development whatsoever.”³⁰ In light of this intended balance, and the wide range of potential mitigation options recognized under SEPA, it is exceptionally rare for a lead agency to conclude that the significant adverse impacts of particular site-specific project cannot be mitigated to acceptable levels, and even more unusual for a proposal to be denied on this basis.

B. Specific Comments Regarding Potential Impacts to Cultural and Tribal Resources

With the SEPA principles above in mind, KPUD offers the following specific comments concerning the Cultural and Tribal Resources Analysis of the DEIS:

(1) The determination of whether impacts to Cultural and Tribal Resources from the project can be effectively mitigated should be based upon objective, evidence-based evaluation.

KPUD’s most fundamental concern with the DEIS is its conclusion that impacts to Cultural and Tribal Resources from the Goldendale Energy Storage project could not be adequately mitigated.³¹ KPUD respectfully disputes this conclusion and its underlying reasoning.

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As the DEIS acknowledges, mitigation specific to Cultural and Tribal Resources could include, without limitation: (i) measures included in the project Applicant’s Draft Historic Properties Management Plan; (ii) measures prepared in accordance with the Section 106 National Historic Preservation Act process; (iii) an inadvertent discovery plan; and (iv) other measures proposed by the Applicant.³² This in turn is not, and does not purport to be, an exhaustive list of potential mitigation options for the project. The numerous regulatory approvals required for the Goldendale Energy Storage project³³ will provide ample opportunities to impose any appropriate conditions needed to ensure that the proposal’s impacts will be adequately addressed.

The DEIS, however, does not meaningfully attempt to evaluate the efficacy of these measures or to identify other potential methods to mitigate the impacts of the Goldendale Energy Storage project upon Cultural and Tribal Resources. Instead, the DEIS simply parrots the subjective assertions of the Tribes to the effect that no amount of mitigation would suffice in this context:

- *“Through scoping comments to Ecology, conversations during technical meetings, media releases, and a Yakama Nation Tribal council resolution, Tribes have repeatedly indicated that mitigation would not reduce project impacts to the Tribes. The Yakama Nation stated in their scoping comment letter that “the proposed action will have significant adverse environmental impacts, many of which cannot be avoided or mitigated if Project implementation is permitted”.*³⁴

12 cont.

²⁹ *Maranatha Mining, Inc. v. Pierce County*, 59 Wn. App. 795, 804, 801 P.2d 985 (1990).

³⁰ *Cougar Mountain*, 111 Wn.2d at 753.

³¹ DEIS, §4.9 (p.157, 164-165).

³² DEIS, §4.9.2.3 (p.164). Mitigation measures are also referenced in the Applicant’s DEIS comment letter.

³³ DEIS, Chapter 3 (p.20-23).

³⁴ DEIS, §4.9.2.3 (p.164) (emphasis added).

13 cont.

- *“Yakama Nation scoping comments also included this statement about mitigation: “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 of ancestral sites that are still used to observe ceremonial and cultural practices.””³⁵*
- *“In addition, the Yakama Nation 2021 Tribal Council Resolution T-089-21 includes a statement of opposition to the project: “the proposed pump storage development violates the Yakama Nation’s inherent sovereignty and Treaty-reserved rights through direct, permanent, and adverse destruction of nine Traditional Cultural Properties of religious and ceremonial significance, and the reduction and elimination of access to gather food and medicine roots, which results in an irreplaceable loss of cultural resources and negative environmental degradation to several ephemeral waterbodies, and aquatic and terrestrial resources.””³⁶*
- *“Furthermore, Yakama Nation has stated that ‘no amount of mitigation could address the impacts of this project to our culture today, or for our future generations...Due to the sacredness of this resource, this development would destroy the lives of our Tribal members’.”³⁷*
- *“The Confederated Tribes of the Umatilla Indian Reservation scoping comments included similar language: “There may be impacts for which no mitigation is possible...” Comments on this document from the Confederated Bands of the Warm Springs Reservation of Oregon also noted that “you propose to permanently destroy unique and irreplaceable resources.””³⁸*

Based entirely upon these statements of tribal opposition, the DEIS asserts that “there is no information available about mitigation proposed by or supported by the Tribes”.³⁹ This in turn is the foundation for the DEIS’s ultimate conclusion that the identified impacts to Cultural and Tribal Resources “would be considered unavoidable.”⁴⁰

KPUD does not question the sincerity of the Tribes’ beliefs or the Tribes’ right to comment and provide input on the Goldendale Energy Storage project. However, the analytical approach above is tantamount to abdicating DOE’s role as lead agency and delegating it to the Tribes in contravention of the applicable SEPA standards. SEPA review is premised upon the function of the lead agency as an impartial, objective evaluator of the underlying proposal, its anticipated impacts, and the viability of potential mitigation measures. Simply deferring to the subjective assertions of the Tribes regarding the mitigation analysis is inconsistent with this framework.⁴¹

³⁵ DEIS, §4.9.2.3 (p.164-165) (emphasis added).

³⁶ DEIS, §4.9.2.3 (p.165) (emphasis added).

³⁷ DEIS, §4.9.2.3 (p.165) (emphasis added).

³⁸ DEIS, §4.9.2.3 (p.165) (emphasis added).

³⁹ DEIS, §4.9.2.3 (p.165) (emphasis added).

⁴⁰ DEIS, §4.9.2.3 (p.165).

⁴¹ It is also concerning to KPUD that some of the content of the Tribal Resources Analysis Report has been redacted and is accordingly not subject to public scrutiny or objective evaluation. See DEIS, Appendix H (p.7-8).

13 cont.

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13 cont.

14 cont.

14 cont.

As noted above, SEPA contemplates a wide range of potential mitigation measures by which to ameliorate the impacts of a proposal. "Avoiding" such impacts altogether is merely one of many alternatives in this regard.⁴² The DEIS does not seriously attempt to identify, much less objectively evaluate, whether and to what extent some combination of "minimizing", "rectifying", "reducing", "compensating" for, and/or "monitoring" with respect to the project could effectively address the Cultural and Tribal Resources impacts at issue.⁴³ The FEIS should thoroughly evaluate this issue with the flexibility contemplated by SEPA. Tribal input should certainly be considered as part of this process, but it should not replace DOE's own objective analysis.

(2) Probable significant adverse impacts to Cultural and Tribal Resources should not include impacts with only a marginal likelihood of occurrence.

In identifying the potential impacts to Cultural and Tribal Resources from the Goldendale Energy Storage project, the DEIS repeatedly characterizes the probability of occurrence for various impacts in noncommittal terms. E.g.,

- *"Regarding Tribal resources, research and consultation have identified a number of natural and cultural resources of importance to Tribes that could be impacted by the proposed project."*⁴⁴
- *Activities that could impact Tribal and cultural resources include ground disturbance, restrictions to access, degradation of visual quality, noise, and interruption of the landscape and habitat. The Tribes' spiritual practices could be interrupted by construction impacts to land areas and cultural or sacred sites.*⁴⁵
- *There is also a potential for significant adverse impacts on unrecorded archaeological sites that are associated with the TCPs.*⁴⁶
- *The change in the natural state of the landscape could interrupt Tribal cultural practices and impact the expression of Tribal spirituality.*⁴⁷
- *Breeding and pre-fledged birds are more likely to be directly affected by vegetation clearing, noise, and other construction activities, which could result in elimination of nesting and perching sites. These persistent disruptions would impact normal behavior of birds that are unable to leave the disturbance areas. If breeding and nesting sites are less than 0.5 mile from blasting activities, they could experience a significant adverse impact, which may impact species viability.*⁴⁸

15

14 cont.

⁴² WAC 197-11-768(1).

⁴³ WAC 197-11-768(2)-(6).

⁴⁴ DEIS, §4.9.1 (p.160) (emphasis added).

⁴⁵ DEIS, §4.9.2.1 (p.161) (emphasis added).

⁴⁶ DEIS, §4.9.2.1 (p.161) (emphasis added).

⁴⁷ DEIS, §4.9.2.1 (p.162) (emphasis added).

⁴⁸ DEIS, §4.9.2.1 (p.162) (emphasis added).

15 cont.

15 cont.

- *Archaeological sites in the study area, and the Columbia Hills Archaeological District, could be impacted by the increase in activity in the study area during operation of the project.⁴⁹*
- *There is also a potential to impact unrecorded archaeological sites that are associated with the TCPs. Ongoing ground disturbance could occur in areas where no archaeological sites have been identified during recent surveys, but there is still a potential for previously unrecorded sites to be identified during operation.⁵⁰*
- *Significant adverse impacts could occur on talus and cliff habitat if it can no longer support breeding raptors because of the proximity of human development and reduced prey availability.⁵¹*

16

Expressing the likelihood of the above-referenced impacts in such uncertain phraseology undermines the conclusion that these impacts are in fact “probable” within the meaning of SEPA.

(3) The project will not create significant and unavoidable adverse impacts to legally-protected Tribal access rights.

One of the key conclusions of the DEIS posits that construction of the Goldendale Energy Storage project could restrict access to areas deemed important to the Tribes.

17

Construction of the proposed project will occur in Pushpum and Nch’ima, which are areas used for resource gathering and other ritual and cultural activities. Construction will prevent those activities from occurring at reservoir and construction staging areas. Construction of the proposed project will limit, if not eliminate, use of these areas, which is a significant adverse impact. There is also a potential for significant adverse impacts on unrecorded archaeological sites that are associated with the TCPs.

Tribes have stated during consultation that impacts to Tribal members’ ability to participate in, teach, learn, and share cultural practices affects the mental, spiritual, and physical health of Tribal members. Restrictions to access and removal of areas used for cultural practices will indirectly affect entire Tribal communities and multiple generations.⁵²

The DEIS also identifies alleged impacts from the future operation of the proposed facility:

Operation of the project will restrict access to activities associated with Pushpum and Nch’ima. As noted above, operation of the proposed project would also impact the associated archaeological sites due to the increased human activity and ongoing interruption of culturally significant activities. This constitutes a significant adverse impact. . . .

15 cont.

⁴⁹ DEIS, §4.9.2.2 (p.163) (emphasis added).

⁵⁰ DEIS, §4.9.2.2 (p.163) (emphasis added).

⁵¹ DEIS, §4.9.2.2 (p.164) (emphasis added).

⁵² DEIS, §4.9.2.1 (p.161).

17 cont.



17 cont.

Operation of the proposed project would restrict access to resource gathering and other ritual and cultural activities, especially in the reservoir areas. Per Yakama Nation Tribal Council Resolution T-089-21, there would be “direct, permanent and adverse destruction of nine TCPs of religious and ceremonial significance and the reduction and elimination of access to gather food and medicine roots, which results in an irreplaceable loss of cultural resources...” Any permanent restrictions to these areas would be a significant impact to the Tribes.⁵³

18

The conclusions above are unsupported by the relevant evidence. Viewed objectively, the anticipated impacts of the proposal on Tribal access are greatly overstated in the first instance. For example, the Goldendale Energy Storage project does not impact access to the waterfront for fishing, gathering or ceremonial functions in any manner.⁵⁴ And although safety fencing will ultimately be installed on the project site in order to secure the new reservoirs from human and animal entry, these barriers will be physically limited to the immediate perimeter of each separate reservoir itself.⁵⁵ The construction footprint of the connection between the upper and lower reservoirs of the project is located entirely underground.⁵⁶

19

With respect to the future operation of the facility, any permanent loss of access will be limited to the two sites immediately surrounding the proposed reservoirs and the substation.⁵⁷ Here, it is critical to acknowledge that the total project site is comprised of only 681 acres—by any measure, a *de minimus* area in relation to the greater Columbia Gorge region—and the vast majority of the site is, and has historically been, in private ownership.⁵⁸ The evidence does not support the current DEIS determination that any adverse access impacts to the Tribes in relation to such a geographically limited, private area would be “significant” under the applicable SEPA standard above.

20

(4) The project will not create significant and unavoidable adverse impacts to legally protected access to Tribal fishing areas.

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While the DEIS does not expressly conclude that the Goldendale Energy Project would cause significant, adverse and unavoidable impacts to Tribal fishing rights, the document nevertheless implies that “there may be impacts to the Tribes if they are unable to access established and culturally significant fishing areas”⁵⁹, and that the “Tribes have expressed concerns about how the proposed project may impact access to fishing sites.”⁶⁰ In fact, there is no evidence whatsoever indicating that impacts either from construction or operations would limit Tribal access to the Columbia River in any manner. The point of water withdrawal for the proposed facility from the river is not part of the DEIS. And the point of withdrawal for the water system is an existing concrete vault separated from the river impoundment with

17 cont.

⁵³ DEIS, §4.9.2.2 (p.163).

19 cont.

⁵⁴ See June 2020 FERC Final License Application, Exhibits F & G.

⁵⁵ Understanding based upon KUPD’s communications with the Applicant.

⁵⁶ See June 2020 FERC Final License Application, Exhibits A, F, & G.

⁵⁷ See June 2020 FERC Final License Application, Exhibits A, F, & G.

21 cont.

⁵⁸ DEIS, §2.2 (p.6).

⁵⁹ DEIS, §4.9.2.2 (p.164).

⁶⁰ DEIS, §4.9.2.1 (p.163).



21 cont.

rock and gravel; if required by FERC, additional fish screening will be installed as required. As a closed loop system, there is no interaction with the river other than the permitted withdrawal of water rights.

(5) The project will not create significant and unavoidable adverse impacts to plants and animals.

22

From a “non-Tribal perspective”⁶¹, the DEIS did not find any unavoidable significant adverse impacts to terrestrial species.⁶² This conclusion was effectively reversed in the Cultural and Tribal Resources analysis with respect to various plants and animals in relation to Tribal considerations.⁶³ The evidence does not support this dichotomy. The referenced species are all indigenous and would continue to be accessible to the Tribes outside the construction and future operational footprint of the Goldendale Energy Storage facility. Again, there is an extremely limited geographic area that would be impacted by construction, and even less during the future operation, of the proposed facility. Under the objective SEPA review standard, the resulting impacts on species are not significant or otherwise incapable of mitigation.

IV. CONCLUSION

23

KPUD appreciates DOE’s thorough environmental review for the Goldendale Energy Storage project as reflected throughout the majority of the June 2022 Draft Environmental Impact Statement, and is grateful for the opportunity to provide these comments. Apart from the minor corrections to the Water and Energy Resources provisions identified in this submittal, KPUD generally concurs in the analysis and conclusions of the DEIS.

24

However, for the reasons explained above, KPUD disagrees that the Goldendale Energy Storage project will necessarily result in significant adverse impacts to Cultural and Tribal Resources that are unavoidable. The very limited physical footprint of the proposed project underscores that any adverse impacts should be mitigatable through appropriate project conditions. If evaluated using the same evidence-based, empirical methodology that the DEIS uses for the various other elements of the environment analyzed in the DEIS, KPUD is confident that some thoughtful combination of mitigation measures will be deemed adequate to address the proposal’s potential impacts upon Cultural and Tribal Resources.

25

In preparing the FEIS that will ultimately be issued for this important public project, KPUD would respectfully request that DOE revisit its Cultural and Tribal Resources analysis. DOE’s evaluation should appropriately consider input from the Tribes, but—consistent with the governing SEPA framework—it should not defer entirely to the Tribes in determining the effectiveness of potential mitigation efforts.

Thank you for your consideration.

Sincerely,

Jim Smith, General Manager
Public Utility District No. 1 of Klickitat County

22 cont.

⁶¹ DEIS, §4.9.1 (p.160).

⁶² DEIS, §4.7.

⁶³ DEIS, §4.9.1 (p.160); DEIS, §4.9.2.1 (p.162).



Klickitat County EDA Anonymous

- 1 | Please see comments attached from the Klickitat County Public Economic Development Authority (Klickitat County EDA).



KLICKITAT COUNTY PUBLIC ECONOMIC DEVELOPMENT AUTHORITY

115 W. Court Street, MS 207, Goldendale WA 98620
Office: 509-773-7060

August 9, 2022

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

Re: Comments on the Draft Environmental Impact Statement for the Goldendale Energy Storage Project

Dear Ms. Park,

1 cont. The Klickitat County Public Economic Development Authority (Klickitat EDA) was formed in 1995. Its Board of Directors includes the three Klickitat County commissioners, the mayors of the county's three incorporated cities, a Port of Klickitat County commissioner, a Klickitat County Public Utility District commissioner, and other stakeholders. The Klickitat EDA's mission is to enhance the economy of Klickitat County and the lives of its citizens by using all available resources to create opportunity and employment through sustained leadership, planning and strategic investment. Today, 2 I am writing at the direction of Klickitat EDA's Board of Directors to express the Board's support for the Goldendale Energy Storage Project and the economic benefits it will yield.

1 cont. The Goldendale Energy Storage Project is identified as a catalyst opportunity for Central Klickitat County in our 10-year Economic Development Strategic Plan (<http://klickitatcounty.org/DocumentCenter/View/3482/2017-05-22-Klickitat-County-Strategic-Plan-V14-FINAL-PDF>). Catalyst opportunities are projects that have the greatest short- and long-term promise to accelerate economic growth. We submit that the 3 EIS for the Goldendale Energy Storage Project should address the Project's socioeconomic impacts, which will be significant.

2 cont. After the Gorge Aluminum Smelter closed in 2003, Central Klickitat County experienced challenges economically, including a decreasing population and an industrial base lacking diversification. In the short-term, the Goldendale Energy Storage project will supply an estimated 3,000 construction jobs, providing critical local employment. Local businesses (e.g. restaurants, hotels, RV parks) will benefit from increased visitation

during construction, providing a boost to the local economy. The project will also support the development of a diversified, skilled workforce by providing the opportunity for workers to complete trade apprenticeships. Over the long-term, the project will provide 40 to 60 well paying, direct jobs during operations and a significant bump in tax revenue, which through the County and junior taxing districts will be reinvested in the community to support roads, schools, and emergency services. This project is an opportunity to once again realize economic prosperity for Central Klickitat County by redeveloping a former industrial site for a new, suitable use.

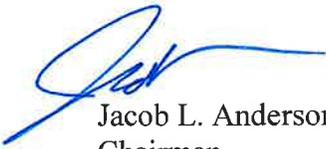
The benefits of this project extend beyond just the economic. The developer will assist with brownfield remediation at the Gorge Aluminum Smelter site, addressing a long-standing environmental concern. The project will also help secure power grid reliability by giving us a way to store energy generated by solar and wind power facilities, making Klickitat County's prior clean energy investments even more valuable. The federal government and Washington State have both set aggressive renewable energy goals, and projects like the Goldendale Energy Storage Project are vital to making those goals a reality.

Scaling up our energy infrastructure to invest in a clean energy future always involves tradeoffs. However, as the draft EIS identifies, the impacts of this proposed project on land and water resources are expected to be minimal and have viable mitigation pathways. The developer appears committed to developing this locally- and regionally-important project in an environmentally responsible manner.

We again express Klickitat EDA's support for the Goldendale Energy Storage Project. It will yield critical short- and long-term economic benefits to Central Klickitat County and support federal and state renewable energy goals.

Thank you for this opportunity to comment.

Sincerely,



Jacob L. Anderson
Chairman

2 cont.

Dylan Bass

Please accept the attached letter from WSDOT regarding the Goldendale Energy Storage Project.

Thanks,
Dylan Bass
WSDOT SW Region



August 9, 2022

Sage Park
Washington State Department of Ecology
Central Region Office
Attn: Goldendale Energy DEIS
1250 W Alder Street
Union Gap, WA 98903

Re: Goldendale Energy Storage Project – SEPA Draft EIS Comments
SR 14 MP 106.59

Dear Sage Park:

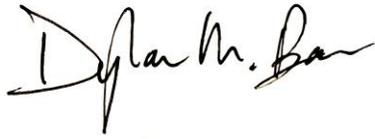
Washington State Department of Transportation (WSDOT) Southwest Region staff would like to thank the Washington State Department of Ecology for providing us the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Goldendale Energy Storage project. WSDOT staff were engaged in the scoping process for the proposal, and while our comments were addressed in the DEIS, we would like to clarify our position and add to our comments. Please accept the following comments for your consideration.

The Transportation section of the DEIS states that there will be no significant and unavoidable adverse impacts to transportation associated with the Goldendale Energy proposal. This determination appears to be based on information provided by the project proponent but does not appear to include a traffic impact analysis (TIA). The preparation of a TIA is referenced as a mitigation measure recommended by WSDOT, to be prepared prior to construction of the proposed facility.

It is the opinion of WSDOT staff that the TIA should be completed during the EIS process and incorporated into the appendices of the final EIS. The findings and recommendations in the TIA may include additional information that can be used to determine whether significant and unavoidable impacts will occur during the construction of the proposed facility. Mitigation measures may be recommended by the TIA, some of which could be included in the Construction Traffic Management Plan proposed by the project proponent or conditioned in the EIS as a mitigation measure for the project.

In closing, WSDOT is supportive of the project, provided that impacts to the state highway system are adequately analyzed and mitigated for. Thank you for the opportunity to comment on the DEIS for the Goldendale Energy Storage project. If you have any questions or require additional information, please contact me at BassD@wsdot.wa.gov or at 360-831-5829.

Sincerely,

A handwritten signature in black ink that reads "Dylan M. Bass". The signature is written in a cursive style with a large initial 'D' and a long horizontal stroke at the end.

Dylan Bass
Development Review Planner
WSDOT Southwest Region

Cc: Laurie Lebowsky-Young
Scott Langer

Klickitat County - Board of County Commissioners

- 1 | Please see attached comments from the Klickitat County Board of County Commissioners.



KLICKITAT COUNTY
BOARD OF COUNTY COMMISSIONERS



115 W COURT, ROOM 201, GOLDENDALE WASHINGTON 98620 • VOICE 509 773-4612

JACOB ANDERSON, DISTRICT #1

DAVID M. SAUTER, DISTRICT #2

DAN CHRISTOPHER, DISTRICT #3

August 9, 2022

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

Re: Goldendale Energy Storage Project Draft Environmental Impact Statement

Dear Ms. Park,

We are writing to express our support for the proposed Goldendale Energy Storage Project. This project would be located in Klickitat County and generate numerous benefits for our residents, economy, environment, and clean energy future.

The Goldendale Energy Storage Project has been a priority project in Klickitat County for many years. It is identified as a catalyst economic development opportunity in the Klickitat Public Economic Development Authority's 10-Year Economic Development Strategic Plan (<http://klickitatcounty.org/DocumentCenter/View/3482/2017-05-22-Klickitat-County-Strategic-Plan-V14-FINAL-PDF>). It is also identified in Mid-Columbia Economic Development District's Comprehensive Economic Development Strategy as the top priority for the Washington side of the Columbia River Gorge. As a rural county, we are excited by the economic activity this project would generate. Clean energy is a burgeoning industry sector that has and will continue to support critical employment in rural Klickitat County. The Goldendale Energy Storage Project is expected to create more than 3,000 family-wage jobs during construction, including valuable trade apprenticeships that are foundational to successful, lifelong professions. Economic benefits of the project will also extend long-term to all Klickitat County residents, as the annual property taxes from this project will support our schools, roads, and emergency services.

1 cont.

This project is also an opportunity to clean up and redevelop the prior Columbia Gorge Aluminum Smelter Site. Once a prominent provider of local, family-wage jobs, this industrial site has sat unused for too long. The developer is bringing significant outside funding to clean up and responsibly redevelop this site for a new, productive use. Numerous studies have identified this site as being ideal for pumped storage; we are fortunate to have it in our County. The project site's unique geography makes the pumped storage project feasible, and the site's proximity to grid access and existing wind and solar projects makes it cost-effective. This is an opportunity to address relic environmental contamination while investing in a sustainable future.

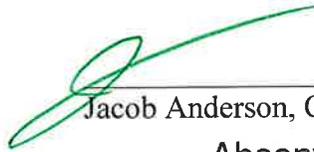
1 cont.

The Goldendale Energy Storage Project is a critical piece of our collective clean energy future. Klickitat County already produces abundant wind power and we will soon also be generating solar power. We need a safe, reliable way to store these intermittent energy sources so that energy is available to hospitals, homes, schools, and business on demand. The Goldendale Energy Storage Project will serve that need, helping to create a more reliable grid while supporting Washington State's renewable energy policy goals and national energy needs.

Relative to the serious benefits this project will bring to Klickitat County and the renewable energy sector, the adverse environmental impacts (including water quality impacts) identified in the EIS are minor and mitigatable. We resoundingly support this project and look forward to realizing the benefits locally in Klickitat County.

Sincerely,

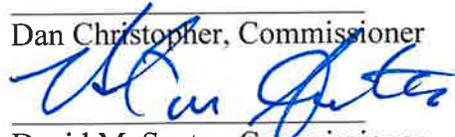
BOARD OF COUNTY COMMISSIONERS
Klickitat County, Washington



Jacob Anderson, Chairman

Absent

Dan Christopher, Commissioner



David M. Sauter, Commissioner



KLICKITAT COUNTY NATURAL RESOURCES & ECONOMIC DEVELOPMENT DEPARTMENT

115 W. Court St., MS 204, Goldendale, Washington 98620
Telephone: 509 773-7060

August 9, 2022

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

RE: Comments -- Goldendale Pumped Storage Project Draft EIS

Dear Ms. Park:

1 Thank you for the opportunity to comment on Draft Environmental Impact Statement (DEIS) that was prepared to support review of FFP Project 101, LLC's (Applicant) application for 401 water quality certification for its 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.

2 This is an important project on many levels. If built, the Project, with its the long-duration energy storage capability, will play an important role in the State's and broader region's transition to a low carbon energy future while maintaining reliability of the power grid. It will expedite and enhance the cleanup at the former aluminum smelter site. And, it will serve as a catalyst for economic development in Klickitat County. On the subject of economic development, the EIS should include an analysis of the Project's socioeconomic impacts.

3 Given that the DEIS was prepared to support a decision on an application for 401 water quality certification, it is noteworthy that the DEIS documents no significant adverse impacts to water resources. Moreover, as summarized in Table S-1 of the DEIS, the Project is not expected to have significant adverse impacts on soils and geology, air quality and greenhouse gases, energy resources, public services and utilities, aquatic species and habitats, terrestrial species and habitats (with implementation of proposed mitigation measures), aesthetic/visual quality, environmental health, land use, recreation, transportation, or environmental justice. Cultural and Tribal resources is only resource for which the DEIS reports significant unavoidable adverse impacts.

4 Klickitat County concurs with Klickitat Public Utility District's (PUD) comments on the DEIS and incorporates the PUD's August 8, 2022 comment letter by reference. In particular, we share the PUD's concern that the DEIS includes determinations on whether Project impacts to cultural and Tribal resources would be significant adverse impacts and whether these impacts could be mitigatable were apparently made by a third party, not the Department of Ecology (Ecology).

Below are additional comments regarding cultural and Tribal resources.

Appendix H Tribal Resources Analysis Report

Table 2 Applicable Laws and Policies

5 The description in Table 2 regarding the Treaties of 1855 states: "Each of the referenced treaties set aside reservation land and reserved fishing, gathering, and hunting rights for the signatory Tribes throughout their usual and accustomed grounds." This description should be revised to provide more precise information regarding gathering and hunting rights, particularly given that the Project is located on private property, except where transmission lines are to be strung on existing BPA towers. The treaties guarantee the signatory Tribes "...the privilege of hunting, gathering roots and berries, and pasturing their horses and cattle upon open and unclaimed land." Private property is not opened and unclaimed land.

Appendix H, Section 3.2.2 Natural Resources Associated with Tribal Use

In paragraph three of section 3.2.2 it states: "Additionally, Yakama Nation included concerns about the potential disruption of a Programmatic Agreement related to the construction and operation of the wind farm that overlaps with the proposed project area (BPA 1997). That agreement requires that the wind farm proponent "make a good-faith effort to acquire an access easement...to allow members of the [Yakama Nation] to conduct traditional plant gathering activities and other traditional uses (BPA 1997:3)." The wind farm that was the subject of this Programmatic Agreement was Columbia Wind Farm #1.

6 In 1995 Klickitat County issued a Conditional Use Permit (CUP) for Columbia Wind Farm #1 to Conservation and Renewable Energy Systems (CARES). However, Columbia Wind Farm #1 not constructed. I understand this was due to an unfavorable energy market. In 2006 Klickitat County issued an Energy Overlay Zone (EOZ) permit to Windy Point Partners, LLC for the Windy Point Wind Energy Project, which was build and is operating today where Columbia Wind Farm #1 was to have been sited. The EOZ permit for Windy Point Wind Energy Project does not include a provision regarding access to conduct traditional plant gathering activities or other traditional uses.

I recently spoke with Scott Tillman, President of NSC Smelter, which owns the land where Columbia Wind Farm #1 was to be constructed, and is the location of the Project's upper reservoir. From my conversation with Mr. Tillman, it is my understanding that there is no access easement to conduct traditional plant gathering activities or other traditional uses, no one has requested access to the site to conduct traditional plant gathering activities or other traditional uses, and he is unaware of anyone going on the property for the purpose of plant gathering or other traditional uses. The status of the 25-year old, project-specific Programmatic Agreement should be verified. It likely lapsed when Columbia Wind Farm #1 was canceled.

In 1995 Bonneville Power Administration (BPA) and Klickitat County were the lead agencies for the joint NEPA/SEPA EIS that supported review of the proposed Columbia Wind Farm #1 (<https://www.energy.gov/nepa/downloads/eis-0206-final-environmental-impact-statement>).

The matter of access for traditional plant gathering and other traditional uses is addressed in the NEPA/SEPA EIS. For example, in section 2.4.4 Environmental Consequences of the Draft NEPA/SEPA EIS it states:

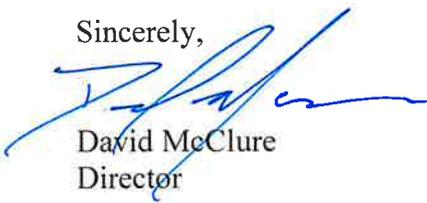
Development of the Project as proposed would result in temporary and permanent disturbance to vegetation, including ethnobotanical plants, from construction and operation of the Project. Access to the Project site is not currently provided to Native Americans by the property owners, and Project development would not alter the status of access agreements. Therefore, the Project is not expected to adversely affect current availability of ethnobotanical plant resources to Native American groups.

The situation regarding access to the Project Area today is effectively the same today as it was in 1995. Yet, the NEPA/SEPA EIS for Columbia Wind Farm #1 and the DEIS for the Goldendale Energy Storage Project reached different conclusions as to whether or not there would be significant and unavoidable adverse impact to access for plant gathering and other traditional uses. The current status/baseline condition of the Project Area with respect to access should be verified. I question whether the Goldendale Energy Storage Project DEIS the information provided for the development of the DEIS are consistent with respect to the geographic extent of the Study Area verses the Project Area.

The Applicant and the landowner may be willing to consider an access easement. If so, this could help mitigate for Project impacts on cultural and tribal resources.

Thank you for considering my comments.

Sincerely,



David McClure
Director

Sage Park
Department of Ecology
Central Region Office
Attn: Goldendale Energy DEIS
1250 W. Alder Street
Union Gap, WA 98903-0009

RE: Turlock Irrigation District's and Tuolumne Wind Project Authority's Comments on the Draft Environmental Impact Statement for the Goldendale Energy Storage Project.

Dear Ms. Park,

The Turlock Irrigation District ("TID") on behalf of itself and the Tuolumne Wind Project Authority ("TWPA") hereby submits comments on the draft Environmental Impact Statement ("EIS") for the Goldendale Energy Storage Project ("GES Project"), which is owned by Free Flow Power Project 101, LLC ("FFP") and is being developed by Rye Development ("Rye"). TID and TWPA thank the Washington State Department of Ecology for providing them an opportunity to comment on the draft EIS.

1 FFP proposes to construct the GES Project's massive upper reservoir, which would be the equivalent of a 19-story building that covers 38 square city blocks, in the middle of TWPA's 62-turbine wind farm, immediately adjacent to 15 turbines. Since TID purchases all the energy and Renewable Energy Credits ("RECs") produced by TWPA's wind farm and pays all the wind farm's costs, TID has raised the following concerns to Rye and the Federal Energy Regulatory Commission ("FERC" or "Commission") throughout FERC's licensing process for the project:

- 2
1. The GES Project should not proceed as the proposed location for the upper reservoir has not been adequately secured by FFP and could change, because the TWPA-NSC Lease prohibits NSC from entering into a lease that would interfere with TWPA's turbines, use of the property, or other rights under the lease.
 2. The GES Project's new reservoirs would change the area's topography, causing changes to wind patterns within TWPA's wind farm, which would:
 - (a) reduce the output of energy and RECs that TWPA's turbines produce;
 - (b) increase wind turbulence intensity, potentially causing: (i) damage to the turbines, (ii) increased maintenance and repairs to address this damage, and/or (iii) a reduction in the turbines' design and service lives, which would reduce the turbines' overall energy output; and/or
 - (c) potentially invalidate the warranties that TWPA has on the wind turbines, depriving TWPA of their crucial energy output and design and service lives guarantees.
 3. The GES Project's new reservoirs could saturate the foundations of the turbines making them unstable and could:
 - (a) damage to the turbines;



2 cont.

- (b) increase maintenance and repairs on the turbines to address this instability and damage;
 - (c) reduce the turbines’ design and service lives, thereby reducing their overall energy output; and/or
 - (d) invalidate the warranties that TWPA has on the wind turbines.
4. The GES Project’s new reservoirs will increase the presence of avian species and their prey near the turbines, which will increase the risk of birds and bats colliding with the turbines’ blades (i.e., avian strikes) potentially causing:
 - (a) increased bird and bat deaths, including the deaths of some protected bird and bat species that would cause TWPA to incur significant fines;
 - (b) increased damage to TWPA’s turbines due to these strikes, which in turn would require increased maintenance and repairs to address this damage, a reduction in the turbines’ design and service lives, and a reduction in the turbines’ overall energy output; and/or
 - (c) regulators to require TWPA to reduce or cease its operation of one or more turbines due to the increased avian strikes.
 5. The GES Project could damage or interfere with the operations or output of TWPA’s turbines during construction, when FFP does the excavation or drilling for the reservoirs and underground tunnels.

3

Rye has not adequately addressed any of these concerns. Rather, it merely conducted a narrow set of studies, which are reflected in the Wind Resource Effects Analysis – Study Report (dated April 2021) (“2021 WREA Study Report”) that was prepared by Rye’s consultant Environmental Resources Management (“ERM”). Although incredibly flawed and intentionally engineered to underestimate the potential effects that the upper reservoir will have on the wind patterns in TWPA’s wind farm, the 2021 WREA Study Report nonetheless shows that construction of the upper reservoir in its currently proposed location would change wind patterns enough to reduce each affected turbine’s output by thousands of megawatt hours, resulting in *each turbine* suffering hundreds of thousands of dollars in lost annual generation and RECs. The reason the 2021 WREA Study Report inaccurately concludes that the changes in wind patterns will not cause a material reduction in the output of TWPA’s turbines is that ERM did not have access to the turbines’ power curves, so it could not accurately determine how the wind pattern changes it identified would affect the turbines’ output. The 2021 WREA Study Report also reaches this inaccurate conclusion because it relies on limited, “cherry picked,” and erroneous data, as well as unproven study methodologies which do not follow industry practices. Even with these flaws, the 2021 WREA Study Report still produced data that, when applied to the turbines’ power curves, showed the upper reservoir would significantly reduce the output of TWPA’s turbines. These reductions are a direct violation of the TWPA-NSC Lease’s provisions that expressly prohibit NSC from causing such adverse impacts.

4

Unfortunately, the draft EIS appears to rely on the 2021 WREA Study Report’s inaccurate conclusions and certain unsupported statements made by Rye in response the concerns raised by TID. The purpose of the EIS is to provide “an unbiased and scientifically based analysis, which



4 cont.

provides a comprehensive and objective evaluation of probable environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize impacts,” and “will be used to inform permit decisions and potential changes to the proposed project.”¹ Therefore, TID submits these comments and requests that the Department of Ecology direct FFP to pay for additional, independent studies, in the hope that the EIS will be amended to fulfill its purpose by adequately and accurately addressing the potential effects that the GES Project will have on TWPA, TWPA’s production of renewable generation, and the birds and bats that could be killed due to increased avian strikes.

SUMMARY OF TID’S COMMENTS

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TID has attempted to raise its concerns with FFP, but FFP has not taken any concrete steps to address these concerns. Therefore, TID has no choice but to continue to seek relief in the state and federal proceedings that regulate the GES Project’s development and construction. TID’s comments demonstrate why the GES Project cannot go forward until TID’s concerns are resolved and its ratepayers are protected from the potentially significant adverse effects that could result from FFP’s decision to site the GES Project in the middle of the TWPA’s wind farm.

6

TID believes that the Final EIS should not be issued and that the EIS process should not proceed at this time. FFP’s submission is fundamentally flawed because the proposed location for the upper reservoir has not been adequately secured by FFP and could change. The proposed location is on property TWPA leases from NSC. Under the TWPA-NSC Lease, NSC is prohibited from constructing buildings or other structures – or allowing anyone else to take any of these actions – if such actions would interfere with TWPA’s operations, the output of TWPA’s turbines, TWPA’s use of the property, or adversely affect any other rights TWPA enjoys under the TWPA-NSC Lease. Because the 2021 WREA Study Report found that construction of the upper reservoir in the proposed location would cause wind pattern changes that would significantly reduce the energy output of TWPA’s turbines, proceeding with the reservoir in this location would be a direct violation of the aforementioned Lease provisions. Hence, the only way the upper reservoir can be built in the currently proposed location is if TWPA waives its rights under the TWPA-NSC Lease and consents to its construction there. *TWPA has not waived these rights and has not given such consent.* If FFP is unable to get TWPA’s consent, the upper reservoir’s location will have to be moved. Such a move would nullify the findings in the draft EIS and would make the final EIS premature because the draft EIS would not address the upper reservoir’s correct, ultimate location.

To correct this fundamental flaw in FFP’s proposal, the Department of Ecology should hold the EIS process in abeyance until FFP demonstrates that it has: (1) secured the requisite property rights to construct the upper reservoir on property currently leased by TWPA, which would include FFP obtaining TWPA’s written consent to the construction of the GES Project, as the proposed location for the project could change without such consent; (2) mitigated the adverse impacts on TWPA’s wind farm caused by the GES Project and TWPA has approved the mitigation measures; and (3) entered into an agreement with TWPA to compensate TWPA for any adverse

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¹ Washington Department of Ecology, State Environmental Policy Act Draft Environmental Impact Statement, for the Proposed Goldendale Energy Storage Project, Publication No. 22-06-006 (dated June 2022) (“draft EIS”), Appendix A Scoping Summary Report, Section 1.2 EIS Process at p. 1.



6 cont.

impacts that the GES Project causes to the TWPA wind farm that are not mitigated, so that TID’s ratepayers are not stuck paying the costs of such adverse impacts.

If FFP can make the foregoing demonstration to the Department of Ecology, the Final EIS should be amended to more accurately and adequately address all the potential environmental impacts that will result from the construction and operation of the GES Project. In particular, the Department of Ecology should amend the statements and findings in the following sections of the draft EIS to ensure that they address all the potential impacts that the GES Project could have on TWPA, TWPA’s turbines, TWPA’s renewable energy output, the avian species in the area, as well as the measures that FFP must take to mitigate these impacts:

7

- Section 4.4 Energy Resources
- Section 4.5 Public Services and Utilities
- Section 4.7 Terrestrial Species and Habitats
- Section 4.11 Land Use
- Section 6.2 Cumulative Impacts by Resource
- Appendix E Energy Resource Analysis Report
- Appendix G Terrestrial Species and Habitats Resource Analysis Report
- Appendix I Environmental Health Resource Analysis Report

8

The Department of Ecology should also disregard the 2021 WREA Study Report’s conclusion that the upper reservoir will cause minimal impacts on wind patterns because the Weather Research Forecasting (“WRF”) model used in the report was employed improperly and used limited, inaccurate data. For example, the WRF model inappropriately relied on meteorological tower (“Met Tower”) data that did not accurately represent the wind patterns experienced by the turbines at the wind farm. In addition, the WRF model inappropriately used only two years of turbine generation data that did not accurately represent how changes in wind patterns would affect the output of the turbines at the wind farm. The WRF model also does not comport with the standard industry practice of using an uncertainty assessment to predict the changes to wind patterns and speeds. The WRF model is merely a weather forecasting model, which alone cannot and should not be used to determine wind pattern changes caused by the upper reservoir.

9

In addition, the 2021 WREA Study Report does not adequately address any of TID’s above-referenced concerns and fails to address the following issues that FERC directed it to address: First, it does not provide an accurate analysis of how the change in airflows would affect the output of TWPA’s turbines or how they would affect wind turbine operations. Second, the 2021 WREA Study Report does not provide an adequate analysis of the project’s potential effects on golden eagles because it does not address the increase in prey around the two new reservoirs. Third, the 2021 WREA Study Report does not provide analysis of the number of turbines potentially affected by project’s operation relative to the number of turbines in the project area. Fourth, the 2021 WREA Study Report was not developed in consultation with TID and TWPA, as directed by

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8 cont.

the Commission.

8 cont. Because the 2021 WREA Study Report does not adequately address these issues or TID’s concerns, the Department of Ecology should order new studies that: (1) fully and adequately address each of the issues raised by TID and the FERC; (2) identify the potential risks associated with each issue; and (3) provide mitigation measures to reduce these risks and prevent the occurrence of adverse impacts. The Department of Ecology should require that these new studies be performed by an independent third-party chosen by TID and FFP and paid for by FFP. These new studies should comport with industry practices and should rely on data, models, and methodologies (e.g., an uncertainty assessment) that are commonly used, with abundant prior case examples reflecting their use. The Department of Ecology should order that any study addressing the effects of the GES Project on wildlife should include input from the U.S. Fish and Wildlife Service (“USFWS”), and the State of Washington Department of Fish and Wildlife (“WDFW”). The Department of Ecology should also order that any study addressing the impacts of the GES Project on TWPA’s wind turbines should include input from Siemens Gamesa Renewable Energy, Inc. (“SGRE” or “Siemens”) as it is the manufacturer of the turbines and the entity that has been responsible for their operations and maintenance (“O&M”) since they were erected on the property. Such input is necessary to accurately determine the various potential impacts that the upper reservoir could have on the turbines and on the warranties that Siemens has provided on the turbines. These independent studies are the only way to ensure that the Final EIS sets forth unbiased, scientifically grounded, objective, and comprehensive conclusions regarding the potential effects that the GES Project will have on TWPA, TWPA’s production of renewable generation, and the birds and bats that could be killed due to increased avian strikes.

11 The Final EIS should set forth a process for TWPA and other stakeholders to be compensated if the mitigation measures identified in the studies fail, causing them to suffer losses or other damages. This process should include a requirement that FFP enter into an agreement with TWPA and any other affected stakeholder that would allow them to receive compensation from FFP for any adverse impacts that the GES Project causes them to suffer.

BACKGROUND

A. Description of the GES Project

The proposed Goldendale Energy Storage Project (“GES Project”) is owned by FFP and is a closed-loop pumped storage facility. Completing the GES Project would require the construction of the following new facilities:

- 12
- (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, ***which is equivalent to a 19-story building that covers 38 square city blocks;***
 - (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;
 - (3) *an underground conveyance tunnel system connecting the two reservoirs consisting of a 2,200-foot-long, 29-foot-diameter concrete-lined vertical shaft, a 3,300-foot-long, 29-*



foot-diameter concrete-lined high pressure tunnel, a 200-foot-long, 22-foot-diameter high pressure manifold tunnel, three 600-foot-long, 15-foot-diameter steel/concrete penstocks, three 200-foot-long, 20-foot-diameter steel-lined draft tube tunnels with bonneted slide gates, a 200-foot-long, 26-foot-diameter concrete-lined low-pressure tunnel, and a 3,200-foot-long, 30-foot-diameter concrete-lined tailrace tunnel;

(4) *an underground powerhouse located between the upper and lower reservoir in a 0.83-acre powerhouse cavern containing three 400-megawatt (MW) Francis-type pump-turbine units for a total installed capacity of 1,200 MW;*

(5) a 0.48-acre underground transformer cavern adjacent to the powerhouse containing intermediate step-up transformers that will step up the voltage from 18 kilovolts (kV) to 115 kV;

(6) *two 30-foot-diameter tunnels for accessing the powerhouse and transformer caverns;*

(7) a 0.84-mile-long, 115-kV underground transmission line extending from the transformer gallery through the combined access/transmission tunnel to where it emerges aboveground near the west side of the lower reservoir and extending an additional 0.27 miles to an outdoor 7.3-acre substation/switchyard where the voltage would be stepped up to 500 kV;

(8) a 3.13- mile-long, 500-kV transmission line routed from the substation/switchyard south across the Columbia River and connecting to Bonneville Power Administration’s existing John Day Substation;

(9) a buried 30-inch-diameter water fill line leading from a shut-off and throttling valve within a non-project water supply vault owned by Klickitat Public Utility District (KPUD) to an outlet structure within the lower reservoir to convey water to fill the reservoirs; and

(10) appurtenant facilities. The project would also include an existing 0.7-mile road for accessing the lower reservoir site and an existing 8.6-mile-long road for accessing the upper reservoir site both of which may be modified to provide access for construction vehicles.²

As proposed, the GES Project is to be located approximately 8 miles southeast of the City of Goldendale in Klickitat County, Washington. The upper reservoir of the project will be located on lands owned by NSC. with some project features on lands associated with the historic Columbia Gorge Aluminum Smelter. The “Major Land Uses” section of the “Environmental Report” in Section 1.2 of Exhibit E to the Draft License Application (“DLA”) for the GES Project, filed with the Federal Energy Regulatory Commission (“Commission” or “FERC”) on December 16, 2020, (in FERC Docket No. P-14861-002) states that the GES Project’s upper reservoir is located within the footprint of the TWPA wind farm:

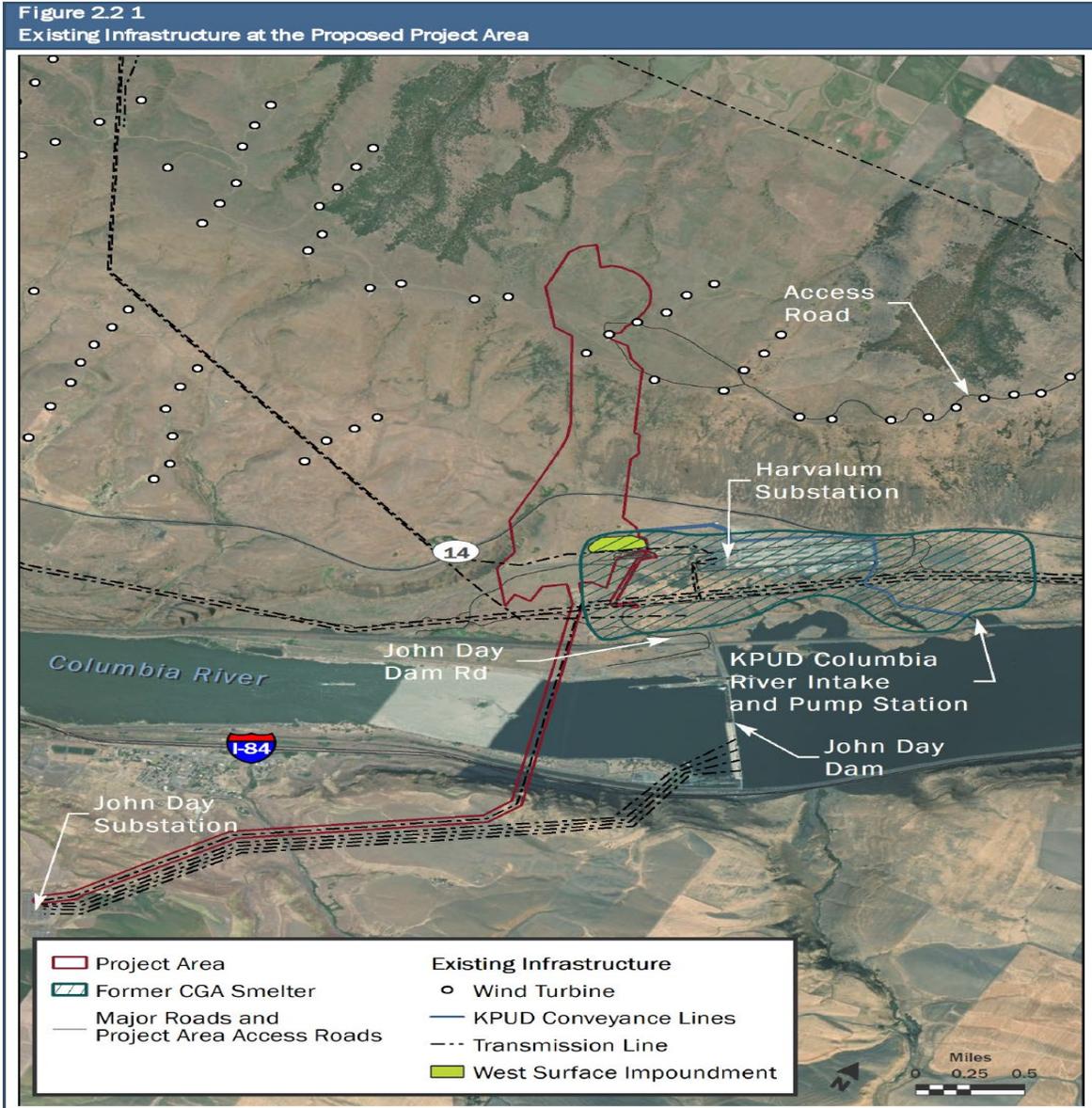
The upper reservoir vicinity includes wind farms and dry-land agriculture/rangeland. A wind farm is located just east of and adjacent to the Project Boundary and consists of 13 wind turbines owned by Tuolumne Wind

² Notice of Application Accepted for Filing and Soliciting Motions to Intervene and Protest, (dated December 17, 2020) FERC Docket No. P-14861-002 (“NOA”) (emphasis added).

12 cont.

Project Authority. These wind turbines are part of the Windy Point Phase I Project, which is comprised of 62 wind turbines (Ecology and Environment 2006).³

Figure 2.2.1 from the draft EIS shows the approximate location of the upper reservoir and adjacent TWPA wind turbines. Figure 2.2.1 does not show the elevations of the reservoir or the turbines.

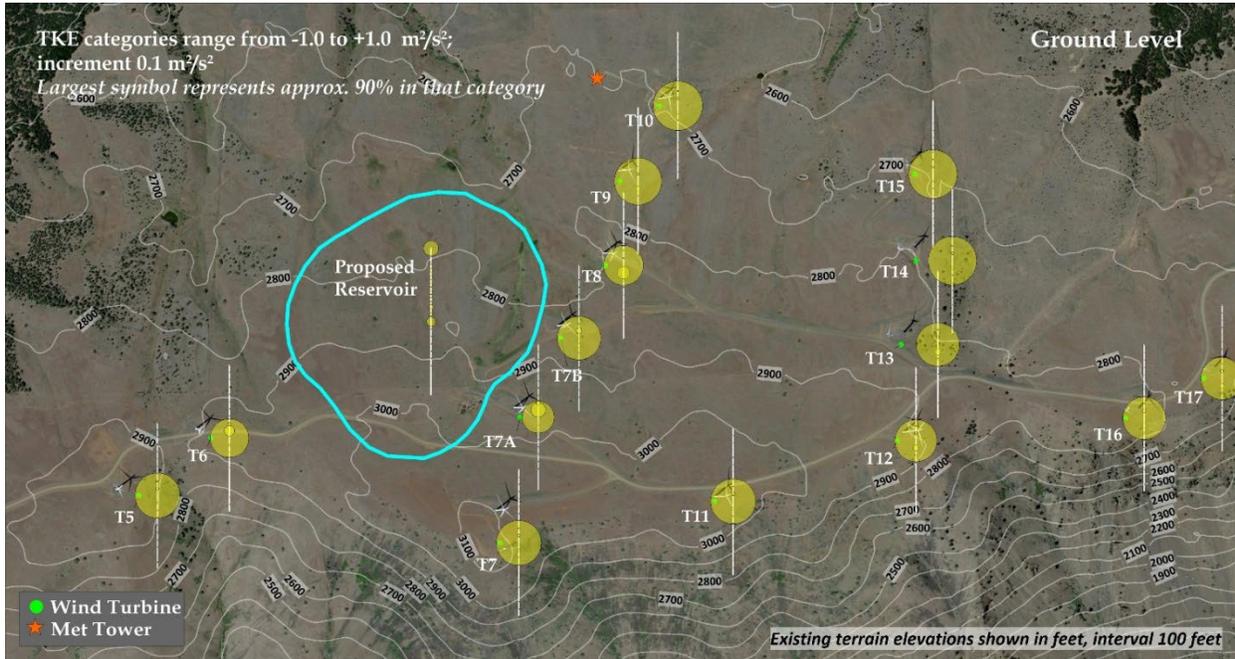


However, Figure 5-10 in the 2021 WREA Study Report shows the proposed upper reservoir located in the middle of the TWPA wind farm with at least 15 turbines adjacent: 2 located on one

³ FFP’s Draft License Application (“DLA”), Exhibit E at p.1 (emphasis added); see also Section 9.2, entitled “Potential Land Use Resource Impacts,” also states “the upper reservoir site is utilized for wind energy and non-irrigated agriculture (grazing). Project area and adjacent land uses are shown in Figure 9.1-2.” DLA, Exhibit E at p. 132.

12 cont.

side of the reservoir and 13 located on the other. Several of the turbines are within a couple of meters of the location for the proposed upper reservoir.



12 cont.

B. Description of the TWPA Wind Farm, TID and the Siemen’s warranties.

The TWPA wind farm is owned by the TWPA, a California Joint Powers Agency formed in 2008 by TID and the Walnut Energy Center Authority. The TWPA wind farm represents a \$400 million investment by TID. The TWPA wind farm is located in Klickitat County, Washington and constructed on land TWPA leases from several landowners, one of which is by NSC Smelter, LLC (“NSC”).

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TID is a not-for-profit, consumer-owned irrigation district organized under the laws of the State of California (California Water Code §§ 20500-29978). TID supplies electric power and energy to the residents and businesses within its service area. TID serves approximately 100,000 electric retail customers and has annual electric sales of approximately 2 million MWhs. On behalf of its consumer-owners – i.e., its ratepayers – TID purchases all the capacity and energy from the wind farm and pays all its costs. TID also relies on this energy and capacity to meet its California State mandated Renewable Portfolio Standard (“RPS”) obligations.

Siemens is the manufacturer of the wind turbines surrounding the GES Project’s upper reservoir and of most of the other turbines on TWPA’s wind farm. Siemens performs operations and maintenance (“O&M”) services for the entire wind farm. Upon installing these turbines, Siemens issued certain warranties that cover various aspects of their design and service lives, their O&M, and guarantee the energy output of the turbines. These warranties are common in the industry and are based on studies conducted by Siemens which analyze, among other things, the



13 cont.

following factors in and around the wind farm: (1) the geological features and topography, (2) wind speeds, patterns, and flows, (3) the impacts that the geology will have on the foundations and structural integrity of the turbines, and (4) the relationship between the topography and the energy output of the turbines. Therefore, any material change to these factors could invalidate the Siemens warranties. This, in turn, would cause TWPA to suffer significant damages and, by extension, TID’s ratepayers would suffer these damages, as they are ultimately responsible for paying the costs of any losses or damages suffered by the TWPA.

COMMENTS

A. The Department of Ecology should hold the EIS in abeyance until FFP can demonstrate that it has secured the property rights necessary to construct the upper reservoir in its proposed location and resolved the each of the issues raised by TID.

The TWPA-NSC Lease provides TWPA the right to quiet enjoyment of its leasehold, obligates NSC to protect and defend TWPA’s rights under the lease, and prohibits NSC from using, leasing, or giving easements over the Property that would infringe on this quiet enjoyment. Section 5.5 of the TWPA-NSC Lease requires that:

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During the entire term of this Lease, as long as Lessee is not in default of its obligations hereunder, (a) *Lessee shall have peaceful and quiet enjoyment of the Property, without hindrance or interruption by Lessor or any other person or entity* and (b) *Lessor shall protect and defend the right, title and interest of Lessee hereunder* from any other rights, interests, title and claims of or by any Related Person of Lessor or any other third person or entity.⁴

Section 13.4 requires NSC to “fully support and cooperate (and shall cause each Related Person of Lessor to fully support and cooperate) with” TWPA “in the conduct of its Operations and the exercise of [its] rights hereunder, and in carrying out and otherwise giving full force and effect to the purpose and intent of this Agreement.”⁵

Section 1.5(b) of the TWPA-NSC Lease limits NSC’s ability to use, lease, and grant easements on the Property. It states that “such uses, leases and easements shall be for purposes and activities that are not and will not unreasonably interfere with any of Lessee’s or any Sublessee’s Operations on the Property, or Lessee’s enjoyment of the rights granted to it under this Lease.”⁶ Therefore, NSC’s rights under Section 1.5(b) of the TWPA-NSC Lease *do not* include the right to grant an easement or lease on the Property to FFP if such an easement or lease will result in the GES Project unreasonably interfering with TWP’s Operations on the Property, or with TWP’s enjoyment of the rights granted to it under this Lease.

Section 1.5(c) of the TWPA-NSC Lease also restricts NSC’s rights under the lease by limiting the terms and conditions of the leases and easements NSC can enter into “after the

⁴ NSC Lease at p. 14 (emphasis added).

⁵ *Id.* at p. 26.

⁶ *Id.* at p. 4.



Effective Date.”⁷ It requires that “any such leases and easements . . . shall expressly provide that they are subject and subordinate in all respects to this Lease and to the rights of Lessee [i.e., TWP] and any Sublessees hereunder.”⁸ Since the Effective Date is long past, under Section 1.5(c), NSC’s rights under the TWPA-NSC Lease *do not* include the right to lease the Property to any third party (including FFP) unless the third party’s rights are subject and subordinate to TWP’s rights under the TWPA-NSC Lease. Therefore, any leases or easements that NSC enters into with any third-party would also be subject and subordinate to TWP’s rights under the TWPA-NSC Lease.

Under Section 5.2, NSC’s rights under the TWPA-NSC Lease also *do not* include the right to “engage in any activity on the Property that has, or could reasonably be expected to have, a Material Adverse Effect on . . . (iv) the output or efficiency of Lessee’s . . . Generating Units located on the Property or that are part of a Project.”⁹ Section 5.2 further provides:

The terms "**Material Adverse Effect**" and "**Materially Adversely Affect**" shall mean the causing of an adverse or negative effect, impact, diminution (including any diminution in value), impairment or interference on, with, to or of (a) Lessee's business or operations, (b) the amount of electricity generated by the Wind Power Facilities or (c) Lessee's Project, which, when cumulated with all other such effects, impacts, diminutions, impairments and interferences over the course of a single calendar year, results in decreased Gross Revenue or increased costs and expenses (excluding any consulting or professional fees) to Lessee of Twenty-Five Thousand Dollars (\$25,000) or more.¹⁰

The evidence shows that the reduction in wind speed attributable to the GES Project could seriously reduce the amount of power produced by TWPA’s turbines, resulting in potential financial losses to TWPA that greatly exceed the \$25,000 threshold for Material Adverse Effects under the TWPA-NSC Lease. Table 4-3 of the 2021 WREA Study Report indicates that if the upper reservoir is built, it would cause annual wind speed changes (measured at 80 meters) that have a Root Mean Square Error (“RMSE”) of 3.56.¹¹ When a RMSE of 3.56 is applied to the power curves for the TWPA’s turbines, it shows that the reduction in wind speed caused by the upper reservoir would reduce each affected turbine’s output by thousands of megawatt hours, resulting in each experiencing hundreds of thousands of dollars in lost generation revenues and lost RECs. If such losses are experienced by just the wind turbines adjacent to the proposed upper reservoir site, it will cause TWPA millions of dollars in annual losses.

Because the TWPA-NSC Lease expressly prohibits NSC from doing anything that would interfere with TWPA’s rights under the lease, NSC cannot lease or grant an easement on the Property to FFP for the GES Project. The only way this could occur is if TWPA consents to the project’s construction and agrees to waive its rights under the lease. *TWPA has not given this consent or waived its rights.* Therefore, the Department of Ecology should issue an order that the EIS process shall be held in abeyance until FFP demonstrates that it has: (1) secured the requisite

⁷ *Id.*

⁸ *Id.*

⁹ *Id.* at p. 13.

¹⁰ *Id.*

¹¹ 2021 WREA Study Report at p. 23.

14 cont.

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14 cont.

14 cont.

15 cont.

14 cont. property rights to construct the upper reservoir on property currently leased by TWPA, which would include FFP obtaining TWPA’s written consent to the construction of the GES Project, as the proposed location; (2) mitigated the adverse impacts on TWPA’s wind farm caused by the GES Project and TWPA has approved the mitigation measures; and (3) entered into an agreement with TWPA to compensate TWPA for any adverse impacts that the GES Project causes to the TWPA wind farm that are not or cannot be mitigated, so that TID’s ratepayers are not stuck paying the costs of such adverse impacts.

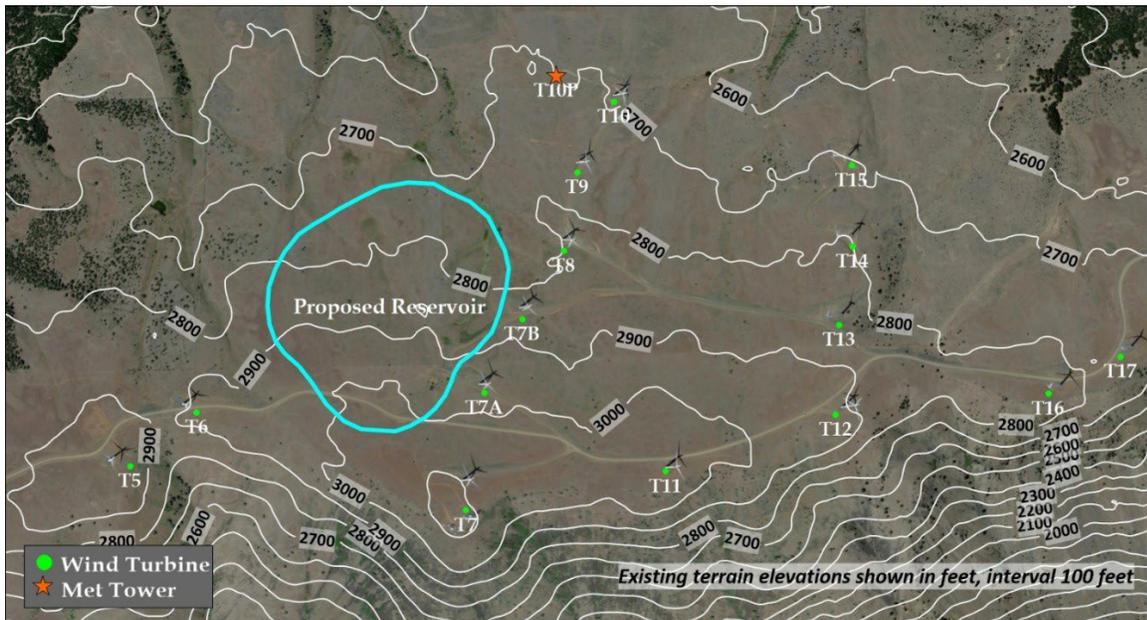
B. The Department of Ecology should reject the 2021 WREA Study Report and order that a new, independent study be performed that accurately addresses all of the GES Project’s potential impacts on TWPA’s wind farm.

16 The 2021 WREA Study Report should still not be relied upon by the Department of Ecology because it substantially underestimates the wind pattern changes and energy output reductions caused by the upper reservoir and fails to address the other potential impacts that the GES Project could have on TWPA’s turbines. This underestimation occurs because the 2021 WREA Study Report is extremely flawed and does not comport with commonly accepted wind power study practices and industry standards.

1. The 2021 WREA Study Report relies on insufficient and inapplicable data, which underestimates the effects that the GES Project will have on wind patterns.

17 The 2021 WREA Study Report concluded that there would be minimal impact on wind flow by examining data from an inappropriately limited sample. In fact, the study examined the data from *only one* Met Tower. Several characteristics of this source demonstrate that it is not representative of the significant adverse effects that the upper reservoir’s 19-story embankment would have on TWPA’s power generation activities. For one, the Met Tower is at a significantly lower elevation than is necessary to estimate the impact that the upper reservoir’s embankment would have wind flows. For another, the Met Tower is a long distance away from TWPA’s turbines, meaning it may have underestimated the impact of reduced wind flow on those turbines. Both of these limitations of the Met Tower as a source of data are demonstrated by the following “Figure ES-1: Location Plot,” which “displays the area surrounding the [upper] reservoir.”¹² The red star at the top (labeled “T10P”), is the location of the Met Tower. The elevations are the figures in the grey boxes (*e.g.*, 2600, 2700, 2800, *etc.*).

17 cont. ¹² 2021 WREA Study Report at p. 2.



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cont.

Figure ES-1 (above) shows that the Met Tower is a significant distance from all the turbines in the wind farm except one (T10) and is at an elevation that is 100 meters or more lower than all but two of the turbines (T10 and T15).¹³ More importantly, the data from this Met Tower is inapplicable to most of the turbines at the wind farm because the tower’s wind readings are taken from an elevation of between 40 and 80 meters above the tower’s 2700-meter elevation, which means that these wind readings are at most from a 2780-meter elevation. This elevation is well below the elevation of all but two of the turbines (T10 and T15). All other turbines are located at ground level elevations of 2800 to 3000 meters and their blade height is 120 meters above these ground elevations. Therefore, the Met Tower’s wind pattern readings used in the WRF model, and incorporated into 2021 WREA Study Report through the latter’s use of the WRF, are unsuitable to determine wind pattern changes for 13 of the 15 nearby turbines because they are taken from an elevation that is hundreds of meters below the wind patterns experienced by these 13 turbines.¹⁴ As such, the WRF model does not provide relevant, accurate data regarding wind patterns for the vast majority of the turbines at the wind farm. To be accurate and reflective of the wind patterns these turbines experience, the wind pattern readings should have been taken at much higher elevations.

The Met Tower’s wind pattern readings would not even be accurate for turbines T10 and T15 because they were only taken from elevations between 40 and 80 meters above their 2700-meter ground level elevation. However, to examine relevant wind patterns for turbines, data from at least a 120-meter height is needed because the turbines’ swept area¹⁵ extends to approximately 120 meters above the ground. Section 3 of the 2021 WREA Study Report states:

¹³ *Id.*

¹⁴ *Id.* (referencing Figure ES-1).

¹⁵ The swept area is the area of the circle created by the blades as they sweep through the air. The variable swept area is used to improve efficiency of the wind turbines.



Existing data was provided by TID consisting of 10-minute meteorological data (wind speed, wind direction, and horizontal turbulence) measured on the 80-meter tower shown in Figure 3-1, and 10-minute power generation for all wind turbines.¹⁶

On January 4, 2021, TID asked the following question to FFP, the listed owner of the GES Project, regarding the 80-meter height:

Have results across the swept area of the WTG rotors been analyzed to assess changes in the variation over its height? Does the model show a change in wind shear from before and after reservoir construction in terms of wind speed, direction or turbulence?¹⁷

FFP responded:

Yes, although the modeling was conducted for heights above 80-m (turbine hub height), the results are presented only for surface level, 40-m and 80-m heights. Both 40-m and 80-m represents the lower half and center of the swept area of the WTG rotors respectively. The effect on wind parameters decreases with height, therefore focusing on the 40-m to 80-m range is a conservative approach (i.e., effects above 80 m will be lower than at this level).¹⁸

In its May 27, 2021 questions, TID asked this follow-up question to the question above:

Referring to FFP’s response, ***please state whether ERM studied the wind shear across the rotor swept area between 40 meters and 120 meters above the ground.***¹⁹

FFP responded:

ERM examined the changes in wind due to the presence of the proposed upper reservoir for the vertical heights of 40-80 meters. In our analysis the layer from the surface (near ground level) and 40 meters had the greatest impact from the reservoir, although this was very small at the turbine locations and largest directly over the reservoir. ***As stated previously our analysis was based on the region from the ground surface up to 80 meters.***²⁰

FFP admits that it relied on wind readings only from “vertical heights of 40-80 meters” above the ground level of the Met Tower, which Figure ES-1 shows to be 2700 meters. Therefore, the WRF

¹⁶ 2021 WREA Study Report at p. 2.
¹⁷ FFP’s July 1, 2021 Response, Attachment 10, Q&A No. 7.
¹⁸ *Id.*
¹⁹ *Id.* (emphasis added).
²⁰ *Id.* (emphasis added).

17 cont.

model relied on wind readings from only 2780 meters and below, even though 13 of the 15 turbines adjacent to the upper reservoir are located at ground elevations of 2800 meters or higher.

In addition, in response to a question from TID regarding the need for a larger Met Tower dataset, FFP indicated that “**observed data for 2014 at the 80-meter meteorological tower were requested but not available.**”²¹ Therefore, the Met Tower data used in the WRF model for 2014 did not include tower readings from 80-meters. The *only* 80-meter Met Tower data used in the WRF model was from one year (2019). ERM’s statements suggest that it only used 40-meter Met Tower data from 2014. However, tower readings from that elevation are worthless, especially when you factor in that the Met Tower is at least 100 meters below 13 of the 15 turbines located near the upper reservoir, including T7A and T7B. Thus, the Met Tower data used in the WRF model is completely unrepresentative of the wind patterns experienced by any of the turbines at the wind farm.

Had the 2021 WREA Study Report used Met Tower data from a 120-meter elevation, it would have been able to more accurately address wind patterns and wind pattern changes – *e.g.*, wind shear across the swept area, which is necessary to determine effects that wind pattern changes can have on the turbine blades’ rotation, structural loading variations on the rotor, as well as rotor fatigue. The report’s failure to use data from elevations of at least 120-meters above the ground level of turbines T10 and T15 demonstrates that the Met Tower’s wind pattern readings were even inapplicable to these two turbines. Put another way, the WRF model’s use of wind readings from elevations between 40 and 80 meters above the Met Tower’s 2700-meter ground level elevation proves that all the data used in the model is erroneous because the data is inapplicable to and cannot predict wind pattern changes for any of the turbines in the wind farm. Therefore, the WRF model’s conclusions are equally erroneous and should not be relied upon.

2. The 2021 WREA Study Report relies on insufficient turbine generation data, which underestimates the effects that the GES Project will have on wind patterns and on the energy output of TWPA’s turbines.

17 cont.

The 2021 WREA Study Report used only two years of turbine generation data to estimate how changes in wind patterns would affect TWPA’s power generation, which likely resulted in an underestimate of the harm to TWPA. Section 1.3 of the 2021 WREA Study Report provides the following description of the “Study Approach” ERM used with WRF model:

WRF modeling was conducted for 2 full years (2014 and 2019); based on an examination of **historical generation data, the May–July period of each year from 2014 through 2019 showed the highest periods of monthly generation, with 2014 and 2019 showing the highest monthly generation over all 6 years.** 2014 and 2019, therefore, were analyzed to determine whether the proposed reservoir would have any effects on winds and turbulence in the vicinity of the reservoir, specifically at the wind turbines closest to the reservoir.²²

²¹ *Id.*

²² 2021 WREA Study Report at p. 2 (emphasis added).

The foregoing shows that although ERM had six years of generation data, it only chose to include in its modeling two years of data from 2014 and 2019 because these two years had the “highest monthly generation over all 6 years.”²³ ERM “cherry picked” these two years to increase, and thereby overstate, the average monthly generation. This overstated average monthly generation was then used to overstate the average, assumed monthly wind speeds for the entire wind farm. Overstating these average monthly wind speeds resulted in the WRF model finding that wind speed and direction changes caused by the upper reservoir were lower relative to this overstated average. Put another way, by overstating wind speeds, ERM was able to understate the potential wind pattern changes the reservoir would cause. However, if the average wind speeds had been based on all six years of generation data, these average assumed wind speeds would have been much lower and the wind speed and wind direction changes identified in the model would represent a much more significant effect on these wind patterns.

On March 31, 2021, TID submitted the following statement and question to FFP:

A single (or two) year of data does not establish whether the model represents interannual variability patterns or possible wind speed frequency distributions. We suggest a minimum of five years of data be used, modeled from 2014 – 2019. Please state whether Rye is willing to update its analysis to use a minimum of five years of data. If not, *please explain why and how a one- or two-year model is superior to a five to ten year model.*²⁴

FFP responded:

Given the similar characteristics of both the modeled meteorology for 2014 and 2019 and the results of the WRF modeling for all time periods, it is reasonable to conclude that *additional modeling would not alter the conclusions described in this report.*²⁵

The modeled meteorology for 2014 and 2019 have “similar characteristics” because the data has been “cherry picked” and manipulated so that it yields similar results. The reason ERM did not use a larger dataset is because it would have showed greater adverse effects on the wind patterns.

In its May 27, 2021 questions, TID asked this follow-up question to the question above:

Referring to FFP’s response, *please explain the scientific basis ERM relies on to make such speculations?*²⁶

FFP responded:

²³ *Id.*
²⁴ FFP’s July 1, 2021 Response, Attachment 10, Q&A No. 21 (emphasis added).
²⁵ *Id.* (emphasis added).
²⁶ *Id.* (emphasis added).



The basis for our conclusion is based on examination of the time series of both the observed and WRF wind data which showed two distinct wind characteristics. One is the dominant westerly flow regime. This regime typically had the largest wind speeds, correlated well with the largest power production and was consistent with wind statistics at other National Weather Service observed data in the region. The second was a northeast-east wind regime which typically had lower wind speeds, lasted for shorter periods, and would not result in wind flow from the proposed reservoir to the wind turbines.²⁷

The foregoing answers show that FFP and ERM cannot scientifically justify ERM’s use of only two years of generation data in its model. The “observed” wind data from the Met Tower is inapplicable for the reasons detailed above and the WRF wind data alone is not granular enough to make any predictions about specific wind pattern changes at the wind farm. A basic tenet of any scientific analysis is that more data is always better than less data, especially when that data is from the very data points (*i.e.*, the turbines) that the analysis is intended to address. It is clear that ERM “cherry picked” this generation data because it wanted to engineer the WRF model’s results to show minimal impacts from the upper reservoir. Simply put, ERM did not want to reveal the truth.

ERM’s attempts to manipulate the results of the WRF model are further demonstrated in its responses to the following questions. On March 31, 2021, TID stated:

Regarding FFP’s response to Question 3 of February 22, 2021 questions, ERM states that “a climatological analysis would define the existing wind characteristics for a longer period of record than a single year but would not address potential impacts from the proposed reservoir, which may occur during specific short-term wind conditions.” ***The establishment of a climatological set of statistics would allow for a more robust and statistically significant analysis. This will ensure a better understanding of whether the years being modeled (2014 and 2019) are at all different than normal operating conditions. Please explain how ERM plans to ensure the years being modeled are representative of normal operating conditions.***²⁸

FFP responded:

The time period selected for this study provides assurance that selection of a different time period or length of record would not alter the conclusions of the study. It is useful to point out the primary objective of this study, which is to determine whether or not presence of the reservoir will adversely affect winds and TKE in a way that could also adversely affect power generation (lower wind speeds, higher TKE). Changes in winds and TKE

²⁷ *Id.*

²⁸ FFP’s July 1, 2021 Response, Attachment 10, Q&A No. 18 (emphasis added).

17 cont.



are estimated by running the WRF model with sufficient resolution to resolve the surface characteristics of the upper reservoir (i.e., terrain and land use) and examining differences that are predicted to occur for wind speed, wind direction, and turbulence, both without the presence of the upper reservoir and then with the reservoir added. The representative wind conditions that were used for the modeling (2014 and 2019) reflect wind characteristics that correlate with peak wind power generation but also contain periods of low wind speed and low generation. As explained in this report, on average there is no change in wind speed or turbulence at turbine locations due to the addition of the reservoir and these results are consistent across all time periods modeled. Increases and decreases do occur but are balanced such that for every increase there is a corresponding decrease, and vice versa.”²⁹

In its May 27, 2021 questions, TID asked this follow-up question to the question above:

Referring to FFP’s response, *please explain whether it is ERM’s position that a data set with a longer duration would not produce statistically more significant results.*³⁰

FFP responded:

The specific limited periods used in for the high-resolution WRF analysis reflect wind characteristics that are dominant in a long period of record. ERM believes that a full multi-year WRF analysis would not alter the conclusions. In ERM’s initial phase of the study we used a full one-year WRF simulation coupled with the observed data to isolate specific periods for the high-resolution simulations with and without the reservoir. ERM then repeated this analysis for a second full year (2014), extracted a new set of periods to conduct higher resolution WRF simulations, again, with and without the reservoir. The full year wind statistics from the WRF simulations for 2014 showed essentially the same effects on wind and turbulence characteristics as found in the simulations for 2019. **Observed data for 2014 at the 80-meter meteorological tower were requested but not available.** Our conclusions regarding the wind impacts of the proposed reservoir for the 2014 simulations were unchanged from the 2019 results.³¹

FFP’s foregoing answer reflects its weak attempt to evade the fundamental flaw in its analysis, which is the exclusion of multiple years of lower generation data. This lower generation data, would have yielded lower average, assumed monthly wind speeds in the model. When called out on this, FFP says that ERM compared the data from the two highest generation years (2014

²⁹ *Id.*
³⁰ *Id.* (emphasis added).
³¹ *Id.* (emphasis added).

17 cont.

and 2019) and that this data showed “essentially the same effects on wind and turbulence.”³² This statement makes sense because the data has been “cherry picked” so that it yields these similar results. However, had FFP answered the question asked, it would have had to admit that if it used the generation data from the other four years, this data would have yielded much lower wind speeds in the WRF model. These lower wind speeds would have shown much more significant impacts on wind patterns from the construction of the upper reservoir. The more significant the change in wind patterns, the higher the likelihood that the energy output of TWPA’s turbines will be reduced. Moreover, significant changes in wind patterns are likely to cause increased turbulence intensity, which in turn is likely to increase wear and tear on the turbine blades.

FFP’s answer also shows that it only used one year (2019) of 80-meter Met Tower data. ERM contends that this data was requested but was not available. What ERM fails to mention is that it could have asked Siemens for additional data but it and FFP chose not to do so. Because the WRF model only used one year (2014) of 80-meter Met Tower, and because the Met Tower is located at an elevation that is 100 meters or more below all but two of the turbines near the upper reservoir, this Met Tower data is worthless and cannot be relied upon. ERM’s use of this limited and unrepresentative data, coupled with the perverse effects it has on the WRF model’s conclusions, demonstrates that the model’s results and the associated conclusions in the 2021 WREA Study Report are inaccurate and unreliable.

3. The 2021 WREA Study Report does not use the necessary uncertainty analysis to estimate the GES Project’s effects on wind patterns and on the energy output of TWPA’s turbines.

The 2021 WREA Study Report deviated from industry practice in failing to use an uncertainty analysis to estimate the changes to wind flows caused by the GES Project’s construction. Thus, it is not a sound basis to estimate reductions in wind flows in the project area. The production of *wind energy* involves *uncertainties* due to the stochastic nature of wind speeds and the variation of the power curve. Because the energy production in a wind farm follows a stochastic principle, modeling such production requires a statistical analysis in which production estimates are associated with occurrences probabilities. The evaluation of a wind resource and the subsequent estimation of that wind resource’s annual energy production (“AEP”) is a highly uncertain process. Uncertainty arises at all points in the process, from measuring the wind speed to the uncertainty inherent in a power curve. A proper assessment of uncertainty is critical for predicting future wind patterns and speeds. An uncertainty analysis is always performed as part of a wind farm energy yield assessment because the economic viability of a wind farm requires an analysis of the risks associated with production uncertainties. Thus, it is standard industry practice for an uncertainty assessment to be used when judging the feasibility of any potential wind energy development.

Each wind farm development’s uncertainties must be individually determined and then calculated for the entire project. Often, project uncertainties are presented by giving the probabilities of exceedance in terms of the expected annual production of the wind farm. Two

³² *Id.*

17 cont.

methods for calculating uncertainties are the deterministic method and the Monte Carlo analysis.³³ The deterministic method is based around the assumptions that the different uncertainties are independent and that there is a linear relationship between the input uncertainties and the output uncertainty. The various individual uncertainties are summed using the Root Means Squared (“RMS”). This method allows for the magnitude of the individual uncertainties to be determined. The Monte Carlo method for estimating energy uncertainties is a stochastic method simulating the behavior of a physical system multiple times. In a wind farm uncertainty analysis, these simulations produce wind farm outputs while randomly varying the uncertainties according to a defined probability distribution. The final uncertainty estimates are then determined from the distribution of the simulated outputs. This allows for non-linear relationships between the different uncertainties since the final uncertainty is not the result of summing the various uncertainties.³⁴ It is almost certain that Siemens conducted such an uncertainty assessment when it analyzed the feasibility and risks of TWPA’s wind farm.

The WRF model used by ERM in this case *does not* rely on any such uncertainty assessment. On January 4, 2021, TID submitted the following questions to FFP:

What is the change in power generation from the model? *What [is] the associated uncertainty?*³⁵

FFP responded:

Wind is the driving force for wind turbines to generate power. Since WRF predicted changes in wind speed at hub height after the proposed reservoir are small enough not to be distinguishable in terms of the amount of power generated from other factors, and are on average close to zero, there is no need for further modeling of power generation.³⁶

FFP’s response to the foregoing questions means that ERM did not perform an uncertainty analysis because it did not believe it was needed. ERM is wrong. The WRF predicted changes in wind that did in fact reduce the power generated by the two turbines the WRF model measured (*i.e.*, turbines T7A and T7B). As detailed above, when TID applied the 3.56 annual RMSE, referenced in Table 4-3 of the WREA,³⁷ to the power curves for turbines T7A and T7B, it determined the wind speed impacts identified would reduce the output of these turbines by thousands of megawatt hours, resulting in hundreds of thousands of dollars in lost generation revenues and lost RECs.

ERM’s stated reason for failing to perform an uncertainty analysis was that the data it was relying on for the WRF model was too limited. This fact was laid bare in FFP’s response to questions submitted to it by TID on February 22, 2021. In this response, ERM states “*we do not believe that uncertainty can be calculated meaningfully for these modeled data, as they are not*

³³ *Id.*

³⁴ *Id.*

³⁵ FFP’s July 1, 2021 Response, Attachment 10, Q&A No. 13 (emphasis added).

³⁶ *Id.*

³⁷ 2021 WREA at p. 23.

17 cont.

17 cont. *measurements with known instrument uncertainty ranges.*³⁸ However, to the extent that the data was insufficient, it was *only because* ERM and FFP chose to artificially limit the data they considered and refused to get the necessary data from Siemens.

C. Because the 2021 WREA Study Report is flawed and reaches inaccurate conclusions, the Department of Ecology should reject it and direct FFP to pay for a new, independent study to be performed.

18 Because the WRF model does not comport with the standard industry practice of using an uncertainty analysis and relies on extremely limited and faulty turbine generation data that does not accurately reflect how changes in wind patterns would affect the output of the turbines at the wind farm, TID requests that the Department of Ecology reject the WRF model and the 2021 WREA Study Report, which relies on this model, and direct that a new study be performed which more accurately addresses these issues and uses a more robust data set. Specifically, the Department of Ecology should require that this new study: (1) be performed by an independent third-party chosen by TID and FFP and paid for by FFP; (2) comport with industry practices and rely on data and input from Siemens and models and methodologies that are commonly used, with abundant prior case examples reflecting the use of these models and methodologies; (3) provide measures to mitigate any identified adverse impacts the GES Project causes; and (4) be used to inform the development of the Final EIS so that the Final EIS's conclusions regarding the impacts of the GES Project on TWPA's operations are based on sound evidence.

The Department of Ecology should require that this new study address the following issues regarding the turbines' output and operations:

1. Whether the GES Project's upper reservoir, with its 19-story embankment, will change the area's topography enough to cause changes to wind patterns within TWPA's wind farm, which could:
 - (a) reduce the output of energy and RECs that TWPA's turbines produce;
 - (b) increase wind turbulence intensity causing: (i) damage to the turbines, (ii) increased maintenance and repairs to address this damage, and/or (iii) a reduction in the turbines' design and service lives, which would reduce the turbines' overall output; and/or
 - (c) invalidate the warranties that TWPA has on the wind turbines, depriving TWPA of their crucial energy output and design and service lives guarantees.
2. Whether the GES Project's new reservoirs could saturate the foundations of the turbines, making them unstable and could:
 - (d) damage the turbines;
 - (e) increase maintenance and repairs on the turbines to address this instability and damage;
 - (f) reduce the turbines' design and service lives, thereby reducing their overall output; and/or

17 cont. ³⁸ *Id.* at Q&A No. 19 (emphasis added).



19 cont.

(g) invalidate the warranties that TWPA has on the wind turbines.

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3. Whether the GES Project could damage or interfere with the operations or output of TWPA’s turbines during construction when, for example, FFP performs the excavation or drilling for the reservoirs and underground tunnels.

18 cont.

Each of these studies are crucial to determining all of the potential adverse impacts that the GES Project could have on TWPA and its operations. The following provides additional information regarding why these studies are so crucial.

1. The study addressing the GES Project’s impacts on TWPA’s turbine warranties is crucial and should not be ignored.

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Most of TWPA’s turbines were manufactured by Siemens. Siemens has provided TWPA with a series of warranties on the energy output, design life, and service life of these turbines. Siemens issued these warranties to TWPA contingent on a series of factors: (1) Siemens’s analyses of the wind patterns and conditions around the turbines (e.g., wind direction and turbulence); (2) the effect of existing land uses and topography on these wind conditions; and (3) the turbines’ performance and operational wear and tear observed under the foregoing conditions. Because existing land uses and topography were used to establish the terms and conditions of the turbines’ generation output, design life and service life warranties, any change to these conditions or any change to the wind patterns and conditions could invalidate these warranties, thereby causing significant economic harm to TID’s ratepayers.

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Like the FLA, which failed to address the possible changes to the design or service lives of TWPA’s turbines, the draft EIS does not appropriately reckon with these serious potential harms to TWPA and its ratepayers. In refusing to analyze the impact of changed wind patterns on the design and service lives of the turbines (and, by extension, the risk that the construction of the GES Project would lead to the invalidation of TWPA’s warranties with Siemens), FFP cited a study produced by ERM entitled Meteorological Analysis of the Impacts of a Proposed Reservoir on the TWPA Wind Farm (“Wind Effects Report”). However, the Wind Effects Report is not a reliable estimate of the degree to which the GES Project would alter wind patterns in the project area. In particular, the Wind Effects Report relied on the WRF model to claim that the proposed GES Project would minimally impact the wind flows in and around two TWPA turbines located near the proposed project site. As discussed previously, however, the WRF model is seriously deficient as a measure of changes to wind patterns in the area because it uses misleading and “cherry-picked” data to understate the level of harm to TWPA’s operations. Moreover, FFP has not provided any other evidence besides the flawed Wind Effects Report to show that changes to wind patterns will be minimal.

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In particular, changes to wind patterns in the project area may adversely affect the service and/or design lives of TWPA’s turbines. A turbine’s service life is determined by examining the mechanical loading on several of the turbine’s key components: specifically, its blades, drive train, generator, tower, and foundation. The International Electrotechnical Commission (“IEC”) “61400” is the international technical standard published by the IEC for wind turbines. The IEC

61400 is a set of design requirements made to ensure that wind turbines are appropriately engineered against damage from hazards within their planned lifetime. In accordance with IEC 61400, wind turbines are classified based on the specific wind climate the turbine will be exposed to. That wind climate is modeled during the construction and design phase using long-term wind measurements. These models look at three parameters to determine the turbine's winds class: (i) annual average wind speed at hub height, (ii) the turbulence intensity at a wind speed of 15 m/s and (iii) the extreme 50-year gust that is sustained for 3 seconds.

23 cont. A turbine must be certified for the corresponding wind class of the site. This requires the turbine's design to fall within the loading envelope of the above three wind parameters. The suitability is typically assessed by the turbine manufacturer and certified with a design life warranty. TWPA's existing turbines are warranted by Siemens under the existing wind regime – that is, on the assumption that wind patterns will stay largely the same. However, it is an undisputed fact that the upper reservoir will change the wind regime for at least two of the fifteen turbines surrounding it.³⁹ The analysis provided by ERM – FFP's own consulting firm – shows that the upper reservoir's construction would have a significant impact on the energy output of two of TWPA's turbines. In particular, the data under the "Statistical Analysis" header in Section 4 of the WREA shows a significant reduction in the energy output of turbines T7A and T7B when the 3.56 annual RMSE in Table 4-3⁴⁰ is applied to their power curves. Although there is not enough data to confirm that the reservoir's construction would adversely impact the other turbines, the reservoir's significant impacts on these two turbines suggest that other turbines in the area may be similarly affected. Therefore, the GES Project is likely to cause significant changes to wind patterns in the area, which could cause the Siemens turbine warranties to be invalidated.

24 The invalidation of the warranties would cause significant harm to TID and its ratepayers because these warranties guarantee that turbines will produce a certain amount of energy and RECs and if they fail to do so, TID is compensated for this shortfall. Removing this safeguard risks exposing TID to serious economic losses if turbine power generation is reduced for a period of time. Importantly, because TID is a not-for-profit, "non-public utility," any costs it incurs from such economic impacts would be passed on to its ratepayers. Thus, the draft EIS did not give appropriate consideration to the risks associated with the possible invalidation of the Siemens warranties, which in turn could be caused by significant changes to wind patterns in the area associated with the GES Project.

25 In addition to incorporating findings of the requested studies identified herein, the draft EIS should be modified to make construction of the GES Project contingent on: (1) TWPA consenting to the project proceeding; (2) FFP demonstrating that it has taken the necessary actions, identified by TID, TWPA and Siemens, to prevent the GES Project from invalidating Siemens' warranties on TWPA's turbines; and (3) FFP entering into an agreement with TWPA that would make FFP and the GES Project liable for any damages or other losses resulting from the invalidation of Siemens' warranties due to the construction of the GES Project.

³⁹ 2021 WREA Study Report at p. 23.

⁴⁰ *Id.*



2. The study addressing the GES Project’s impacts on TWPA should include an analysis of how the vibrations from construction could damage TWPA’s turbines.

The independent studies TID proposes should consider the potential damage to TWPA’s turbines that could result from vibrations produced by the GES Project’s construction. As the draft EIS itself notes, the GES Project would require a number of construction-related activities to take place in the project area. The draft EIS points out that some of these construction activities are “[l]arge-scale excavation and blasting to construct the reservoirs,” in addition to “[b]lasting and tunneling to construct the underground powerhouse and conveyance system.”⁴¹ Therefore, a study of the potential impacts of these vibrations on TWPA’s turbines should be included in the new, independent studies directed by Department of Ecology.

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23 cont.

TID proposes the foregoing independent studies because they are the only way to ensure that the Final EIS is unbiased, scientifically based, objective and comprehensive. If the study determines that the GES Project will cause any of the foregoing adverse impacts to TWPA’s wind farm, the study should propose mitigation measures that would enable FFP to prevent these impacts. The Department of Ecology should also include in the Final EIS a process for TWPA and other stakeholders to be compensated if the mitigation measures identified in the studies fail, causing them to suffer losses or other damages.

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D. The draft EIS should be amended to more adequately and accurately address all the potential environmental impacts that will result from the construction and operation of the GES Project, including those raised by TID and FERC.

The purpose of the EIS is to provide “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,” and “will be used to inform permit decisions and potential changes to the proposed project.”⁴² As currently written, the draft EIS *does not* fulfill this purpose, because it fails to accurately and adequately address all of potential adverse impacts that could result from the construction of the GES Project in the middle of TWPA’s wind farm. Therefore, TID submits comments regarding the following sections of the draft EIS in the hope that the Final EIS will be more fully and accurately address all of the potential impacts that the GES Project could have on TWPA, TWPA’s turbines, TWPA’s renewable energy output, and the avian species in the area:

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- Section 4.4 Energy Resources
- Section 4.5 Public Services and Utilities
- Section 4.7 Terrestrial Species and Habitats
- Section 4.11 Land Use
- Section 6.2 Cumulative Impacts by Resource
- Appendix E Energy Resource Analysis Report

26 cont.

28 cont.

⁴¹ Draft EIS Section Appendix I at p. 28.

⁴² Washington Department of Ecology, State Environmental Policy Act Draft Environmental Impact Statement, for the Proposed Goldendale Energy Storage Project, Publication No. 22-06-006 (dated June 2022) (“draft EIS”), Appendix A Scoping Summary Report, Section 1.2 EIS Process at p. 1.



28 cont.

- Appendix G Terrestrial Species and Habitats Resource Analysis Report
- Appendix I Environmental Health Resource Analysis Report

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TID’s comments request that the Department of Ecology require FFP to pay for certain independent studies that: (1) would evaluate the probable environmental impacts of FFP building the GES Project in the middle of the TWPA wind farm, (2) identify reasonable alternatives to the GES Project, and (3) identify mitigation measures that would avoid or minimize impacts. TID believes that such independent studies are the only way to ensure that the Final EIS reaches unbiased, scientifically based, objective and comprehensive conclusions regarding the potential effects that the GES Project will have on TWPA, TWPA’s production of renewable generation, and the birds and bats that could be killed due to increased avian strikes.

1. The discussion of Energy Resources in Section 4.4 and the Energy Resource Analysis Report in Appendix E of the draft EIS should be amended to reflect that the GES Project will impact TWPA’s wind farm.

Draft EIS Section 4.4, which is entitled “Energy Resources,” indicates that it addresses “the type and quantity of energy resources used in construction and operation of a project can affect overall availability of energy sources for other uses.”⁴³ The “Key Findings of the Energy Analysis” states:

Local energy resources would not be constrained by construction or operation of the proposed Project. *Energy use would be consistent with local and regional energy plans and would not impact adjacent uses.*⁴⁴

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Draft EIS Section 4.4.2.1, which addresses the direct and indirect impacts from construction of the GES Project, indicates that “the structures that are planned to be part of the operating proposed project would not have prominence above ground level tall enough to affect the generating potential of adjacent wind turbines.”⁴⁵ Section 4.4.2.1 concludes that “there would be no significant adverse impacts with respect to adjacent energy uses during construction.”⁴⁶

Draft EIS Section 4.4.2.2, which addresses the direct and indirect impacts from operation of the GES Project, does not identify any impacts from the operation of the project and concludes in the discussion of indirect impacts that:

The project would influence the energy flow at the interconnection point to the surrounding electrical grid. The analysis in Appendix E determined that additional reinforcement is not necessary for transmission infrastructure near the interconnection point. Therefore, *the proposed project would have*

⁴³ Draft EIS Section 4.4 at p. 93.

⁴⁴ *Id.* (emphasis added).

⁴⁵ Draft EIS 4.4.2.1 at p. 95.

⁴⁶ *Id.*

*no significant adverse impacts on adjacent energy sources with respect to energy flow fluctuations.*⁴⁷

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Draft EIS Section 4.4.2.3, which addresses “Proposed Mitigation Measures,” indicates that “[n]o mitigation measures would be required because there would be no significant adverse impacts.”⁴⁸ Therefore, draft EIS Section 4.4.2.4 concludes that there “would be no significant and unavoidable adverse impacts related to energy resources from construction or operation of the proposed project.”⁴⁹

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The Energy Resource Analysis Report in Appendix E of the draft EIS contains nearly identical statements and reaches the same conclusions as those set forth above.⁵⁰ Neither Section 4.4 of the draft EIS nor Appendix E identifies the particular source used to support the foregoing statements. However, Appendix E does list the FLA and the attached 2021 WREA Study Report among its references.⁵¹ To the extent the above-quoted EIS statements are premised on the 2021 WREA Study Report, these statements are erroneous and should be amended. As detailed above, when the 2021 WREA Study Report’s findings are applied to the power curves for TWPA’s turbines, it is apparent that the GES Project will significantly reduce their energy output. In addition, as also detailed above, the 2021 WREA Study Report’s findings significantly understate the effects that the GES Project will have on TWPA’s turbines because these findings are based on extremely limited, “cherry picked” and erroneous data, as well as faulty assumptions and unproven study methodologies. Therefore, if the above-quoted statements and conclusions from the draft EIS are based on the 2021 WREA Study Report, they too are erroneous and should be amended to reflect the findings made by the independent studies TID proposes in these comments. These studies would correct the errors in the 2021 WREA Study Report and would ensure that the Final EIS reaches unbiased, scientifically based and comprehensive conclusions regarding whether the structures that are planned to be part of the operating proposed project would have prominence above ground level tall enough to affect the generating potential of adjacent wind turbines.

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In addition, the draft EIS’s conclusions are unreasonable in light of the proposed location of the upper reservoir. Besides being inside TWPA’s wind farm, the proposed location of the upper reservoir is “on the Columbia Hills adjacent to a high desert plateau above the Columbia River (upper plateau) at an elevation approximately 2,800 feet above sea level.”⁵² This area of the Columbia Hills is extremely important to the wind farm because it is relatively unobstructed and allows wind speeds to increase as they are entering the wind farm from the west. Therefore, the installation of structure that would obstruct wind flows in this area will have significant adverse impacts on the wind farm’s energy output. The upper reservoir will be a massive structure with the height of a 19-story building that covers 38 square city blocks and would have turbines less than a few meters away. Hence, it is disingenuous for the draft EIS to suggest that the upper reservoir would not have prominence above ground level tall enough to affect the generating potential of adjacent wind turbines.

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⁴⁷ Draft EIS 4.4.2.2 at p. 96.

⁴⁸ Draft EIS 4.4.2.2 at p. 96.

⁴⁹ Draft EIS 4.4.2.4 at p. 97.

31 cont.

⁵⁰ See e.g., Draft EIS Appendix E at p. 11.

⁵¹ Draft EIS Appendix E at p. 14.

32 cont.

⁵² Draft EIS Section 2.2 at p. 6.



The draft EIS’s discussion of the prominence of the upper reservoir also fails to adequately address TID’s concerns regarding other potential adverse effects that could result from the construction of these two large reservoirs adjacent to TWPA’s wind farm. These concerns are detailed below.

2. The discussion of Public Services and Utilities in Section 4.5 of the draft EIS should be amended to reflect that GES Project will impact neighboring utilities because it will impact TWPA’s wind farm.

Draft EIS Section 4.5, which is entitled “Public Services and Utilities,” indicates that it “describes the current services and facilities in the study area and potential impacts and mitigation measures related to public services and utilities.”⁵³ The “Key Findings of the Public Services and Utilities Analysis” states:

The analysis found the proposed project would have *no significant and unavoidable adverse impacts* related to public services and utilities.⁵⁴

Section 4.5.1 indicates that one of the factors considered for the analysis of potential impacts to public services and utilities infrastructure is “[w]hether there would be potential for disruption of services.”⁵⁵ Regarding the potential impacts from construction of the GES Project, Draft EIS Section 4.5.2.1 indicates:

Given the scale of the proposed infrastructure changes, it is anticipated that the addition and relocation of utility infrastructure during construction could result in the short-term disruption of utility services, but there would not be a significant adverse impact on utility infrastructure.⁵⁶

Regarding the potential impacts from the operation of the project, Draft EIS Section 4.5.2.2 states:

Operation of the proposed project would not result in the relocation, replacement, or addition of public service or utility infrastructure, and no disruption of services would occur related to infrastructure. Therefore, there would be no significant adverse impact on public service and utility infrastructure during operation.⁵⁷

Draft EIS Section 4.5.2.3, which addresses “Proposed Mitigation Measures,” indicates that “[n]o mitigation measures would be required because there would be no significant adverse impacts.”⁵⁸ Therefore, draft EIS Section 4.5.2.4 concludes that there “would be no significant and

⁵³ Draft EIS 4.5 at p. 98.

⁵⁴ *Id* (emphasis added).

⁵⁵ Draft EIS 4.5.1 at p. 101.

⁵⁶ Draft EIS 4.5.2.1 at p. 101.

⁵⁷ Draft EIS 4.5.2.2 at p. 103.

⁵⁸ Draft EIS 4.4.2.2 at p. 96.

unavoidable adverse impacts related to public services and utilities from construction or operation of the proposed project.”⁵⁹

Draft EIS Section 4.5 does not identify the particular source used to support the above-quoted statements. To the extent these statements are premised on the 2021 WREA Study Report, these statements are erroneous for the reasons detailed in the preceding section of these comments. These statements should be amended to reflect the findings made by the independent studies TID proposes herein. These studies would correct the errors in the 2021 WREA Study Report and would ensure that the Final EIS reaches unbiased, scientifically based, and comprehensive conclusions regarding whether the GES Project would have significant adverse impacts on utility infrastructure during operation.

3. The discussion of Terrestrial Species and Habitats in Section 4.7 and the Terrestrial Species and Habitats Resource Analysis Report in Appendix G of the draft EIS should be amended to more accurately reflect that the GES Project could impact TWPA’s wind farm by increasing avian strikes.

Draft EIS Section 4.7, which is entitled “Terrestrial Species and Habitats,” indicates that it “addresses terrestrial species and habitats. Terrestrial habitats refer to non-aquatic or upland areas of the landscape that support land-dwelling plants and animals.”⁶⁰ The “Key Findings of the Public Services and Utilities Analysis” states:

The analysis found the proposed project would have *no significant and unavoidable adverse impacts* related to terrestrial species and habitats, *with inclusion of mitigation to reduce significant impacts*.⁶¹

These findings are inaccurate because the draft EIS does not give due consideration to the GES Project’s potential impacts on protected species and on wildlife in general.

a. Section 4.7 of the draft EIS does not give due consideration to the GES Project’s potential impacts on protected species like the golden eagle.

The draft EIS does recognize that the GES Project would result in significant adverse effects on golden eagles, a protected species. As the draft EIS notes, golden eagles inhabit the project area in sizable numbers:

During bird surveys conducted from 1994 to 2003, golden eagles were observed in the study area during all seasons (WEST 2006) and golden eagle nests are documented within a 36-square-mile area overlapping the proposed project (FFP 2020a).⁶²

⁵⁹ Draft EIS 4.5.2.4 at p. 104.

⁶⁰ Draft EIS 4.7 at p. 115.

⁶¹ *Id* (emphasis added).

⁶² Draft EIS Section 4.7 at p. 124.

The draft EIS also notes that the GES Project’s construction has the potential to disrupt breeding and nesting golden eagles:

If present, actively breeding and nesting golden eagles at previously documented cliff sites directly adjacent to the lower reservoir area could be disturbed by heavy equipment operation and drilling and blasting noise and vibration, which could affect species viability. Additionally, extended construction activities occurring within 1 to 3 miles may cause golden eagle disturbance, including nest abandonment, which would constitute “take” under the Bald and Golden Eagle Act.⁶³

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The draft EIS further observes that the project’s operation could reduce the availability of certain types of prey for golden eagles:

Operation of the project could permanently reduce the density of small prey species in the study area, thereby affecting raptor species such as prairie falcons and golden eagles.⁶⁴

The draft EIS insists that “implementation of proposed mitigation measures . . . would reduce or eliminate impacts on breeding and nesting golden eagles.”⁶⁵ These mitigation measures are outlined in FFP’s draft VMMP and draft WMP and are summarized in Tables 4.7-4 and 4.7-5 of the draft EIS.

But given its apparent concern for the species, it is baffling that the draft EIS does not extensively discuss perhaps the most serious impact on golden eagles that the GES Project threatens: a significant increase in golden eagle strikes on nearby wind turbines. As TID has made clear in other public comment proceedings related to the GES Project, it is very concerned that the construction of the project may increase the availability of prey for golden eagles, attracting them to the project area and increasing the risk of avian strikes on wind turbines. That the draft EIS largely ignores this risk is all the more striking given that one study it cites in discussing golden eagles notes that golden eagles “may use different habitats based on breeding, migration, and wintering [or the] availability of prey.”⁶⁶ In fact, the presence of the upper reservoir in the middle of TWPA’s wind farm will attract insects, small mammals, waterfowl, migratory birds, and other prey, which currently are not attracted to the area. This new prey will attract bats, raptors, and other avian predators to areas they currently are not found, which will increase the risk that these predators will be killed by one of the turbines’ blades when they attempt to pursue prey near the reservoir. An increase in waterfowl and other birds that are attracted to the reservoir will also increase the risk of avian strikes as the flight path to and from the reservoir is through the wind farm.

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Moreover, the mitigation measures described in the VMMP and WMP, as well as in Tables 4.7-4 and 4.7-5 of the draft EIS, are very attentive to other threats facing golden eagles, but pay

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⁶³ Draft EIS Section 4.7.2.1 at p. 132.

⁶⁴ Draft EIS Section 4.7.2.2 at p. 134.

⁶⁵ Draft EIS Section 4.7.2.1 at p. 132.

⁶⁶ Draft EIS Section 4.7 at p. 123-24.

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comparatively little attention to the threat of eagle strikes on turbines. In particular, the “Raptor Nest Surveys and Monitoring” pre-construction mitigation measure specifies that the GES Project will “[c]onduct pre-construction surveys to identify and locate raptor (bald eagle, golden eagle, and prairie falcon) nests based on historically documented nest locations and all areas of suitable nesting habitat within 1-mile of the project area”⁶⁷ and will use this information to limit adverse effects on nests. Another mitigation measure, “Noise Control,” specifies that no blasting will be done within a certain distance of golden eagle nests.⁶⁸

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One mitigation measure, “Wildlife Deterrents for Reservoirs,” aims to “[r]educe potential attractants to mammals that are potential raptor prey species”⁶⁹ and take other steps to reduce the availability of prey in the area. But as described in Table 4.7-5, this mitigation measure is not aimed at deterring golden eagles specifically, but wildlife in general. The same is true of the proposal for a pre-construction “Literature Review” that aims to “[i]nform the development of measures to reduce the attractiveness of the future reservoirs to migratory birds and bats.”⁷⁰ Finally, although both the “Light Pollution Management” and “Carcass Removal Program” proposals are focused on reducing attractants for wildlife, they are not tailored to golden eagles specifically.⁷¹ Even more importantly, neither of these proposed mitigation measures addresses the particular danger TID has raised again and again in public comment proceedings: the risk of avian strikes on wind turbines involving golden eagles. Like the 2021 WREA study report, the draft EIS does not focus on particularized threats to this protected species, so it cannot give appropriate consideration to the effects of the project on vulnerable wildlife.

Because the draft EIS does not address all of the GES Project’s potential effects on golden eagles, a new study should be performed to address this issue. TID requests that the study be done by an independent third-party chosen by TID and FFP and paid for by FFP. This new study should comport with industry practices. USFWS, WDFW, and any other relevant regulatory agency should be consulted, and a determination should be made by these entities as to relevant study parameters and data. These agencies have already been consulted about the mitigation measures contained in the VMPP and WMP, and it stands to reason that they should be consulted regarding any further mitigation measures taken to protect golden eagles in particular.⁷² The study should comport with the USFWS Eagle Conservation Plan Guidance, which is generally viewed as the standard for assessing eagle impacts due to wind farm operations. TID wants to be sure any study performed comports with the applicable regulators’ requirements.

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In addition, TID requests that this new study be used to establish baseline, pre-construction data regarding average golden eagle strikes over the past 25 years. Then, prospectively, for the life of the TWPA turbines, an annual study should be performed to determine whether the GES Project’s presence is causing an increase in golden eagle strikes when compared to the baseline’s average data. The TWPA wind farm has experienced only one golden eagle strike since TWPA

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⁶⁷ Table 4.7-5, Draft EIS at p. 138.
⁶⁸ Table 4.7-5, Draft EIS at p. 139.
⁶⁹ Table 4.7-5, Draft EIS at p. 140.
⁷⁰ Table 4.7-5, Draft EIS at p. 138.
⁷¹ Table 4.7-5, Draft EIS at p. 140-41.
⁷² EIS 4.6.2.3 at p. 12-13.

has owned it. The data in the 2021 WREA Study Plan shows that such strikes have been a rare event for all wind farms in the region and nationally:

Based on consultation with the WDFW and USFWS, the Applicant has knowledge of known golden eagle mortalities associated with the nearby Windy Flats Wind Energy Facility. Pagel et al. (2010) document golden eagle fatalities at wind energy facilities in the contiguous United States, including six golden eagles in Oregon and five in Washington from 1997 through 2012. . . . The American Wind Wildlife Institute summarized bird fatality incidents and adjusted fatality estimates by avifaunal biome (e.g., aggregations of Bird Conservation Regions) at wind energy facilities (AWWI 2019). An estimated 17 golden eagles (0.3 percent of all fatality incidents) were reported in 11 scheduled searches, including 12 within the Pacific biome.⁷³

This independent study is the only way to ensure that the Final EIS will contain analyses, conclusions and mitigation measures regarding the potential impacts of the GES Project on golden eagles that is unbiased, scientifically based, objective and comprehensive. The Department of Ecology should require FFP to enter into an agreement with TWPA which provides that, if the GES Project’s reservoirs cause an increase in golden eagle strikes above the average that TWPA has experienced under the relevant baseline study data, FFP will implement proactive measures to prevent these strikes from continuing to occur and will compensate TWPA for any losses, penalties, costs, or damages that TWPA experiences due to such strikes. Such a study would ensure that the Final EIS reaches unbiased, scientifically based and comprehensive conclusions regarding the GES Project’s potential impacts on golden eagles.

b. Section 4.7 of the draft EIS does not give due consideration to the GES Project’s potential impacts on wildlife generally, and especially to the risk of avian strikes.

Aside from largely ignoring the issue of avian strikes as it relates to golden eagles, the draft EIS avoids the issue of avian strikes in general. One of the draft EIS’s only references to avian strikes is the following:

“The reservoir open water areas are not intended to provide habitat, but would likely attract birds, bats, and flying insects, potentially resulting in injury or mortality from wind turbines near the upper reservoir.”⁷⁴

The draft EIS acknowledges that “[i]nsects and spiders would provide a food source to birds and bats, potentially attracting them to the area.”⁷⁵ This would attract even more wildlife to an area already inhabited by a number of avian species. In particular, the draft EIS notes that

⁷³ 2021 WREA Study Report at p. 54.

⁷⁴ Draft EIS Section 4.7.2.2, pp. 132

⁷⁵ *Id.*

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“nesting bald eagles have the potential to be present in the study area.”⁷⁶ Moreover, the little brown bat, which the draft EIS notes is “likely” to be present in the project area, “makes up approximately 1.3% of bat fatalities at wind farms in the Columbia Plateau Ecoregion (WEST 2010, 2011).”⁷⁷ These are just a few of the many avian species that inhabit the project area and would be attracted in even greater numbers by the presence of the project’s reservoirs, exposing them to the danger of collision with TWPA’s turbines.

In fact, the draft EIS also notes that “[b]irds and bats that congregate around the open water areas of the reservoirs because of increased insect prey resources would be more likely to experience a collision with existing project power lines or nearby wind turbines.”⁷⁸ The draft EIS proposes to solve this problem with “floating shade balls,” one part of the “Wildlife Deterrents for Reservoirs” mitigation measure.⁷⁹ But though the “Wildlife Deterrents for Reservoirs” mitigation measure was indeed developed in consultation with the appropriate government agencies, it is aimed at deterring birds, not necessarily preventing avian strikes. Indeed, as noted previously, none of the mitigation measures provided for in the VMPP or WMP are expressly aimed at preventing avian strikes. Without an assessment of how effective this measure is in mitigating avian strikes specifically, and not just mitigating the presence of wildlife near the reservoir generally, TID’s concerns will go unheeded yet again.

The draft EIS has a blinkered view of the “adverse effects” that would result from the increased presence of wildlife in and around the reservoir. The draft EIS states that “[n]o state or federally endangered or threatened species are expected to be among those that would congregate near the reservoirs.”⁸⁰ Thus, the draft EIS concludes, “this would not result in a significant adverse effect.”⁸¹ Limiting “significant adverse effects” to impacts on protected wildlife ignores the serious threats to TWPA’s turbines posed by the increased presence of wildlife in and around the proposed reservoir, and the project should not be approved until TID’s legitimate concerns are addressed.

TID’s concerns regarding the increased presence of wildlife in and around the proposed reservoir are substantial. TID has raised concerns regarding the reservoirs’ potential impact on avian strikes in every set of public comments it has filed in relation to the GES Project. TID has raised these concerns because an increase in avian strikes would have significant adverse environmental impacts and would adversely impact TID ratepayers in a variety of ways. First, increased avian strikes could result in increased fines that will be imposed on Tuolumne and ultimately paid for by TID ratepayers. Second, if such avian strikes were to increase significantly, they could lead to legal actions that force TWPA to take some or all of the wind turbines out-of-service, which would also harm the environment because if the turbines are off-line, they cannot produce carbon free energy. Third, increased avian strikes could damage the wind turbines’ blades, thereby increasing repair costs and reducing the wind turbines’ energy output because they would need to be taken out-of-service to conduct such repairs. For the same reasons mentioned

⁷⁶ Draft EIS Section 4.7 at p. 124.
⁷⁷ Draft EIS Section 4.7 at p. 127.
⁷⁸ Draft EIS Section 4.7.2.2, pp. 134
⁷⁹ *Id.*
⁸⁰ *Id.*
⁸¹ *Id.*



above, any increase in the amount of time the turbines are off-line harms the environment because the turbines are not producing carbon free energy.

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If any of the foregoing were to occur, TID’s ratepayers would ultimately be stuck paying for any costs that result from such events. If all or a portion of TWPA’s wind turbines were ordered to cease operations due to increased avian strikes, this would have considerable socioeconomic impacts both on the region, as the wind farm employs a number of different trades to provide O&M services. Moreover, TID’s ratepayers would be adversely affected because they would have to bear the costs of unusable wind turbines. Thus, this issue needs to be fully vetted and studied and mitigation measures must be identified and instituted to prevent any increase in avian strikes.

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Because the draft EIS does not address all of the GES Project’s potential effects on other species of birds and bats, a new study should be performed to address this issue. TID requests that the study be done by an independent third-party chosen by TID and FFP and paid for by FFP. This new study should comport with industry practices. USFWS, WDFW, and any other relevant regulatory agency should be consulted, and a determination should be made by these entities as to relevant study parameters and data. TID wants to be sure any study performed comports with the applicable regulators’ requirements. This independent study is the only way to ensure that the Final EIS will contain analyses, conclusions and mitigation measures regarding the potential impacts of the GES Project on all non-golden eagle, avian species, which is unbiased, scientifically based, objective and comprehensive.

In addition, TID requests that this new study be used to establish baseline, pre-construction data regarding the annual number of avian strikes. Then, prospectively, for the life of the TWPA turbines, an annual study should be performed to determine whether the GES Project’s presence is causing an increase in avian strikes when compared to the baseline’s average data.

4. The discussion of Land Use in Section 4.11 of the draft EIS should be amended to reflect that GES Project will impact TWPA’s wind farm.

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Draft EIS Section 4.5, which is entitled “Land Use,” indicates that it “describes the current land use conditions in the study area, potential changes or impacts, and mitigation measures.”⁸² The “Key Findings of the Public Services and Utilities Analysis” states:

The analysis found the proposed project would have *no significant and unavoidable adverse impacts* related to land use.⁸³

In discussing impacts from the operation of the Project, the Draft EIS Section 4.11.2.2 claims that: (1) “[t]here would not be a significant adverse impact related to land use conflicts during operation,” (2) “[l]and use in the upper reservoir area would be converted from undeveloped open space but *would not impact . . . [TWPA’s] adjacent wind farm,*” and (3) *The proposed*

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⁸² Draft EIS 4.11 at p. 179.
⁸³ *Id* (emphasis added).

project would be compatible with adjacent energy infrastructure such as existing transmission lines, substations, and *wind energy infrastructure*.⁸⁴

Draft EIS Section 4.11.2.3, which addresses “Proposed Mitigation Measures,” does not identify any mitigation measures that would address potential impacts the GES Project would have on TWPA’s wind farm.⁸⁵ Therefore, draft EIS Section 4.11.2.4 concludes that there “would be no significant and unavoidable adverse impacts related to land use from construction or operation of the proposed project.”⁸⁶

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Draft EIS Section 4.11 does not identify the particular source used to support the above quoted statements. To the extent these statements are premised on the 2021 WREA Study Report these statements are erroneous for the reasons detailed in the preceding section of these comments. These statements should be amended to reflect the findings made by the independent studies TID proposes herein. These studies would correct the errors in the 2021 WREA Study Report and would ensure that the Final EIS reaches unbiased, scientifically based and comprehensive conclusions regarding whether the GES Project would have significant adverse impacts on utility infrastructure during operation.

In any case, the claim that there would be no significant unavoidable adverse impacts with respect to land use is not true, as a great deal of evidence shows that land use in the upper reservoir area would greatly increase the risk of Material Adverse effects within the meaning of Section 5.2 of the TWPA-NSC Lease. One Material Adverse Effect, and one of TID’s primary concerns with the GES Project, is the potential of the GES Project to reduce the amount of power TWPA is capable of generating from its turbines. Reductions in power generation capabilities and other adverse effects on the turbines as a result of the construction of the GES Project would occur in two distinct ways: 1) the GES Project would redirect the wind used by the existing wind turbines, reducing wind flow in the project area and 2) the GES Project would increase wind turbulence intensity, which would reduce energy output and increase wear and tear on the turbines.

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In addition, because the 2021 WREA Study Report authored by Rye’s consultant ERM shows that the upper reservoir will cause such significant reductions in the energy and RECs produced by TWPA’s turbines, the EIS’s claim that “[t]he proposed *project would be compatible with adjacent energy infrastructure* such as . . . *wind energy infrastructure*”⁸⁷ is unsupportable and inaccurate. Therefore, these provisions in Section 4.11 of the draft EIS should be amended to acknowledge that the 2021 WREA Study Report identifies changes to wind patterns caused by the GES Project that will significantly reduce the energy output of TWPA’s wind turbines. Section 4.11 should also be amended to add the findings of the new study that TID proposes be performed to more accurately address the GES Project’s impacts on TWPA’s turbines. Again, such study-based amendments are the only way to ensure that the Final EIS presents unbiased, scientifically based, objective and comprehensive conclusions regarding the potential effects that the GES

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⁸⁴ Draft EIS Section 4.11.2.2 at pp. 185-186 (emphasis added).

⁸⁵ Draft EIS 4.11.2.3 at p. 186.

⁸⁶ Draft EIS 4.11.2.3 at p. 186.

⁸⁷ Draft EIS 4.11.2.4 at p. 186.

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Project will have on TWPA, TWPA’s production of renewable generation, and the birds and bats that could be killed due to increased avian strikes.

Section 4.11 of the draft EIS also ignores several other significant adverse effects on TWPA’s power generation activities and operations that will likely result from the construction of the GES Project. These include the possible invalidation of TWPA’s warranty with the manufacturer of its turbines, the incompatibility of the land uses, and the risk that the GES Project will cause increased noise output from TWPA’s turbines and expose TWPA to legal liability. Therefore, Section 4.11 of the Final EIS should incorporate the findings of TID’s proposed independent studies addressing these issues.

The draft EIS’s failure to acknowledge the aforementioned adverse effects is not surprising, given that its land use analysis relies solely on information provided by FFP. Section 4.11.1 of the draft EIS states:

Land use information within the study area was identified by using information provided by the Applicant, Klickitat County plans and documents, the Klickitat Zoning Ordinance (Klickitat County 2018), aerial photographs, and Klickitat County GIS data.⁸⁸

Thus, the draft EIS apparently did not take into account any evidence about the likelihood of avian strikes, reduction in wind flows, or other adverse effects particularized to TWPA’s land uses. To fully capture the range of adverse effects on surrounding land uses, the environmental impact analysis must take TID’s concerns seriously.

a. Section 4.11 of the EIS should also be amended to more accurately reflect the fact that vibrations from construction could damage TWPA’s turbines.

The draft EIS also fails to adequately consider the potential damage to TWPA’s turbines as a result of vibrations produced by the GES Project’s construction. As the draft EIS itself notes, the GES Project would require a number of construction-related activities to take place in the project area. The draft EIS points out that some of these construction activities are “[l]arge-scale excavation and blasting to construct the reservoirs,” in addition to “[b]lasting and tunneling to construct the underground powerhouse and conveyance system.”⁸⁹ Further, the draft EIS correctly acknowledges that vibrations from these activities pose a significant risk to structures in the area:

Trains, heavy trucks, blasting, and jackhammers can all cause ground-borne vibrations, as well as noise. Ground-borne vibration is a technical term to define human-made vibratory motions through the ground, as opposed to vibration caused by geological changes such as earthquakes. Vibrations can affect any structure.⁹⁰

⁸⁸ Draft EIS Section 4.11.1 at p. 184.

⁸⁹ Draft EIS Section Appendix I at p. 28.

⁹⁰ Draft EIS Section Appendix I at p. 22.

However, the draft EIS gives scant attention to possible adverse effects on TID’s turbines from project-related vibrations. Although it does acknowledge that “[w]ind turbines are located within and immediately adjacent to the upper reservoir project footprint,”⁹¹ the draft EIS seems satisfied with a vague promise from FFP to adopt mitigation measures:

To reduce the effects of construction vibration on wind turbines, the Applicant intends to implement best management practices and to develop a construction vibration monitoring program, including definition of vibration criteria, to ensure no damage to those existing wind farm facilities and no interruptions to their operation.⁹²

FFP has previously promised in similar terms to take such mitigation measures but has not yet followed through. In fact, in an August 7, 2020 letter submitted in relation to another public comment proceeding, FFP promised to develop detailed contractor requirements related to maximum construction vibrations from the GES Project and to develop a construction vibration monitoring program, including a definition of vibration criteria, to ensure no damage to TWPA’s existing wind farm facilities and no interruptions to their operation. Without more specificity as to what these measures will entail, the draft EIS should not dismiss the risk of vibration-related damage to TWPA’s turbines out of hand.

The importance of clarifying the risks and developing mitigation measures to address possible adverse effects on TWPA’s turbines from construction vibration is underscored by the draft EIS’s equivocal position on the risk to those turbines. In particular, the draft EIS states:

Vibration from construction of the facility is not expected to affect any nearby structures because vibration levels for common construction equipment would be below FTA requirements (Table 5). The nearest structures are located within 500 feet of the lower reservoir footprint but are part of the decommissioned smelter plant and not in use (Tetra Tech et al. 2021).⁹³

Although the previous passage suggests that TWPA’s turbines – which doubtlessly fall within the category of “nearby structures”– will be totally unaffected by vibration from construction activities, the passage then goes on to suggest that the mitigation measures outlined above, including the “vibration monitoring program,” would be used “to ensure no damage to those existing wind farm facilities and no interruptions to their operation.”⁹⁴ The draft EIS, then, seems to claim both that TWPA’s turbines will be unaffected by construction-related vibrations and that mitigation measures will be needed to avoid harm to TWPA’s turbines as a result of construction-related vibrations. This confusing position only highlights the importance of ensuring that the GES Project will not result in serious adverse effects to TWPA’s operations by causing significant vibrations in the affected area.

⁹¹ Draft EIS Section Appendix I at p. 29.

⁹² Draft EIS Section 4.10.2.1 at p. 173.

⁹³ Draft EIS Section Appendix I at p. 29. “FTA requirements” refers to regulations developed by the Federal Transit Administration to ensure that vibrations from certain activities do not damage nearby structures.

⁹⁴ *Id.*



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Because the above evidence suggests a strong likelihood that the GES Project will be incompatible with TWPA’s land uses, TID requests that FFP develop mitigation measures to address these harms. Developing mitigation measures is an appropriate response to the risk of adverse effects to TWPA’s operations, given that the draft EIS specifies that “significant adverse effects” must be addressed via mitigation measures before the project can proceed.⁹⁵

Again, thank you for this opportunity to provide TID’s and TWPA’s comments on the draft EIS. TID hopes the Department of Ecology will adopt TID’s recommendations in these comments. If you have any questions regarding these comments, please do not hesitate to contact me.

Sincerely,

/s/ Dan Severson

Dan Severson

Assistant General Manager

⁹⁵ Draft EIS Section at S-6.

Joe Dabulskis

Attached is a letter of support.

Joe Dabulskis
Sherman County Judge
500 Court Street
P.O. Box 365
Moro, OR. 97039

July 12, 2022

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

Re: Draft EIS for the proposed Goldendale Energy Storage Project

Dear Ms. Park,

I am writing in my capacity as the Judge of Sherman County, Oregon regarding the draft EIS for the proposed Goldendale Energy Storage Project (Free Flow Power Project 101, LLC). Sherman County is located across the Columbia River from Goldendale and has benefited greatly from renewable energy development over the past decades. While the draft EIS does not include an economic analysis, the economic impacts and job opportunities the proposed project presents for rural counties in Oregon and Washington are quite significant.

1 The Goldendale Project would create 3,000 family-wage jobs and will greatly boost the local economies in Klickitat County and across the Columbia River in Sherman County, Oregon. New revenue streams for Klickitat County—\$14 million annually will support schools, health services, roads, emergency services and more. In addition to the economic impact this \$2 billion project will have on our rural communities, it will provide educational opportunities and valuable on-the-job training for workers in the building trades. All this while also serving as a critical piece of infrastructure to combat climate change.

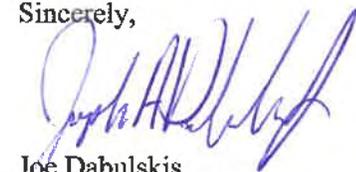
2 The draft EIS found no significant adverse impacts in almost every single study area. The Applicant has been a ready and willing partner to bring this important project to fruition, doing the necessary studies and presenting mitigation measures necessary to complete the project while having little to no adverse environmental impacts. The draft EIS includes an analysis of the project's impact on air quality and greenhouse gas emissions, but should also consider the long-term benefits of turning a brownfield site (the former Columbia Gorge Aluminum Smelter) into a clean energy resource on which our region's

2 cont. | future 100% carbon-free grid will depend.

1 cont. | Future generations will benefit from having this contaminated site transformed into a revenue-generating facility that produces high-quality union jobs, 100% clean energy, and energy storage for the region's wind and solar power. This project would enable our region to rely less on the fossil fuel industry to power our economy, thereby significantly improving air quality and reducing greenhouse gas emissions over the 100-year (or more) life of the project. That should be a consideration of decision makers.

Thank you for the opportunity to comment. We are very supportive of the project.

Sincerely,



Joe Dabulskis
Sherman County Judge

Scott Tillman

- 1 | Please find attached a declaration regarding the Draft Environmental Impact Statement for the Goldendale Energy Storage Project.

DECLARATION OF SCOTT TILLMAN

STATE OF WASHINGTON

§

COUNTY OF KLICKITAT

§

§

I, Scott Tillman, declare as follows:

1. My business address is at 85 John Day Dam Rd, Goldendale, WA, 98620.
2. I am of sound mind, over the age of eighteen, and competent to swear to the facts

stated herein.

3. I have been the President of NSC Smelter, LLC (“NSC”) since 2007.

4. During this period, NSC has been the landowner of the property containing the site for the proposed Goldendale Energy Storage Project in Klickitat County, Washington. This project will occupy roughly 10 percent of the land currently owned by NSC.

5. I am submitting this declaration to address any misunderstandings in the record regarding access to the property.

6. To the best of my knowledge, outside of visits related to environmental assessments and to permit applications for proposed industrial developments, access to the property has not been requested by any tribal members or groups since I became President of NSC in 2007.

7. To the best of my knowledge, no access agreement with any tribal groups exists, inclusive of the 1997 programmatic agreement signed between the Bonneville Power Administration (“BPA”), the Washington SHPO, and the Advisory Council on Historic Preservation. The 1997 agreement required BPA to ensure that the project developers of a proposed wind farm attempt to acquire an access easement to allow access to the property by members of the Yakama Nation, as a stipulation for the project’s implementation. Because this

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particular proposed wind farm project was never completed, to the best of my knowledge, no access easement was acquired.

2 cont.

8. NSC would engage in discussion with tribal members or groups regarding access if requested.

9. The only restricted access portion of the proposed project site is at the location of the proposed lower reservoir. This area contains a waste pile with restricted access to protect public safety.

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10. NSC does not own land adjacent to Hoctor Road. Pedestrian or vehicle access to the Pushpum ridgeline would cross land owned by a different landowner.

11. I declare under penalty of perjury that this declaration is true and correct.



Scott Tillman

August 9, 2022

Date

August 9, 2022

Sage Park
Regional Director
SEPA Responsible Official
Washington Department of Ecology
Central Regional Office
1250 W. Alder Street
Union Gap, WA 98903-0009

RE: Comments on the State Environmental Policy Act Draft Environmental Impact Statement for the Proposed Goldendale Energy Storage Project

Dear Ms. Park,

1 Thank you for the opportunity to submit comments regarding the proposed Goldendale Energy Storage Project¹ (the Project) June 6, 2022 Draft Environmental Impact Statement (DEIS) prepared by the Washington State Department of Ecology (Ecology). The comments of FFP Project 101, LLC (Applicant) are provided as Attachment A. The Applicant submitted a Clean Water Act Section 401 Water Quality Certification (WQC; Order No. 20153) request to Ecology in June 2020. The submittal included a draft State Environmental Policy Act (SEPA) checklist and associated resource reports and studies to inform Project review under the SEPA and to inform analysis of the National Environmental Policy Act (NEPA) to be prepared by the Federal Energy Regulatory Commission (FERC). Both documents are required for federal and state permitting, and a FERC license. A final SEPA checklist was submitted to Ecology in December 2020, and it is this document, along with the above-referenced resource reports and studies, that precipitated SEPA review. As you are aware, a new request for WQC and additional/revised Project plans and studies were submitted to Ecology on May 23, 2022. The comments provided in Attachment A and additional information about the proposed Project are included to reflect the Applicant's knowledge of the Project, findings of subsequent research and field investigations, and additional/revised plans and studies prepared after the December 2020 SEPA submittal.

2 In addition to the comments and information provided below and attached, the Applicant is respectfully requesting that Ecology prepare a socioeconomics section for the Final Environmental Impact Statement (FEIS). We recognize that this is an optional element to be studied in an EIS,² but socioeconomics is both an important and a common topic to be included in EIS's throughout the state³ by counties, Ecology, and the state Energy Facilities Site

1 cont. ¹ Federal Energy Regulatory Commission (FERC) No. 14861.

2 cont. ² Washington Administrative Code (WAC) 197-11-440(8).

³ *Wind Power Project Final Environmental Impact Statement*, EFSEC February 2007, at Section 3.7.

3
2 cont.

Evaluation Council (EFSEC).⁴ The climate crisis we are currently facing is existential. The State of Washington is addressing climate change through a variety of measures including, but not limited to, the Clean Energy Transition Act (CETA)⁵ and the Climate Commitment Act.⁶ These legislative directives are driving extraordinary change in how electricity is generated and transmitted in the state. The state has, over the years, developed an abundant number of studies regarding the effects of climate change and responses, including the effects on life, lifestyles, land use patterns, and myriad other aspects of coping with a warming planet. We strongly believe that the socioeconomic aspects of developing a 1,200 megawatt (MW) clean and renewable source of electricity generation are important to understand, and this EIS process provides a valuable pathway to examining them. We understand the potential effects that this could have on the budget and timing for publication of the FEIS and are happy to discuss them further with you before making a decision on this request.

On behalf of the Applicant, thank you for your consideration of these materials as you finalize the EIS. Should you have questions, please do not hesitate to contact me.

Sincerely,



Erik Steimle
Vice President, Rye Development
Oregon Offices
830 NE Holladay St.
Portland, OR 97232

Email: erik@ryedevelopment.com

3 cont.

⁴ See, e.g., *Lower Snake River Wind Energy Project Final Environmental Impact Statement*, Garfield County October 2009, at Section 2.2.15; *Millennium Bulk Terminals Longview Final Environmental Impact Statement*, Cowlitz County and Washington Department of Ecology April 2017, at Section 3.2, Social and Community Resources, Page 3.2-1 (“These resources include population characteristics, economic activity, and utility services.”); *Kittitas Valley Wind Power Project Final Environmental Impact Statement*, EFSEC February 2007, at Section 3.7.

⁵ Revised Code of Washington (RCW) 19.405.

⁶ RCW 70A.65.

Attachment A – Applicant Comments on Ecology DEIS

Overarching Comments

Purpose

4 An EIS is not a permit to be either granted or denied. The purpose of an EIS is to inform decision-makers, when taking action, about the probable significant adverse environmental impacts of a proposed action and to provide recommended mitigation measures where feasible, including those that can eliminate or reduce impacts to a level that are less than significant. It is Ecology’s document and it is Ecology’s SEPA Responsible Official who has the responsibility to determine whether the analysis, inclusive of the mitigation measures recommended in the EIS, is adequate to satisfy the objectives of SEPA as written and as confirmed by case law. That duty cannot be delegated to any third-party stakeholder to the Project. At various points below, we address the existence of mitigation measures that the Applicant has either built into the Project’s siting and design, or suggested as potential conditions of subsequent permits to reduce the level of the Project’s impacts. We strongly encourage Ecology to consider mitigation measures that are built into the Project’s siting and design to support a conclusion that, when coupled with mitigation measures identified in the EIS, the Project will not have significant impacts on the built and natural environment inclusive of, but not limited to, wetlands, cultural resources, and fish and wildlife.

Alternatives

6 For a private project at a specific site, the EIS is required to examine only the Proposed Action, the No Action Alternative, and other reasonable alternatives *that will allow the applicant to achieve the proposal’s objective on the same site.*⁷ Here, the Applicant seeks to build a facility capable of generating up to 1,200 MW of CETA-compliant clean electricity via a closed-loop pumped storage hydroelectric facility that avoids any river or stream impoundments, and which provides balancing services to the electric grid and flexible renewable energy capacity to utilities serving customers in the Pacific Northwest, California, and the Western Interconnection.

6 While other DEIS comments submitted to Ecology to date urge the agency to consider ‘an appropriate range’ of alternatives, there are no other alternatives that can reasonably accomplish the Project’s purpose, need, and objectives on this site. As is stated in the DEIS, the objectives of the Proposed Action include reusing an existing industrial site. A portion of the Project would be constructed at a brownfield site that was previously used for industrial activities. The Applicant will participate in part of its cleanup. Repurposing a portion of a former industrial development and committing to support cleanup activities is a responsible means of funding a cleanup and minimizing the Project’s impacts by limiting them to an already affected area.

7 An additional objective of the Project is to make use of an existing water right. Using an existing water right owned by Klickitat Public Utility District (KPUD) allows the Project to be built without drawing additional water from the Columbia River above and beyond those water rights already in place. The KPUD water right is a long-existing entitlement that has been exercised for many years. As a result, the water intake features on the Columbia River are already in place.

6 cont. ⁷ See WAC 197-1-440(5)(d).

7 cont.

The objective of using an existing water right and intake structure is a built-in feature of the Project designed to avoid impacts on water supply and the fisheries dependent thereon. There are no other existing water rights with existing intake features available to this site that would support the provision of the water required to generate up to 1,200 MW of clean and renewable electricity.

8

Last, the Project would be located near existing Bonneville Power Administration (BPA) transmission lines, the existing John Day Substation, and nearby windfarms. This Project objective—proximity to the BPA transmission lines and the John Day Substation—allows the Applicant to mitigate land use and visual impacts through Project siting and design, as the Project is proposed for siting in an area already containing other energy facilities including transmission, substations, and wind energy generation.

9

These express objectives support development of the Project at this site. There is no other alternative at this site that can meet all of these objectives while generating 1,200 MW of clean renewable electricity using pumped storage hydro. It is not only reasonable but proper that the DEIS examined the Proposed Action and the No Action Alternative on this site, which is the only site on which alternatives must be examined, particularly in light of the Project objectives established for this proposal, which themselves facilitate built-in siting and design measures that mitigate the Project's impacts.

Main DEIS Document – Section 4.2, Water Resources

Page 71, Section 4.2.2.1: Ecology should provide the technical basis for the following statement regarding construction dewatering: “The dewatering would also create a temporary reduction in the quantity of groundwater reaching its existing discharge location that, depending on location of dewatering relative to the Unconsolidated Aquifer (UA) flow system, is either springs or Lake Celilo surface water,” or remove this text. Groundwater modeling presented within the Dewatering Plan submitted as part of the Project's Section 401 WQC Application indicates minimal potential for leakage from the lower reservoir to impact groundwater flow.

Page 77, Section 4.2.2.2: Ecology should provide the technical basis for the statement that Project operation would result in “anticipated changes to groundwater flow direction,” or remove this text.

10

Page 80, Section 4.2.2.2: Ecology states “The migration of the assumed leakage return flow is expected to occur via groundwater, although the specific pathway(s) for that migration is not currently defined. Given an expected gradual degradation in water quality within the pumped storage system, this leakage return flow has the potential to impact groundwater quality in the southern portion of the study area as well as the Columbia River, which receives groundwater discharges from that area.” Ecology should provide the technical basis for “assumed leakage of return flow” and potential for leakage to impact the Columbia River, or remove these statements. The Project tunnels and lower reservoir will be designed to minimize potential for groundwater leakage as detailed in the Project's 401 WQC Application. The Applicant has included measures to monitor and adaptively manage water quality within the Project reservoirs in the Water Quality Monitoring Plan provided with the Project's Section 401 WQC Application.

Main DEIS Document – Section 4.9, Cultural and Tribal Resources

Cultural resources include “the collective rights and access [by Native Americans] to traditional areas and times for gathering resources associated with an Indian Tribe’s sovereignty since time immemorial. It includes inherent rights or formal treaty rights associated with usual and accustomed territories. In addition, Tribal resources includes areas important to traditional cultural practices and the natural and cultural resources associated with those practices including plants, wildlife, or fish used for commercial, subsistence, and ceremonial purposes.”⁸

11 The DEIS was informed by the results of archaeological and ethnographic studies in the study area and archaeological sites, and the Traditional Cultural Properties (TCP) have been inventoried. More importantly, Ecology has engaged directly, and continues to engage, in government-to-government consultation with the affected Tribes to enhance its knowledge and understanding of the potential effects of the Project on affected Tribes.⁹ Ecology is participating in the Project’s FERC Licensing process and attended the November 10, 2021, meeting FERC held with the Yakama Nation to discuss the Commission’s role and obligations to consult pursuant to Section 106 of the National Historic Preservation Act for the proposed Goldendale Energy Storage Project.

Because of the Tribes’ unique, deep, and strong connection to, and reliance on, cultural and natural resources, they have what is known as Tribal Ecological Knowledge of ecosystems. Given the interwoven nature of ecosystems, in addition to DEIS Section 4.9, Cultural Resources, other elements of the environment have been examined in the DEIS for impacts on them, including Section 4.8, Aesthetics/Visual Quality; the Aquatic Species and Habitats Resource Analysis Report (Appendix F of the DEIS; Anchor QEA 2022a) and Section 4.6 of the DEIS; and the Terrestrial Species and Habitats Resource Analysis Report (Appendix G of the DEIS; Anchor QEA 2022b) and Section 4.7 of the DEIS.

12 The Applicant has also repeatedly engaged with Tribes affected by the Project in an effort to better understand the Project’s potential impacts on cultural resources as well as the built and natural environment more broadly. In 2017, representatives of the Applicant, Rye Development, met with the full Yakama Nation Tribal Council to provide an overview of the Project, answer questions, and listen to their concerns. Per Yakama Nation’s request, the Applicant enlisted the Tribe’s cultural resource staff and botanist to conduct a TCP study for input and deeper understanding of the potential impacts of the Project. Early on, Rye made significant design modifications to lessen the impacts on the landscape and visual impacts. We believe that the materiality of the modifications should be recognized in the DEIS as mitigation built into the facility design, as the changes include moving the location of the upper reservoir and tunneling or burying the majority of the Project features that connect the two ponds.

13 Rye also enlisted staff from the Nez Perce Tribe and the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) to conduct TCP studies. The results of these efforts include ethnographic studies completed by the Nez Perce Tribe, the CTUIR, and the Confederated Tribes and Bands of the Yakama Indian Nation (Yakama Nation), and a Project-specific Historic Properties Management Plan (HPMP). Throughout 2021, Rye sent quarterly updates to all three

11 cont. ⁸ DEIS at Page 157.
⁹ DEIS at Page 157.

13 cont affected Tribes, requesting the opportunity to meet with Tribal Councils to provide updates and discuss the Project. Due to the disproportionate health impacts related to COVID-19¹⁰ on the Yakama Nation, most direct communication with Tribal leadership ceased. Then, in October 2021, Rye was invited to attend a full Yakama Nation Tribal Council meeting and was assigned two points of contact with the Tribe for the Goldendale Project.

14 All of the above has informed a variety of measures—some built into design and others proposed for inclusion in the EIS and subsequent permits—designed specifically to avoid, protect, and/or mitigate impacts on cultural and environmental resources that the Project could have on affected Tribes. For example, Attachment B is a list of 15 specific measures proposed by the Applicant tailored to address impacts of significance to the Nez Perce Tribe, CTUIR, and Yakama Nation. Note that any identifying information that would disclose the specific nature or location of such measures has been redacted to protect confidentiality. These measures address both cultural and ecosystem impacts of the type identified in the DEIS.

15 In addition to these, the Applicant will be obligated by FERC, through its 50-year facility license, to negotiate an Historic Property Management Plan with affected Tribes. A Programmatic Agreement will also be prepared under Section 106 of the National Historic Preservation Act. Compliance with these and other permitting agencies' requirements is a standard condition in permits issued by Washington agencies. The Applicant expects that compliance with these FERC conditions will be recommended in Ecology's FEIS, which enables an agency to determine that a Project's impacts can be adequately minimized.

16 Considering the magnitude of the efforts and measures described above, Rye is troubled by the language in the DEIS at Page 157 that states "Some mitigation options for Tribal and cultural resources have been proposed by the Applicant. However, to date, there is no information available about mitigation proposed by or supported by the Tribes that would reduce the level of impact to less than significant." Reading this finding, one would incorrectly assume that the Applicant has made no effort to engage with Tribal stakeholders when, in fact, Rye has and will continue to earnestly engage with Tribes because we share an interest in the environment in which the Project would be developed. With all due respect to Tribal stakeholders, however, there is a difference between a lead agency recognizing unique vulnerabilities of Tribes and discounting the voluminous information in its SEPA record, or failing to conduct its own independent analysis of any mitigation measure for which a Tribe has not put forth or indicated support, or even opposes. Washington law does not allow a lead agency to decline to independently consider mitigation measures built into Project design or put forth by an Applicant simply because another stakeholder refuses to advance, opine on, or opposes them. This is true regardless of the element of the environment involved. Likewise, a lead agency may not draw conclusions that impacts are unmitigable based merely on a stakeholder's silence regarding such mitigation. Because the EIS is the document of Ecology and not the Applicant or any other stakeholder, it is Ecology's sole duty to determine the adequacy of the EIS. Ecology must make the final determination as to the potential for mitigation measures to reduce impacts. This remains true even if comments regarding mitigation are ultimately provided by the Tribes before

13 cont. ¹⁰ Coronavirus disease 2019.

17 cont. | the close of the comment period. SEPA contemplates lead agencies making determinative findings on a record-informed, but objective basis.

18 | The Applicant urges Ecology and its EIS consultant to examine, consider, and discuss these measures with the Nez Perce Tribe, CTUIR, and Yakama Nation as part of the agency’s evaluation of how impacts can be minimized prior to finalizing the EIS. Rye also expressly encourages Ecology and its EIS consultant to review the body of Tribal-related additional information that the Applicant has submitted to Ecology in the course of its 401 WQC and SEPA review of the Project.¹¹ Doing so should inform and ultimately enable the FEIS to conclude that as mitigated and conditioned as proposed, the Project will not result in any significant adverse impacts. The Applicant is happy to continue discussing additional mitigation measures that can ameliorate the effects of the Project on the environment and stakeholders, including Native American Tribes.

19 | The Applicant notes that in various places, the DEIS affirmatively states that the Project itself would restrict access to areas used by the Tribe. This statement is not properly informed or correct. The Project parcel is neither public nor open and unclaimed as that term is defined by law. Nevertheless, in the entire time that the Applicant has been leasing the Project site, it has not rejected any of the many requests it has received for access to the Project site. None of the requests received has been from a Tribe. Additionally, the Project site itself is surrounded by parcels in third-party ownership. Access rights across those parcels must exist in order to reach the Project site. The Applicant, as lessee of the Project site, cannot control, modify, create, or in any way impact Tribal access rights across those other parcels of land, which would be necessary in all cases to reach the Project site. The statement that the Project will restrict access is unsupported by the record. The Applicant requests that Ecology provide more information and figures in the EIS that indicate past, current, and future intended use and access by the Tribe.

20 | Thereafter, Applicant respectfully requests that Ecology revisit the mitigation measures proposed by the Applicant and conclude that “to alleviate potential impacts to access to the Project site for historically conducted activities, a mitigation measure can be to require the Applicant to consider allowing Tribal members to access select areas near the Project site, such as at root digging areas or areas containing other traditionally gathered resources.”

21 | Page 157, *Key Findings of the Tribal and Cultural Resources Analysis* pop-out: “Some mitigation options for Tribal and cultural resources have been proposed by the Applicant. However, to date, there is no information available about mitigation proposed by or supported by the Tribes that would reduce the level of impact to less than significant.” Ecology should note in the FEIS that the Tribes chose not to participate in discussions or collaborate with Project representatives.

22 | Page 159: Ecology states that “Both MPDs^[12] are NRHP^[13]-eligible.” This is partially incorrect, as MPDs are not resources and thus cannot be NRHP-eligible. An MPD is a fillable form used to nominate groups of significant related properties. An MPD is not itself a nomination (i.e., it is

18 cont. | ¹¹ If the resource studies and materials that were provided to Ecology in association with the Applicant’s Clean Water Section 401 WQC submittal are not included as part of the SEPA review record, Applicant expressly requests that they become part of the record considered and upon which the FEIS is based.

22 cont. | ¹² multiple property documentation

¹³ National Register of Historic Places

not a resource in and of itself) but is rather a context for evaluating and nominating properties with similar characteristics. Ecology should restate the characterization in its FEIS for accuracy.

Page 161: Ecology states that “The Washington State Department of Archaeology and Historic Preservation has estimated that 100% of 15 sites could be disturbed (DAHP 2022b).” (Emphasis supplied). However, the Applicant’s findings—based on site-specific investigations that have also been submitted to Ecology for inclusion and analysis in the SEPA review process—identify only five sites that will be disturbed. The discrepancy is likely due to Department of Archaeology and Historic Preservation (DAHP) not considering the fact that various sites within the Project boundary have been combined into single sites through Shellenberger’s and the Applicant’s investigations as reported in Table 2-1 in the HPMP (FFP 101, LLC 2022). Also as described in the HPMP, there are indeed more than the five noted archaeological resources within the Project boundary, but these will be avoided by the Project. This information provides important context that should be included in the EIS.

Main DEIS Document – Section 4.10, Environmental Health, Cleanup Action for Contaminant Impacts from the Adjacent Smelter

General: There are multiple references in the DEIS to a “separate process” regarding investigating contamination on the site and developing cleanup actions. Ecology should clarify what the processes are for the cleanup action early in the document (e.g., site-wide cleanup action for the Columbia Gorge Aluminum Smelter by the Potentially Liable Persons [Smelter PLPs, i.e., National Smelter Corporation (NSC) and Lockheed Martin] or Goldendale Energy Storage Project area cleanup action and Prospective Purchasers Consent Decree [PPCD] for those impacts within the Project area). The Applicant notes that the DEIS refers to these processes accurately in some locations (e.g., Section 4.10, Pages 166–167).

Page 170, Section 4.10: Following description of the Prospective Purchaser Agreement, Ecology details “the Applicant exercising an option to purchase the land required to complete the proposed Project.” The Applicant is going to lease the land required to complete the proposed Project.

Page 170, Section 4.10: Ecology details the “Applicant estimates that 145,550 in-place cubic yards of materials would need to be removed.” The Applicant notes that this is an estimate based on the draft Remedial Investigation / Feasibility Study and represents one potential excavation option. The volume of material to be excavated may change (i.e., increase or decrease) depending on the disproportionate cost analysis; in the FEIS, Ecology should remove the estimate or indicate that this estimate may change.

Page 170, Section 4.10.1: Ecology details that the analysis of environmental substances within the smelter cleanup site by the Applicant “included no additional data collection or modeling.” The Applicant notes that groundwater modeling was completed to estimate the dewatering effect on groundwater hydrology and plume migration as presented in the Draft Dewatering Plan submitted with the Section 401 WQC Application. Ecology should clarify that no additional data was collected to assess contamination due to the availability and sufficiency of historical data associated with the West Surface Impoundment (WSI) closure and post-closure monitoring to assess cleanup actions.

26 Page 172, Section 4.10.2.1: In discussion of construction stormwater, Ecology states “If Ecology defines an allowable discharge for the contaminants of concern associated with the WSI cleanup action prior to their issuance of a Section 401 water quality certification decision for the proposed Project, Ecology may choose to address the handling of contaminated stormwater and material in the Section 401 water quality certification instead of a site-specific Administrative Order.” To inform the FEIS, the Applicant expects to address construction stormwater via the 1200-C Permit.

27 Page 172, Section 4.10.2.1: Ecology details that “The Surface and Groundwater Hydrology Resource Analysis Report” (Appendix B of the DEIS) proposes preparation of a Construction Water Resource Monitoring and Response Plan as a mitigation measure. This Plan would be implemented during construction and would provide an integrated program to monitor water quantity (hydrology) and water quality for groundwater and surface water. It would also define metrics for determining the presence and degree of impact. The proposed Plan would likely be prepared independent of the proposed WSI removal action under the Model Toxics Control Act (MTCA), but it may overlap with MTCA monitoring requirements (e.g., share monitoring locations) to achieve a comprehensive and efficient program overall.” The Applicant does not anticipate a separate Construction Water Resource Monitoring and Response Plan will be required as a mitigation measure for groundwater or surface water due to the minimal impacts to these systems expected according to groundwater modeling and understanding of surface water features. The Applicant will address water quality associated with Project construction through the Dewatering Plan, water quality during operation through a Water Quality Monitoring Plan, and soil and groundwater cleanup actions under MTCA; the Applicant has submitted a draft Mitigation Plan to address potential impacts on wetlands or ephemeral streams adjacent or within the Project area.

Main DEIS Document – Section 4.14, Environmental Justice

28 A newly added requirement to SEPA environmental review, the environmental justice (EJ) element of the environment, is expressly examined in the DEIS.¹⁴ Traditionally a federal requirement, through the addition of Chapter 70A.02 to the Revised Code of Washington (RCW), the Washington Legislature has made this a focus for agency consideration of actions on matters both public and private. There is no federal formula established for analyzing EJ, nor is there any binding guidance associated with it. As reflected in RCW 70A.02.005(2), people of color and low-income people are, and continue to be, disproportionately exposed to environmental harms in their communities, leading to a higher risk of adverse health outcomes for such communities. The focus on EJ is to reduce those environmental and health disparities.¹⁵ Additionally, Chapter 70A.02 is intended to “reduce exposure to environmental hazards within Indian country, as defined in 18 U.S.C. Sec. 1151, due to off-reservation activities within the state, and to improve state practices to reduce contamination of traditional foods wherever they occur.”

28 cont. ¹⁴ DEIS at Page ii; see also DEIS Section 14, Environmental Justice, and Figure 4.14-1, Environmental Justice Study Area Map.

¹⁵ RCW 70A.02.005(1).

29 The EJ study area used in the DEIS includes people living within 2 miles of the Project footprint.¹⁶ Nobody lives in or immediately adjacent to the study area, as the Project is proposed for siting in an area that is rural, isolated, and sparsely developed; there is only one house in the vicinity, located 0.4 mile away from the lower reservoir. The study area was not identified as an overburdened community based on review of the Environmental Health Disparities layer of the Washington Tracking Network (WTN 2022).¹⁷ Consequently, there are no overburdened communities (people of color or low income) to be impacted by the Project.

30 Moreover, the Project is not the type of development that would lead to exposure to the environmental hazard that Chapter 70A.02 RCW is designed to address. The same is true for the Project's potential to expose Native Americans to environmental hazards due to off-reservation activities. Unlike the traditional types of environmental hazards such as air emissions from fossil-fuel combustion at generation plants or contaminated drinking water from coal ash impoundments, the proposed Project has neither of these features. Consequently, this Project presents neither environmental hazards nor vulnerable communities that require protection. While there is currently no electricity generating facility with harmful emission within 2 miles that the proposed Project would displace, the phenomena of climate change and adverse health impacts from fossil-fuel emissions is global, and the impacts are also universal. If anything, this Project presents the real potential for a reduction in harmful air emissions when it displaces other fossil-fuel-based electric generation.

31 The DEIS is informed by analysis contained in the DEIS Appendix J, Environmental Justice Report, showing the work that the Lead Agency did to draw its conclusions. The analysis provides the citations to the authorities and methodologies that were utilized for the DEIS, and in the absence of any binding guidance and adopted regulations, the approach taken by Ecology is reasonable and supported by ample evidence. We concur with the analysis and conclusion in Chapter 4.14 of the DEIS that the proposed Project would have no significant and unavoidable adverse impacts to the extent related to EJ requiring mitigation because there are no communities of color or low income present to be impacted. Furthermore, the Project is not the type of facility that presents the risk of food supply contamination in the area. We agree with the DEIS conclusion that there are no significant adverse impacts on EJ as a result of the Project.

32 The Applicant does respectfully request, however, that the Lead Agency revise and limit its conclusions in the EJ section of the DEIS to only EJ impacts. Conclusions regarding any impacts from the proposed Project related to cultural resources properly belong in DEIS Section 4.9, Cultural Resources. Duplicating conclusions from one section of the document to a second section of the document inappropriately and unnecessarily amplifies the Project's potential impacts and dilutes the appropriate EJ focus on the impacts on food supplies and disproportional health risks to vulnerable communities.

Appendix B – Surface and Groundwater Hydrology Resource Analysis Report

33 Page 11, Section 3.2.2, Table 3: A new wetland delineation of the lower reservoir area needs to be performed since Wetlands A, B, C, and D are artifacts from water loss at the former smelter. The increased recharge in the area from historical artificial ponds that were used during smelter

29 cont. ¹⁶ DEIS at Page 205.
¹⁷ DEIS at Page 205.

33
cont.

operations are the reason the wetlands are there. As presented in the 401 WQC Application, since water flow to the smelter was shut off, aerial photographs show the wetlands migrating and disappearing over time. Visits to the site also concluded that the wetlands no longer exist. Most of the identified wetlands have fully dried up and the rest will likely also disappear since the artificial ponds no longer exist. Since these wetlands are naturally disappearing, they should not be included as surface waterbodies in the FEIS since they will not be affected by the Project.

34

Page 30, Section 3.3.1.1.2: Ecology states that, “The Applicant has proposed to include hydrologic/groundwater level monitoring as a component of a broader water quality monitoring plan, prepared in coordination with Ecology during the permitting process. Any such program would need to include pre-construction baseline monitoring to have a basis to assess changes. With appropriate water management (e.g., infiltration of the extracted and treated water to minimize loss of the groundwater resource), control measures, and monitoring programs in place and as required by permits, the temporary construction-related alteration to groundwater flow patterns, and potential downgradient effects at corresponding groundwater discharge locations, would not result in a significant adverse impact.” The Applicant agrees with this, provided the reference is to monitoring already proposed in the Water Quality Monitoring Plan or Dewatering Plan that were submitted to Ecology as part of the Project’s Section 401 WQC Application on May 20, 2022.

35

Pages 37, Section 3.3.2.1.1: Ecology states “As described in Section 3.3.1.1.2, the Applicant would include hydrologic/groundwater level monitoring as a component of a broader Water Quality Monitoring and Response Plan to document hydrologic changes to surface waterbodies within and surrounding the proposed project footprint. This plan would be prepared in coordination with Ecology during the permitting process. With appropriate control measures and monitoring programs in place, including measurement of the project’s operating water balance with quantification of precipitation capture and leakage losses, the capture of precipitation by the upper and lower reservoirs would not result in a significant adverse impact. Should the project’s actual operating water balance indicate that the leakage is less than the estimated 5 AFY^[18] of surface water loss to the Swale Creek watershed, or 3 AFY of loss to the Columbia Tributaries watershed, the Applicant will be required to propose alternative mitigation.” The Applicant will incorporate hydrologic monitoring into the Dewatering Plan and Water Quality Monitoring Plans that were submitted as part of the Project’s Section 401 WQC Application.

36

Page 44, Section 3.3.4, Construction Water Resource Monitoring and Response Plan, and Operations Water Resource Monitoring and Response Plan: Ecology proposed water resources mitigation measures that would be included as conditions in the reservoir permit and described in these Monitoring and Resource Plans. Ecology requests an integrated program to monitor both water quantity and water quality of groundwater, surface water, and wetlands. The May 2019 and July 2021 field delineation of the waters and wetlands showed changes in the wetlands, which included significantly decreased wetlands and areas where wetlands no longer occur as compared to the those identified in the site-wide Remedial Investigation by Tetra Tech dated November 30, 2021. As identified in the 401 WQC application, aerial photos predating the development and construction of the former smelter show wetlands A, B, C, or D did not exist

35 cont. ¹⁸ acre-feet per year

36
cont.

prior to the smelter. Once the smelter was constructed, operating water loss from the plant increased recharge to groundwater in the area. This can be seen in aerial photos as wetlands begin to appear, grow, and migrate as the introduced water moved through the system. When the smelter was razed and the increased recharge to the area terminated, the aerial photographs show the wetlands decreasing in size and finally dissipating. The change in wetlands caused by the reduction of recharge from the smelter is further supported by the overall downward trend of groundwater elevations seen in the monitoring wells around the lower reservoir. Furthermore, with a decrease in groundwater elevation, the amount of overall pumping for dewatering and the corresponding affected areas will diminish. Since the wetlands in the area and the elevated groundwater are artifacts of the water loss from the smelter, the former wetlands and streams do not require monitoring and will not require mitigation.

Appendix C – Wetlands and Regulated Waters Resource Analysis Report

Wetlands

Pages 11-16, Section 3.2.2.1: Wetlands A, B, C, D, and H: While the Applicant appreciates the full range of information Ecology has included in the analysis, the Applicant disagrees with the inclusion of the areas identified as Wetlands A, B, C, D, and H in PGG's 2013 Septic System, Wetlands, Upper Fluoride Area, and Soil Background Investigation Report. These areas were likely misidentified or the hydrology has changed over time and these locations no longer support wetlands. The 2013 report does not indicate that a delineation was performed. The study investigated soil contamination and provided detailed information about the location and type of contaminants, but it only included a cursory mention of wetlands: no delineation methodology was presented; it did not include any descriptions or photographs of the wetlands; and no data sheets were included. Furthermore, there is no indication that a jurisdictional determination was applied for or made.

37
Pages 17-19, Section 3.2.3.1: These areas identified as wetlands occur in and adjacent to the old aluminum smelter site where soil and hydrology conditions have been highly disturbed over time, as described above in the comment on Appendix B, Surface and Groundwater Hydrology Resource Analysis Report, Page 11, Section 3.2.2, Table 3.

No other information gathered or studies performed to support Project reporting and analysis indicate that these areas currently support wetland conditions. National Wetland Inventory data does not indicate the presence of Wetlands A, B, C, or H, and only a small portion (1.43 acres) of the 17 acres identified as Wetland D is mapped as a wetland.

Field investigations indicate that these wetlands are not present:

- 2015: Applicant performed a reconnaissance-level site visit to prepare for Final License Application (FLA) studies that included a tour around the areas identified as Wetlands A, B, C, D, and H, and included general notes on vegetation. Separately, ERM performed a habitat typing in the same year.
- 2019: Applicant performed a wetland delineation in the Project boundary. Although the smelter site was not the focus of the study, no wetlands were identified at a reconnaissance level while the field crew accessed Project areas. Botanical surveys were also conducted in 2019.

- 2021: Applicant performed the Environmental Protection Agency’s Streamflow Duration Assessment Method (SDAM) on S7 and S8.
- 2022: Applicant performed a delineation of these areas at the request of Ecology and found no wetlands present. None of the dominant vegetation consisted of wetland obligate species and none of the soil samples at delineation locations indicated hydric soils. Soils were not examined at Wetland A due to the presence of unknown cultural resources mapped in and overlapping the footprint of the presumed wetland.

Although the Applicant’s 2022 wetland delineation was performed in consultation with Ecology, the reporting was not completed in time to include in the DEIS. The Applicant requests that Ecology include the 2022 delineation results in the FEIS.

Appendix G – Terrestrial Species and Habitats Resource Analysis Report

Pages S-1, 29, and 31: The report suggests that the Project could permanently reduce the density of small prey species in the study area (Pages S-1 and 31), but conflictingly also says small prey species could be attracted to the reservoirs (Page 29). The Applicant believes that the proposed mitigation measures (e.g., deterrents, fencing, vegetation management around reservoirs) will reduce the potential for small prey species to be attracted to the reservoirs (Final License Application Section 3.2.3.2, Appendix D, Wildlife Management Plan Section 2.3.3.). Please clarify in the FEIS.

Page 4, Figure 1a, Terrestrial Species and Habitats Study Area and Priority and Rare Plant Habitats in the Southern Portion of the Study Area: The wetland polygons displayed on this map are inaccurate per the Applicant’s 2022 wetland delineation field findings and should be updated in Ecology’s FEIS.

Pages 10, 15, and 23: Ecology indicates that several plant species may have been missed during the Applicant’s 2019 botanical survey because of the survey’s timing (e.g., California broomrape, Nuttall’s quillwort, and smooth desert parsley). The Applicant has proposed to perform pre-construction surveys, including a protocol-level full floristic survey with the intent of documenting all species present in the study area. The Washington Department of Natural Resources’ *Guidelines for Conducting Rare Plant Surveys* (2020), or similar Ecology-recommended protocol, will be followed to ensure the timing of the surveys captures bloom times.

Page 21, Section 3.2.3, Western Gray Squirrel, and Attachment 2, Table 2-3 Wildlife Species: Ecology’s FEIS should be updated to indicate that western gray squirrels are very unlikely to occur within the study area, as their required habitat types are not present. The Priority Habitats and Species (PHS) mapped for western gray squirrel in this area and conclusions regarding potential permanent impacts on the western gray squirrel throughout the document should be updated to reflect this. “There are only three remaining populations of the western gray squirrel in Washington, one of which occupies oak woodlands and conifer forests in Klickitat and Yakima counties, including similar habitat types within the Study Area” (WDFW 2021f). No oak woodlands have been documented within the study area. Open to moderately dense stands of conifers (i.e., Ponderosa pine and western juniper) are present (2019 Botanical Report Page 11), but not forests. “Stands of Ponderosa pine and western juniper were observed within mapped PHS boundaries in the upper and lower reservoir areas and the middle escarpment, but no

41
cont.

Oregon white oak was observed within the Study Area” (2019 Botanical Report Page 16). The quoted DEIS sentence is misleading because it says similar habitat types to oak woodlands and conifer forests occur in the study area. The same paragraph goes on to say, “The squirrels require mature stands of trees with sufficient canopy cover to provide secure nest sites and allow for traveling in trees.”

42

Page 30, Section 3.3.2.2: “Operational devices to allow surface lighting in the central portion of the Project area to be turned off at night are also being considered. If such designs are implemented, indirect impacts from reduced habitat connectivity between surrounding habitat types would occur due to the presence of the proposed Project and the potential for edge effects.” As stated, this concept is unclear; Ecology should clarify in the FEIS if 1) turning lights on creates edge effects, 2) turning lights off creates edge effects, and 3) the purpose for lights if they will be turned off at night.

43

Page 11, Attachment 2, Table 2-1: A footnote should be added to the table to clarify when species “were not observed during the botanical survey.” This does not mean that the botanists did not observe them; it means that they were not documented because this survey was not a protocol-level full floristic survey which would identify every species present. The 2019 botanical survey’s intent was to document presence of rare plants and to field-verify PHS habitat types. As an example, many common species such as yarrow are present in the study area, but the botanical survey did not mention them. A pre-construction botanical survey will take place to document all species present in the study area.

44

Attachment 3: This mule deer range map does not include the study area boundary, so it is difficult to obtain mule deer information in relation to the proposed Project. The Applicant requests that Ecology update the map in the FEIS to include the study area boundary.

Appendix H – Tribal Resources Analysis Report

45

Page 4, Section 2.1: Ecology states that “The study area is the geographic extent of potential direct and indirect impacts to Tribal resources, including both the Project footprint and the adjacent area that could be affected by construction and operation of the proposed Project. The geographic extent of Tribal resources that could be impacted could extend well beyond the proposed Project footprint.” The Ecology study area includes areas outside the Project boundary, whereas the Applicant’s cultural investigations completed for the Project have been restricted to the Project boundary. Ecology’s FEIS should acknowledge that the Applicant has performed due diligence under FERC, and that FERC has not directed the Applicant to consider a larger study area.

46

Page 9, Section 3.2.2: Ecology indicates that “...Yakama Nation included concerns about the potential disruption of a Programmatic Agreement related to the construction and operation of the wind farm that overlaps with the proposed project area (BPA 1997^[19]). That agreement requires that the wind farm proponent ‘make a good-faith effort to acquire an access easement...to allow members of the [Yakama Nation] to conduct traditional plant gathering activities and other traditional uses’ (BPA 1997:3).” While the Applicant acknowledges this

46 cont. ¹⁹ Cited previously as BPA 1997, but has not been located.

46 cont.

statement, the actual access agreement does not appear to be available from any source, including DAHP, and it therefore cannot be reviewed.

Appendix I – Environmental Health Resource Analysis Report

47

Page 26, Section 3.3.1.1.2: In discussing construction stormwater, Ecology states, “If Ecology defines an allowable discharge for the contaminants of concern associated with the WSI cleanup action prior to their issuance of a Section 401 water quality certification for the proposed project, Ecology may choose to address the handling of contaminated stormwater and material in the Section 401 water quality certification instead of a site-specific Administrative Order.” The Applicant expects to address construction stormwater via the 1200-C Permit.

48

Page 26, Section 3.3.1.1.2: Ecology details that, “The Surface and Groundwater Hydrology Resource Analysis Report (Appendix B of the DEIS) proposes preparation of a Construction Water Resource Monitoring and Response Plan as a mitigation measure. This Plan would be implemented during construction and would provide an integrated program to monitor water quantity (hydrology) and water quality for groundwater and surface water. It would also define metrics for determining the presence and degree of impact. The proposed Plan would likely be prepared independent of the proposed WSI removal action under the Model Toxics Control Act (MTCA), but it may overlap with MTCA monitoring requirements (e.g., share monitoring locations) to achieve a comprehensive and efficient program overall.” The Applicant does not anticipate that a separate Construction Water Resource Monitoring and Response Plan will be required as a mitigation measure for groundwater or surface water due to the expected minimal impacts on these systems according to groundwater modeling and understanding of surface water features. The Applicant will address water quality associated with Project construction through the Dewatering Plan and soil and groundwater cleanup actions under MTCA, and has submitted a draft Mitigation Plan to address potential impacts on wetlands or ephemeral streams adjacent to or within the Project area.

Page 26, Section 3.3.2.1.2: Ecology details that, “The Surface and Groundwater Hydrology Resource Analysis Report (Appendix B of the EIS) proposes preparation of an Operations Water Resource Monitoring and Response Plan as a mitigation measure. This Plan would include monitoring of water quantity (hydrology) and water quality during long-term operation of the proposed project. The proposed Plan would likely be prepared independent of the proposed WSI removal action under MTCA, but it may overlap with MTCA monitoring requirements and locations, similar to the construction plan, to achieve a comprehensive and efficient program overall.” The Applicant does not anticipate a separate Operations Water Resource Monitoring and Response Plan will be required as a mitigation measure for groundwater or surface water due to the expected minimal impacts on these systems according to groundwater modeling and understanding of surface water features. The Applicant will address water quality during operation through a Water Quality Monitoring Plan and soil and groundwater cleanup actions under MTCA, and has submitted a draft Mitigation Plan to address potential impacts on wetlands or ephemeral streams adjacent to or within the Project area.

Page 35, Section 3.3.4: Ecology proposes mitigation measures for water resources during construction and operations and notes that these measures are “not required to reduce any significant adverse impacts.” The Applicant will address these proposed mitigation measures

(i.e., Construction Water Resource Monitoring and Response Plan and Operations Water Resource Monitoring and Response Plan) by developing plans that will reduce potential impacts to environmental health, including the Construction Stormwater General Permit (i.e., 1200-C Permit; addresses construction water quality); the Dewatering Plan (addresses construction water quality); the Remedial Investigation, Feasibility Study, Cleanup Action Plan and PPCD (includes soil and groundwater cleanup actions under MTCA); and Mitigation Plan (addresses potential impacts on wetlands or ephemeral streams adjacent or within the Project area).

48
cont.

Attachment B – Proposed Cultural Resources Mitigation Measures**HPMP Section 4.6.3**

1. Interpreting historic properties, via interpretive panels, displays, walking tours, or other means, to enable the history and importance of the properties to be shared with the public or, if public sharing is inappropriate, internally within a Tribe;
2. Displaying artifacts in a museum or museum-like setting;
3. Providing support to tribal programs to give access to tribal members to select areas within TCPs and/or providing support to tribal cultural programs related to oral histories, education, vegetation enhancement, First Foods, etc.; or
4. Listing a historic property in the NRHP; note, however, that may only be appropriate for certain types of historic properties, and some Tribes do not support listing TCPs to the NRHP.

HPMP Section 4.6.4

5. Given that the TCPs, in part, draw significance from culturally significant vegetation, conduct surveys to identify areas where traditionally gathered resources are present and implement a protection and enhancement plan for said resources;
6. Allow Tribal members to access select areas within or near the APE,²⁰ for example, at root digging areas or areas containing other traditionally gathered resources;
7. Incorporate vegetation or other visual screening measures to minimize viewshed changes resulting from the Project;
8. Partially redesign the Project laydown areas, or incorporate protective measures (e.g., restrict ground disturbances through use of mats or other means), to minimize effects at 45KL567/570 and 45KL746;
9. Conduct archaeological data recovery at Site 45KL746, for which the Licensee has prepared a draft treatment plan detailing a proposed data recovery research design (see Punke et al. 2021); notably, however, the CTUIR consider data recovery to be an adverse effect and not mitigation for an adverse effect (Shawn Steinmetz, personal communication 2021), and the CTWSRO technical reviewer has stated concerns about the necessity of data recovery at the site and would prefer design modifications to avoid the site (Christian Nauer, personal communication 2021);
10. Recover and curate artifacts for display and interpretation at a Tribal museum, or provide other museum support or funding;
11. Conduct cultural resources monitoring during construction with a focus on using tribal monitors; simultaneously enact safety measures to ensure security of monitors and surrounding communities, particularly Indigenous communities, against potential increased violence during construction (policing of construction housing camps, enforcing a no drugs and alcohol policy, etc.);

49

49 cont. ²⁰ Area of potential effect

49 cont.

12. Provide funding for oral history programs or other tribal cultural programs; for example, support the CTUIR's Elder in Residence Program, in which the CTUIR CRPP works with an elder to document important places and record the information in their oral history database;
13. Provide funding, recordation of digital content, or other efforts to support other tribal cultural or education programs or initiatives;
14. Work with tribal programs to conduct First Foods inventories, which work with Elders and community members to document areas where tribal members can harvest First Foods; and
15. Purchase mitigation property(ies) for tribal ownership, for example properties containing First Foods or those appropriate for conducting cultural activities.



WESTERN ENVIRONMENTAL LAW CENTER

June 8, 2022

Via electronic mail sage.park@ecy.wa.gov and meg.bommarito@ecy.wa.gov.

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

Re: Request for Extension of the Public Comment Period for the Free Flow Power Project (FFP) 101, LLC Goldendale Storage Project Draft Environmental Impact Statement.

Dear Ms. Park and Ms. Bommarito:

The Western Environmental Law Center, Columbia Riverkeeper, Washington Environmental Council, Washington Chapter of the Sierra Club, and American Rivers request that the Washington Department of Ecology extend the public comment period on the Goldendale Energy Storage Project (Project) draft Environmental Impact Statement for an additional 15 days.

The purpose of the commenting period is to engage the public in the review process. According to Washington regulation, “[r]eview, comment, and responsiveness to comments on a draft EIS are the focal point of the act’s commenting process...” Wash. Admin. Code 197-11-500. Without meaningful public review and participation, the purpose of the commenting process is unavailing and to no effect. As it stands, the current timeframe set for the commenting period is inadequate.

First, forty-nine days is not enough time for public review of a draft EIS during a pandemic. Currently, Washington has 2,613 daily cases of COVID. This ongoing and worsening public health crisis has limited the public’s ability to engage in this process. More specifically, the COVID pandemic continues to impact the communities with a direct stake near the proposed project. The Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) have consistently opposed this project since its inception due to the irreparable destruction it would cause to their natural and cultural resources located in the project footprint. The pandemic hit the Yakama Nation Reservation and surrounding ceded lands particularly hard, with tribal resources and attention directed to relief response. As a result, it is unreasonable to expect that the

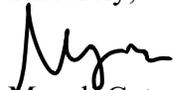
public, and even professionals who often engage in these agency processes, can operate under the time limitations that were considered normal before the pandemic. Furthermore, summer schedules may prevent much of the public from participating in a meaningful review of the draft EIS.

Second, to comment effectively on this decision requires reviewing and considering a significant amount of information that may not be readily available. The unprecedented size of this project, as the largest proposed pumped-storage project in the Pacific Northwest, requires more time to review the Goldendale Energy Storage Project Draft Environmental Impact Statement, the other project documents, and any additional research the public will have to seek out to understand the Project and its implications independently. With thousands of pages of material to review and understand, forty-nine days is not enough time for a public continuing to face a pandemic to review. Moreover, because the website has changed, it may confuse some, making it difficult to access the information.

For these reasons, we request that you extend the public comment period on the draft Environmental Impact Statement for an additional 15 days.

Thank you for your prompt attention to this request. If you have any questions or if we can provide additional information, please contact Andrew Hawley via email at hawley@westernlaw.org or phone at 206.487.7250.

Sincerely,



Magali Cota
Legal Intern
Western Environmental Law Center

Simone Anter
Staff Attorney
Columbia Riverkeeper

Rebecca Ponzio
Climate and Fossil Fuel Director
Washington Environmental Council

Margie Van Cleve
Conservation Chair
WA Chapter of the Sierra Club

Bridget Moran
Associate Director, Puget Sound-Columbia Basin
American Rivers

Leslie Hiebert

Please see the attached letter.

Thank you, Leslie Hiebert



KVH

Klickitat Valley Health

June 20, 2022

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

Re: Goldendale Energy Storage Project Draft Environmental Impact Statement

Dear Ms. Park,

I am writing on behalf of Klickitat Valley Health to express support for the proposed Goldendale Energy Storage Project. We are a nonprofit health care provider, operated by Public Hospital District #1 in Klickitat County and owned by the citizens of the district. Our core values guide our work within the community in Klickitat County, one of which is promoting the responsible stewardship of the resources entrusted to us, to protect and preserve a healthy future.

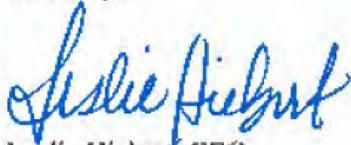
The energy we use every day is one of those vital resources and is directly connected to our community's health. Using renewable energy-and having ways to store energy is vital to ensuring that our region remains able to access clean and renewable wind and solar power. We have already been investing our own resources in exploring energy storage for our facilities, and we were one of 14 organizations in disadvantaged communities chosen in the Pacific Northwest National Laboratories Technical Assistance Program to explore energy storage as a pathway to resilience, energy affordability, independence, and environmental sustainability.

There is a growing need for this project-locally and regionally-and the draft EIS seems to conclude that it will have very little adverse impacts that can't be mitigated. The growing number of wind and solar electricity facilities in the Gorge means that energy storage is becoming increasingly important for grid reliability. A stable and reliable grid is critical to our ability to provide health care to the community when and how it is needed. To stabilize the grid and reduce the potential of outages in the future, we know a multiplicity of storage solutions is needed-solutions that include both lithium-ion batteries and the "Energy storage at scale" that pumped storage provides.

Most importantly, the proposed Goldendale Energy Storage Project will bring numerous benefits for the people living right here in Klickitat County. The lower reservoir site includes cleaning up a former brownfield site, removing toxic substances that are known to cause negative health impacts. The Goldendale Project is also expected to create more than 3,000 family-wage jobs in our community at a time when rural Washington and Oregon desperately need them.

The Goldendale Energy Storage Project will benefit residents of Klickitat County and support our health care organization in delivering the care the residents need. For these reasons, we support the project.

Sincerely,



Leslie Hiebert, CEO
Klickitat Valley Health

Laborers'
International
Union of
North America

LIUNA! LOCAL
737

Feel the Power

To the State of Washington Department of Ecology,

1 On behalf of the thousands of construction craft Laborers of Laborers International Union of North America (LIUNA) Local 737, I am writing to express support for the Goldendale Energy Storage Project. The energy investment firm behind this proposed project, Copenhagen Infrastructure Partners, has committed to a project labor agreement (PLA) covering the construction of this project. This commitment is significant, and merits praise: PLAs show the commitment of businesses to supporting workers, their families, and their communities by ensuring the payment of good wages, supporting crucial benefits like healthcare and retirement programs, and creating opportunities for on-the-job apprenticeship programs. PLAs are critical in building an economy and society that supports the working class.

Additionally, this project will be an important piece of infrastructure in meeting state and regional clean energy goals. Pump storage projects are a well-established technology that works particularly well with other forms of renewable energy, such as wind and solar. Pump storage facilities allow the storage of energy during lower demand periods, and the “release” of energy during high demand periods. This feature complements the variable nature of the broader renewable energy infrastructure being built in our region. Renewable energy facilities can vary in their output at given points in time depending on local conditions. Indeed, one of the biggest challenges facing the renewable energy transition is the problem of storage; pump storage is a tried-and-true method of solving the storage challenge.

2 The environmental impact statement for this project identified some issues, particularly around tribal rights in the project area. LIUNA Local 737 encourages the Department of Ecology and other relevant state agencies to move expediently towards a reasonable solution that limits negative impact on our tribal sisters and brothers, while also ensuring that this project is able to be constructed and completed. If the project does not proceed to construction and completion, we will have lost a chance to strengthen our renewable energy infrastructure, and we will further lose the opportunity to strengthen this infrastructure under a PLA that supports workers, their families, and their communities.

1 cont.

LIUNA Local 737 looks forward to being a partner in ensuring this project proceeds in a way that benefits all parties.

Sincerely,

Zack Culver
Business Manager
Laborers International Union of North America (LIUNA) Local 737

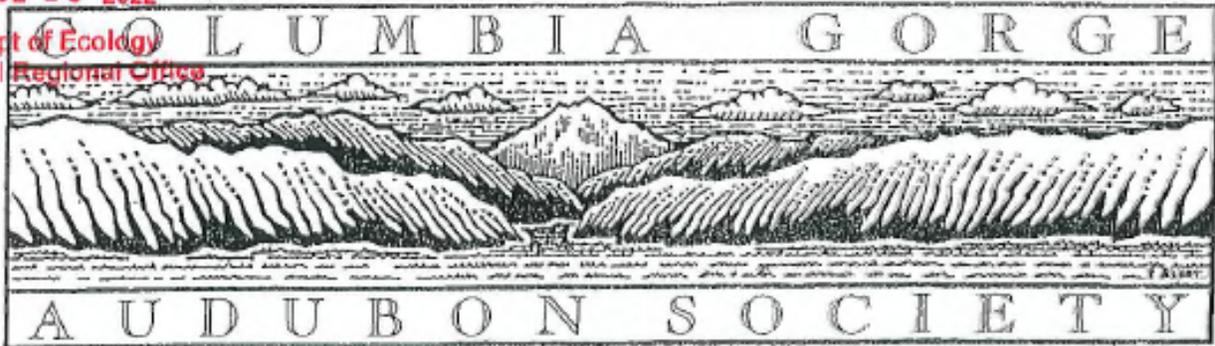
Phone (541) 801-2209 * 17230 NE Sacramento St., Suite 202 * Portland, Oregon 97230
www.Local737.org

Hello my name is Chris Blair I'm a Union Rep for the Operating Engineers Local 701.

- I would like to thank the Department of Ecology for providing a thorough review of the Goldendale project.
- There are a couple of things I would like to point out, This project represents the culmination of decades of work both at the local and state level to encourage a renewable energy future for Washington
- The project also helps avoid an overbuild of wind and solar which would cause additional land use issues in the region - while preserving the affordability and reliability that ratepayers in the Pacific Northwest currently enjoy
- We need a project like this to help offset what my colleague Nate Stokes calls the funnel effect. "Imagine pouring water into a funnel—the water backs up as it pours through the narrow opening because the funnel can't handle all the water at once. In this analogy, the water in the funnel is generated power, the water pouring out of the funnel is transmission of power."
- The project will provide 12 hours of on-demand renewable electricity to 500,000 homes in the Pacific Northwest. **We will not be able to add more renewable energy resources to the grid and eliminate the use of fossil fuels without massive amounts of energy storage—which the Goldendale Project will provide in a low-impact way.** While lithium-ion batteries are expected to be one solution for our future storage needs, they cannot meet all our demands, and other types of energy storage—like the Goldendale Project—need to be part of the solution too.
- We need to have a place to **store the power.**
- This project will also generate \$14 million+ in tax dollars annually for the local economy.
- Just remember that **We must all work together to bring this project to the Pacific Northwest.**

JUL 20 2022

Dept of Ecology
Central Regional Office



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

FROM: David Thies, President
 Columbia Gorge Audubon Society
 PO Box 1393
 White Salmon, WA 98672

DATE: July 13, 2022

ATTEN: Goldendale Energy Storage Draft EIS. (Public comment).

Kind People,

ENVIRONMENTAL IMPACT STATEMENTS

1

EIS's are a hurdle proponents of large projects must leap. Anything and everything that can cause a problem for the project must be solved, contained, managed or hidden. The most expensive solution is to solve the problems. The Department of Ecology will never see an EIS that intentionally exposes problems that can kill a project, even if they exist. We have examined many EIS's over the last 40 years. At first we were shocked to see the misinformation and outright lies provided in those EIS's. We are no longer shocked. We hope the Department of Ecology reviews the pump storage EIS with a healthy skepticism.

WHO COMMENTS, AND WHY IT MATTERS

2

Most of the information and comments submitted to the Washington Department of Ecology concerning this project will probably come from professionals. It is likely that reviewers will give more weight to that information and those comments than they will to

the information and comments from the general public. Some of those professionals will be engineers, biologists and other specialists hired by the proponent of this pump storage project. The unions are likely to comment, as well as the contractors, local government leaders, local Public Utility District commissioners, residential developers (who are already taking action), local business owners, and a few landowners. These people will all have one thing in common: they have a pecuniary interest in the project, or the proponent is paying for their information and comments. When considering these comments, you should not forget this fact.

On the other hand, comments from the general public (excepting for a few who hope to land a job, or who were advised by their boss to make a public comment in support) have nothing to gain from the project, they are most likely the people to be directly or indirectly negatively impacted in some way by the project, and they are often the most familiar with the land that will be impacted by the project. For these reasons, information and comments from the general public deserve your full attention.

A vast majority of Klickitat County citizens will not be commenting on this proposal. Most of those silent citizens have no conception of the massive build-out of wind, solar and other power providers that will be triggered by this proposed pump storage project if it is approved. Some of these people do know about that impact, but they have given up trying to stop projects that seem predetermined for approval. We wager that a vast majority of this counties residents will be deeply saddened and angered by the future planned for us by industrial energy companies, if that future comes to pass. Other counties that have already experienced this fate have suffered mass migrations, and boarded over business. Land values have plunged due a flood of For Sale signs. The energy companies are pleased to purchase that land at rock-bottom prices. There is a cruelty in ignoring this.

2 cont.

DISMISSING PUBLIC COMMENT

If the intent of public comment is to hear what the public has to say, then those comments should not be dismissed and not considered because they do not "fit the guidelines," or because they fail to make things more convenient for your reviewers. Comments from the general public "come as they are," and their significance as a much under valued commodity deserve to be recognized.

Big projects like this pump storage proposal come with considerable boosterism that is intended to create a sense of inevitability about the project. General public comments can bring a sense of balance to your consideration, they can raise issues proponents do not want you to consider, they can help you keep an open mind about the project under consideration, and they even have the potential to nudge you "out of the box" of "has the proponent followed all the rules?" to a real consideration of the question: "should this project be approved?"

SAFETY FIRST

"Safety First" is a slogan developed by Public Relations experts. This phrase was originally used to encourage employee safety, but now it is often used to deflect criticism of projects. If safety were really the first concern, the public would know by now where the water and debris field would go if a worse case scenario collapse of either of the dams in this project occurred. But proponents do not want to talk about that, and have deflected inquires with assurances that the project will be safe. Deflecting questions about project safety is a hindrance to real safety. The public deserves to know the answer to this question, and they should have been given this information right up front a long time ago. We wonder if the Department of Ecology knows the details of the consequences of complete dam failure of either or both of the proposed dams? You need to know the answer to this question. As a public agency, genuine public safety should be your first concern.

3

Of course professionals hired by the developers will reassure you that the project will be safe. But history teaches us that dams have failed with tragic results, especially earthen-rock dams as is proposed here. The dams that failed did so because safety was not the highest priority, because of faulty expert judgment, because of improper or inadequate materials, because of poor siting, because of inadequate consideration of conditions or changing conditions, and due to insufficient oversight and regulation. (Regulations often have their birth in project failures.) The well-known "bottom line" of a project does not refer to safety, it refers to the profit margin, and reducing the margin of safety as much as possible increases profit by as much you and other regulators will allow.

Engineers will claim that their project achieves the peak of engineering safety. But new insights (often due to failures) and changing conditions are constantly rendering projects out-dated, even before they are built. And yet, I have never met an engineer humbled by this fact. Of course, engineers are well paid to be positive in their outlook. There is danger in that fact.

CAN ALL THE EXPERTS AND PUBLIC LEADERS BE WRONG?

4

Experts and public leaders can all be wrong, and here's why: they are not independent actors making independent decisions (they are the "ducks being lined up"), and it is much easier to go with the flow than it is to fight it. This is how boosterism works. Should the project be built? That option is given little or no real consideration. This doesn't just apply to the boosters, the experts, or the public leaders; it also applies to the regulators. This is why dysfunctional and disastrous project are built all the time.

SITING A PROJECT IS OFTEN NOT AN ENGINEERING DECISION

5 Siting the pump storage dams should arguably be the first engineering issue. Therefore, the public might think these dam sites were chosen specifically to meet the dams engineering needs. They would be wrong. Just like safety, engineering takes a back seat to profit. The key determinates to the establishment of the dam sites are: (1) The lower dam site was chosen because the Aluminum plant land had become available, (2) the upper dam site was desirable because it was located above the lower dam site and owned by the US Army Corp of Engineers, or a single willing private land owner (we have heard both accounts), (3) the water rights at the old aluminum plant site had been purchased by the Klickitat PUD, and, (4) the Bonneville Power Administration transmission lines were close-by.

The point is, these dam sites were not chosen for their engineering desirability, they were chosen due to the economic benefits of the sites. We believe these dam sites could give the engineers significant challenges.

GEOLOGICAL PROBLEMS

6 The Department of Ecology might not consider geological and engineering problems something you should be concerned with, but you should be. If either or both of these dams should fail, there would be considerable negative impact on the environment; but, of course, then it would be too late for you to do anything about it.

7 The engineering of the dams seems simple. These dams basically appear to be cut and fill projects. But challenges are not always apparent, nor are they always made apparent even when they are known. Protecting and advancing the project is always the number one priority of the developers.

8 The soil on the Columbia Hills is noted for its capacity to "slip." This seems to us to not be the best soil to build dams on, or to use as a construction material. A further aggravating factor is the steepness of the surrounding land. The engineers may not consider this a problem because the weather conditions that usually trigger slippage have historically not occurred that often. However, Climate Change means more extreme storms and wetter weather for the Columbia Hills during the expected lifetime of these dams.

If the dams were constructed, weather would not be the only cause of bringing water to the site. There would be the obvious matter of the reservoirs themselves. Is there a plan to seal the reservoir? If so, will that plan work? Will sealing integrity survive an earthquake? If there is no plan to seal the reservoirs, the water could be available for slippage as soon as it is pumped into the reservoirs. If an earthquake should occur the integrity of a seal could be lost, and the water would again be available for slippage.

Hillsides like the Columbia Hills are commonly cut into by vertical draws that erode and enlarge. Why do these draws occur? Often it is because geological faults provide a channel for water run-off that is then further eroded. A review of a map provided by a developer at an earlier public meeting showed a Columbia Hills pump storage dam site located on or near an identified active geological fault. The question of faults needs to be addressed and resolved, and yet when this question came up at that previous public hearing, proponents seemed intent on ridiculing and dismissing the issue. That map has not been seen since. This is not a good approach for getting at the facts. The Columbia Hills is known to be active geologically; this should not be swept under the rug. Combine the fault issue with the slip capacity of the Columbia Hills soil with the steepness of the slopes, and it seems like there could be a problem here. But like we mentioned earlier, when all the infrastructure elements are locked in, the siting of the dams is predetermined, despite the potential weakness of the sites. The Department of Ecology should keep this fact in mind when reviewing the dam sites, and you should do your own research of the potential danger of faults and slippage.

9

We have raised these issues in previous letters to FERC, and perhaps the removal of the phrase "earthen dams" by proponents and its replacement with the phrase "rock dams" is a response to the doubts we raised. But has anything really changed, other than terminology? If the plan has always been to remove on site material to form the reservoirs dams, how will this change? Will extra rock be brought in from a more rocky location to bulk up the dams, or was a PR decision made to use the phrase "rock dams" because the on site soil includes rocks, and it makes the dams seem safer? The Department of Ecology needs to discover and disclose the answer to this question. If additional rock is to be brought in as a condition to approving the project, that condition should be locked in, and not left open for later renegotiations. The Department of Ecology needs to investigate this issue and give it careful consideration.

Approximately every 500 years the Northwest experiences a major earthquake. This was not known until relatively recently, but now we do have this knowledge. The geologic pressures have been accumulating and we are now well within the period that a major quake is expected to strike. Considering this, the construction of an earthen - and even rock-dams seems imprudent to us. And, as you know, we are not talking small dams here: they will be the height of 17 and 20 story buildings.

10

When challenged in a public hearing about the safety of the dams, proponents of pump storage responded that at least one of the Columbia River dams is built on a geological fault, and that some of the federal dams incorporate rock fill. This defense, in a public hearing, confirmed what was on one of the maps they displayed in the public hearing: faulting is involved here. The suggestion was, "are we to be required to do better than the federal government?" But when the Columbia River dams were constructed on or near faults, the location of those faults were not known, and the frequency of a major Northwest earthquake was not known, and climate change was unheard of. So yes, considering these facts, the developer should be required to do better.

WEATHER ISSUES

11

Extreme weather conditions have occurred in Klickitat County. I well recall one weather event when deep snow had a rind of ice so thick you could walk on it, and then we had a rapid warm up and it rained hard. I was living on the western edge of Major Creek Canyon in western Klickitat County at the time and the entire canyon walls were one continuous water fall about six inches deep. A lot of flood damage occurred to hillsides, something you would not normally expect. Roads were flooded and washed out, landslides slipped onto roads, bridges and culverts were washed out and rural residents and whole communities were basically cut off from the rest of the world. Klickitat County engineers had not anticipated that weather event. They thought they had taken sufficient precautions. But they were not the only ones to misjudge the potential of extreme weather. The water run-off in Major Creek Canyon was coming so fast and was so deep that the run-off topped a high railroad fill at the mouth of the canyon and washed it out. The rails were left hanging in mid-air as a reminder that man proposes, but nature disposes.

12

The Columbia Hills is known to have a history of occasional severe rapid water run-off in the past. Engineers usually try to familiarize themselves with historic facts such as this, but with climate warming the weather is predicted to become more intense and wetter than it historically has been. The fact is, we do not know how severe global warming storms could get here, but the newer predictions have always increased the severity of the storms. This means that extreme weather incidents that once were rare will likely occur more often and will be much more extreme. This could cause a large volume of water with slipping mud and debris to enter the reservoirs. Would the closed loop reservoir system handle such an event that could raise the water level, plug the outlets, perhaps to the point of dam breach? Disasters often occur when several issues combine to create an unexpected overwhelming problem. In this instance, those issues could be: poor siting, global warming, slipping soil, earthquake potential, and chancy construction material. Regulators need to address these issues. (See the included photo provided by the proponent to the Goldendale Sentinel newspaper, showing the proposed reservoirs, the draws, the steepness of the slopes - and unintentionally - the potential for slippage.)

Each professional has his own specialty, and he will not look beyond it. The general manager looks beyond the elements of the project, but he, along with the developer, are probably the people most influenced by the bottom line, which is the profit margin. Engineering and management oversight are thought of as the best way to avert disaster, and in a way it is true, but in another seldom-considered way, it can be the cause of disaster. The Department of Ecology should give real consideration to the weather issue, not just as elements, but also how weather might combine with other factors, because that is how you will be able to realize the potential for disaster, and only then will you be able to protect public safety.

ENGINEERING, ECONOMICS, AND WHERE THE CONSEQUENCES FALL

13

Engineering is always limited by the bottom line. Once real money is spent on a proposed project (and that has definitely happened) it is critical that development precedes and overcomes all problems, no matter what. This real life fact especially applies to the developer of a project, because the developer must make a profit to survive so he can move on to their next project. The investors that come in later to buy the project, and the electric ratepayers would also like their interests protected; but unlike the developer, they have little or no hands-on opportunity to actually protect their interests. The developer is the only one uniquely situated to protect his own interests. The significance of the fact that developers typically sell their projects when they are completed, and are therefore disconnected from the long-term engineering and economic viability of the project, is seldom given the consideration that it deserves when projects are reviewed. There is danger when the impacts of errors fall on others; it is a situation ripe for the making of errors.

THE ENERGY OVERLAY ZONE

The Klickitat County Energy Overlay Zone (EOZ) was originally billed as a way to identify specific locations where wind power and other alternative energy facilities would not impact the environment. Instead, we got an extensive EOZ that included about two thirds of our large rural county. At the time we wondered, why is the EOZ so large? But soon we realized that instead of protecting most of the counties environment, the real intent of the EOZ was to open most of the county to industrial energy development.

14

Klickitat County and the energy companies like to give the impression that they are independent of each other, and that the county is there to provide oversight and to protect the interests of county citizens. We follow the general pattern of counties infiltrated and impacted by big corporations with big plans. Our county EOZ was not independently produced as county government leaders often suggest. It essentially arrived with Dana Peck, former county Economic Development Director, and before that, project developer for Kenetech Wind Power. This is how fast tracking of alternative energy projects occurred here, and it is why the fast tracking is still occurring. Huge dams ought not to be fast tracked.

Kenetech Wind Power, "the largest wind power company in the world," (boasted Kenetech at the time) went bankrupt in a manner that suggested scandal and a "mining of green investors." Kenetech is gone, the investors took the hit, and we are still stuck with the EOZ.

CUMMULATIVE IMPACTS AND PUMP STORAGE AS THE LINCH PIN

15

Bird impacts resulting from alternative energy have only been considered on a per-project basis. This has been like studying the insignificance of felling a single tree while ignoring the significance of denuding a forest.

There should have been a base-line bird population study before alternative energy projects were built in the Northwest, but that did not happen. There should have been a cumulative impact study of the impact of alternative energy on birds by now, but that has not happened either. Two opportunities lost to learn what we had, and what we have lost so far. Our track record has been to follow the formula of, "The least we know, the better." This method of advancing projects suggests dirty secrets not revealed.

The Department of Ecology must cut through the circular argument that the purpose of pump storage is to store electricity. Pump storage is absolutely necessary for the industrial energy production build-out within the Klickitat County Energy Overlay Zone and beyond. This build-out of energy production is the only purpose, and the only reason for pump storage. Pump storage is the linch pin activator for energy build-out. If the resulting impact of energy build-out triggered by pump storage is not given proper consideration in the Environmental Impact Statement for this project, then, by far the greatest environmental impacts of pump storage will be entirely ignored.

16

If you stand on high ground around here - like on the Columbia Hills, where the project is proposed - you will see that this build out is already in progress. But if pump storage goes in, what you see now will be nothing compared to what would come. Pump storage would eventually result in the energy industrialization of two thirds of Klickitat County rural lands, far beyond what most of us or you could ever conceive. We do not believe that the developers of pump storage will want you to consider these wider negative impacts - to the land, to the people and to the wildlife - that would be triggered by pump storage and the resulting build-out of solar, wind and other energy projects. But these impacts are directly connected to pump storage, because pump storage will make the build-out possible. Build-out depends on power storage, and the Washington State Department of Ecology needs to take a very close look at what the full impact that this pump storage project would cause.

The Department of Ecology, the wildlife agencies, the Bonneville Power Administration and the federal government should work together to make sure that an EOZ and regional bird impact study is finally done. We need to know the full impact of energy build out, and we deserve and need to know it now, while we can still make corrective changes. This pump storage project should be put on hold until we know the complete cumulative impact of this project.

16 cont.

If this project is built without knowledge of the cumulative environmental consequences, a precedence would be established for the reckless construction of other similar pump storage projects that would likely be built throughout the region, and this would multiply the disastrous consequences many fold.

HISTORY OF THE PROJECT AND POSSIBLE HIDDEN PHASES

17

When alternative energy projects have been proposed in the past, and when later additional phases followed, we often suspected that those later phases were known to the developer from the beginning, but were held back from required regulatory review to secure unwarranted tax credits, and to avoid a more intense environmental review. We believe this has happened here in Klickitat County, and we know a similar situation happened in Oregon just across the Columbia River, because the Oregonian exposed several "independent" wind power projects that were actually one huge project. The pump storage proposal before you is unique in that the first unveiling described a much larger project, but now you are only offered a part of it for review. At least that is what we suspect is going on.

Has the developer offered you a phased plan that leads to the much larger project that was originally presented? If not, you should be skeptical that the presented plan is, in fact, the entire plan. The Department of Ecology should keep this in mind as your attention is drawn to the smaller pump storage project before you. The Department of Ecology needs to determine the actual, complete and final scale of this proposed pump storage project, so that you can give it a proper and complete review. Right now. Not one piece at a time. Not avoiding environmental review triggers, and without offering the developer a later opportunity to declare that the Columbia Hills is already being used for pump storage, so why not more of the same?

18

We believe that county leaders have a long-standing culture of welcoming every lousy project that knocks on our door. We believe project managers have been emboldened to take chances in this county; like hiding a larger project and presenting an initial stage of that project as the entire project. Many years of experience requires us to press this point home.

THE SIZE OF THE PROJECT AND THE PROBLEM OF PUBLIC RELATIONS

19

The original pump storage proposal involved five to seven holding reservoirs behind earthen dams with a combined length of approximately seven miles. One, or perhaps two of the dams were to be 500 foot in height, which is a mere 50-foot shorter than Grand Coulee Dam. The size of the project as it was first introduced was alarming and presented a public relations problem. It would still be a PR problem today.

19 cont.

The present proposal involves only two dams with a 14,100 foot combined length. The upper dam would have a height of 175 foot, and the lower dam would be 205 foot tall. While this proposal is less likely to excite alarm, we are still considering dams that are as tall as 17 story and 20 story buildings. The initial fill would require 7,640 acre-feet of water, which amounts to a lot of kinetic energy. You wouldn't want to be in the run-off zone in the event either of these dams suffered a sudden and complete breach.

GETTING AT THE TRUTH ABOUT THE SIZE OF THE PROJECT

The Principle of Economy of Scale is a good tool for getting at the true size of any project. I discovered how project managers and engineers use this principle to their advantage during an appeal of a proposed wind power project that we believed to be a hidden second phase of an earlier project by the same developer. The idea is that suppliers and contractors are told up-front about everything that is required from them, because the larger the orders, the better the deals the managers can negotiate. We believe the desire to reduce costs is so compelling, managers of projects will likely - in some form - make their orders for the entire project, even when later phases of the project are not revealed to the regulators.

20

Is it too early to order items necessary for this project? Experience has taught us that project managers are often way ahead of everyone else regarding important components of their projects. The question is, how will the ordering be handled? We believe there often is a preliminary or conditional order, and by this method the reduced rate for necessities can be secured for present and later phases. Another aspect about the need for project managers to think ahead is that some of the projects necessary items - like the generators - take time to build.

Managers should be asked pointed questions about economy of scale issues to get at the possibility of "arrangements" for components for the project that go beyond the needs of the project they are presenting to you. This is important, because such questioning could provide positive proof that the real plan is larger than now appears.

Our experience is that securing this information is not easy. There are a lot of dodges. The one we had the most difficulty getting around is the claim of proprietary information, the notion being that the information requested is protected because to hand it over would result in that information falling into the hands of their competitors.

But the Department of Ecology is not a competitor. You are a public regulating agency seeking the truth about a project. Could you not offer the proponent a promise of confidentiality on matters involving economy of scale? You should definitely figure a way out to do that.

Another in-road is the fact that both Klickitat County and the Klickitat County PUD have spent public money on moving this project forward. Also KPUD would provide infrastructure and would use the proposed project for energy storage for their alternative energy projects. Another public entity involved in the project may be the US Army Corp of Engineers. When public money is spent on this project by county government, our public utility district and possibly the Corp of Engineers, this should help open the door to public agencies like yours for the purpose of gather information like pending or conditionally promised orders of items for the project. You should go through that door.

Let's pose some questions with the Principle of Economy of Scale in mind, along with other indicators of a larger project waiting just out of sight.

(1) What arrangements have the proponent made (formally or informally, and not necessarily fully committed to) regarding maximizing the benefits of economy of scale? Of special interest should be the total number of generators, the number of pipes, the amount of wiring and conduit, electrical boxes, etc.

Likewise has the proponent made arrangements with contractors and the unions involving the size of the project? Are they reaching out to favored sub-contractors for hints of bids from in which the size of the project could be a negotiating tool? Has the proponent offered a prospectus with contingency plans for expansion to possible loan sources or investors? Once you start considering this, you could probably come up with other key items to inquire about. The Department of Ecology should ask these questions.

20 cont.

(2) Anyone that has added onto a house knows that it would have been more convenient and less expensive to know beforehand that an addition would be added on later so the plans could take the addition into account. The same thing applies to pump storage. For instance, does the width of the dams exceed what is necessary for their heights? If so, this could be offered as an extra measure of safety, but it could also be a foundation for later height increases. We seriously doubt the proponent would add any measure of safety beyond what regulators require because an important part of controlling the profit margin involves minimizing the expenses.

Since the presentation of the original larger pump storage proposal, has the diameter of the pipe extending between the two reservoirs been reduced to accommodate a smaller project? Is the diameter of the pipe between the two dams larger than necessary to service the project? If so, why go with the wider pipes when savings can accrue with a smaller diameter pipe? This could be another indicator of a larger project.

(3) It would be wise to compare the original project plan with the present plan. Are elements of the earlier larger plan retained in the present project plan? If so, why would they do that? This could indicate a conscious intent to later expand the project.

(4) Yet another example of unexplained expenses may be found in the proposed underground powerhouse. Would the generating capacity of three 400-megawatt

Francis-type pump turbines, involving the production of 1,200 MG's service a larger project? Would the powerhouse provide room for additional generators?

(5) Does the proposed project have the capacity to handle the coming expansion of wind, solar and other power producers in the region? About two thirds of our large rural county is now in an Energy Overlay Zone, and most of that land remains undeveloped. But the new national administration is friendly to renewables, and an alternative energy boom has already appeared over the horizon. This additional energy development would increase demand for pump storage. Will the present plan meet this local demand, or the increase in regional demand? The fact that the original plan was so much bigger suggests that the developers anticipated a continuing growth in renewable and other energy sources, and the smaller plan that you have been presented could be the "foot in the door plan."

20 cont.

(6) Other dams were included in the original plans. Are there any indications that actions are pending on those dams? Are there any agreements or commitments with the landowners of the property the other dams were proposed for? Since the US Army Corp of Engineers seems to have played some role in the upper dam site, they may have information concerning future expansions. They should be asked about that.

The Department of Ecology would not necessarily have to investigate all of these avenues; just finding one item of interest could shake the truth out if there is an unrevealed plan for future expansion of pump storage. At minimum, you should ask pointed questions about the complete size of the project. Put the proponent on the spot. If he is hiding something, force him to lie.

Remember, you need to know the size of the entire project before you can assess the impacts of the project.

ECONOMIC VIABILITY OF PUMP STORAGE AND DECOMMISSIONING

Alternative energy sources like wind and solar produce intermittent power, and require back-up power sources from Columbia River dams, and from natural gas. Now the Goldendale Pump Storage project is being offered as a solution to the problem of intermittent alternative energy power production.

21

It can reasonably be argued that wind and solar energy facilities in the Northwest offer a solution to a problem that does not exist. Before wind and solar energy arrived on the scene, we had plentiful and inexpensive renewable energy provided by our prepaid BPA dams. The addition of other less efficient renewables that require the expensive replacement of our electric power transmission system, has not only increase the price of renewable energy, they have also decreased our access to the traditionally less expensive BPA hydropower. This has been accomplished through BPA contractual commitments to purchase expensive wind energy (and probably solar energy), even when it means dumping water over the dams and foregoing less expensive renewable hydropower

energy. Economically speaking, this has been a lose-lose proposition for the rate paying public. The BPA's dumping spring run-off water over the dams to honor their contracts with renewables not only costs rate payers more, it also negatively impacts our already reduced salmon runs.

The Northwest, which has been energy self sufficient since the construction of Bonneville Dam, is exporting electric energy to states that lack our plentiful rivers. Some of that exported energy is being produced by wind, solar and other energy sources that would be more productive, more efficient and less costly in the states the NW exports energy to. Our electric ratepayers are picking up part of the tab for this ill-advised system, and the folks receiving our exported power do not have the unsightly facilities for neighbors, and their states do not have to suffer the ecological impacts. This seems unreasonable and unfair to us.

It has always been known that new alternative energy would be more expensive than Columbia River hydropower, and that the new alternative energy producers could not compete with hydropower or even Canadian natural gas when those prices are down. The solution was to give alternative energy producers every tax credit, tax break and subsidy possible, along with so many other inducements they cannot be listed here, excepting for two: the BPA has contractually committed to expensive new alternative energy over cheap renewable river hydropower, and legislation has likewise shackled the public to a phased commitment to purchase new alternative energy over less expensive river hydropower.

21 cont.

When we have suggested that pump storage is not economically viable, the response has always been, "If it was not viable it would not be built." This ignores the disconnect previously discussed between the developer and what eventually becomes of the project once it is sold. The project is built because the developer takes his profit off of the front end, and he is untouched by whether or not the project has long-term economic viability. Economically speaking, shifting the expenses away from the front end of the project through loans and investors, and then selling the project, may be thought of as consolidating front-end profits for a few developers, and dispersing long-term costs to the purchaser, the investors - and more consequently - to the electric rate paying public.

Pump storage is not a perpetual motion device; it does use more energy than it produces. Its saving grace is that it stores intermittent energy. But is it economically viable long-term? An electrical engineer told me that the real cost of wind energy is about twice as much as river hydropower energy, and that pump storage doubles the costs again to approximately four times the expense of river hydropower. Of course, the economic impact on the electric ratepayer is not felt immediately because the costs are dispersed and buffered by long-term subsidies and other economic devices. But eventually those costs will show up on our electric and tax bills. (Yes, lowering taxes on alternative energy raises the tax load falling to the public, and we believe the alternative energy companies and the county have figured out how to lower the energy industries taxes.) This is why the public is being legislatively locked into the costs of wind, solar and

pump storage. Later, when the electric bills become exorbitant, and our taxes increase, there will be a lot of public disbelief, frustration and anger.

21 cont.

We believe that pump storage - instead of being the savior of alternative energy - may be the straw that breaks it's back. Pump storage is incredibly expensive to build. We sincerely doubt that this proposed pump storage project will be able to pay for it's planning, construction, profit taking, management, operations, maintenance, interest on debts and decommissioning before this project reaches it's projected end of life.

22

Decommissioning is a dirty word for us in this county. Too often the plan for decommissioning here is no plan at all, but rather a suggestion that there will be a plan, and sometimes there is not even that reassurance. If the Department of Ecology believes this is not an issue for your consideration, rest assured it will be a matter of consideration for you if there are insufficient or no funds available for decommissioning at the end of the projects life. We believe there is a reason these energy corporations are LLC's (Limited Liability Corporations). You need to look hard at decommissioning now, because later will probably be too late.

23

We do not believe that the Department of Ecology should approve a project that dangles on the edge of long-term economic viability, nor one that fails to secure a workable front-end plan for decommissioning. Real decommissioning does not involve some sort of "balloon payment" toward the back-end of the project's lifetime, or a fantasy that scrappers will rush in and do the job for free. A real plan would require monetary payments towards decommissioning starting on day one, and the payments should be largest on the front end of the project when it is most valuable and the profits are the most assured.) We believe that long-term financial viability and decommissioning issues are matters of the public trust, public safety and protecting the environment. The public should not get stuck with another decommissioning bill or another Federal Superfund clean up.

FUTURE PUBLIC REACTION TO THE TRUE COST OF RENEWABLES

24

What would be the consequences of renewable energy driving the cost of Northwest electricity up four-fold? We believe that the legislative locks on our commitment to renewable energy may well crumble, or the public would have to live with a lot less electricity. Either way, what would then become of all those massive industrial wind and solar projects scattered across our landscape? What would become of pump storage? We believe these projects would become industrial wreckage that would litter our lands without giving any benefit in return, and which would cost huge amounts of public money to clean up. Kind of like the nuclear WHOOPS! debacle.

THE LACK OF TRANSPARANCY

25 The fact that public hearings come at the end of the planning process says a lot about transparency. Planning is conducted out of sight, first in the board room; then in an engineering office; then with some big investors; then with some loan officers; then with the county commissioners, the PUD, the planning department; and after the plan has taken form, and when commitments for financing and land deals are being made or are already made; finally, the public is brought in and given a peek at the project and is allowed a relatively brief time for public comment. Quite often, the public notices or public hearings occur during a holiday season, just as the FERC notices here for this project occurred. No doubt "think tank" studies have shown that it is best to hide public notices and hearings during holidays because it reduces public comment. Recommending electronic comments is yet another way of limiting public access to the process. Klickitat County has many areas not served by the Internet, and our public library computers were not accessible for almost a year due to the pandemic. We fit a victim profile that energy corporations target.

26 When it comes to transparency, this project is no different than the others that have preceded it. When wind power came to the Northwest the public was not told that it would necessitate an expensive conversion of our entire electrical transmission system to a "smart" system. Nor were we informed that alternative energy would require gas and possibly even nuclear backup, instead of replacing those energy sources as we had been led to believe. Nor were we told that alternative energy would require pump storage dams and reservoirs. We surmise that the public was not informed of these facts because we (not the developers) would be paying the bulk of the substantial additional expenses for the new alternative power and supporting infrastructure, and we would also be the ones to suffer the intrusion of industrial alternative energy production and it's infrastructure in our rural county.

Another transparency issue is proprietary information, which has already been mentioned. Proprietary information is a way to protect information from falling into the hands of competitors, but we believe it is also a way to keep the public and regulators from information they deserve and should have access to. Wind power corporations withheld information about their high rate of bird kills for years by claiming it to be proprietary information. Misuse of the shield of proprietary information happens, and it deserves pushback.

KPUD AND KLICKITAT COUNTY LEADERSHIP

27 Klickitat County government and the Klickitat Public Utility District have a long and lamentable history of promoting and supporting large projects that proved a bust, or at least of financial burden to the public. We have little doubt that this factor was considered in siting this proposed pump storage project in Klickitat County. We believe that KPUD has narrowly skirted economic disaster on several of their projects, and they

27 cont.

really got clobbered when they invested in nuclear energy, against our advice, by the way. For a small public utility district, KPUD is juggling a lot of projects, has built a lot of infrastructure, and is staggering under a huge debt load as a consequence. The county has contributed public money to keep the pump storage concept alive, and so has KPUD. This project has sucked up about a million and a half dollars of local public money already, and it will likely cost us more in the future; this despite claims that the public has paid nothing to further pump storage. KPUD has been promised a pay-back for their financial contributions if pump storage goes through; KPUD would transmit a lot of electric energy if the project goes through; and KPUD would provide the water for the project, so KPUD is sure to support pump storage no-matter-what. KPUD comments on this proposed project should be considered in the light of a payback understanding that only works if the project goes through, and with the understanding of KPUD's deep involvement committing them to the project.

BIRDS, RESERVOIRS AND LARGER WIND POWER BLADES

28

The real impacts of this project will never be known unless a federal and/or state bird study is conducted involving anticipated bird-reservoir-wind power interactions; or, if the studies are not conducted, it will just be a matter of trying to get to all of the slaughtered birds before the scavengers can, so a good count can be taken. And we believe you can forget that the count would be factual. Every trick of the trade has been used throughout the introduction of wind power to assure regulators and the public that there is no bird issue. Before wind towers went in, local newspapers reported that raptors were systematically shot, and at least one of the only trees - a raptor roost tree - on the Columbia Hills was cut down. These activities reduced the baseline enumeration of raptors using the Hills. Furthermore, we have reason to believe that wind power projects anticipated bird-kill studies were "adjusted" until they produced an acceptable low bird kill rate. When the disastrous actual rate of wind power bird kills was leaked to us by two independent sources, that number confirmed that the studies of anticipated bird deaths were faulty in the extreme. We do not believe there is any reason to believe things have changed since those earlier times, because a lot of money is still on the table, and some people will be very intent on securing big chunks of that money for themselves. When you hear and read confident presentations by proponents, keep that in mind.

29

30

Is it not a Red Flag to have industrial wind power machines located in a National Audubon Society Important Bird Area? The Columbia Hills Important Bird Area is covered with wind power machines, and more are planned until build-out is complete. The wind power machines have turned the Columbia Hills Important Bird Area into a Bird Kill Zone. There has already been a bird kill rate in the area that is 15 to 17 times more than what was anticipated; rates that so far exceed what is acceptable, that had they been known (or admitted) prior to permitting, the wind power projects could not have been constructed. Too late! The machines are up, and they will continue killing the birds.

28 cont.

Into the industrialized wind "farms" already in the Columbia Hills Important Bird Area comes the plan to build pump storage reservoirs that will only serve to attract considerably more birds into the kill zone. To make matters worse, industry is replacing the older smaller wind power blades with new larger blades. The combination of the attraction of the reservoirs and the larger wind power blades is bound to increase the slaughter of birds beyond anything we have seen so far, and that has been inexcusably bad. Is this really to be the legacy of Northwest renewables?

The department of Ecology should take a look at previous EIS's for wind power in this county, and see what they have to say about the benefits to birds of those earlier, shorter, wind power blades. Those benefits would not apply with the longer blades now being installed.

BIRD KILL SOLUTIONS

There has not been a workable solution to the bird kill problem since day one of the first wind power project. Plenty of solutions to the bird kill problem have been proposed and promised, but few were implemented and those that were have not provide the solution. The reason for this is that the purpose of the proposed solutions was never to solve the bird kill problem, but rather to solve the regulator and the permit problem. We call the bird kill solutions "wink-wink solutions."

31

Other dodges to the bird kill problem are: defining the problem away, as in, "What does wind power/bird kill issues have to do with pump storage?"; claiming that it is not a problem at all (Pleez!); claiming that proponents have the solution to the problem (they do not); claiming off-site and on-site mitigation (saving off-site land not threatened yet, and making minor adjustments on-site that amount to nothing); claiming that they have the perfect site for avoiding the killing birds (they don't), pointing to other power sources or glass buildings and noting the damage that they inflict (as if that justified their own bird kills); and on and on. What these claims all have in common in the notion that the Department of Ecology should be reassured that the bird issue will not be a problem, so the DOE can look the other way while the proponents pump storage project slides through.

32

Proper siting of projects has always offered the best possible solution to the bird kill problem, and it is the only solution that is never sincerely embraced and acted upon. (Reconsider the actual siting determinants of pump storage. They have nothing to do with siting to avoid bird kills.) Of course, project developers have always given recognition to the critical significance of proper siting of projects to avoid bird kills, but they inevitably torture the meaning of proper siting so that their site just happens to be the one that will cause the fewest bird kills. The truth is that the Columbia Hills Important Bird Area is a haven for birds. Wind power should not be sited there. Pump storage should not be sited there. And especially, both of them should not be sited there together

32 cont.

on the Columbia Hills. Can it really be so difficult to see the truth of this? Any evaluation that ignores this reality has entered the realm of fantasy.

NATIONAL AUDUBON SOCIETY AND THEIR IMPORTANT BIRD AREA

33

The sad fact is that National Audubon Society tried to talk Columbia Gorge Audubon Society into dropping our nomination for a Columbia Hills Important Bird Area (IBA), and they tried to pressure their own avian experts into refusing our nomination for this IBA, despite overwhelming evidence of the significance of the Hills for birds. But the avian experts did not back down, and neither did we. We later learned that at this very time, a new member had joined the National Audubon Board. Coincidentally, this new board member was a lawyer for a corporation proposing a wind power project on the Columbia Hills. New board members are expected to bring a substantial gift to National Audubon Society when they join the board, a system ripe for corruption. Subsequently we had a show-down with then Audubon president, John Flicker, and as a consequence we disaffiliated from National Audubon Society and became an independent chapter, just like Portland Audubon did, and just like many other local chapters did.

We bring this to your attention for two reasons. First, someone may ask, "If the Columbia Hills Important Bird Area is really so important for birds, why haven't we heard from National Audubon Society?" And second, we want you to realize just how cunning proponents can be, and how far they are willing to go to line up all their ducks.

PERMIT CONDITIONS AS ENVIRONMENTAL SOLUTIONS

34

The Department of Ecology may believe that county conditions for approval of this project will serve to solve environmental and other problems. It is our experience that that is not the case in Klicitat County. Conditions are demanded and accepted until the project is permitted, and then they are appealed and dropped. Of course, when the conditions are mandated it is done with public fanfare, but when they are dropped the public hears nothing about it. Do not depend on conditions to protect the environment or anything else, because they won't.

RECOMMENDATIONS

35

We urge the Department of Ecology to require a mandatory independent bird study of anticipated reservoir - bird - wind machine interactions, to be conducted by public wildlife agency bird biologists. Private study firms should not be used because most of their income comes from developers, and they will be seeking employment with those developers again in the future. The design and implementation of this study should

receive real time advisor over-sight by eminent avian experts who have not and will not work for wind power developers. In the event the study is inconclusive (which is unlikely), the opinion of these avian experts on the wisdom of mixing birds with reservoirs and wind power machines should be requested and considered. This study, and the opinions of the avian experts should be completed, compiled and considered by the Department of Ecology prior to a decision on this pump storage project.

35 cont.

We recommend that the developer of this pump storage project be required to pay for this study, and that they have no contact or influence with the agency or the bird experts what-so-ever regarding any aspect of the study. As an alternative, wind and solar companies could be asked to also contribute funds, as they would be major beneficiaries of pump storage. Paying for this study should not be an undue burden on the developer(s) because they are always being required to hire studies. The difference is that this would be an independent study that would not easily be influenced by the developer(s). We have seen too many of the other kind of bird studies, and they only served to hide the truth.

We recommend a moratorium on this pump storage project until the results of this study are available, and a proper review has been completed.

36

We recommend that the Department of Ecology request an independent regional cumulative impact study of bird-reservoir-wind machine interactions, and bird-solar interactions. The US Fish and Wildlife Service should conduct this study, and the alternative energy developers should help fund it. This study would include an anticipated growth of wind, solar and other energy facilities throughout the region due to pump storage, and the study would include anticipated additional pump storage facilities that would service regional energy producers. The Department of Ecology needs to know how to properly limit this build-out, and it needs to know when to halt build-out before the impacts are too damaging. This study needs to clearly delineate how much negative impact is acceptable, and where the line should be drawn. The premise that build-out may have already gone too far should not be dismissed out-of-hand.

37

We recommend that involved federal and state agencies support a regional moratorium on all pump storage proposals, and all solar and wind projects within the state and the region until the results of the regional study are available for review and the real impacts are known.

38

Furthermore, we also recommend a sociological survey be conducted to gauge the opinion of the public living in counties that already are, or will, be impacted by wind power, solar power, and pump storage. People living in counties having these facilities should be asked their opinion. How do they feel about having these facilities for neighbors? And people not yet living next to a project should be asked if they would be all right with a wind power, solar power or a pump storage facility located near to them? The people most impacted deserve to be heard. Perhaps one of our universities would be interested in doing the survey, but there needs to be a firewall between industry funding

38 cont.

and the sociologists doing the study. Grants and gifts to universities can and do influence studies.

39

The failure to conduct real cumulative impact studies of alternative energy projects and expected projects facilitated by pump storage has been irresponsible, and if not criminal, it should be. For almost forty years Columbia Gorge Audubon Society has tried to help alternative energy producers to actually be better than the energy producers they seek to replace; but we have failed in those efforts. At some level, deep within the planning and review processes, we have come to believe the over-riding reason the studies have not been conducted has been to prevent the public from learning the level of damage being inflicted by irresponsible new alternative energy projects. The Washington Department of Ecology and the Bonneville Power Administration, along with the federal and state wildlife agencies, owes the public these studies because they provide the only path for alternative energy to become both a good neighbor and environmentally acceptable.

Sincerely,



Dave Thies, President
Columbia Gorge Audubon Society

LOWER RESERVIOR



UPPER RESERVIOR



6 cont.

Jessica Metta

Please see the attached comments on behalf of Mid-Columbia Economic Development District.



July 20, 2022

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

Re: Comment period for the Goldendale Energy Storage Project draft EIS

Dear Ms. Park,

I am writing on behalf of Mid-Columbia Economic Development District (MCEDD) regarding the draft Environmental Impact Statement 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 is our No. 1 priority project in Washington state.

1 As Oregon and Washington make the transition to a 100% carbon-free grid, the wind, solar and hydro facilities in the Columbia River Gorge will play an increasingly important role in our electricity system. To completely phase out fossil fuel-based power plants, along with the greenhouse gas emissions (GHG) associated with them, we will need to add more renewables, along with reliable large-scale energy storage facilities, to the grid. Both will be necessary for ensuring the lights stay on in our homes, businesses, hospitals, schools and other buildings and for meeting the goals of Washington State's Clean Energy Transformation Act.

2 MCEDD commends the WA Department of Ecology for completing the draft EIS, which is a big milestone and be a valuable tool for decision makers. We suggest the draft EIS consider the positive environmental impacts of cleaning up a very contaminated industrial site and utilizing it in a way that will help the region meets its clean energy goals over the next century.

1 cont. We would also like to comment on the positive economic impacts the proposed Goldendale Energy Storage Project would have on our region. The proposed pumped storage facility is a creative reuse of a former brownfield site that will create more than 3,000 family-wage jobs at a time when rural Washington and Oregon desperately need them. Given the length of the construction timeline, it will provide training and apprenticeship opportunities for people seeking careers in the building trades. These jobs will be union jobs, which guarantees fair wages and safe working conditions, which are the types of jobs we want to grow in our region.

1 cont.

In conclusion, MCEDD believes the Goldendale Energy Storage Project is the type of project that will help Washington and Oregon reduce our dependence on fossil fuels, significantly reduce GHG emissions and air pollution, make our electricity grid more resilient to power outages, and create economic opportunities for rural communities.

Sincerely,

Jessica Metta

Mike Bridges

Hello, my name is Mike Bridges, and I am the current President of the Longview/Kelso Building and Construction Trades Council, and Business Representative for IBEW Local 48 representing thousands of trade workers in SWWA. I appreciate the opportunity to be able to comment in support of the thorough work done by the Department of Ecology on the Draft EIS for this important and monumental project.

We are excited to share that both the project owner and the developer have signed a Memorandum of Agreement with the Washington State Building and Construction Trades to construct the project under a Project Labor Agreement – guaranteeing the over 3,000 family wage jobs will go to the region's tradespeople.

1

In May of 2018, myself and large and broad group of stakeholders were able to visit the location of the proposed facility, which painted a clear picture and helped me understand the reason why this site was chosen. This project represents the culmination of decades of work both at the local and state level to encourage a renewable energy future for Washington. The project also helps avoid an overbuild of wind and solar which would cause additional land use issues in the region, while preserving the affordability and reliability that ratepayers in the Pacific Northwest currently enjoy.

Washington and Oregon, have, and likely will continue implementing stringent clean energy policies, and utilities and regulators are working on how to comply with these mandates. Washington's Clean Energy Transformation Act, passed in 2019, requires that all of the state's utilities supply non-global greenhouse emitting electricity by 2045. CETA will make it necessary to build new infrastructure to supply this clean energy, which leads to work for all in the construction trades. We feel the Goldendale Pump Storage Project is a prime example of the right project happening at the right time and the right location to help address climate change. We are excited to be part of this project as it moves through the process, and thankful for the ability to comment on why we are in full support of the comprehensive review done on the EIS thus far.



Longview/Kelso Building Trades Council

Mike Bridges, President

Adam Davis, Recording Secretary

To: Department of Ecology
RE: Goldendale Energy Storage Project Draft EIS
Attention: Meg Bommarito

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Sincerely,



Mike Bridges
President LKBCTC
mikebridges@ibew48.com
C-360-431-1472

Robin Everett

- 1 | Sierra Club comments



Monday, August 8, 2022

Washington Department of Ecology,

The Sierra Club submits the following 398 petition signatures and personalized comments from our members and supporters regarding the Goldendale Energy Storage Project, Project 101, LLC, Draft Environmental Impact Statement, with the following message:

1 I oppose Rye Development's proposed Goldendale Energy Storage Hydroelectric Development because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) since 2017. Alleged "green energy" cannot be built at the expense of Tribal Nations, who are already on the front lines of climate change and extractive industrialization and practices.

Rye Development's application should be denied full stop. To allow the application to proceed with Environmental review ignores the intense opposition to building this Development in this location. However, if Ecology proceeds with a Final EIS, it must include the following:

-Consideration of an appropriate range of alternatives, not just the proposed Project and a "no action alternative"

-Changing the "Aesthetics/Visual Quality" impacts to "significant adverse" impacts because of the impacts on Tribes

-An analysis of the cleanup integration and oversight planned for the former Aluminum smelter site

2 -An analysis of the potential impacts to groundwater from excavation on the former Aluminum smelter site if construction moves forward

-And, an acknowledgment that there are significant adverse environmental justice concerns with this development, including a disproportionate impact on tribal people

The Draft EIS fails to integrate the Development's destruction of irreplaceable tribal culture and religious resources, along with the intense disruption that this Development would cause to current tribal cultural practices, such as food and medicine gathering, into the full



2 cont. | environmental analysis. The Final EIS must integrate these concerns throughout the full analysis and not just the “Cultural and Tribal Resources” sections.

Sincerely,

1. Valerie Iwata

PUB-256_Iwata

Bellingham, WA 98225

A central tenet of equitable policymaking is when the people most directly impacted by a proposed policy are at the decision making table with power to influence the outcome that impacts them. Proceeding with a project that the Northwest Tribal Nations oppose violates this central tenet.

2. John Osborn

PUB-257_Osborn

Vashon, WA 98070

Against a genocidal past and climate crisis future, tribes are especially vulnerable. I encourage you within the agency to take steps as necessary to honor the tribe, and reject this proposed permit.

3. Joe Jennings

PUB-258_Jennings

Seattle, WA 98115

Although I do support renewable energy, I am against this project as it is another case of injustice for indigenous people. These facilities need to be located in areas where they do not impact tribal peoples in such negative ways.

4. Janet Swihart

PUB-259_Swihart

Long Beach, WA 98631

Chances are if the Tribes don't like it there are no good reasons to do it. Follow the Tribes lead.

5. Dorothy Jordan

PUB-260_Jordan

Lynden, WA 98264

Clean energy is not "clean" if it is developed at the expense of indigenous people.

6. John Alder

PUB-261_Alder

Spokane, WA 99207

copd sufferer need clean energy now!

7. Richard Noll

PUB-262_Noll

Port Townsend, WA 98368



Don't go against the Yakima Nation's wish to preserve their cultural and religious resources by approving the Goldendale hydroelectric project in places that impact their Tribal and cultural resources. We can respect the treaty rights of the Northwest Tribal Nations and choose to site our clean energy projects somewhere besides places of cultural significance to them.

8. Noel Allen

PUB-263_Allen

Seattle, WA 98103

Dont we have somewhere else to put this? We live in a state with lots of hills!

9. Marianne Edain

PUB-264_Edain

Langley, WA 98260

Ends do not justify means. "Clean" energy has to be clean from start to finish. The present proposal fails that standard grievously. When Ecology's own DEIS declares the proposal fails minimum standards, it is time to reject the proposal. It contains basic drop deads which cannot be mitigated.

10. J. Eggers

PUB-265_Eggers

Addy, WA 99101

Enough of this S#it!!!!!!!

11. Shirley A. Cooper

PUB-266_Cooper

Bellingham, WA 98225

Ethically speaking,listen! It was their land before we came along to destroy it and their culture. Please act with wisdom and care. Thank you, Shirley A. Cooper.

12. Nancy Peters

PUB-267_Peters

Kirkland, WA 98033

Everything is connected Please stop damaging everything on Tribal Lands and another Earth You will be horrendously affecting humanity and animals and Moth Earth Is very thing is connected

13. Richard E Pondelick

PUB-268_Pondelick

Tacoma, WA 98404

Find a cleaner different ecological way. Stay off Tribal Lands

14. Julianne Clark

PUB-269_Clark

Seattle, WA 98133

Give Mother Earth a chance!



15. Frances Rains

[PUB-270_Rains](#)

Lacey, WA 98503

Halito/Greetings. I write to advocate for the REJECTION OF THE GOLDENDALE PROJECT. While always grateful when Native voices are included, too often it is merely a means of claiming diverse voices were included. Native Nations and their Treaty Rights must not be ignored. The claim of "clean energy" often ignores the DEVASTATION that occurs to Native Cultures & Traditions when their lands are flooded-the Plants/Traditions connected to them and the Animals, as well as Sacred & Ancestral Sites. Please do MORE THAN LISTEN. There is a history of not listening to Natives, for example the Winters Supreme Court Case of 1908. It shouldn't take a Supreme Court Case to stop/restore Native Rights. Native Rights are intertwined with the founding of this country [U.S. Constitution]. Please DENY the Goldendale Project and HONOR NATIVE TREATY RIGHTS. Please. Respectfully, Frances V. Rains, Ph.D., Professor Emeritus

16. James Santoro

[PUB-271_Santoro](#)

Vancouver, WA 98685

Hands off native lands.

17. Linda Carroll

[PUB-272_Carroll](#)

Spokane, WA 99205

Haven't we white people taken more than enough from native peoples. Linda

18. Elena Molina

[PUB-273_Molina](#)

Lakewood, WA 98498

Haven't we done enough to the indigenous peoples already? Giving them land, taking it away when we decide it's too valuable, decimating their population with disease both unintentional and deliberate, stealing their children and forcing them to give up their heritage-WHEN DOES IT STOP?

19. David Joel Thornton

[PUB-274_Thornton](#)

Seattle, WA 98117

Honor our past agreements with Native Americans

20. Brooke Krekow

[PUB-275_Krekow](#)

Seattle, WA 98102

I am a concerned citizen and fifth generation Washingtonian.

21. Mary Lou Johnson

[PUB-276_Johnson](#)

Spokane, WA 99223

I am a mother, a grandmother and a person of faith.



22. Marilyn Scheer

[PUB-277_Scheer](#)

Bellingham, WA 98225

I am AGAINST the Goldendale pump hydroelectric storage project, since it's a serious threat to the environment of the Northwest Tribal Nations----any adverse impacts to cultural and tribal resources is FAR MORE important to me than any hydroelectric storage project!! We've 'harmed' the native culture WAY TOO MUCH already!!

23. Rui Page

[PUB-278_Page](#)

Trout Lake, WA 98650

I am all for hydroelectric, however, not at the expense of breaking a treaty and taking/destroying what is not ours. Find another place or go without. Bonneville dam already supplies enough, as well as all the wind turbines we have.

24. Rachel Hermansen

[PUB-279_Hermansen](#)

Olympia, WA 98501

I am sickened by how much human beings are stomping on fellow beings. We have no right to do that. Affecting the environment drastically with this project is wrong.

25. Marcia Fankhauser

[PUB-280_Franhouser](#)

Edmonds, WA 98020

I am very concerned about the future development of energy sources in Washington State and the western United States in particular. Water is necessary for sustaining life in so many ways. I am very concerned how water as a resource is literally drying up from the skies and in our river systems. Note eg: The use of the Colorado River system all the way to Mexico. Treaties are sacred. Some tribal communities don't even yet have running water. Our energy systems need to be developed from different resources like wind, solar and salt water.

26. Frances Blair

[PUB-281_Blair](#)

Steilacoom, WA 98388

I apologize for using a form letter as a base of my note. However, while I would definitely have been briefer, the form letter says it well!

27. Anita Holladay

[PUB-282_Holladay](#)

Eastsound, WA 98245

I have for years studied with Native Americans, and as someone with a degree in Cultural Anthropology, I can say that preservation of archaeological sites, culturally important plants, and so on, are important to me but most importantly to the present and future generations of tribal peoples. They must not be sacrificed for this facility. Keep looking for a better site.



SIERRA CLUB

28. Barbara Arnzen

PUB-283_Arnzen

Spokane, WA 99202

I have Native American friends including from the Yakama Nation and believe that they have been wronged far too many times. We need to move forward with respect for the people who originally lived in our country. Sincerely yours, Barbara J Arnzen

29. Jade Getz

PUB-284_Getz

Seattle, WA 98122

I urge you to respect the treaty rights of the Northwest Tribal Nations. Any pump storage we need should be built in a just and equitable way.

30. Janis Swalwell

PUB-285_Swalwell

Freeland, WA 98249

If it violates treaty rights it must not be done, period. In addition, this is experimental and does not sound like more promising long-term solutions to energy recapture. Who really benefits here? Sounds like mostly the corporation who wants the revenue.

31. Gary Schuldt

PUB-286_Schuldt

Olympia, WA 98506

If this project violates treaties, it's quite obviously illegal; otherwise it appears it's an issue of Big Power steamrolling over the less powerful. Such disrespect ill-becomes the State of WA.

32. Mr. Shelley Dahlgren, Phd

PUB-287_Dahlgren

Sammamish, WA 98029

I'm in favor of green energy, but this is not the correct project to get there. Mr. SDD, PhD

33. Michael Rummerfield

PUB-288_Rummerfield

Onalaska, WA 98570

I'm strongly in support of clean, green, sustainable energy, but we must respect and honor Native tribal rights and treaties. Only the Northwest Tribal Nations can determine what is significant to the tribe -- we must respect their treaty rights and avoid siting energy projects in places that are not endorsed by them.

34. Bradley Thompson

PUB-289_Thompson

Tacoma, WA 98405

Injustice is at the heart of the climate crisis. As badly as we need clean energy solutions, we can't move forward while leaving anybody behind or by furthering historic injustices. That's why I stand with the Yakama Nation in opposition to this project.



35. Amy Sherwood

Seattle, WA 98126

PUB-290_Sherwood

It is not enough to consult with tribal nations; they must also be listened to. Only the Northwest Tribal Nations can determine what is significant to the tribe -- we must respect their treaty rights and avoid siting clean energy projects in places of cultural significance.

36. Monica Dunn

White Salmon, WA 98672

PUB-291_Dunn

It is time for respect and honoring our indigenous peoples. We must find another way to create energy in ways that honor all.

37. Karen Lohmann

Olympia, WA 98502

PUB-292_Lohmann

It is time to honor the the Native American tribes and the future of our land and waters. Please deny this project 101, Goldendate Energy Storage Project. Look to the Nordic lands for new discoveries about how to store energy in sand. thank you.

38. Karen Loeser

Mercer Island, WA 98040

PUB-293_Loeser

It is time to stop encroaching and/or building on Tribal Lands.

39. Deirdre Cochran

Seattle, WA 98102

PUB-294_Cochran

Let?s finally make a decent and respectful decision about indigenous rights.

40. Art Petersen

Seattle, WA 98103

PUB-295_Petersen

Let's focus on developing renewable energy sources that don't further impact Indigenous Peoples in Washington State, and elsewhere.

41. Donna Vanderheiden

Langley, WA 98260

PUB-296_Vanderheiden

Listen to the tribal advice, please, oppose Rye Development?s proposed Goldendale Energy Storage Hydroelectric Development. other forms of Green energy must be created to combat our Climate Crisis.

42. Pat Jones

Ridgefield, WA 98642

PUB-297_Jones



My sincere request of each decision maker is to respect what our tribal leaders say. As a country we must no longer view those voices as less than. As they tell us this is hallowed land, please do not desiccate any of it with construction of the Goldendale Storage Project.

43. Melissa Rubin

PUB-298_Rubin

Port Townsend, WA 98368

No bueno! Be consistent! And equitable!

44. Dave Robinson

PUB-299_Robinson

Curlew, WA 99118

No trespassing on Tribal Resource?s, PERIOD!!!

45. Barbara Ocskai

PUB-300_Ocskai

Snohomish, WA 98290

No!

46. Charles Fink

PUB-301_Fink

Seattle, WA 98116

No, absolutely NO, to the Goldendale project.

47. Dennis Rice

PUB-302_Rice

Washougal, WA 98671

Northwest Indian tribes have treaty rights that were established long before hydro power projects were established, Their rights need to be considered before any approval of proposed power generation takes place. Please respect these rights.

48. Shane Glass

PUB-303_Glass

Lacey, WA 98509

Northwest Tribal Nations should have the first and last words on what affects their Trivbal and cultural resources.

49. Kim Secunda

PUB-304_Secunda

Eastsound, WA 98245

Now is not the time for you to amp up your shameless genocidal craziness . You are cursed by the killing and hate crimes. Stop lying to yourself like the schools and church killing us this too is wrong headed. Have some respect. You make your soul sick by all this greedy destructive hate. Use s place you already already destroyed, Hanford, mines, some military bases. Back off

50. LeeAnn Chastain

PUB-305_Chastain



Eastsound, WA 98245

Our state must demonstrate respect for our tribal residents and honor their rights. They are benevolent stewards of natural resources, while our businesses and governments continue to exploit the environment, to the peril of all living things.

51. Sherri Dysart

PUB-306_Dysart

Shelton, WA 98584

Please carefully listen to tribal concerns about this project. We need to respect their rights.

52. Mark Leed

PUB-307_Leed

Vancouver, WA 98661

Please deny Rye Development's application. This project's huge footprint on the Easter Columbia Gorge landscape, plus its impact on cultural resources of the Yakama Nation make it the wrong project in the wrong place.

53. Patrice Colle

PUB-308_Colle

La Conner, WA 98257

Please deny the goldendale project We must respect the Treaty rights of the NORTHWEST Tribal Nations and avoid siting clean energy projects in places of cultural significance. Do the right thing. Please. Thanks

54. Pamela Hastings

PUB-309_Hastings

Port Angeles, WA 98362

Please deny the Goldendale project. I would interfere with treaty rights and the technology has not been worked out sufficiently to avoid ecological damage. Thank you

55. Kimberly Fischer

PUB-310_Fischer

Wenatchee, WA 98801

Please don't even consider this. It is wrong on so many levels.

56. Beth Borst

PUB-311_Borst

Chehalis, WA 98532

Please give our Native people the consideration and respect they deserve, and find a better process for your planned project that will not deny their rights. They have lost too much already, and deserve our greatest protection. Thank you.

57. Betsey Bess

PUB-312_Bess

Port Hadlock, WA 98339

Please honor treaties and respect land.



58. Robert Strader

Yakima, WA 98908

PUB-313_Strader

Please reject the pump storage project at Goldendale. Environmental justice is important and tribal cultural issues should be respected.

59. Zua Stivers

Olympia, WA 98502

PUB-314_Stivers

Please respect Northwest tribal rights, resources and culture by denying the Goldendale project proposal by Rye Development.

60. Rachel La Fein

Concrete, WA 98237

PUB-315_La Fein

Please respect the rights of the indigenous people.

61. Jennifer Shaw

Marysville, WA 98270

PUB-316_Shaw

Plz save animals

62. Mary Lou Bennington

Spokane, WA 99203

PUB-317_Bennington

Respect Northwest Tribal Nations treaty rights!

63. Carol Price

Poulsbo, WA 98370

PUB-318_Price

Respect.

64. Robert Astyk

Bellingham, WA 98227

PUB-319_Astyk

Since Columbus landed in 1492 we Euro-colonizers have exploited indigenous peoples and destroyed their culture. The state of Washington has been very good in seeking to restore some modicum of equity in this heretofore dark history. Why now create another destructive project that we will need to apologize for in the future and of which we will need to compensate victims before a single watt of electricity is stored?

65. Lynda Marvin

Mead, WA 99021

PUB-320_Marvin

Strongly urge you to consider the many negative and destructive implications of this proposed project.



66. Crystal Gartner

Seattle, WA 98136

PUB-321_Gartner

Support the NO ACTION ALTERNATIVE. We must prioritize the rights of Tribal Nations in our pursuit of a clean energy system that is just and equitable.

67. Martha Bartlett

Bellingham, WA 98226

PUB-322_Bartlett

Thank you for your work to respect and protect treaty rights

68. Robin Rowedder

Seattle, WA 98122

PUB-323_Rowedder

The Goldendale area and Yakima tribal lands contain 3000 years of cultural history including petroglyphs. This cultural heritage would be destroyed by Rye Development 's proposed project and would abrogate Yakima tribal rights.

69. Rebecca Wolfe

Edmonds, WA 98020

PUB-324_Wolfe

The reputation of the WA State Dept. of Ecology will be elevated by Ecology's demonstration of respect for the ecological and cultural values of Northwest Tribal Nations. Please choose the "No Action" alternative in this process.

70. Gregory Espe

Seattle, WA 98115

PUB-325_Espe

The Tribes affected need to sign off on this project before going forward.

71. Denise Snyder

Bellingham, WA 98225

PUB-326_Snyder

The tribes have been taken advantage of time and time again whenever their lands have resources that are of economic value. Their lands have been mined, drilled, contaminated and their cultural places overrun. Since the Confederate Tribes of the Yakima Nation are opposed to the Hydroelectric Storage facility their wishes should be respected.

72. Bealinda Brady

East Wenatchee, WA 98802

PUB-327_Brady

The Tribes should have final say on how Tribal resources are used.

73. Chris Tipton

Sequim, WA 98382

PUB-328_Tipton



The Yakama Nation and 17 signatories to their notice of no consent regarding this project have spoken clearly. Respect.

74. B Pepowski

PUB-329_Pepowski

Seattle, WA 98122

There are many types of renewable energy in the world, and many places to harvest it. The US government has already dealt heartbreaking damage to North American Indigenous cultural sites and practices. Have a conscience and avoid further damage - do not site this project here.

75. Mike Wende

PUB-330_Wende

Liberty Lake, WA 99019

There are too many credible alternatives for storage to further sacrifice the tribes to avoid minor inconveniences.

76. Helga Burkhardt

PUB-331_Burkhardt

White Salmon, WA 98672

There is no way we can again take the rights away from tribal communities. Have we not stolen enough from all the tribes?

77. Robin Barr

PUB-332_Barr

Seattle, WA 98125

There MUST be a way to do this storage project in a way that respects and protects Washington Tribe's rights!! Please, we have already done so much harm, let's make sure we don't do more!

78. Aniko Bahr

PUB-333_Bahr

Tulalip, WA 98271

There must be Free Prior and Informed Consent by the sovereign tribal communities that stand to be affected. Without FPIC, the project lacks full ethical and practical grounding. As an ordinary citizen, I applaud the efforts towards clean energy, but not at the expense of the first Americans.

79. Margaret Johnston

PUB-334_Johnston

Seabeck, WA 98380

This is extremely important to me. The Northwest tribes have a history of being ignored and oppressed by the government, and we cannot continue those practices.

80. Richard Donnelly

PUB-335_Donnelly

Bellingham, WA 98229

This project needs complete buy-in from tribal representatives.



81. Ellery O'Darra

[PUB-336_O'Darra](#)

Seattle, WA 98107

Treaty rights are not just words on paper. They are crucial safe guards for a free and just society, as well as a vital and healthy environment. Now more than ever we must put the needs of the planet and its citizens over the greed of the few! This dam is not a good solution to anything.

82. Esther Kronenberg

[PUB-337_Kronenberg](#)

Olympia, WA 98502

Tribal interests should weigh heavily in your decision

83. Lorraine Pedersen

[PUB-338_Pedersen](#)

Lake Stevens, WA 98258

Tribal peoples' rights have been trampled for hundreds of years. It is beyond time for this to stop. Do not allow this to happen.

84. Rita Pinchot

[PUB-339_Pinchot](#)

White Salmon, WA 98672

Tribal resources are resources for everyone and allow protecting them allows for healing and restoration of land and relationship.

85. Dave Shaver

[PUB-340_Shaver](#)

Snohomish, WA 98290

Tribal rights come first. Also I am curious to know about this proposal, is long run commitment in Columbia river water really the future? And as the snow pack declines over time then what? The dams were never green, just ask the salmon...It is time to plan a future without these schemes, in the long run I don't see them being sustainable?

86. Virginia Voorhees

[PUB-341_Voorhees](#)

Seattle, WA 98122

Tribal rights have been trampled for generations and our boarding schools tried to obliterate their languages and cultures. We should be backpedaling six ways from Sunday to make up for all the damages we have perpetrated to tribes! Including not damaging their lands of which they have been better stewards at Han we.

87. Katherine Shellorne

[PUB-342_Shellorne](#)

Spokane, WA 99201

Tribal rights to control their environment must be respected.



SIERRA CLUB

88. Helen Harlow

Tacoma, WA 98402

PUB-343_Harlow

Violations of tribal treaties are unacceptable, These are contracts with standing and cannot be ignored. The tribunal consensus, not just considering forto overlook. helen!

89. Kate Nelson

Seattle, WA 98103

PUB-344_Nelson

We are just beginning to address our many decades of ignoring Indin treaty rights. This project must pass muster on this issue or we should not do it.

90. Meaghan Geiger

Orting, WA 98360

PUB-345_Geiger

We are so far behind in our search for ?clean? energy, but again and again it is indigenous people leading the push to protect the environment. It would be hubris to think that further colonial abuse would do any long term good.

91. Millie Magner

Seattle, WA 98199

PUB-346_Magner

We can no longer proceed with impunity. The sacrificing of a people and their way of life must stop. We are all responsible for honoring the promises made to our indigenous neighbors. Deny Rye's Goldendale development.

92. K Burnell Schaetzel-Hill

Olympia, WA 98516

PUB-347_Schaetzel-Hill

We cannot move to a sustainable energies future and ?do business as usual? like we?ve done for centuries!

93. Gary Ranz

Bellingham, WA 98229

PUB-348_Ranz

We have already done more damage to tribal cultural properties than can ever be mitigated. We do not need to do more upon the hollow Rosie?s of mitigation.

94. Catherine Martinez

Poulsbo, WA 98370

PUB-349_Martinez

We have developed our country to the detriment of indigenous people for most of our history. We cannot continue to do this. It is time to acknowledge and repair our broken treaty record. This project is wrongheaded and fails to acknowledge the needs and humanity of the tribes.



95. Wendy Wright

PUB-350_Wright

Puyallup, WA 98374

We must continue to find alternative energy sources. However, we also must take into consideration the Native Americans' tribal sovereignty. Storage of water to be pumped downstream should comply with all environmental and tribal protections. No action is the best alternative.

96. Ellen Notehelfer

PUB-351_Notehelfer

Camano Island, WA 98282

We must respect the rights of our Native American Tribal Nations and seek alternative solutions to the fight for clean energy. No clean energy solution can be chose if it violates the rights of our native brothers and our sisters.

97. Phillip Brugalette

PUB-352_Brugalette

Lake Forest Park, WA 98155

We must respect the treaty rights of the Northwest Tribal Nations and avoid siting clean energy projects in places of cultural significance.

98. Deborah Kramer

PUB-353_Kramer

Vancouver, WA 98664

We must show respect to the Indigenous people in our state.

99. Alice Flegel

PUB-354_Flegel

Rochester, WA 98579

We MUST uphold tribal rights! In this day and age it is imperative that we do so. Do NOT approve the Goldendale energy storage!!

100. Michael Baranoski

PUB-355_Baranoski

Spokane, WA 99205

We need sustainable alternatives to fossil fuels. This is not that.

101. James Maurer

PUB-356_Maurer

Covington, WA 98042

We need to find solutions that don't trample the rights of Native Americans.

102. Teizeen Mohamedali

PUB-357_Mohamedali

Bellingham, WA 98229

We need to honor tribal rights and resources by preventing this project.



103. Holly Brewer

Bainbridge Island, WA 98110

we need to move away from fossil fuels

PUB-358_Brewer

104. Julie Martinson

Everett, WA 98201

We need to respect indigenous people's sites and practices, so this must be sited elsewhere.

PUB-359_Martinson

105. Nancy Jacobs

Bellevue, WA 98005

We simply must respect treaty rights of these Northwest Tribal Nations. Even though this is a clean energy project, it must be sited where it does not cause adverse impacts to these rights.

PUB-360_Jacobs

106. Cindy Gailey

Seatac, WA 98168

What other options have been studied? I find it sad that tribal lands are again expected to allow such interference.

PUB-361_Gailey

107. George Morgan

Washougal, WA 98671

While I am in favor of pumped storage/generation facilities, I do not want them sited where native tribe, environmental or other concerns are ignored.

PUB-362_Morgan

108. Barbara Boyle

Seattle, WA 98177

While I support building clean new energy storage, a project opposed by affected Tribes because of multiple concerns is not the right way to go. Please make appropriate changes in the FEIS and do not support going forward with this project in this location.

PUB-363_Boyle

109. Tim Sampson

Walla Walla, WA 99362

While it is critically important that we move away from fossil fuels it is also as critically important that we don't just move ourselves out of the frying pan and into the fire by inappropriately siting green projects on critical habitat and culturally important sites. There is no such thing as empty land.!

PUB-364_Sampson

110. Bill Rivers

Dallesport, WA 98617

PUB-365_Rivers



SIERRA CLUB

Why should native folks have to shoulder yet another Half Baked white man energy scheme!
This is a Crazy Idea!!

111. Smith Guy

Silverlake, WA 98645

[PUB-366_Guy](#)

112. Jo Harvey

Pacific, WA 98047

[PUB-367_Harvey](#)

113. Kathy Wilson

Port Ludlow, WA 98365

[PUB-368_Wilson](#)

114. Rebecca Glass

Shoreline, WA 98133

[PUB-369_Glass](#)

115. K Otto

Normandy Park, WA 98166

[PUB-370_Otto](#)

116. James Mulcare

Clarkston, WA 99403

[PUB-371_Mulcare](#)

117. Constance Derooy

Seattle, WA 98122

[PUB-372_Derooy](#)

118. vana spear

Lynnwood, WA 98036

[PUB-373_Spear](#)

119. Matthew Pasco

Seattle, WA 98105

[PUB-374_Pasco](#)

120. Carol Else

Lakewood, WA 98498

[PUB-375_Else](#)

121. David Chambers

Renton, WA 98059

[PUB-376_Chambers](#)

122. Sharon Fetter

Puyallup, WA 98371

[PUB-377_Fetter](#)



SIERRA CLUB

123. Marta Benson
Vancouver, WA 98661

[PUB-378_Benson](#)

124. Tory, Ann, Todd Tjersland
Olympia, WA 98512

[PUB-379_Tjersland](#)

125. Janet Riordan
Seattle, WA 98177

[PUB-380_Riordan](#)

126. Corrine Anderson-Ketchmark
Des Moines, WA 98198

[PUB-381_Anderson-Ketchmark](#)

127. Karen And Chris Davis
Seattle, WA 98107

[PUB-382_Davis](#)

128. Patrick Archer
Seattle, WA 98177

[PUB-383_Archer](#)

129. Roger Delmar
Port Townsend, WA 98368

[PUB-384_Delmar](#)

130. David Turnoy
Eastsound, WA 98245

[PUB-385_Turnoy](#)

131. Karen Fortier
Monroe, WA 98272

[PUB-386_Fortier](#)

132. Amelia Vesper
Bellevue, WA 98004

[PUB-387_Vesper](#)

133. Kalama Reuter
White Salmon, WA 98672

[PUB-388_Reuter](#)

134. Dagmar Fabian
Bellingham, WA 98225

[PUB-389_Fabian](#)

135. Denise Echelbarger
Camano Island, WA 98282

[PUB-390_Echelbarger](#)



SIERRA CLUB

136. Martha Currey
Vancouver, WA 98665

PUB-391_Currey

137. Ernie Robeson
Spokane, WA 99208

PUB-392_Robeson

138. Faye Bartlett
Bellingham, WA 98226

PUB-393_Bartlett

139. Felix Lee
Seattle, WA 98112

PUB-394_Lee

140. Linda Knight
Bellevue, WA 98008

PUB-395_Knight

141. Steve Shapiro
Seattle, WA 98144

PUB-396_Shapiro

142. Lorelette Knowles
Everett, WA 98201

PUB-397_Knowles

143. William Crimbring
Silverdale, WA 98383

PUB-398_Crimbring

144. David Bailey
Sequim, WA 98382

PUB-399_Bailey

145. Danielle Baehm
Everett, WA 98203

PUB-400_Baehm

146. Meryle A Korn
Bellingham, WA 98226

PUB-401_Korn

147. Diane Christensen
Lynnwood, WA 98087

PUB-402_Christensen

148. Deborah Gandolfo
Kirkland, WA 98033

PUB-403_Gandolfo



SIERRA CLUB

149. Julia Paulsen
Seattle, WA 98115

PUB-404_Paulsen

150. Karen Weis
Bellingham, WA 98226

PUB-405_Weis

151. Alex & Pauline Nakamura
Bellevue, WA 98005

PUB-406_Nakamura

152. Joann Mesa
Snohomish, WA 98290

PUB-407_Mesa

153. Barbara Fristoe
Seattle, WA 98144

PUB-408_Fristoe

154. Sherry Sites
Gig Harbor, WA 98332

PUB-409_Sites

155. Wendy Krakauer
Seattle, WA 98103

PUB-410_Krakauer

156. Steven Uyenishi
Seattle, WA 98115

PUB-411_Uyenishi

157. John Waddington
Spokane, WA 99224

PUB-412_Waddington

158. Constance Knudsen
Seattle, WA 98117

PUB-413_Knudsen

159. Philip Condit
Snohomish, WA 98290

PUB-414_Condit

160. Janice Schuch
Ferndale, WA 98248

PUB-415_Schuch

161. Lin Higley
Spokane, WA 99207

PUB-416_Higley



SIERRA CLUB

162. C Lenihan

Beaver, WA 98305

PUB-417_Lenigan

163. Barbara Dubois

Tacoma, WA 98406

PUB-418_Dubois

164. Lyle Courtsal

Port Townsend, WA 98368

PUB-419_Courtsal

165. David Dunneback

Seattle, WA 98112

PUB-420_Dunneback

166. Melanie Hamilton

Silverdale, WA 98383

PUB-421_Hamilton

167. David Habib

Kirkland, WA 98033

PUB-422_Habib

168. Jan Jack

Bainbridge Island, WA 98110

PUB-423_Jack

169. Julia Larsen

Seattle, WA 98105

PUB-424_Larsen

170. Sabine Bestier

Gig Harbor, WA 98332

PUB-425_Bestier

171. Klaudia Englund

Anacortes, WA 98221

PUB-426_Englund

172. Robert Ulrich

Issaquah, WA 98027

PUB-427_Ulrich

173. Caroline Swinehart

Tacoma, WA 98403

PUB-428_Swinehart

174. Marjorie Millner

Vancouver, WA 98685

PUB-429_Millner



SIERRA CLUB

175. Dennis Berg
Seattle, WA 98119

PUB-430_Berg

176. Cornelia Teed
Bellingham, WA 98225

PUB-431_Teed

177. Martin Kenzer
Anacortes, WA 98221

PUB-432_Kenzer

178. Anne Huckins
Kent, WA 98032

PUB-433_Huckins

179. Craig Britton
Port Townsend, WA 98368

PUB-434_Britton

180. Grace Padelford
Kirkland, WA 98034

PUB-435_Padelford

181. Thom Peters
Snohomish, WA 98290

PUB-436_Peters

182. Katherine Nelson
Kent, WA 98031

PUB-437_Nelson

183. Lee And Heidi Musgrave
White Salmon, WA 98672

PUB-438_Musgrave

184. Hilke Faber
Seattle, WA 98108

PUB-439_Faber

185. Lauren Ranz
Bellingham, WA 98229

PUB-440_Ranz

186. Dakota Duncan
Brush Prairie, WA 98606

PUB-441_Duncan

187. Karen Fisher
Ferndale, WA 98248

PUB-442_Fisher



SIERRA CLUB

188. Linda Wasserman
Tacoma, WA 98406

[PUB-443_Wasserman](#)

189. Sheila Sondik
Bellingham, WA 98229

[PUB-444_Sondik](#)

190. Katie Mace
Spokane, WA 99203

[PUB-445_Mace](#)

191. Candice Cassato
Olympia, WA 98502

[PUB-446_Cassato](#)

192. Holly Smith
Redmond, WA 98052

[PUB-447_Smith](#)

193. Mary Gallagher
Leavenworth, WA 98826

[PUB-448_Gallagher](#)

194. Erin Neubauer
Clyde Hill, WA 98004

[PUB-449_Neubauer](#)

195. Karen Klein
Sequim, WA 98382

[PUB-450_Klein](#)

196. Carol Olsen
Otis Orchards, WA 99027

[PUB-451_Olsen](#)

197. Amanda Sue Rudisill
Olympia, WA USA, WA 98508

[PUB-452_Rudisill](#)

198. Janet Alderton
Deer Harbor, WA 98243

[PUB-453_Alderton](#)

199. Rusty West
Shoreline, WA 98155

[PUB-454_West](#)

200. Robert Foster
Port Townsend, WA 98368

[PUB-455_Foster](#)



SIERRA CLUB

201. Nancy White

Spokane Valley, WA 99216

PUB-456_White

202. Anne O'Leary

Vashon, WA 98070

PUB-457_O'Leary

203. Emily Van Alyne

West Richland, WA 99353

PUB-458_Van Alyne

204. Laura Theodorson

Tacoma, WA 98405

PUB-459_Theodorson

205. Lela Perkins

Everett, WA 98208

PUB-460_Perkins

206. Kate Blessing

Seattle, WA 98116

PUB-461_Blessing

207. Stan Seeberg

Vancouver, WA 98665

PUB-462_Seeberg

208. Mia Heavyrunner

Port Orchard, WA 98366

PUB-463_Heavyrunner

209. Phil and Enid Crawford

Stevenson, WA 98648

PUB-464_Crawford

210. Joann Polley

Poulsbo, WA 98370

PUB-465_Polley

211. Elaine Packard

Seattle, WA 98122

PUB-466_Packard

212. Hannah Taylor

Vancouver, WA 98682

PUB-467_Taylor

213. William Gregory

Sedro Woolley, WA 98284

PUB-468_Gregory



SIERRA CLUB

214. Charles Collier
Redmond, WA 98052

[PUB-469_Collier](#)

215. Dan Morgan
Lynnwood, WA 98036

[PUB-470_Morgan](#)

216. David Baine
Federal Way, WA 98023

[PUB-471_Baine](#)

217. William Mcgunagle
Spokane, WA 99207

[PUB-472_Mcgunagle](#)

218. Nancy Johnson
Edmonds, WA 98020

[PUB-473_Johnson](#)

219. Jacob Meyer
North Bonneville, WA 98639

[PUB-474_Meyer](#)

220. Joanna Redman-Smith
Kent, WA 98031

[PUB-475_Redman-Smith](#)

221. Erik LaRue
Burlington, WA 98233

[PUB-476_LaRue](#)

222. Jill Quick
Bellingham, WA 98229

[PUB-477_Quick](#)

223. Pam Borso
Custer, WA 98240

[PUB-478_Borso](#)

224. Alaina Moon
Olympia, WA 98501

[PUB-479_Moon](#)

225. Carolee Flaten
Hansville, WA 98340

[PUB-480_Flaten](#)

226. Gerald Wheeler
Tukwila, WA 98168

[PUB-481_Wheeler](#)



SIERRA CLUB

227. Gary Peniston

Bellingham, WA 98226

[PUB-482_Peniston](#)

228. Raymond Wells

Ellensburg, WA 98926

[PUB-483_Wells](#)

229. Ben Rall

Spokane, WA 99205

[PUB-484_Rall](#)

230. Kathy Swinehart

Vashon, WA 98070

[PUB-485_Swinehart](#)

231. Linda Chu

Seattle, WA 98103

[PUB-486_Chu](#)

232. Matthew Cloner

Seattle, WA 98115

[PUB-487_Cloner](#)

233. Catherine Duff

Spokane Valley, WA 99212

[PUB-488_Duff](#)

234. Jacquelyn Deal

Bothell, WA 98021

[PUB-489_Deal](#)

235. Shannon Markley

Shoreline, WA 98177

[PUB-490_Markley](#)

236. Brandie Deal

Bothell, WA 98021

[PUB-491_Deal](#)

237. Selim Uzuner

Carnation, WA 98014

[PUB-492_Uzuner](#)

238. Christine Eaton

Bremerton, WA 98312

[PUB-493_Eaton](#)

239. Cassie Hodgin

Pullman, WA 99163

[PUB-494_Hodgin](#)



SIERRA CLUB

240. Paul Muldoon
Seattle, WA 98116

PUB-495_Muldoon

241. Joseph Baglieri
Spokane, WA 98014

PUB-496_Balieri

242. Lisa Wright
Everett, WA 98203

PUB-497_Wright

243. Nancy McMahon
Olympia, WA 98501

PUB-498_McMahon

244. Barbara Blackwood
Spokane Valley, WA 99206

PUB-499_Blackwood

245. Tana Anderson
Spokane, WA 99223

PUB-500_Anderson

246. Randy Widen
Seattle, WA 98107

PUB-501_Widen

247. Robert VanderKamp
Battle Ground, WA 98604

PUB-502_VanderKamp

248. Melissa Rees
Spokane Valley, WA 99212

PUB-503_Rees

249. Ken Zirinsky
Tacoma, WA 98407

PUB-504_Zirinsky

250. Karen Hoover
Bremerton, WA 98312

PUB-505_Hoover

251. Paula Shafransky
Sedro Woolley, WA 98284

PUB-506_Shafransky

252. Dean Webb
Seattle, WA 98199

PUB-507_Webb



SIERRA CLUB

253. Lindell Haggin
Spokane, WA 99208

PUB-508_Haggin

254. Stephen Wilhelm
Edmonds, WA 98026

PUB-509_Wilhem

255. Jan Dove
Port Angeles, WA 98362

PUB-510_Dove

256. Alexandra Torres
Tacoma, WA 98466

PUB-511_Torres

257. Jennifer Woodbridge
Shaw Island, WA 98286

PUB-512_Woodbridge

258. jj
Orting, WA 98360

PUB-513_J

259. Ric Berkholtz
Seattle, WA 98105

PUB-514_Berkholtz

260. Sandra Ciske
Seattle, WA 98116

PUB-515_Ciske

261. Ruth Darden
Seattle, WA 98115

PUB-516_Darden

262. Janet Ehrenfreund
Mineral, WA 98355

PUB-517_Ehrenfreund

263. Susan Johnson
George, WA 98824

PUB-518_Johnson

264. Stephanie Bell
Seatac, WA 98198

PUB-519_Bell

265. Judy Hedstrom
Edmonds, WA 98026

PUB-520_Hedstrom



SIERRA CLUB

266. Marie Bailey

Bellingham, WA 98229

[PUB-521_Bailey](#)

267. Suzanne Cunliffe

Edmonds, WA 98020

[PUB-522_Cunliffe](#)

268. Barbara Foster

Bellingham, WA 98226

[PUB-523_Foster](#)

269. Elena Rumiantseva

Redmond, WA 98052

[PUB-524_Rumiantseva](#)

270. Diane Marks

Port Angeles, WA 98362

[PUB-525_Marks](#)

271. Noah Ehler

Carnation, WA 98014

[PUB-526_Ehler](#)

272. Richard Plancich

Shoreline, WA 98155

[PUB-527_Plancich](#)

273. Ken Zontek

Yakima, WA 98908

[PUB-528_Zontek](#)

274. Jill LaRue

Cashmere, WA 98815

[PUB-529_LaRue](#)

275. Laura Finkelstein

Seattle, WA 98119

[PUB-530_Finkelstein](#)

276. Giles Sydnor

Seattle, WA 98107

[PUB-531_Sydnor](#)

277. Tracy Wang

Seattle, WA 98107

[PUB-532_Wang](#)

278. Mildred Sheehan

Randle, WA 98377

[PUB-533_Sheehand](#)



SIERRA CLUB

279. Elise Baldwin
Seattle, WA 98199

PUB-534_Baldwin

280. Lori Stephens
Freeland, WA 98249

PUB-535_Stephens

281. Vanessa Lundheim
Everett, WA 98203

PUB-536_Lundheim

282. Rich Voget
Seattle, WA 98103

PUB-537_Voget

283. Cheryl Biale
Olympia, WA 98512

PUB-538_Biale

284. William Sneiderwine
Vancouver, WA 98683

PUB-539_Sneiderwine

285. Sheryl Sparling
Lynden, WA 98264

PUB-540_Sparling

286. Jacob Bailey
Orting, WA 98360

PUB-541_Bailey

287. Melodie Martin
Seattle, WA 98102

PUB-542_Martin

288. Lucinda Stroud
Seattle, WA 98119

PUB-543_Stroud

289. Achala Devi
Woodinville, WA 98072

PUB-544_Devi

290. Rebecca Deardorff
Seattle, WA 98103

PUB-545_Deardorff

291. Cecile Ervin
Walla Walla, WA 99362

PUB-546_Ervin



SIERRA CLUB

292. David Hand

Bainbridge Island, WA 98110

[PUB-547_Hand](#)

293. David Elmendorf

Walla Walla, WA 99362

[PUB-548_Elmendorf](#)

294. Eliza Kronenberger

Seattle, WA 98146

[PUB-549_Kronenberger](#)

295. Michael and Barbara Hill

Mineral, WA 98355

[PUB-550_Hill](#)

296. Eugene Kiver

Anacortes, WA 98221

[PUB-551_Kiver](#)

297. David Hand

Bainbridge Island, WA 98110

[PUB-552_Hand](#)

298. Dianne & Vince Foster

Bellingham, WA 98225

[PUB-553_Foster](#)

299. Stephen Zettel

Sequim, WA 98382

[PUB-554_Zettel](#)

300. Robin Sissom

Yakima, WA 98902

[PUB-555_Sissom](#)

301. Susan Finley

Marysville, WA 98270

[PUB-556_Finley](#)

302. Dede Campbell

Coupeville, WA 98239

[PUB-557_Campbell](#)

303. Tien Vu

Renton, WA 98059

[PUB-558_Vu](#)

304. Daniel Henling

Seattle, WA 98107

[PUB-559_Henling](#)



SIERRA CLUB

305. David Askew
Seattle, WA 98109

PUB-560_Askew

306. Becky Hage
Bellingham, WA 98229

PUB-561_Hage

307. Kim Howe
Seattle, WA 98115

PUB-562_Howe

308. PAMELA JORDAN
Lake Forest Park, WA 98155

PUB-563_Jordan

309. Caroline Allen
Sammamish, WA 98074

PUB-564_Allen

310. Clayton Jones
Tukwila, WA 98168

PUB-565_Jones

311. Rosemary Sikes
Port Townsend, WA 98368

PUB-566_Sikes

312. Derek Benedict
Lynnwood, WA 98036

PUB-567_Benedict

313. James Smith
Seattle, WA 98115

PUB-568_Smith

314. Bridget Demouy
Seattle, WA 98115

PUB-569_Demouy

315. Paul Roberts
Seattle, WA 98102

PUB-570_Roberts

316. Mary Olheiser
Burien, WA 98146

PUB-571_Olheiser

317. Carole Huelsberg
Port Townsend, WA 98368

PUB-572_Ehuelsberg



SIERRA CLUB

318. Rebecca Evans

Seattle, WA 98117

[PUB-573_Evans](#)

319. Jean & Kyle Pauley

Seattle, WA 98112

[PUB-574_Pauley](#)

320. Nick Barcott

Lynnwood, WA 98087

[PUB-575_Barcott](#)

321. Vanessa Jamison

Marysville, WA 98270

[PUB-576_Jamison](#)

322. Cynda Cleveland

Lakewood, WA 98498

[PUB-577_Cleveland](#)

323. Christina Dyson

Redmond, WA 98052

[PUB-578_Dyson](#)

324. Lanie Cox

Spokane, WA 99224

[PUB-579_Cox](#)

325. Lynette Goad

Lynnwood, WA 98037

[PUB-580_Goad](#)

326. Linda Chung

Seattle, WA 98101

[PUB-581_Chung](#)

327. Elizabeth Tilley

Tacoma, WA 98408

[PUB-582_Tilley](#)

328. Kara Harms

Bothell, WA 98012

[PUB-583_Harms](#)

329. Richard Osmun

Camas, WA 98607

[PUB-584_Osmun](#)

330. Robin Everett

Seattle, WA 98115

[PUB-585_Everett](#)



SIERRA CLUB

331. Andrea Speed

Tacoma, WA 98445

PUB-586_Speed

332. Phelan Rolloson Halbhuber

Sammamish, WA 98074

PUB-587_Halbhuber

333. Rose Fanger

Spokane, WA 99201

PUB-588_Fanger

334. Dennis Ledden

Sequim, WA 98382

PUB-589_Ledden

335. Hannah Liu

Vancouver, WA 98686

PUB-590_Liu

336. Frances Marcolli

Port Orchard, WA 98367

PUB-591_Marcolli

337. Jean Kroll

Bellingham, WA 98225

PUB-592_Kroll

338. Alyssa Crum

Gig Harbor, WA 98329

PUB-593_Crum

339. Terrance Ryan

Quilcene, WA 98376

PUB-594_Ryan

340. Nancy Debusman

Carlsborg, WA 98324

PUB-595_Debusman

341. Lisa Mihm

Seattle, WA 98144

PUB-596_Mihm

342. Veronica Allen

Everett, WA 98201

PUB-597_Allen

343. Kari Darvill-Coate

Bothell, WA 98021

PUB-598_Darvill-Coate



SIERRA CLUB

344. Susan Pitiger
Vashon, WA 98070

PUB-599_Pitiger

345. Jennifer Macdonald
Bellingham, WA 98226

PUB-600_Macdonald

346. Jada Seaton
Lynnwood, WA 98087

PUB-601_Seaton

347. Odette Kelly
Spokane, WA 99223

PUB-602_Kelly

348. Marian Wineman
Seattle, WA 98199

PUB-603_Wineman

349. William Barmettler
Chehalis, WA 98532

PUB-604_Barmettler

350. Christa Nicholas
Vancouver, WA 98660

PUB-605_Nicholas

351. Marie Weis
Fox Island, WA 98333

PUB-606>Weis

352. Donald Chesebro
Port Angeles, WA 98362

PUB-607_Chesebro

353. Jeffrey Lightfoot
Sequim, WA 98382

PUB-608_Lightfoot

354. Gail Vincent
Tacoma, WA 98446

PUB-609_Vincent

355. Kathy Albert
Seattle, WA 98125

PUB-610_Albert

356. Alfred Colter
Yakima, WA 98902

PUB-611_Colter



SIERRA CLUB

357. Robert Reinhart
Tacoma, WA 98407

[PUB-612_Reinhart](#)

358. Elizabeth Duke
Seattle, WA 98126

[PUB-613_Duke](#)

359. shary B
Seattle, WA 98101

[PUB-614_B](#)

360. Virginia Moore
Stanwood, WA 98292

[PUB-615_Moore](#)

361. Patricia Hinneburg
Carnation, WA 98014

[PUB-616_Hinneburg](#)

362. Frances Parson
Seattle, WA 98105

[PUB-617_Parson](#)

363. Ruth Maule
North Bend, WA 98045

[PUB-618_Maule](#)

364. Jennifer Vining
Seattle, WA 98103

[PUB-619_Vining](#)

365. Niki Vogt
Vancouver, WA 98682

[PUB-620_Vogt](#)

366. Linda Kroeger
Seattle, WA 98117

[PUB-621_Kroeger](#)

367. James Adams
Olympia, WA 98502

[PUB-622_Adams](#)

368. Clarice Arakawa
Port Angeles, WA 98362

[PUB-623_Arakawa](#)

369. Keith Van Meter
Port Townsend, WA 98368

[PUB-624_Meter](#)



SIERRA CLUB

370. valarie matinjussi
Bellingham, WA 98225

PUB-625_Matinjussi

371. James Keeley
Vancouver, WA 98662

PUB-626_Keeley

372. Craig Swanson
Bellevue, WA 98008

PUB-627_Swanson

373. Rebecca Lee
Anacortes, WA 98221

PUB-628_Lee

374. Kelly Spain
Issaquah, WA 98027

PUB-629_Spain

375. Linda Ellsworth
Eastsound, WA 98245

PUB-630_Ellsworth

376. Florie Rothenberg
Seattle, WA 98126

PUB-631_Rothenberg

377. Jax Sprague
Redmond, WA 98052

PUB-632_Sprague

378. Julie Goebel
Bellingham, WA 98229

PUB-633_Goebel

379. Alan Waggoner
Seattle, WA 98112

PUB-634_Waggoner

380. Gena DiLabio
Mount Vernon, WA 98274

PUB-635_DiLabio

381. Greg Saul
Olympia, WA 98501

PUB-636_Saul

382. Joanne Richard
Tacoma, WA 98402

PUB-637_Richard



SIERRA CLUB

383. Amber Kaplan
Spokane, WA 99223

PUB-638_Kaplan

384. Bruce Gundersen
Poulsbo, WA 98370

PUB-639_Gundersen

385. Leslie Chartrand
Vancouver, WA 98686

PUB-640_Chartrand

386. Leslie Smith
Bellingham, WA 98226

PUB-641_Smith

387. Elizah DeMartini
Seattle, WA 98177

PUB-642_DeMartini

388. Susan Tochterman
Bellevue, WA 98007

PUB-643_Tochterman

389. Cole Grabow
Seattle, WA 98109

PUB-644_Grabow

390. Judy Clark
Cinebar, WA 98533

PUB-645_Clark

391. Luanne Pasik
Anacortes, WA 98221

PUB-646_Pasik

392. Melissa Eriksen
Seattle, WA 98103

PUB-647_Eriksen

393. Elaine Somers
Monroe, WA 98272

PUB-648_Somers

394. Lucy Johnson
Seattle, WA 98116

PUB-649_Johnson

395. Gary Brill
Seattle, WA 98133

PUB-650_Brill



396. Shelly Peterson
Anacortes, WA 98221

PUB-651_Peterson

397. Howard Borer
Vancouver, WA 98683

PUB-652_Borer

398. Libby Erie
Lake Stevens, WA 98258

PUB-653_Erie

Number	First Name	Last Name	City	State	Postal Code	Personal Message
1	Valerie	Iwata	Bellingham	WA	98225	A central tenet of equitable policymaking is when the people most directly impacted by a proposed policy are at the decision making table with power to influence the outcome that impacts them. Proceeding with a project that the Northwest Tribal Nations oppose violates this central tenet.
2	John	Osborn	Vashon	WA	98070	Against a genocidal past and climate crisis future, tribes are especially vulnerable. I encourage you within the agency to take steps as necessary to honor the tribe, and reject this proposed permit.
3	Joe	Jennings	Seattle	WA	98115	Although I do support renewable energy, I am against this project as it is another case of injustice for indigenous people. These facilities need to be located in areas where they do not impact tribal peoples in such negative ways.
4	Janet	Swihart	Long Beach	WA	98631	Chances are if the Tribes don't like it there are no good reasons to do it. Follow the Tribes lead.
5	Dorothy	Jordan	Lynden	WA	98264	Clean energy is not "clean" if it is developed at the expense of indigenous people.
6	John	Alder	Spokane	WA	99207	copd sufferer need clean energy now!
7	Richard	Noll	Port Townsend	WA	98368	Don't go against the Yakima Nation's wish to preserve their cultural and religious resources by approving the Goldendale hydroelectric project in places that impact their Tribal and cultural resources. We can respect the treaty rights of the Northwest Tribal Nations and choose to site our clean energy projects somewhere besides places of cultural significance to them.
8	Noel	Allen	Seattle	WA	98103	Dont we have somewhere else to put this? We live in a state with lots of hills!
9	Marianne	Edain	Langley	WA	98260	Ends do not justify means. "Clean" energy has to be clean from start to finish. The present proposal fails that standard grievously. When Ecology's own DEIS declares the proposal fails minimum standards, it is time to reject the proposal. It contains basic drop deads which cannot be mitigated.
10	J.	Eggers	Addy	WA	99101	Enough of this S#it!!!!!!!
11	Shirley A.	Cooper	Bellingham	WA	98225	Ethically speaking,listen! It was their land before we came along to destroy it and their culture. Please act with wisdom and care. Thank you, Shirley A. Cooper.
12	Nancy	Peters	Kirkland	WA	98033	Everything is connected Please stop damaging everything on Tribal Lands and another Earth You will be horrendously affecting humanity and animals and Moth Earth Is very thing is connected
13	Richard E	Pondelick	Tacoma	WA	98404	Find a cleaner different ecological way. Stay off Tribal Lands
14	Julianne	Clark	Seattle	WA	98133	Give Mother Earth a chance!
15	Frances	Rains	Lacey	WA	98503	Halito/Greetings. I write to advocate for the REJECTION OF THE GOLDENDALE PROJECT. While always grateful when Native voices are included, too often it is merely a means of claiming diverse voices were included. Native Nations and their Treaty Rights must not be ignored. The claim of "clean energy" often ignores the DEVASTATION that occurs to Native Cultures & Traditions when their lands are flooded-the Plants/Traditions connected to them and the Animals, as well as Sacred & Ancestral Sites. Please do MORE THAN LISTEN. There is a history of not listening to Natives, for example the Winters Supreme Court Case of 1908. It shouldn't take a Supreme Court Case to stop/restore Native Rights. Native Rights are intertwined with the founding of this country [U.S. Constitution]. Please DENY the Goldendale Project and HONOR NATIVE TREATY RIGHTS. Please. Respectfully, Frances V. Rains, Ph.D., Professor Emeritus
16	James	Santoro	Vancouver	WA	98685	Hands off native lands.
17	Linda	Carroll	Spokane	WA	99205	Haven?t we white people taken more than enough from native peoples. Linda
18	Elena	Molina	Lakewood	WA	98498	Haven't we done enough to the indigenous peoples already? Giving them land, taking it away when we decide it's to valuable, decimating their population with disease both unintentional an me deliberate, stealing their children and forcing them to give up their heritage-WHEN DOES IT STOP?
19	David Joel	Thornton	Seattle	WA	98117	Honor our past agreements with Native Americans
20	Brooke	Krekow	Seattle	WA	98102	I am a concerned citizen and fifth generation Washingtonian.
21	Mary Lou	Johnson	Spokane	WA	99223	I am a mother, a grandmother and a person of faith.
22	Marilyn	Scheer	Bellingham	WA	98225	I am AGAINST the Goldendale pump hydroelectric storage project, since it's a serious threat to the environment of the Northwest Tribal Nations----any adverse impacts to cultural and tribal resources is FAR MORE important to me than any hydroelectric storage project!! We've 'harmed' the native culture WAY TOO MUCH al;ready!!
23	Rui	Page	Trout Lake	WA	98650	I am all for hydroelectric, however, not at the expense of breaking a treaty and taking/destroying what is not ours. Find another place or go without. Bonneville dam already supplies enough, as well as all the wind turbines we have.
24	Rachel	Hermansen	Olympia	WA	98501	I am sickened by how much human beings are stomping on fellow beings. We have no right to do that. Affecting the environment drastically with this project is wrong.
25	Marcia	Fankhauser	Edmonds	WA	98020	I am very concerned about the future development of energy sources in Washington State and the western United States in particular. Water is necessary for sustaining life in so many ways. I am very concerned how water as a resource is literally drying up from tge skies and in our river systems. Note eg: The use of the Colorado River system all the way to Mexico. Treaties are sacred. Some tribal communities dont even yet have running water. Our energy systems need to be developed from different resources like wind, solar and salt water.
26	Frances	Blair	Steilacoom	WA	98388	I apologize for using a form letter as a base of my note. However, while I would definitely have been briefer, the form letter says it well!
27	Anita	Holladay	Eastsound	WA	98245	I have for years studied with Native Americans, and as someone with a degree in Cultural Anthropology, I can say that preservation of archaeological sites, culturally important plants, and so on, are important to me but most importantly to the present and future generations of tribal peoples. They must not be sacrificed for this facility. Keep looking for a better site.
28	Barbara	Arnzen	Spokane	WA	99202	I have Native American friends including from the Yakama Nation and believe that they have been wronged far too many times. We need to move forward with respect for the people who originally lived in our country. Sincerely yours, Barbara J Arnzen
29	Jade	Getz	Seattle	WA	98122	I urge you to respect the treaty rights of the Northwest Tribal Nations. Any pump storage we need should be built it in a just and equitable way.
30	Janis	Swalwell	Freeland	WA	98249	If it violates treaty rights it must not be done, period. In addition, this is experimental and does not sound like more promising long-term solutions to every recapture. Who really benefits here? Sounds like mostly the corporation who wants the revenue.
31	Gary	Schuldt	Olympia	WA	98506	If this project violates treaties, it's quite obviously illegal; otherwise it appears it's an issue of Big Power steamrolling over the less powerful. Such disrespect ill-becomes the State of WA.
32	Mr. Shelley	Dahlgren, Phd	Sammamish	WA	98029	I'm in favor of green energy, but this is not the correct project to get there. Mr. SDD, PhD

33	Michael	Rummerfield	Onalaska	WA	98570	I'm strongly in support of clean, green, sustainable energy, but we must respect and honor Native tribal rights and treaties. Only the Northwest Tribal Nations can determine what is significant to the tribe -- we must respect their treaty rights and avoid siting energy projects in places that are not endorsed by them.
34	Bradley	Thompson	Tacoma	WA	98405	Injustice is at the heart of the climate crisis. As badly as we need clean energy solutions, we can't move forward while leaving anybody behind or by furthering historic injustices. That's why I stand with the Yakama Nation in opposition to this project.
35	Amy	Sherwood	Seattle	WA	98126	It is not enough to consult with tribal nations; they must also be listened to. Only the Northwest Tribal Nations can determine what is significant to the tribe -- we must respect their treaty rights and avoid siting clean energy projects in places of cultural significance.
36	Monica	Dunn	White Salmon	WA	98672	It is time for respect and honoring our indigenous peoples. We must find another way to create energy in ways that honor all.
37	Karen	Lohmann	Olympia	WA	98502	It is time to honor the the Native American tribes and the future of our land and waters. Please deny this project 101, Goldendate Energy Storage Project. Look to the Nordic lands for new discoveries about how to store energy in sand. thank you.
38	Karen	Loeser	Mercer Island	WA	98040	It is time to stop encroaching and/or building on Tribal Lands.
39	Deirdre	Cochran	Seattle	WA	98102	Let's finally make a decent and respectful decision about indigenous rights.
40	Art	Petersen	Seattle	WA	98103	Let's focus on developing renewable energy sources that don't further impact Indigenous Peoples in Washington State, and elsewhere.
41	Donna	Vanderheiden	Langley	WA	98260	Listen to the tribal advice, please, oppose Rye Development's proposed Goldendale Energy Storage Hydroelectric Development. other forms of Green energy must be created to combat our Climate Crisis.
42	Pat	Jones	Ridgefield	WA	98642	My sincere request of each decision maker is to respect what our tribal leaders say. As a country we must no longer view those voices as less than. As they tell us this is hallowed land, please do not desiccate any of it with construction of the Goldendale Storage Project.
43	Melissa	Rubin	Port Townsend	WA	98368	No bueno! Be consistent! And equitable!
44	Dave	Robinson	Curlew	WA	99118	No trespassing on Tribal Resource's, PERIOD!!!
45	Barbara	Ocskai	Snohomish	WA	98290	No!
46	Charles	Fink	Seattle	WA	98116	No, absolutely NO, to the Goldendale project.
47	Dennis	Rice	Washougal	WA	98671	Northwest Indian tribes have treaty rights that were established long before hydro power projects were established, Their rights need to be considered before any approval of proposed power generation takes place. Please respect these rights.
48	Shane	Glass	Lacey	WA	98509	Northwest Tribal Nations should have the first and last words on what affects their Trivbal and cultural resources.
49	Kim	Secunda	Eastsound	WA	98245	Now is not the time for you to amp up your shameless genocidal craziness . You are cursed by the killing and hate crimes. Stop lying to yourself like the schools and church killing us this too is wrong headed. Have some respect. You make your soul sick by all this greedy destructive hate. Use s place you already already destroyed, Hanford, mines, some military bases. Back off
50	LeeAnn	Chastain	Eastsound	WA	98245	Our state must demonstrate respect for our tribal residents and honor their rights. They are benevolent stewards of natural resources, while our businesses and governments continue to exploit the environment, to the peril of all living things.
51	Sherri	Dysart	Shelton	WA	98584	Please carefully listen to tribal concerns about this project. We need to respect their rights.
52	Mark	Leed	Vancouver	WA	98661	Please deny Rye Development's application. This project's huge footprint on the Easter Columbia Gorge landscape, plus its impact on cultural resources of the Yakama Nation make it the wrong project in the wrong place.
53	Patrice	Colle	La Conner	WA	98257	Please deny the goldendale project We must respect the Treaty rights of the NORTHWEST Tribal Nations and avoid siting clean energy projects in places of cultural significance. Do the right thing. Please. Thanks
54	Pamela	Hastings	Port Angeles	WA	98362	Please deny the Goldendale project. I would interfere with treaty rights and the technology has not been worked out sufficiently to avoid ecological damage. Thank you
55	Kimberly	Fischer	Wenatchee	WA	98801	Please don't even consider this. It is wrong on so many levels.
56	Beth	Borst	Chehalis	WA	98532	Please give our Native people the consideration and respect they deserve, and find a better process for your planned project that will not deny their rights. They have lost too much already, and deserve our greatest protection. Thank you.
57	Betsey	Bess	Port Hadlock	WA	98339	Please honor treaties and respect land.
58	Robert	Strader	Yakima	WA	98908	Please reject the pump storage project at Goldendale. Environmental justice is important and tribal cultural issues should be respected.
59	Zua	Stivers	Olympia	WA	98502	Please respect Northwest tribal rights, resources and culture by denying the Goldendale project proposal by Rye Development.
60	Rachel	La Fein	Concrete	WA	98237	Please respect the rights of the indigenous people.
61	Jennifer	Shaw	Marysville	WA	98270	Plz save animals
62	Mary Lou	Bennington	Spokane	WA	99203	Respect Northwest Tribal Nations treaty rights!
63	Carol	Price	Poulsbo	WA	98370	Respect.
64	Robert	Astyk	Bellingham	WA	98227	Since Columbus landed in 1492 we Euro-colonizers have exploited indigenous peoples and destroyed their culture. The state of Washington has been very good in seeking to restore some modicum of equity in this heretofore dark history. Why now create another destructive project that we will need to apologize for in the future and of which we will need to compensate victims before a single watt of electricity is stored?
65	Lynda	Marvin	Mead	WA	99021	Strongly urge you to consider the many negative and destructive implications of this proposed project.
66	Crystal	Gartner	Seattle	WA	98136	Support the NO ACTION ALTERNATIVE. We must prioritize the rights of Tribal Nations in our pursuit of a clean energy system that is just and equitable.
67	Martha	Bartlett	Bellingham	WA	98226	Thank you for your work to respect and protect treaty rights
68	Robin	Rowedder	Seattle	WA	98122	The Goldendale area and Yakima tribal lands contain 3000 years of cultural history including petroglyphs. This cultural heritage would be destroyed by Rye Development 's proposed broject and would abrogate Yakima tribal rights.
69	Rebecca	Wolfe	Edmonds	WA	98020	The reputation of the WA State Dept. of Ecology will be elevated by Ecology's demonstration of respect for the ecological and cultural values of Northwest Tribal Nations. Please choose the "No Action" alternative in this process.
70	Gregory	Espe	Seattle	WA	98115	The Tribes affected need to sign off on this project before going forward.

71	Denise	Snyder	Bellingham	WA	98225	The tribes have been taken advantage of time and time again whenever their lands have resources that are of economic value. Their lands have been mined, drilled, contaminated and their cultural places overrun. Since the Confederate Tribes of the Yakima Nation are opposed to the Hydroelectric Storage facility their wishes should be respected.
72	Bealinda	Brady	East Wenatchee	WA	98802	The Tribes should have final say on how Tribal resources are used.
73	Chris	Tipton	Sequim	WA	98382	The Yakama Nation and 17 signatories to their notice of no consent regarding this project have spoken clearly. Respect.
74	B	Pepowski	Seattle	WA	98122	There are many types of renewable energy in the world, and many places to harvest it. The US government has already dealt heartbreaking damage to North American Indigenous cultural sites and practices. Have a conscience and avoid further damage - do not site this project here.
75	Mike	Wende	Liberty Lake	WA	99019	There are too many credible alternatives for storage to further sacrifice the tribes to avoid minor inconveniences.
76	Helga	Burkhardt	White Salmon	WA	98672	There is no way we can again take the rights away from tribal communities. Have we not stolen enough from all the tribes?
77	Robin	Barr	Seattle	WA	98125	There MUST be a way to do this storage project in a way that respects and protects Washington Tribe's rights!! Please, we have already done so much harm, let's make sure we don't do more!
78	Aniko	Bahr	Tulalip	WA	98271	There must be Free Prior and Informed Consent by the sovereign tribal communities that stand to be affected. Without FPIC, the project lacks full ethical and practical grounding. As an ordinary citizen, I applaud the efforts towards clean energy, but not at the expense of the first Americans.
79	Margaret	Johnston	Seabeck	WA	98380	This is extremely important to me. The Northwest tribes have a history of being ignored and oppressed by the government, and we cannot continue those practices.
80	Richard	Donnelly	Bellingham	WA	98229	This project needs complete buy-in from tribal representatives.
81	Ellery	O?Darrah	Seattle	WA	98107	Treaty rights are not just words on paper. They are crucial safe guards for a free and just society, as well as a vital and healthy environment. Now more than ever we must put the needs of the planet and its citizens over the greed of the few! This dam is not a good solution to anything.
82	Esther	Kronenberg	Olympia	WA	98502	Tribal interests should weigh heavily in your decision
83	Lorraine	Pedersen	Lake Stevens	WA	98258	Tribal peoples' rights have been trampled for hundreds of years. It is beyond time for this to stop. Do not allow this to happen.
84	Rita	Pinchot	White Salmon	WA	98672	Tribal resources are resources for everyone and allow protecting them allows for healing and restoration of land and relationship.
85	Dave	Shaver	Snohomish	WA	98290	Tribal rights come first. Also I am curious to know about this proposal, is long run commitment in Columbia river water really the future? And as the snow pack declines over time then what? The dams were never green, just ask the salmon...It is time to plan a future without these schemes, in the long run I don't see them being sustainable?
86	Virginia	Voorhees	Seattle	WA	98122	Tribal rights have been trampled for generations and our boarding schools tried to obliterate their languages and cultures. We should be backpedaling six ways from Sunday to make up for all the damages we have perpetrated to tribes! Including not damaging their lands of which they have been better stewards at Han we.
87	Katherine	Shellorne	Spokane	WA	99201	Tribal rights to control their environment must be respected.
88	Helen	Harlow	Tacoma	WA	98402	Violations of tribal treaties are unacceptable, These are contracts with standing and cannot be ignored. The tribunal consensus, not just considering forto overlook. helen!
89	Kate	Nelson	Seattle	WA	98103	We are just beginning to address our many decades of ignoring Indian treaty rights. This project must pass muster on this issue or we should not do it.
90	Meaghan	Geiger	Orting	WA	98360	We are so far behind in our search for ?clean? energy, but again and again it is indigenous people leading the push to protect the environment. It would be hubris to think that further colonial abuse would do any long term good.
91	Millie	Magner	Seattle	WA	98199	We can no longer proceed with impunity. The sacrificing of a people and their way of life must stop. We are all responsible for honoring the promises made to our indigenous neighbors. Deny Rye's Goldendale development.
92	K Burnell	Schaetzel-Hill	Olympia	WA	98516	We cannot move to a sustainable energies future and ?do business as usual? like we've done for centuries!
93	Gary	Ranz	Bellingham	WA	98229	We have already done more damage to tribal cultural properties than can ever be mitigated. We do not need to do more upon the hollow Rosie's of mitigation.
94	Catherine	Martinez	Poulsbo	WA	98370	We have developed our country to the detriment of indigenous people for most of our history. We cannot continue to do this. It is time to acknowledge and repair our broken treaty record. This project is wrongheaded and fails to acknowledge the needs and humanity of the tribes.
95	Wendy	Wright	Puyallup	WA	98374	We must continue to find alternative energy sources. However, we also must take into consideration the Native Americans' tribal sovereignty. Storage of water to be pumped downstream should comply with all environmental and tribal protections. No action is the best alternative.
96	Ellen	Notehelfer	Camano Island	WA	98282	We must respect the rights of our Native American Tribal Nations and seek alternative solutions to the fight for clean energy. No clean energy solution can be chose if it violates the rights of our native brothers and our sisters.
97	Phillip	Brugalette	Lake Forest Park	WA	98155	We must respect the treaty rights of the Northwest Tribal Nations and avoid siting clean energy projects in places of cultural significance.
98	Deborah	Kramer	Vancouver	WA	98664	We must show respect to the Indigenous people in our state.
99	Alice	Flegel	Rochester	WA	98579	We MUST uphold tribal rights! In this day and age it is imperative that we do so. Do NOT approve the Goldendale energy storage!!
100	Michael	Baranoski	Spokane	WA	99205	We need sustainable alternatives to fossil fuels. This is not that.
101	James	Maurer	Covington	WA	98042	We need to find solutions that don't trample the rights of Native Americans.
102	Teizeen	Mohamedali	Bellingham	WA	98229	We need to honor tribal rights and resources by preventing this project.
103	Holly	Brewer	Bainbridge Island	WA	98110	we need to move away from fossil fuels
104	Julie	Martinson	Everett	WA	98201	We need to respect indigenous people's sites and practices, so this must be sited elsewhere.
105	Nancy	Jacobs	Bellevue	WA	98005	We simply must respect treaty rights of these Northwest Tribal Nations. Even though this is a clean energy project, it must be sited where it does not cause adverse impacts to these rights.
106	Cindy	Gailey	Seatac	WA	98168	What other options have been studied? I find it sad that tribal lands are again expected to allow such interference.
107	George	Morgan	Washougal	WA	98671	While I am in favor of pumped storage/generation facilities, I do not want them sited where native tribe, environmental or other concerns are ignored.
108	Barbara	Boyle	Seattle	WA	98177	While I support building clean new energy storage, a project opposed by affected Tribes because of multiple concerns is not the right way to go. Please make appropriate changes in the FEIS and do not support going forward with this project in this location.
109	Tim	Sampson	Walla Walla	WA	99362	While it is critically important that we move away from fossil fuels it is also as critically important that we don't just move ourselves out of the frying pan and into the fire by inappropriately siting green projects on critical habitat and culturally important sites. There is no such thing as empty land.!
110	Bill	Rivers	Dallesport	WA	98617	Why should native folks have to shoulder yet another Half Baked white man energy scheme! This is a Crazy Idea!!

111	Smith	Guy	Silverlake	WA	98645	
112	Jo	Harvey	Pacific	WA	98047	
113	Kathy	Wilson	Port Ludlow	WA	98365	
114	Rebecca	Glass	Shoreline	WA	98133	
115	K	Otto	Normandy Park	WA	98166	
116	James	Mulcare	Clarkston	WA	99403	
117	Constance	Deroooy	Seattle	WA	98122	
118	vana	spear	Lynnwood	WA	98036	
119	Matthew	Pasco	Seattle	WA	98105	
120	Carol	Else	Lakewood	WA	98498	
121	David	Chambers	Renton	WA	98059	
122	Sharon	Fetter	Puyallup	WA	98371	
123	Marta	Benson	Vancouver	WA	98661	
124	Tory, Ann, Todd	Tjersland	Olympia	WA	98512	
125	Janet	Riordan	Seattle	WA	98177	
126	Corrine	Anderson-Ketchmark	Des Moines	WA	98198	
127	Karen And Chris	Davis	Seattle	WA	98107	
128	Patrick	Archer	Seattle	WA	98177	
129	Roger	Delmar	Port Townsend	WA	98368	
130	David	Turnoy	Eastsound	WA	98245	
131	Karen	Fortier	Monroe	WA	98272	
132	Amelia	Vesper	Bellevue	WA	98004	
133	Kalama	Reuter	White Salmon	WA	98672	
134	Dagmar	Fabian	Bellingham	WA	98225	
135	Denise	Echelbarger	Camano Island	WA	98282	
136	Martha	Currey	Vancouver	WA	98665	
137	Ernie	Robeson	Spokane	WA	99208	
138	Faye	Bartlett	Bellingham	WA	98226	
139	Felix	Lee	Seattle	WA	98112	
140	Linda	Knight	Bellevue	WA	98008	
141	Steve	Shapiro	Seattle	WA	98144	
142	Lorelette	Knowles	Everett	WA	98201	
143	William	Crimbring	Silverdale	WA	98383	
144	David	Bailey	Sequim	WA	98382	
145	Danielle	Baehm	Everett	WA	98203	
146	Meryle A	Korn	Bellingham	WA	98226	
147	Diane	Christensen	Lynnwood	WA	98087	
148	Deborah	Gandolfo	Kirkland	WA	98033	
149	Julia	Paulsen	Seattle	WA	98115	
150	Karen	Weis	Bellingham	WA	98226	
151	Alex & Pauline	Nakamura	Bellevue	WA	98005	
152	Joann	Mesa	Snohomish	WA	98290	
153	Barbara	Fristoe	Seattle	WA	98144	
154	Sherry	Sites	Gig Harbor	WA	98332	
155	Wendy	Krakauer	Seattle	WA	98103	
156	Steven	Uyenishi	Seattle	WA	98115	
157	John	Waddington	Spokane	WA	99224	
158	Constance	Knudsen	Seattle	WA	98117	
159	Philip	Condit	Snohomish	WA	98290	
160	Janice	Schuch	Ferndale	WA	98248	
161	Lin	Higley	Spokane	WA	99207	
162	C	Lenihan	Beaver	WA	98305	
163	Barbara	Dubois	Tacoma	WA	98406	

164	Lyle	Courtsal	Port Townsend	WA	98368
165	David	Dunneback	Seattle	WA	98112
166	Melanie	Hamilton	Silverdale	WA	98383
167	David	Habib	Kirkland	WA	98033
168	Jan	Jack	Bainbridge Island	WA	98110
169	Julia	Larsen	Seattle	WA	98105
170	Sabine	Bestier	Gig Harbor	WA	98332
171	Klaudia	Englund	Anacortes	WA	98221
172	Robert	Ulrich	Issaquah	WA	98027
173	Caroline	Swinehart	Tacoma	WA	98403
174	Marjorie	Millner	Vancouver	WA	98685
175	Dennis	Berg	Seattle	WA	98119
176	Cornelia	Teed	Bellingham	WA	98225
177	Martin	Kenzer	Anacortes	WA	98221
178	Anne	Huckins	Kent	WA	98032
179	Craig	Britton	Port Townsend	WA	98368
180	Grace	Padelford	Kirkland	WA	98034
181	Thom	Peters	Snohomish	WA	98290
182	Katherine	Nelson	Kent	WA	98031
183	Lee And Heidi	Musgrave	White Salmon	WA	98672
184	Hilke	Faber	Seattle	WA	98108
185	Lauren	Ranz	Bellingham	WA	98229
186	Dakota	Duncan	Brush Prairie	WA	98606
187	Karen	Fisher	Ferndale	WA	98248
188	Linda	Wasserman	Tacoma	WA	98406
189	Sheila	Sondik	Bellingham	WA	98229
190	Katie	Mace	Spokane	WA	99203
191	Candice	Cassato	Olympia	WA	98502
192	Holly	Smith	Redmond	WA	98052
193	Mary	Gallagher	Leavenworth	WA	98826
194	Erin	Neubauer	Clyde Hill	WA	98004
195	Karen	Klein	Sequim	WA	98382
196	Carol	Olsen	Otis Orchards	WA	99027
197	Amanda Sue	Rudisill	Olympia, WA USA	WA	98508
198	Janet	Alderton	Deer Harbor	WA	98243
199	Rusty	West	Shoreline	WA	98155
200	Robert	Foster	Port Townsend	WA	98368
201	Nancy	White	Spokane Valley	WA	99216
202	Anne	O'Leary	Vashon	WA	98070
203	Emily	Van Alyne	West Richland	WA	99353
204	Laura	Theodorson	Tacoma	WA	98405
205	Lela	Perkins	Everett	WA	98208
206	Kate	Blessing	Seattle	WA	98116
207	Stan	Seeberg	Vancouver	WA	98665
208	Mia	Heavyrunner	Port Orchard	WA	98366
209	Phil and Enid	Crawford	Stevenson	WA	98648
210	Joann	Polley	Poulsbo	WA	98370
211	Elaine	Packard	Seattle	WA	98122
212	Hannah	Taylor	Vancouver	WA	98682
213	William	Gregory	Sedro Woolley	WA	98284
214	Charles	Collier	Redmond	WA	98052
215	Dan	Morgan	Lynnwood	WA	98036
216	David	Baine	Federal Way	WA	98023

217	William	Mcgunagle	Spokane	WA	99207	
218	Nancy	Johnson	Edmonds	WA	98020	
219	Jacob	Meyer	North Bonneville	WA	98639	
220	Joanna	Redman-Smith	Kent	WA	98031	
221	Erik	LaRue	Burlington	WA	98233	
222	Jill	Quick	Bellingham	WA	98229	
223	Pam	Borso	Custer	WA	98240	
224	Alaina	Moon	Olympia	WA	98501	
225	Carolee	Flaten	Hansville	WA	98340	
226	Gerald	Wheeler	Tukwila	WA	98168	
227	Gary	Peniston	Bellingham	WA	98226	
228	Raymond	Wells	Ellensburg	WA	98926	
229	Ben	Rall	Spokane	WA	99205	
230	Kathy	Swinehart	Vashon	WA	98070	
231	Linda	Chu	Seattle	WA	98103	
232	Matthew	Cloner	Seattle	WA	98115	
233	Catherine	Duff	Spokane Valley	WA	99212	
234	Jacquelyn	Deal	Bothell	WA	98021	
235	Shannon	Markley	Shoreline	WA	98177	
236	Brandie	Deal	Bothell	WA	98021	
237	Selim	Uzuner	Carnation	WA	98014	
238	Christine	Eaton	Bremerton	WA	98312	
239	Cassie	Hodgin	Pullman	WA	99163	
240	Paul	Muldoon	Seattle	WA	98116	
241	Joseph	Baglieri	Spokane	WA	98014	
242	Lisa	Wright	Everett	WA	98203	
243	Nancy	McMahon	Olympia	WA	98501	
244	Barbara	Blackwood	Spokane Valley	WA	99206	
245	Tana	Anderson	Spokane	WA	99223	
246	Randy	Widen	Seattle	WA	98107	
247	Robert	VanderKamp	Battle Ground	WA	98604	
248	Melissa	Rees	Spokane Valley	WA	99212	
249	Ken	Zirinsky	Tacoma	WA	98407	
250	Karen	Hoover	Bremerton	WA	98312	
251	Paula	Shafransky	Sedro Woolley	WA	98284	
252	Dean	Webb	Seattle	WA	98199	
253	Lindell	Haggin	Spokane	WA	99208	
254	Stephen	Wilhelm	Edmonds	WA	98026	
255	Jan	Dove	Port Angeles	WA	98362	
256	Alexandra	Torres	Tacoma	WA	98466	
257	Jennifer	Woodbridge	Shaw Island	WA	98286	
258	j	j	Orting	WA	98360	
259	Ric	Berkholtz	Seattle	WA	98105	
260	Sandra	Ciske	Seattle	WA	98116	
261	Ruth	Darden	Seattle	WA	98115	
262	Janet	Ehrenfreund	Mineral	WA	98355	
263	Susan	Johnson	George	WA	98824	
264	Stephanie	Bell	Seatac	WA	98198	
265	Judy	Hedstrom	Edmonds	WA	98026	
266	Marie	Bailey	Bellingham	WA	98229	
267	Suzanne	Cunliffe	Edmonds	WA	98020	
268	Barbara	Foster	Bellingham	WA	98226	
269	Elena	Rumiantseva	Redmond	WA	98052	

270	Diane	Marks	Port Angeles	WA	98362	
271	Noah	Ehler	Carnation	WA	98014	
272	Richard	Plancich	Shoreline	WA	98155	
273	Ken	Zontek	Yakima	WA	98908	
274	Jill	LaRue	Cashmere	WA	98815	
275	Laura	Finkelstein	Seattle	WA	98119	
276	Giles	Sydnor	Seattle	WA	98107	
277	Tracy	Wang	Seattle	WA	98107	
278	Mildred	Sheehan	Randle	WA	98377	
279	Elise	Baldwin	Seattle	WA	98199	
280	Lori	Stephens	Freeland	WA	98249	
281	Vanassa	Lundheim	Everett	WA	98203	
282	Rich	Voget	Seattle	WA	98103	
283	Cheryl	Biale	Olympia	WA	98512	
284	William	Sneiderwine	Vancouver	WA	98683	
285	Sheryl	Sparling	Lynden	WA	98264	
286	Jacob	Bailey	Orting	WA	98360	
287	Melodie	Martin	Seattle	WA	98102	
288	Lucinda	Stroud	Seattle	WA	98119	
289	Achala	Devi	Woodinville	WA	98072	
290	Rebecca	Deardorff	Seattle	WA	98103	
291	Cecile	Ervin	Walla Walla	WA	99362	
292	David	Hand	Bainbridge Island	WA	98110	
293	David	Elmendorf	Walla Walla	WA	99362	
294	Eliza	Kronenberger	Seattle	WA	98146	
295	Michael and Barbara	Hill	Mineral	WA	98355	
296	Eugene	Kiver	Anacortes	WA	98221	
297	David	Hand	Bainbridge Island	WA	98110	
298	Dianne & Vince	Foster	Bellingham	WA	98225	
299	Stephen	Zettel	Sequim	WA	98382	
300	Robin	Sissom	Yakima	WA	98902	
301	Susan	Finley	Marysville	WA	98270	
302	Dede	Campbell	Coupeville	WA	98239	
303	Tien	Vu	Renton	WA	98059	
304	Daniel	Henling	Seattle	WA	98107	
305	David	Askew	Seattle	WA	98109	
306	Becky	Hage	Bellingham	WA	98229	
307	Kim	Howe	Seattle	WA	98115	
308	PAMELA	JORDAN	Lake Forest Park	WA	98155	
309	Caroline	Allen	Sammamish	WA	98074	
310	Clayton	Jones	Tukwila	WA	98168	
311	Rosemary	Sikes	Port Townsend	WA	98368	
312	Derek	Benedict	Lynnwood	WA	98036	
313	James	Smith	Seattle	WA	98115	
314	Bridget	Demouy	Seattle	WA	98115	
315	Paul	Roberts	Seattle	WA	98102	
316	Mary	Olheiser	Burien	WA	98146	
317	Carole	Huelsberg	Port Townsend	WA	98368	
318	Rebecca	Evans	Seattle	WA	98117	
319	Jean & Kyle	Pauley	Seattle	WA	98112	
320	Nick	Barcott	Lynnwood	WA	98087	
321	Vanessa	Jamison	Marysville	WA	98270	
322	Cynda	Cleveland	Lakewood	WA	98498	

323	Christina	Dyson	Redmond	WA	98052	
324	Lanie	Cox	Spokane	WA	99224	
325	Lynette	Goad	Lynnwood	WA	98037	
326	Linda	Chung	Seattle	WA	98101	
327	Elizabeth	Tilley	Tacoma	WA	98408	
328	Kara	Harms	Bothell	WA	98012	
329	Richard	Osmun	Camas	WA	98607	
330	Robin	Everett	Seattle	WA	98115	
331	Andrea	Speed	Tacoma	WA	98445	
332	Phelan	Rollososn Halbhuber	Sammamish	WA	98074	
333	Rose	Fanger	Spokane	WA	99201	
334	Dennis	Ledden	Sequim	WA	98382	
335	Hannah	Liu	Vancouver	WA	98686	
336	Frances	Marcolli	Port Orchard	WA	98367	
337	Jean	Kroll	Bellingham	WA	98225	
338	Alyssa	Crum	Gig Harbor	WA	98329	
339	Terrance	Ryan	Quilcene	WA	98376	
340	Nancy	Debusman	Carlsborg	WA	98324	
341	Lisa	Mihm	Seattle	WA	98144	
342	Veronica	Allen	Everett	WA	98201	
343	Kari	Darvill-Coate	Bothell	WA	98021	
344	Susan	Pitiger	Vashon	WA	98070	
345	Jennifer	Macdonald	Bellingham	WA	98226	
346	Jada	Seaton	Lynnwood	WA	98087	
347	Odette	Kelly	Spokane	WA	99223	
348	Marian	Wineman	Seattle	WA	98199	
349	William	Barmettler	Chehalis	WA	98532	
350	Christa	Nicholas	Vancouver	WA	98660	
351	Marie	Weis	Fox Island	WA	98333	
352	Donald	Chesebro	Port Angeles	WA	98362	
353	Jeffrey	Lightfoot	Sequim	WA	98382	
354	Gail	Vincent	Tacoma	WA	98446	
355	Kathy	Albert	Seattle	WA	98125	
356	Alfred	Colter	Yakima	WA	98902	
357	Robert	Reinhart	Tacoma	WA	98407	
358	Elizabeth	Duke	Seattle	WA	98126	
359	shary	B	Seattle	WA	98101	
360	Virginia	Moore	Stanwood	WA	98292	
361	Patricia	Hinneburg	Carnation	WA	98014	
362	Frances	Parson	Seattle	WA	98105	
363	Ruth	Maule	North Bend	WA	98045	
364	Jennifer	Vining	Seattle	WA	98103	
365	Niki	Vogt	Vancouver	WA	98682	
366	Linda	Kroeger	Seattle	WA	98117	
367	James	Adams	Olympia	WA	98502	
368	Clarice	Arakawa	Port Angeles	WA	98362	
369	Keith	Van Meter	Port Townsend	WA	98368	
370	valarie	matinjussi	Bellingham	WA	98225	
371	James	Keeley	Vancouver	WA	98662	
372	Craig	Swanson	Bellevue	WA	98008	
373	Rebecca	Lee	Anacortes	WA	98221	
374	Kelly	Spain	Issaquah	WA	98027	
375	Linda	Ellsworth	Eastsound	WA	98245	

376	Florie	Rothenberg	Seattle	WA	98126	
377	Jax	Sprague	Redmond	WA	98052	
378	Julie	Goebel	Bellingham	WA	98229	
379	Alan	Waggoner	Seattle	WA	98112	
380	Gena	DiLabio	Mount Vernon	WA	98274	
381	Greg	Saul	Olympia	WA	98501	
382	Joanne	Richard	Tacoma	WA	98402	
383	Amber	Kaplan	Spokane	WA	99223	
384	Bruce	Gundersen	Poulsbo	WA	98370	
385	Leslie	Chartrand	Vancouver	WA	98686	
386	Leslie	Smith	Bellingham	WA	98226	
387	Elizah	DeMartini	Seattle	WA	98177	
388	Susan	Tochterman	Bellevue	WA	98007	
389	Cole	Grabow	Seattle	WA	98109	
390	Judy	Clark	Cinebar	WA	98533	
391	Luanne	Pasik	Anacortes	WA	98221	
392	Melissa	Eriksen	Seattle	WA	98103	
393	Elaine	Somers	Monroe	WA	98272	
394	Lucy	Johnson	Seattle	WA	98116	
395	Gary	Brill	Seattle	WA	98133	
396	Shelly	Peterson	Anacortes	WA	98221	
397	Howard	Borer	Vancouver	WA	98683	
398	Libby	Erie	Lake Stevens	WA	98258	

Mark Riker

On behalf of the approximately 80,000 members of the Washington State Building and Construction Trades Council, I submit these comments in strong support of moving forward with this project. The transition to cleaner energy sources will require many different sources of power to the grid, this technology will be a component of the energy grid of tomorrow and will be non carbon emitting. We also have the responsibility to make sure that while we make this transition we do not leave the workers and communities most impacted behind in the process. Projects such as this can be the cornerstone for rural community economies. The magnitude of this project can support quality family wage, middle class careers in the construction trades. With the duration of this project an entry level worker from the local region can serve an entire apprenticeship, gathering transferable career sustaining skills that have been the cornerstone of the construction economy for generations, all while improving the future of energy in our region. This project is of the estimated size to support approximately 450 apprenticeship level opportunities as part of the approximate 3,000 worker labor force to construct, something that is severely lacking in our rural communities. The developer has committed to mitigating any items necessary for interested parties, along with ensuring that this particular project does in fact benefit the regional labor force both during construction and during ongoing maintenance and operation functions. For Washington State to meet our GHG emissions reduction targets we need to develop capacity very soon, this project is a component of that effort, and we need to build it now, here, and with our workers.

Thank You,
Mark

Matthew Hepner

Matthew Hepner

My name is Matthew Hepner. I'm the Executive Director of the Certified Electrical Workers of Washington, representing over 10,000 workers statewide, and I'm a journeyman wireman, myself. With the passage of major state climate legislation, like the Clean Energy Transformation Act, the Low Carbon Fuel Standard, and the Climate Commitment Act, we must build new forms of generation and energy storage if we're going to meet those goals. This project is a critical development project for the western grid. · Storage projects like this make wind and solar viable at an industrial scale. We can't build industrial solar and wind without storage, so this is the bottleneck that we really need to have for the green energy economy to take off.

If we're serious about energy independence, we must build. If we're serious about addressing climate change, we must build. If we're serious about Apprenticeships and economic development, we must build.

This project hits the bull's-eye in so many categories; jobs, apprenticeship, clean energy, increasing local tax revenues for schools, hospitals, police and fire departments, and roads.

We urge Ecology diligent and continued support of this critical energy project permitting process.

Thank
you.



August 9th, 2022

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

Submitted electronically to: <https://admin.ecology.commentinput.com/?id=KNBCY>

RE: Comments on the Washington Department of Ecology’s Draft Environmental Impact Statement for the Goldendale Energy Storage Project

Dear Regional Director Park,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement prepared by the Washington Department of Ecology under the Washington State Environmental Policy Act for the proposed Goldendale Energy Storage Project.

Introduction

1 On June 23rd, 2020, Rye Development on behalf of FFP Project 101, LLC filed a Final License Application (FLA) with the Federal Energy Regulatory Commission (FERC) for the Goldendale Pumped Storage Project (Project). The Washington State Department of Ecology (Ecology) initiated the Washington State Environmental Policy Act (SEPA) review process with a Determination of Significance issued on January 14, 2021. Ecology determined that “the proposed Goldendale Energy Storage Project is likely to have significant environmental impacts requiring full evaluation in an environmental impact statement (EIS).”¹ Ecology issued its Draft EIS for review and public feedback on June 6, 2022.

2 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).

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

American Rivers (AR) offers the following comments in response to Ecology’s Draft EIS for the Goldendale Energy Storage Project.

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 as well as human communities. Rye Development’s application for a new 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.

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

Comments

AR 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), Rye’s record of communication with affected Tribal communities, and Ecology’s Draft EIS indicate that the Project poses an uncertain benefit to grid resilience while presenting significantly detrimental impacts to environmental and cultural resources. AR holds concerns regarding Project impacts to 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. Our most cardinal concern, however, is the Project’s proven potential to have “significant and unavoidable adverse impacts to Traditional Cultural Properties (TCPs), archaeological sites, culturally important plants, and other Tribal resources” and the inability of mitigation to attenuate these impacts.² For this reason, American Rivers supports the No Action Alternative.

AR appreciates both the public input opportunity and the analyses conducted by Ecology thus far as part of the environmental analysis process. Our comments and concerns regarding the Project and the Draft EIS as they relate to AR’s interests are detailed below.

I. Impacts to Tribal archaeological and cultural resources

² Washington Department of Ecology (June 6, 2022), State Environmental Policy Act Draft Environmental Impact Statement. Retrieved from: <https://apps.ecology.wa.gov/publications/SummaryPages/2206006.html>

AR reaffirms 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.

Ecology found in its environmental analysis that the Project “would result in significant and unavoidable adverse impacts related to Tribal and cultural resources,” and that there is no mitigation proposed by or supported by the Confederated Bands and Tribes of the Yakama Nation (Yakama Nation), the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Confederated Tribes of the Warm Springs Reservation of Oregon (CTWS), and/or the Nez Perce Tribe that would reduce the level of impacts to less than significant.³

The Draft EIS finds a dense concentration of archeological sites within the study area and asserts that “79% of the study area is within high risk or very high-risk areas for the possibility of encountering archaeological sites.”⁴ The Washington State Department of Archaeology and Historic Preservation estimated that 100% of 15 sites could be disturbed.⁵ It is also important to note that the potential exists for previously unrecorded sites to be discovered during Project construction.⁶

The Draft EIS states, “Activities that could impact Tribal and cultural resources include ground disturbance, restrictions to access, degradation of visual quality, noise, and interruption of the landscape and habitat.” It continues,

The Tribes’ spiritual practices could be interrupted by construction impacts to land areas and cultural or sacred sites. In addition, access to traditional gathering areas for medicinal and traditional plants and foods would also be restricted during construction and permanently lost in the reservoir areas. The loss of Tribal connections and educational opportunities that result from restricted access to Tribal resources would disrupt and degrade Tribal members’ health and mental well-being.⁷

These impacts are severe, and AR stands with the Tribes in their assertion that mitigation is or may not be possible. AR only supports the No Action Alternative for the Project for these reasons.

Throughout the Draft EIS, Ecology fails to adequately acknowledge impacts to Tribes and sequesters Tribal impacts to one section of the document. AR requests that the significant and unavoidable adverse impacts to the natural resources that are also culturally important to Tribes be reflected throughout the Final EIS, particularly in the following sections:

- Under the ‘Aesthetics/Visual Quality’ section, the Draft EIS states that there would be no significant or unavoidable impacts to aesthetics/visual quality. Ecology also writes, “there would be impacts to Tribes from the view changes...”⁸ This is a significant and unavoidable impact with no proposed mitigation. Therefore, AR disagrees with Ecology that there are “no significant adverse impacts” to aesthetics/visual quality.
- The ‘Terrestrial Species and Habitats’ section indicates a finding of “no significant and unavoidable adverse impacts related to terrestrial species and habitats, with inclusion of

³ Ecology (June 6, 2022), Draft EIS. p.157

⁴ Ecology (June 6, 2022), Draft EIS. p. 158

⁵ Ecology (June 6, 2022), Draft EIS. p. 161

⁶ Ecology (June 6, 2022), Draft EIS. p. 161

⁷ Ecology (June 6, 2022), Draft EIS. p. 161

⁸ Ecology (June 6, 2022), Draft EIS. p. 144

mitigation to reduce significant impacts.” However, Ecology acknowledges that, “If wildlife species that are used by Tribes for cultural or spiritual practices are reduced due to construction, this would be an indirect significant adverse impact to the Tribes.”⁹ Therefore, AR holds that there are, in fact, potential significant and unavoidable impacts to terrestrial species.

- Ecology finds that there would be “no significant and unavoidable adverse impacts to land use.”¹⁰ Given Ecology’s definition of “land use” and the Project’s probability of adversely impacting cultural resources, including the Tribes’ ability to utilize TCPs and gather culturally important plants, AR holds that there would certainly be significant and unavoidable adverse impacts to land use.
- Perhaps most importantly, under the ‘Environmental Justice’ section, Ecology states that there is no disproportionate impact on communities of color or low-income populations and that “mitigation is not required to reduce any disproportionate impacts to communities of color and low-income populations.” Ecology defines Environmental Justice as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, rules, and policies.”¹¹ It is difficult for AR to imagine a community of color that has historically been more disproportionately impacted by hydropower and energy development in this region than Indigenous peoples. AR asserts that while there may be no permanent residents in the study area, the area is critical to the maintenance of Tribal lifeways and impacts to Tribal communities are indisputably issues of environmental justice.

Ecology must include impacts to Tribal communities in its analysis of aesthetics/visual quality, terrestrial species and habitats, land use, and environmental justice and corresponding cumulative impact sections in its Final EIS.

II. Impacts to water quality and aquatic resources

The Project’s probable impact to water quality and quantity in and around the Columbia River remains a concern. The Draft EIS states, “Construction would permanently impact 0.09 acre of wetlands and streams and 1.34 acres of stream buffer, as well as temporarily impact 0.06 acre of wetlands and streams and 0.89 acre of stream buffer.”¹² In the northern portion of the study area, “Stream S7, Stream S8, Stream 1 all provide intermittent or ephemeral drainage to Swale Creek” and the permanent loss of these streams “could reduce the volume of surface flows to Swale Creek.”¹³ 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.”¹⁴ Reducing instream flow in a semi-arid

⁹ Ecology (June 6, 2022), Draft EIS. p. 162

¹⁰ Ecology (June 6, 2022), Draft EIS. p. 179

¹¹ Ecology (June 6, 2022), Draft EIS. p. 205

¹² Ecology (June 6, 2022), Draft EIS. p. 60.

¹³ Ecology (June 6, 2022), Draft EIS. p. 69

¹⁴ 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>

11
cont. basin like the Swale Creek watershed, which receives minimal rainfall and incurs high summer air temperatures, can have long-lasting negative impacts on water temperature. This, in turn, poses a great risk to salmonids at all life stages. The Draft EIS verifies the presence of anadromous salmonids in and significance of the watershed: “Swale Creek has the potential to provide viable habitat for salmon, steelhead, and resident rainbow trout if there were to be channel restoration and enhancement to perennial flows” and “lowest reaches of Swale Creek are designated critical habitat for the Mid-Columbia steelhead distinct population segment.”¹⁵

Additionally, surface water from Swale Creek is used for irrigation in the Goldendale area.¹⁶ 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.¹⁷ AR reiterates that reduced instream flows in the Swale Creek watershed 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’s upper reservoir.

12 AR also remains concerned about the amount of water that the Project proposes to use. The Draft EIS states that “Water for the initial fill would be purchased from [Klickitat Public Utility District (KPUD)] using a KPUD-owned conveyance system and existing water right.”¹⁸ Further, “it is assumed that the initial fill would be completed over 6.5 months.” The Draft EIS also states on page 62 that, “a one-time withdrawal to complete the initial fill” is needed. However, Ecology states later in the document, “that water right authorizes a maximum instantaneous rate of 35.3 cubic feet per second and annual total withdrawal quantity of 13,911 acre-feet per year (AFY), which includes a maximum consumptive use of 4,861 AFY” and “...the initial fill of the proposed project system would occur across a 2-year period to comply with the annual maximum consumptive use quantity of the underlying water right.”¹⁹ (Note: the Cliffs Comprehensive Water System Plan in Appendix K of the FLA indicates that the consumptive use is not to exceed 4,851 AFY—a difference of 10 AFY compared to Ecology’s analysis).²⁰ This contradictory information requires explicit clarification. It is AR’s understanding based on the Draft EIS and Rye’s application materials that the proposed total allowable consumptive water quantity is almost 3,000 AFY less than what Rye states is needed for initial reservoir fill. In this case, it would be a violation of the water right to conduct a one-time withdrawal to complete the initial fill in a 6.5-month period. AR requests a thorough explanation of the exact quantity of the water right, and the legally allowed timeline to withdraw the quantity of water needed for initial fill accounting for water supplied to the Project for construction.

13 AR also understands that at least a portion of KPUD’s water right 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

11 cont. ¹⁵ Ecology (June 6, 2022), Draft EIS. p .107

¹⁶ 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

¹⁷ Confederated Bands and Tribes of the Yakama Nation et al. Klickitat River Subbasin Plan, p 17.

¹⁸ Ecology (June 6, 2022), Draft EIS. p. 16.

¹⁹ Ecology (June 6, 2022), Draft EIS. p. 69

12 cont. ²⁰ FFP Project, 101, LLC (June 23, 2020). Final License Application, Appendix K: KPUD Letter, p. 47. Retrieved from: https://goldendaleenergystorage.com/assets/documents/FLA/Goldendale-FLA_Appendix-K_KPUD-Letter.pdf

13
cont.

compliance with state law. We encourage Ecology to closely examine KPUD’s water right and allocated uses, and to include a clear explanation of initial fill timing in its Final EIS.

AR also has growing concerns about impacts to groundwater after reviewing the Draft EIS.

14

Ecology states, “Water quality will likely degrade within the pumped storage system over time...”²¹ This deterioration of reservoir water quality is expected to include bacterial contamination from wildlife and the introduction of oils, lubricants, and other materials from the Project’s conveyance system, and will likely be compounded by the effects of evaporation. AR is concerned about 1) the impacts of this water quality degradation on wildlife that may interact directly with the reservoirs, and 2) the impacts of the degraded water quality on groundwater recharge via anticipated reservoir leakage. We are also concerned by the following statement: “neither the Applicant’s Environmental Report, Exhibit E of their FERC FLA (FFP 2020a), nor the Preliminary Supporting Design Report (HDR 2020b) include an analysis to predict water quality changes in the system over time.”²² AR requests an exhaustive reservoir water quality monitoring plan be developed by Rye in collaboration with Ecology and evaluated in the Final EIS.

15

The Draft EIS mentions, “the lower reservoir is anticipated to include a double liner system to further minimize any potential for leakage.” AR requests clarification as to why only the lower reservoir will be double lined, as it is our understanding that both reservoirs will be subject to degraded water quality and leakage. The Draft EIS also states that “very limited geologic/hydrogeologic information is available” in the area of the proposed upper reservoir.²³ The speculative nature of this analysis is concerning, and AR requests that further analyses are conducted to substantiate the claim that there would be no significant impact to groundwater from reservoir leakage in the Swale Creek watershed.

16

Ecology also mentions in relation to Project impacts to groundwater,

...the estimated amount of groundwater recharge lost would be 14 AFY and the estimated amount of runoff to streamflow lost would be 5 AFY. Based on the net gain to and loss determination presented in Table 4.2-4c, the estimated 30 AFY of artificial recharge from underground leakage would more than offset these amounts. As such, no impacts on surface water hydrology are expected to occur in the northern portion of the study area.²⁴

17

AR is concerned that underground reservoir leakage is being considered artificial groundwater recharge, particularly given Ecology’s understanding that the water quality within the reservoirs is expected to degrade overtime. We are also concerned by the following statement in the Draft EIS:

Should the project’s actual operating water balance indicate that the leakage is less than estimated in this analysis, the Applicant will be required to propose alternative mitigation...Mitigation options could include delivering water directly into the affected subbasin (increasing the quantity of make-up water purchased from KPUD) or implementing out-of-kind riparian enhancements.²⁵

14 cont. | ²¹ Ecology (June 6, 2022), Draft EIS. p. 45

15 cont. | ²² Ecology (June 6, 2022), Draft EIS. p.79

17 cont. | ²³ Ecology (June 6, 2022), Draft EIS. p.59

| ²⁴ Ecology (June 6, 2022), Draft EIS. p. 76

| ²⁵ Ecology (June 6, 2022), Draft EIS. p .78

17
cont.

AR is extremely concerned that reservoir leakage is being considered mitigation for impacts to groundwater from reservoir construction. We are also concerned by the notion of mitigating impacts to groundwater with riparian enhancements. Direct, on-site mitigation is strongly preferred over any off-site, indirect mitigation measures such as riparian enhancements. We are not confident in the current understanding of the hydrology and interplay between potentially contaminated Project reservoirs, groundwater, and aquifers in the study area, and therefore do not believe that a definitive determination of no significant and adverse impacts is appropriate. AR requests a more thorough explanation of Project impacts to groundwater given anticipated water quality degradation (particularly in the area of the proposed upper reservoir), a more comprehensive analysis of existing groundwater systems in the northern part of the study area, and a rationale for why only the lower reservoir will be double lined.

III. Contaminated site management

18

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 the Draft EIS, “The majority of the lower reservoir would be constructed in an area currently occupied by the [West Surface Impoundment (WSI)], a closed Solid Waste Management Unit (SWMU) associated with the former CGA smelter. “The contaminants of concern associated with SWMU 4 include sulfate, chloride, fluoride, and cyanide. Of these, sulfate is the primary contaminant present in groundwater associated with the WSI.”²⁶ The Draft EIS also explicitly states, “In the area surrounding the lower reservoir, the existing groundwater is contaminated.”²⁷ Rye proposes to fully remove the WSI in the initial phases of Project construction.

On page S-2, Ecology writes, “There is uncertainty related to subsurface conditions on the site, including geologic conditions and the location of a potential groundwater divide separating the aquifers of the northern and southern portions of the study area. Additional geotechnical studies proposed by the Applicant are expected to address this uncertainty as the design process proceeds.” AR asserts that a thorough understanding of this information is essential and has significant consequences in relation to the West Surface Impoundment.

19

A Final EIS must not be speculative, and Ecology should only issue its Final EIS after areas of uncertainty related to current conditions are resolved.

20

As previously stated, AR remains concerned about the potential adverse impacts of reservoir leakage (especially at a contaminated site) on groundwater in and around the Project area. The risk of contaminated water interacting the Columbia River through reservoir leakage or failure to too great and should be thoroughly evaluated. AR, again, requests an exhaustive reservoir water quality monitoring plan be developed by Rye in collaboration with Ecology and evaluated in the Final EIS.

IV. Impacts to terrestrial wildlife and plants

21

The Draft EIS finds, “the proposed project would have no significant and unavoidable adverse impacts related to terrestrial species and habitats, with inclusion of mitigation to reduce significant

18 cont.

²⁶ Ecology (June 6, 2022), Draft EIS. p. 170
²⁷ Ecology (June 6, 2022), Draft EIS. p. 174

impacts” even though Project construction would permanently destroy 193.6 acres of existing habitat and temporarily disturb another 54.3 acres.²⁸ AR disagrees that there will be no significant and unavoidable adverse impacts given the presence and potential destruction of areas of smooth desert parsley and other plants that are culturally significant to the affected Tribal Nations. The loss of habitat for these plants directly impacts Treaty-reserved rights to gather in the proposed Project area. Despite Ecology’s assessment that “the area lost is relatively small and other areas of smooth desert parsley are located nearby,” Tribal members will lose permanent access to traditional gathering territory and culturally significant plant species habitat.

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. Specifically, 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, 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), WDFW 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.”²⁹ Further, Ecology acknowledges that the Project is located within the Pacific Flyway, one of the primary north-south migratory routes of various bird species.³⁰ AR remains concerned about the Project’s potential to attract these terrestrial species and potentially cause direct adverse impacts. Rye proposes several measures including covering the reservoirs with shade balls and installing fencing to deter birds and other wildlife but proposes no specific deterrent measures for bats. Ecology’s Final EIS should include information about the general efficacy of the proposed deterrent measures and any additional recommendations for protecting bat species.

In addition to the reservoirs’ inclination to attract wildlife, construction of the Project and noise caused by ongoing operations has the potential to impact breeding and pre-fledged birds including the federally protected golden eagle.³¹ “There is a potential for significant indirect adverse impacts on talus and cliff habitat if they can no longer support breeding raptors because of the proximity of human development and reduced prey availability. Such impacts could result in ongoing or repeated disturbance of habitat that is critical to species viability.”³² AR maintains that the potential of Project development to magnify impacts to terrestrial wildlife, even with Rye’s proposed mitigation, is grounds for the exploration of geographic alternatives.

AR also requests clarification regarding an Eagle Incidental Take Permit mentioned in the Draft EIS: “An Eagle Incidental Take Permit may be required if disturbance to golden eagles cannot be avoided and if impacts are determined to constitute “take” under the Bald and Golden Eagle Act.”³³ We ask that Ecology, in its Final EIS, explain when the need for this permit would be reviewed and by whom.

²⁸ Ecology (June 6, 2022), Draft EIS. p. 115

²⁹ 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

³⁰ Ecology (June 6, 2022), Draft EIS. p. 117

³¹ Ecology (June 6, 2022), Draft EIS. p. 130

³² Ecology (June 6, 2022), Draft EIS. p. 133

³³ Ecology (June 6, 2022), Draft EIS. p. 135

V. Impacts to energy resources and Project viability

AR still holds serious concerns about the financial viability of the project and how the proposed hydropower project fits into the West Coast wholesale energy markets. According to the FLA, “the proposed project’s pumped-water energy storage system is estimated to have between 70% to 85% net efficiency.”³⁴ This efficiency is influenced by “weather and seasonal climate variability, and hour-by-hour regional electricity demand and dispatch from other energy generating sources.”³⁵

With data in the Project’s Preapplication Document (PAD) and Draft License Application (DLA) mostly provided by Rye as sourced from various agencies and utilities, AR felt it necessary to have a third-party evaluate whether or not a project of this scope is economically viable and worth the various inherent impacts. Due to a combination of rising construction costs, decreasing open-market energy prices, and as a way to ground-truth the forecast of Project generation value, we believe that this independent report provides the necessary outside analysis of whether or not the Project can provide renewable energy integration and replacement capacity to support regional decarbonization goals affordably and reliably.

Anthony Jones of Rocky Mountain Econometrics (RME) developed a model of the market forces and financial viability of the Project based on the data provided in the Project’s PAD and DLA. The final critique is attached as Appendix A and contains the following findings that remain a concern today:

1. While Rye’s description of Project operations are preliminary in nature and not overly detailed in the PAD, the parameters of pumped storage project operations are well understood, the Project’s construction costs are sufficiently well defined, and the wholesale energy environment in which it will operate are clear. As a result, RME concluded that the Project is very unlikely to operate profitably given the state of current and future West Coast and Northwest energy pricing.
2. While the Project may be technically able to serve in the stated capacity for a portion of each day, it will not be able to serve in that capacity for a large portion of each day when its upper reservoir has been partially or wholly used for power production and needs to be refilled.
3. Traditionally, pumped storage facilities are built in conjunction with other specific energy generation projects to extend the generating plant’s efficiency range. The Project would be a free-standing, independent operation buying and selling power on the Western transmission grid, from and to the West Coast wholesale energy markets. Based on the overall costs and power generating capabilities, the project would be a price taker (having no control over the prices of energy sold) in most cases rather than a price setter (having the ability to influence energy market prices).

A robust cost benefit analysis, including an analysis of daily fluctuations in Mid-Columbia (Mid-C) energy rates, should be included in Ecology’s Final 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. This Project will

³⁴ Ecology (June 6, 2022), Draft EIS. p. 93

³⁵ Ecology (June 6, 2022), Draft EIS. p. 94

27 cont. | be precedent setting in the region, and the feasibility and long-term viability of the Project must be well understood before it has the opportunity to adversely impact numerous natural and cultural resources.

28 | Additionally, the energy generating capacity of the Project remains unclear. According to information in 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 its anticipated installed capacity (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. With the given timeframe and with Rye’s apparent impression of consistent Mid-C power prices, it is unclear how the Project would feasibly generate 1,200MW in a 12-hour period. In April 2021, FERC asked Rye to clarify this issue through supplemental information. Rye responded: “HDR estimates that the Project will be capable of delivering 14,745 MWh in a typical 24-hour generation-pumping operating cycle with 12 hours of generation and then 12 hours of pumping to be ready for the next cycle of operation.”³⁶ This is contradictory to Exhibit B of the FLA which, again, indicates that the water will be pumped from the lower to upper reservoirs over a period of 15 hours. This contradictory information leaves room for concern that Project operations and energy generation are not fully understood by the applicant and could potentially be unviable. A comprehensive understanding of the operations and economic feasibility of the Project is imperative. We request this information be investigated and analyzed as part of the Final EIS.

Conclusion

29 | Given the question of Project viability, in addition to the serious concerns related to impacts to natural and cultural resources, AR maintains that additional alternatives which meet the stated goal of the Project should be evaluated in Ecology’s Final EIS. At present, the Draft EIS does not provide an adequate range of alternatives. Ecology provides the following rationale for dismissing the evaluation of other decarbonized energy storage technologies: “Other renewable/decarbonized energy storage technologies were suggested in scoping comments, such as the following: stacked blocks, liquid air, underground compressed air, flow battery storage, and solar and lithium-ion battery storage. None of these alternative energies meet the criteria to attain the proposal’s objectives.”³⁷ AR disagrees with this rationale, and requests that Ecology analyze decarbonized energy storage technologies as many do meet the Projects’ objectives of producing and storing energy, as well as Ecology’s criteria of reusing an existing industrial site, using an existing water right and water intake, and is in proximity to complementary energy projects and infrastructure.

Project alternatives should, at minimum, include analysis of industrial-scale battery installation(s) to meet the needs for grid regulation and to meet peak load in the area that would be served by the proposed project. Technologies such as industrial-scale batteries and stacked blocks could reasonably store energy produced by complementary facilities (hydropower from the adjacent John Day Dam, solar and wind energy from adjacent wind and solar farms, etc.) and utilize both the

28 cont. | ³⁶ FERC (July 1, 2021), Response to the Commission’s Request for Additional Information. P. 2. In FERC Docket No. 14861

29 cont. | ³⁷ Ecology (June 6, 2022), Draft EIS. p. 18

29 cont. existing CGA smelter site and KPUD's water right for operational purposes. These technologies would not require the construction of underground conveyance tunnels or reservoirs, therefore drastically decreasing the cost to natural and cultural resources. Such alternatives may also prove more efficient or cost effective than the proposed Project while achieving the Project purpose. In summary, if the Project is intended to serve as a "battery" as the developer touts, then analyses of additional industrial-scale storage technologies (including actual batteries) are undoubtedly warranted.

30 American Rivers still has considerable concerns about the proposed Goldendale Pumped Storage Project, and our opposition to the Project based on its impacts to tribal cultural resources has been affirmed by this Draft EIS. Washington state's unparalleled Tribal, cultural, and natural resources are essential to this landscape and its communities. Given the severity of the unavoidable adverse effects of Project construction and operation on irreplaceable Tribal cultural resources and archeological sites; its infringement upon Tribal peoples' access to food and medicine in the area; potential adverse impacts to water quality, water supply, and wildlife; and its questionable viability, AR remains gravely concerned about this Project. AR requests that Ecology consult with affected Tribal Nations, other state agencies, and the applicant to gather all necessary and outstanding data, which has been mentioned throughout our comments, for inclusion in the Final EIS.

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

Respectfully submitted,



Bridget Moran
Associate Director, Northwest Region
American Rivers
360-268-8974

Appendix A

CRITIQUE OF THE
Goldendale Energy Storage
Hydroelectric Project
(FERC No. 14861)
NOTIFICATION OF INTENT

The top of the page features a dark blue banner with a scenic background of snow-capped mountains and a lake. The company name 'Rocky Mountain Econometrics' is written in a white, serif font. Below the name, contact information is provided in three columns: phone numbers, a physical address, and an email address with a website URL.

Rocky Mountain Econometrics

208-344-0809
208-631-4334 Cell

P.O. Box 1914
Boise, ID. 83701

tjones@design4000.net
www.rmecon.com

Anthony Jones - Principal

CRITIQUE OF THE Goldendale Energy Storage Hydroelectric Project (FERC No. 14861) NOTIFICATION OF INTENT

Prepared for

American Rivers

December 3, 2019

Anthony Jones
ROCKY MOUNTAIN ECONOMETRICS
www.rmecon.com

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I. EXECUTIVE SUMMARY

- On January of this year, 2019, FFP Project 101, LLC, notified FERC of its intent to file an application for an original license for the Goldendale Energy Storage Project No. 14861 (Goldendale), a closed-loop pump storage project, in Washington State close to the Columbia River near to the John Day Dam.¹
- In the Notice of Intent (NOI) Goldendale’s stated purpose for the project is that:
 - “Within the region, renewable energy development is growing, primarily through wind power generation. The Project would provide necessary ancillary services and energy storage to the Northwest region, and allow for more reliable management and integration of disparate renewable energy sources into the grid. The Project would provide additional ramping capacity (both up and down) as well as firming for wind energy regulation, coordination, and scheduling services, automatic generation control, and support of system integrity and security (reactive power, spinning, and operating reserves).”²
 -
- Rocky Mountain Econometrics (RME) finds that while the project may be technically able to serve in the stated capacity for a portion of each day, it will not be able to serve in that capacity for a large portion of each day when its upper reservoir has been partially or wholly used for power production and needs to be refilled. It is also extremely unlikely that Goldendale will be financially viable.
- While Goldendale’s description of project operations are preliminary in nature and not overly detailed, the parameters of pump storage project operations are well understood, Goldendale’s construction costs are sufficiently well defined, and the wholesale energy environment in which it will operate are clear. As a result RME is able to conclude that the Goldendale project is very unlikely to operate profitably given the state of current and future west coast and northwest energy pricing.
- As briefly as possible, Goldendale’s challenge is that to service its debt and cover the cost of M&O, as well as the cost of filling its supply reservoir as a prerequisite to generate power, Goldendale will have to charge almost double the going rate of peak hour open market (NP15) energy. Worse, since pump storage project sales hours are necessarily restricted to the portion of the day when the upper reservoir is not being filled, the opportunity to absorb overhead by operating more than about eight hours per day is precluded. Finally, while Goldendale’s costs of operation will likely increase with inflation over time, NW energy prices for the past two decades have been flat or declining as the market transforms to accommodate proportionally larger and larger amounts of solar power, a trend that is destined to continue.

¹ Goldendale Energy Storage Hydroelectric Project, (FERC No. 14861), Klickitat County, Washington, NOTIFICATION OF INTENT, Prepared for FFP Project 101, LLC.

² Ibid., pp. 2.

II. PROJECT DESCRIPTION

From Goldendale's NOI: Goldendale Energy Storage Project FFP Project 101, LLC, FERC Project No. 14861 Page 4 January 2019

The Project area has the suitable geography for a closed-loop pumped storage facility and is strategically located at the northern terminus of the Pacific AC and DC Interties operated by BPA, Los Angeles Department of Water & Power, and the California Independent System Operator (CA-ISO).

The interties allow for the bulk seasonal exchanges of power between British Columbia, Canada, the Northwest, and California and provide benefits of coordinated markets to the regions.

The Project is also located in close proximity to substantial existing, abundant, high quality, and untapped wind power generation that can be developed with relatively low environmental conflict and cost. The Project's location can also support the daily inter-regional exchanges of California massive mid-day solar oversupply and the significant power generation ramping needed by CA-ISO.³

The proposed Project is a closed-loop pumped storage hydropower facility located off-stream of the Columbia River at John Day Dam, located on the Washington (north) side of the Columbia River at River Mile 215.6. The Project will be located approximately 8 miles southeast of the City of Goldendale in Klickitat County, Washington.

The proposed Project will involve no river or stream impoundments, allowing for minimal potential environmental impact. Initial fill water and periodic make-up water will be purchased from Public Utility District No. 1 of Klickitat County, Washington (KPUD) using a KPUD-owned conveyance system and municipal water right.

The Project facilities include:

- An upper reservoir consisting of a rockfill embankment dam approximately 170 feet high, 8,000 feet long, a surface area of about 59 acres, storage of 7,100 acre-feet (AF), at an elevation of 2,940 feet above mean sea level (AMSL);
- A lower reservoir consisting of an embankment approximately 170 feet high, 7,400 feet long, a surface area of about 62 acres, storage of 7,100 AF, and an elevation of 580 feet AMSL.
- An underground water conveyance tunnel and underground powerhouse; and
- 230-kilovolt (kV) transmission line(s).

The rated (average) gross head of the Project is 2,400 feet, and the rated total installed capacity is 1,200 megawatts (MW).

³ Ibid., pp. 4.

Project Characteristics

Approximate Installed Capacity	1,200 MW
Assumed Number of Units (Variable Speed)	3
Assumed Average Static Head	2,360 feet
Assumed Usable Storage Volume	7,100 AF
Approximate Energy Storage	14,745 MWh
Approximate Hours of Storage @ 1,200 MW	12 hours

Underground Powerhouse

Rated Head (Gross)	Approximately 2400 feet
Max Flow Generating Mode	8,280 cfs
Max Flow Pumping Mode	6,700 cfs
Generating Capacity	Up to 1,200 MW
Number of Units	3 x 400 MW units

III. MARKET PRICES

Understanding Goldendale requires understanding the west coast wholesale energy market with which it will interface.

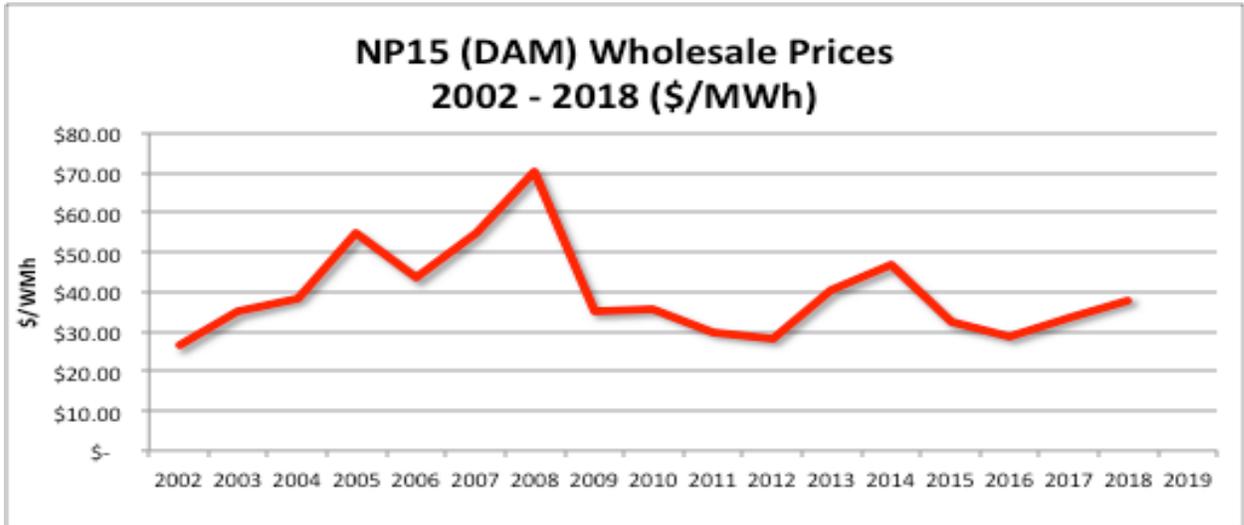
Unlike many, perhaps most, pump storage projects that are built in conjunction with a relatively fixed output, often thermal, generating station, Goldendale will be a free standing, independent operation buying and selling power on the western transmission grid, from and to the west coast wholesale energy markets.

The NOI talks broadly about supporting other regional power producers but makes no mention of contracting with any of them. For the purposes of this analysis RME assumes Goldendale will be a freelance operation, attempting to buy low and sell high on the wholesale market, to the extent of their ability, at their discretion. In the absence of contractual requirements for energy used to fill their upper reservoir or sell their production, it is to market prices that we must look to understand the forces that will shape Goldendale's potential for success or failure.

Pre 2009, Prelude to a Crash

In the years leading up to 2009, west coast and northwest wholesale energy prices were escalating rapidly. From 2002 through 2008, NP15 prices climbed from about \$25/MWh to over \$70/MWh, a 180 percent increase in a scant six years. In 2008, FERC, BPA, and most NW utilities were predicting energy prices to continue escalating, at a somewhat slower rate, on upward toward \$80, \$90, and \$100/MWh within 10 years.

Chart 1



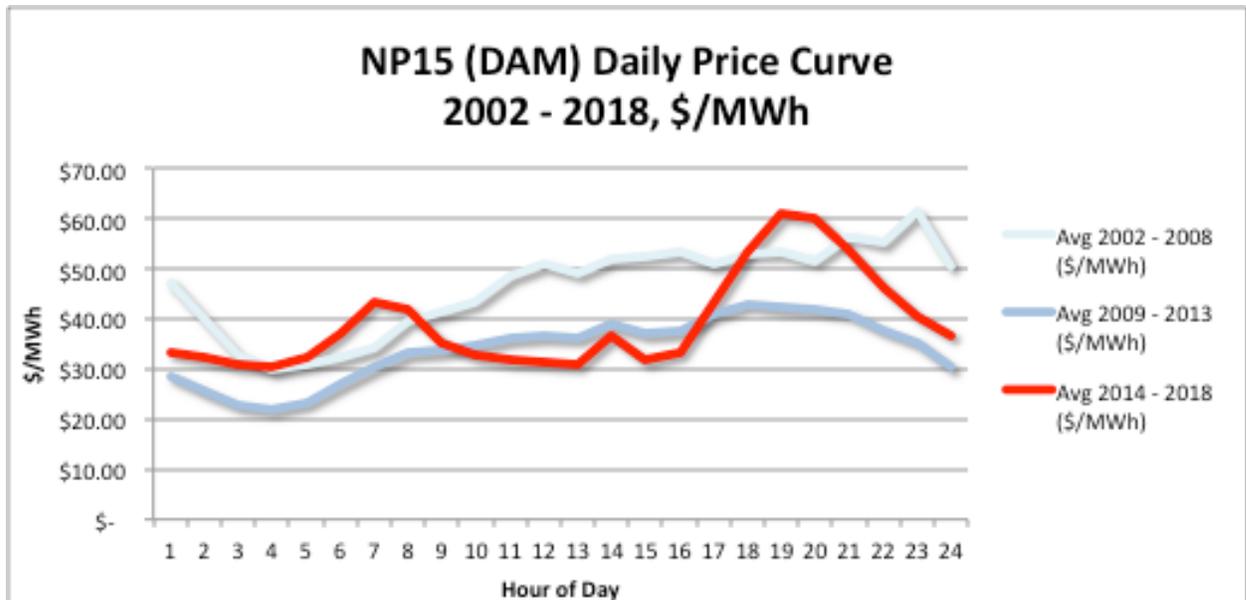
Source: CAISO⁴

⁴ <http://oasis.caiso.com/mrioasis/logon.do>

That line of thinking collapsed in 2009, the first year of the Great Recession. That year saw the collapse of gas prices (a major factor in the price of power produced by gas generating plants) and the point where solar capacity in California started gaining traction. In one year, from 2008 to 2009, NP15 prices dropped by 50 percent and have never recovered to any substantive degree for more than a year or two. Nine years after the 2009 price collapse 2018 prices averaged about \$38/MWh, roughly half of price levels ten years previous. And, the 2018 number would likely have been lower still if not for the effect of the Camp Fire in California that took several major PG&E generating plants offline for several months of the year, thus reducing supply and driving prices higher. Please refer to Chart 1, above.

Prices from 2009 to 2013 followed a daily price curve similar to but lower than the daily price curve prior to 2009. Daily prices continued to bottom out in the hours from midnight to about 6:00 AM and then began climbing to a peak in the late afternoon or early evening. Where pre 2009 prices bottomed out at about \$30/MWh, post 2008 prices bottomed out about \$10 lower at \$20/MWh. Where pre 2009 prices topped out as high as \$60/MWh in the late evening, post 2008 prices topped out about \$20 lower at about \$42/MWh as early as 6:00 PM.

Chart 2



Source: CAISO⁵

Prior to 2009 the range from minimum to maximum price for the day averaged a little more than \$30/MWh. From 2009 - 2014 the daily average price range from minimum to maximum was about \$8 less, at roughly \$22/MWh. Please see Chart 2, above.

⁵ <http://oasis.caiso.com/mrioasis/logon.do>

The lower overall prices and the narrowing of total price range after 2008 was probably due to a combination of factors including reduced demand due to the recession, lower gas prices used by thermal generating plants, and the beginnings of the solar power revolution associated with California investing in renewable energy.

High Spot Market Prices May Not Be Enough

If Goldendale would have made this proposal back in 2008, the year before market prices collapsed from the \$70/MWh range or higher, it would be more difficult to find fault with the proposal. Even the most respected forecaster has difficulty selling an audience on the likelihood of \$30 market prices when they looking at prices averaging as much as \$80/MWh for months at a time.

But this is not 2008 and prices have not averaged greater than \$50/MWh on an annual basis in ten years. In fact, the price collapse was fully expected. The precipitousness of the decline might seem a little severe but the price correction was completely normal. High prices, while inconvenient, are the mechanism that triggers innovation and investment in the market. They lead to new construction that results in more capacity, greater supply, and ultimately lower prices.

The run-up to 2008 was not the first of its kind and is unlikely to be the last. Similarly, price corrections such as the one in 2009 are equally as normal as the preceding price spike. It is for that reason that RME cautions against any prophesy that market prices will return to pre 2009 levels for anything more than brief periods. As Chart 1 demonstrates, 2013-2014 looked like prices were once again heading towards pre 2009 \$60 and \$70 levels. But, again, price changes of that nature are the events that trigger new investment, more construction, and more supply that drives prices back down to \$30/MWh and lower.

One final point before leaving the subject of pre-2009 high market prices. As we will see, high prices are a necessary condition for Goldendale to cover their costs construction costs, but not a sufficient condition for to cover their operating costs.

High peak hour prices are little benefit to pump storage projects if it means similarly high off-peak hour prices. Projects of this nature also need situations that increase the spread between high and low daily prices. Years like 2008 when average prices were much higher than after 2009 present a situation in which the daily price spread is potentially higher, but not necessarily as high as needed.

Emergence Of The Duck Curve

Even more significant for this discussion is the transformation of the western energy market that started in about 2014. That year marked the emergence of the “Duck Curve”. The Duck Curve, named for the curve’s late in the day resemblance to the profile of a duck’s head, is the result of solar power becoming a major force in the California energy market.

Starting in 2014 prices from about 3:00 AM to about 8:00 AM returned to or even exceeded pre 2008 price levels, the difference being that by about 9:00 solar energy sources started producing in sufficient volume that prices, instead of continuing to increase, dropped back to pre-dawn levels of about \$30/MWh where they remained until about 5:00 PM when the late in the day peak begins. As with the morning peak, the late day peak is as high or higher than the pre 2009 peak but it is much shorter in duration. Again, please refer to Chart 2, above.

Dual Daily Supply Curves

Classical economic theory holds that as demand increases, it shifts the demand curve to the right and the equilibrium price increases. At first glance that result would seem to be violated in the western wholesale energy markets where midday prices are now typically lower than earlier in the day even though the amount of energy demanded is substantially higher. However, the west coast currently operates with, effectively, two supply curves, a nighttime curve and a daytime curve.

Early in the day, in the first few hours of peak demand before sun-up, energy load begins to ramp up and, with the nighttime supply curve in play, prices begin to rise in response. Later in the morning, with load ramping up even further, the supply curve begins to shift to the right as solar generation comes online. This process not only counters the earlier increase in prices but also typically over-compensates and drives prices lower than they were before the sun rises.

It is this price environment in which Goldendale proposes to operate. In an effort to recharge the upper reservoir during the 10 lowest cost hours of the day, Goldendale will have to pump for five hours from about midnight to 5:00 AM, for another four hours from about 10:00 AM to about 1:00 PM, and finally for one hour at 3:00 PM.

About half of Goldendale’s pumping will occur during the relatively low priced but high load middle of the day.

In an effort to sell power during the 8 highest hourly prices of the daily load and price cycle, Goldendale will need to run its generators for an hour during the morning price peak at about 7:00 AM, and for 7 hours from about 5:00 PM through 11:00 PM. Please see Chart 3 below.

One final takeaway for the post 2008 open market price history is that inflation has been outpacing NP15 prices and that the difference between peak prices and off peak prices, as

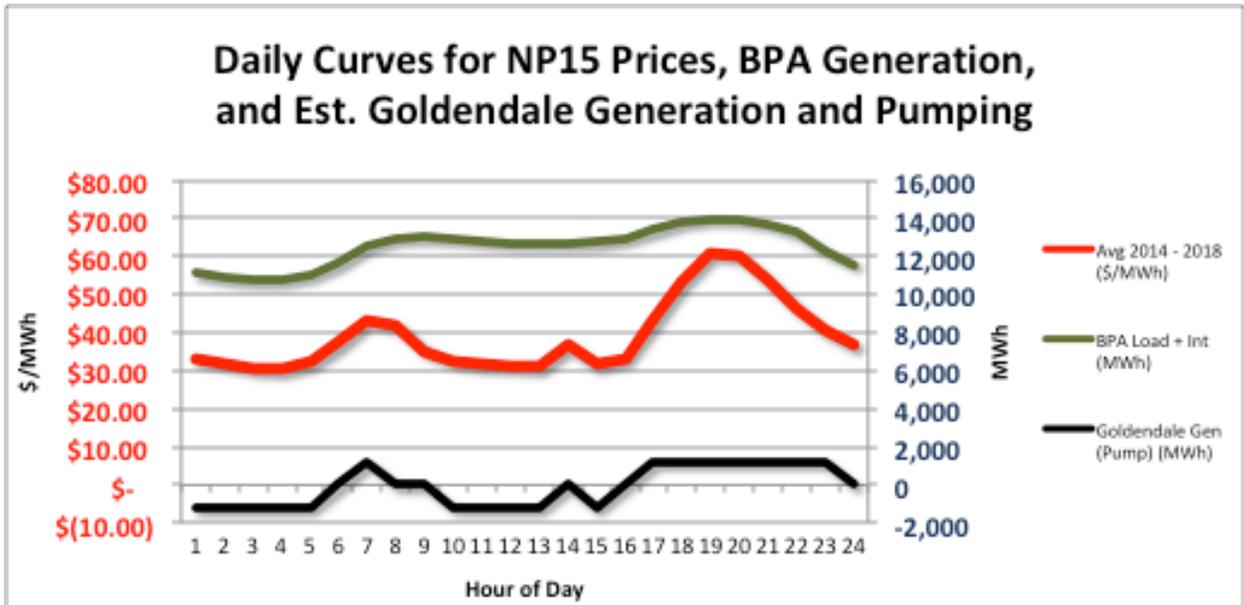
constrained by Goldendale’s profit maximizing operation curve, is a relatively stable \$16 - \$18/MWh.

For the purpose of this analysis of Goldendale’s finances, RME will use the 2014 – 2018 minimum and maximum prices of \$32.0475 and \$50.2530 respectively. The reason for using these two numbers is that it provides a slightly greater range in prices than the full 2009 – 2018 record provides, a factor that gives the benefit of doubt to Goldendale in recognition that they may bring more sophisticated modeling to the operation than RME has at its disposal.

NP15 Prices

	Avg. Minimum Prices	Avg. Minimum Prices	Avg. Price Spread
2014 - 2018	\$32.0475	\$50.2530	\$18.2055
2009 - 2018	\$29.5999	\$45.9677	\$16.3679

Chart 3



IV. GOLDENDALE FINANCIALS

The Goldendale NOI estimates that the project will cost \$2.2 billion. The inclusion of Washington State sales tax and capitalized pre-completion interest will bring the startup cost of the project to about \$2.6 billion. Servicing the interest on \$2.6 billion will cost Goldendale about \$208 million per year.

The NOI indicates that M&O costs will come to about 8.5 million per year, bringing the total for debt service and M&O to about \$216 million per year, roughly \$62/MWh without accounting for pumping costs.

Goldendale - With Amortization

Capital Cost

PAD Cost Estimate	\$2,200,000,000	1
WSST @ 6.5%	\$143,000,000	2
Total Estimated Direct Cost	\$2,343,000,000	
Pre Cost Interest (60 Months)	\$246,310,804	3
Installed Cost	\$2,589,310,804	

Maintenance and Plant Cost

Cost	\$2,589,310,804	
Interest Rate	5.0%	5
Term (Yrs.)	20	6
Annual Interest Pmt.	\$207,772,998	

Wages	\$3,860,000	1
Other	\$4,620,000	
M&O	\$8,480,000	1
Total	\$216,252,998	

Based on Goldendale’s estimates in the NOI, the project will produce about 3.5 million MWh of energy. At an estimated peak-hours average price of \$50/MWh for the 8 highest NP15 daily prices, Goldendale will see revenues of about \$175 million per year.

Also from the NOI, Goldendale will use about 4.4 million MWh each year to power its pumps to fill the upper reservoir. At average market prices for the 10 lowest priced NP15 daily hours Goldendale will have to pay an average of about \$32/MWh and will spend about \$140 million in pumping costs each year.

The relatively narrow differential between peak and off peak market prices, combined with the 20 percent efficiency penalty associated with pumping, Goldendale will net about \$35 million per year at the cash flow level. However, M&O costs and debt service will lead to Goldendale losing about \$181 million per year, a loss of \$52/MWh of production.

Cash Flow From Operations⁶

Generation

Capacity	1,200	4
Hrs / Day	8	4
Days /Yr.	365	4
Annual Prod (MWh)	3,504,000	4

Generation \$/MWh	\$50	3
Revenue from Generation	175,200,000	

Pumping

Pumping Rate	1,200	4
Hrs / Day	10	4
Days /Yr.	365	4
Annual Pumping (MWh)	4,380,000	4

Pumping \$/MWh	\$32	3
Annual Pumping Cost	140,160,000	

Net Cash Flow from Operation \$35,040,000

Profit (Loss) **(\$181,212,998)**

Cost of Production (\$/MWh)	\$101.72
Profit (Loss) \$/MWh	(\$51.72)

⁶ Goldendale, PAD, pp 182; <http://www.salestaxstates.com/sales-tax-calculator-washington/>; RME; and Goldendale, PAD, pp 18.

To summarize, the minimum cost to cover debt service and O&M is about \$61/MWh. The minimum market price spread for Goldendale to cover its pumping costs is 20 percent above the price Goldendale pays to fill the upper reservoir. Combined, for Goldendale to operate profitably it needs to see market prices of \$61/MWh plus a price spread of about \$8/MWh on top of the \$32/MWh⁷ estimate for the lowest cost 10 hours of pumping. Thus, with the lowest 10 hours of a typical day averaging about \$32/MWh, efficiency losses will increase the value of water in the upper reservoir to about \$40/MWh. Adding the \$61.72/MWh necessary to cover debt service and O&M means Goldendale will need to see average prices for the 8 highest priced hours of the day of \$102/MWh or higher.

⁷ With efficiency losses of 20% \$32/MWh pumping costs equate to \$40/MWh at the generating level.

V. GENERAL DISCUSSION

Large Producer

Unlike many hydro type power producers that typically only run at full capacity during spring runoff or brief moments to match peaking demand, Goldendale can be expected to run at or near full capacity for most of its daily 8-hour operation as it attempts to maximize revenue.

When generating, Goldendale output will be one of the larger single-plant power sources in the northwest. It will be capable of out producing Bonneville Dam for the eight hours per day it generates. In terms of nameplate capacity it will be larger than McNary Dam. In terms of average production, when running, it will be on par with Chief Joseph dam and second only to Grand Coulee in the NW.

Larger Consumer

During the 10 hours per day that Goldendale will be pumping, it will be a major load center. When pumping, Goldendale will have the load equivalent of about 720,000 households, about the same as the all the residential households in Idaho!⁸

Net Consumer of Electricity

Goldendale estimates that the project is 20 percent less efficient in pumping mode than it is in generating mode. The result is that to produce 3.5 million MWh of electricity Goldendale will consume about 4.4 million MWh, an annual loss to the system of about 877,000 MWh.

General Operating Characteristics

Goldendale combines some of the features of a hydro project and some of the features of a thermal project and some features unique to pump storage projects.

Like any substantial hydroelectric generating plant, Goldendale's will be a major capital investment. Servicing the interest payment on its debt will be a major challenge. In the absence of high prices in the wholesale energy market, the alternative method for absorbing overhead is

⁸ Goldendale will consume 1,200 aMW in pumping mode. Idaho has about 720,000 residential electrical customers who consume an average of about 1,200 KWh per month. (720,000 Residents X 1.2 MWh/month = 864,000 MWh. 864,000 MWh / 30 Days / 24 Hours = 1,200 MWh)

to operate as many hours per year as possible. That, combined with minimal marginal operating costs, is the reason most hydro facilities operate as close to 24/7 as possible.

However, a 24/7 generating schedule will not be possible in Goldendale's case.

The requirement to spend more time filling the upper reservoir than time generating energy, plus potentially waiting out shoulder hours when the price differential is insufficient to cover pumping losses, tends to limit Goldendale's capacity utilization rate to about 33 percent. If Goldendale could generate power 16 hours per day it could double its overhead absorption and cut its pre-pumping cost of production by half. However, again, that will not be possible.

Like a thermal project, the water in the upper reservoir has value in that it costs money to pump the water the 2360 vertical feet up from lower reservoir. Like a thermal project, Goldendale cannot generate electricity profitably unless it receives at least as much per MWh as the water in the upper reservoir cost to pump it up there, plus the 20 percent efficiency penalty.

If it cost \$40/MWh to fill the reservoir (\$32/MWh plus a 20 percent efficiency penalty for a total of about \$40 /MWh generating equivalent.), that tends to suggest that the cost minimizing operation level is when sales prices are \$40/MWh or higher. That logic works well enough until about 5:00 in the afternoon when the need to absorb overhead starts to conflict with the need to cover pumping costs. In other words, just because it cost \$40/MWh to fill the reservoir on one day does not mean the same water will be worth the same amount the next day. If, having paid \$40/MWh to fill the reservoir there is no guarantee peak prices the next day (or the day after that, ad infinitum) will not be even lower. In that event Goldendale would be smarter, toward the end of the day, to treat the pumping costs as sunk costs and produce as much power as possible during the late afternoon / evening peak price period in an effort to absorb overhead cost, to the extent possible.

In that manner, Goldendale would cover some of its overhead and recoup at least a portion of the day's pumping cost prior to beginning the next day of operation.

Clearly, no project of this type can profitably operate in that manner on a continuing basis, but it serves to illustrate the complex nature of Goldendale's business model as it attempts to minimize losses and maximize profits.

Finally, unlike the vast majority of both thermal and hydro projects, Goldendale will never be more than about 12 hours from running out of "fuel", exhausting the water in the upper reservoir, and having to stop generating electricity.

Emergency Generating Capability

Goldendale's data table claims that the plant's approximate hours of storage @ 1,200 MW is 12 hours. The implication seems to be that Goldendale will provide 12 hours of backup for a variety of ancillary services including emergency generation in the event some other project fails.

This claim fails for a variety of reasons. First, if 1,200 MW generation requires 8,280 cfs of water flow, the 7,100 acre foot reservoir will be exhausted in a little over 10 and hours, not 12. But that misses the second and broader point, the assumption that any event triggering the need for 12 hours, or 10.5 hours, of Goldendale production will occur when the upper reservoir is at full capacity.

Barring the unlikely event that Goldendale is paid to sit patiently, 24/7, with a full upper reservoir laying in wait for a moment when its services are needed, it seems far more likely that any emergency calling for Goldendale's services will happen when the project has already been generating for some period of time. Clearly, the length of time that Goldendale can provide backup is directly proportional to the amount of water remaining in the upper reservoir.

Assuming Goldendale operates a daily pumping and generating schedule consistent with maximizing revenue from the daily price swings, any emergency calling for Goldendale's production is most likely to occur when the upper reservoir is substantially depleted. If any emergency happens after Goldendale is more than 4 hours into its daily generating cycle, or fewer than 5 hours into its daily pumping cycle, the upper reservoir will be half empty. In that manner, if emergencies happen at random times of day, the expectation is that Goldendale's ability to respond to emergencies is only about 6 hours, not 12.

Finally, if some other power plant were to go offline and need backup while Goldendale is already in generating mode as part of its daily production schedule, it is not clear that there will be a benefit to the system if Goldendale ceases putting power onto the grid under its own name to begin putting power onto the grid in the name of some other power producer. This scenario results in a zero net increase in production.

Market Price Impacts

Classical economics suggests that, at the margin, Goldendale will drive off-peak prices up and peak prices down.

Traditionally, pump-storage projects have been built in conjunction with other specific generation projects in an attempt to extend the efficiency range of the main generating plant into other parts of the day, week, month, or year.

That description does not apply to Goldendale as presented in the NOI.

Goldendale, as currently proposed, is not linked to any individual power producer, or group of power producers. It will be a parasitic operation in that it will attempt to purchase power from other existing regional suppliers during the lower cost portions of the daily price curve in an effort to resell the energy later in the day when prices are relatively higher.

Regional power producers will hope the potential for higher off-peak prices they receive when Goldendale operates its pumps will be enough to offset the potentially lower peak prices they will see later in the day when Goldendale is producing power.

On the other side of the equation, Goldendale will hope its potential to drive up off-peak prices and the potential amount it will drive down peak-prices will not narrow the price spread to the point that they cannot operate profitably.

Finally, retail consumers will hope that the net reduction in supply and the resulting potential increase in energy costs will not adversely affect their retail rates.

Minimal Price Impact

Goldendale will be one of the regions larger power producers when generating and one of the regions larger load center when pumping. As mentioned in previous sections, that tends to suggest that Goldendale will depress market prices when generating and increase wholesale prices when pumping, at least at the margin. The amount of these effects is hard to predict but will probably be fairly small.

The reason the effect will likely be small is that, while Goldendale will be a major northwest load center when pumping and a large northwest power producer when generating it will not be a large producer or load center by California standards, and it is the California wholesale markets that are the price setters.

People in the northwest tend to forget that California utilities are sized to supply the peak needs of about 40 million people while northwest utilities are sized to serve the peak needs of about 13 million people.

Goldendale may be as much as five percent of northwest capacity when generating but it will be only about one percent of California capacity. Since Goldendale will be directly connected to the west coast wholesale markets by way of the west coast power grid Goldendale will be a price taker in most cases rather than a price setter.

Self-Defeating Market Price Impact

While any market price impact resulting from Goldendale's operation will likely be small, any effect will be self-defeating for Goldendale's needs.

For example, in its analysis of Goldendale's potential profitability RME estimated peak hour and off-peak hour prices would average \$50/ MWh and \$32/MWh respectively. If Goldendale's operation reduces peak hour prices by \$1 and raises off-peak hour prices by \$1, to \$49 and \$33/MWh respectively, the resulting \$2/MWh narrowing of the daily price spread will reduce Goldendale's annual net revenue by nearly \$8 million and increase its per MWh loss by over \$2/MWh to \$53.97/MWh.⁹

“Quick Response” May Not Mean Lower Rates.

Goldendale lists “quick response time” as one of the project's assets. It is not clear to RME that this is a net benefit to the region.

From Goldendale's perspective, its proposed ability to supply power in response to “emergency” changes in load and or reduce the supply of power as necessary to help balance system load, is a benefit to the system.

However, quick response time can just as easily be used to respond, pumping or generating, in efforts to grasp low cost pumping opportunities or switch to generating mode to take advantage of fleeting moments of high wholesale prices. Responding to emergencies may be a benefit to the system but chasing momentary price changes can increase chaos, uncertain, and risk, and be detrimental to the system.

For instance, Goldendale has the potential to switch from consuming 1,200 MW per hour in pumping mode to producing 1,200 MW per hour in generating mode, and vice versa, in an unspecified but presumably brief period of time, perhaps as quickly as a few minutes or even quicker. To other entities on the grid, power producers, energy aggregators, and consumers, this would be seen as a 2,400 MW swing in load volume, the equivalent of a substantial western city suddenly going off line, or Grand Coulee switching arbitrarily off and on, with little or no warning!

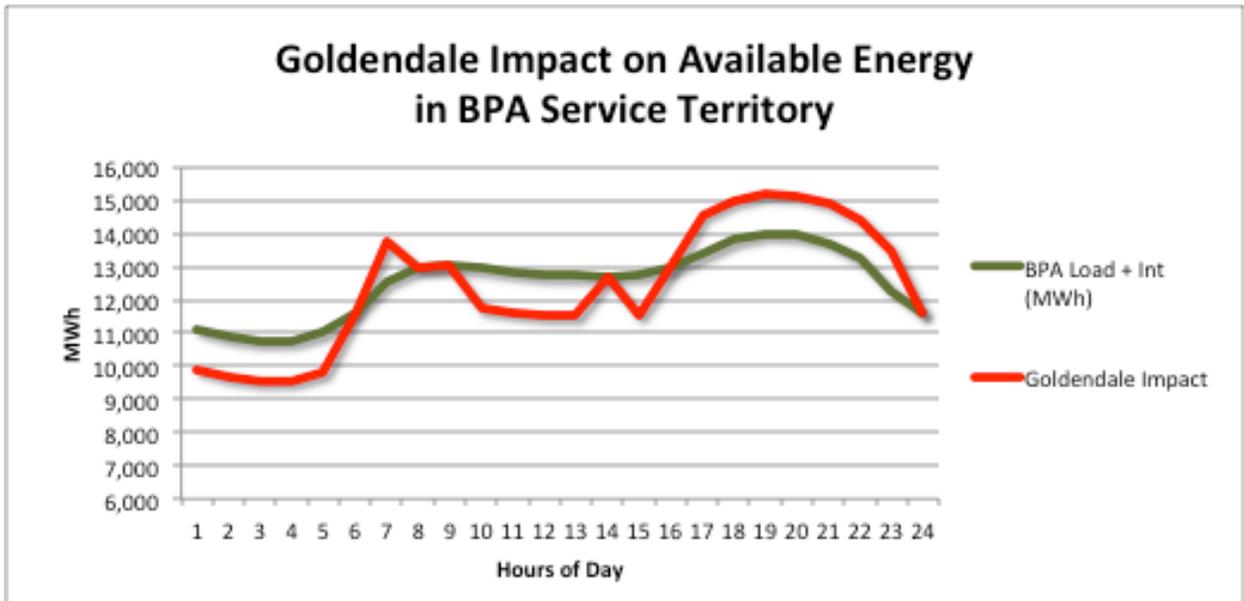
Given Goldendale's precarious financial situation, and in the absence of regulatory or contractual operational constraints, increased wholesale market chaos appears to be the most likely result of Goldendale's operation.

⁹ RME is highly skeptical of Goldendale's potential to operate profitably. However, by choosing options and assumptions that tilt the scale in Goldendale's direction, and not including price impacts such as this, RME generally gives the benefit of the doubt to Goldendale.

Chart 4 below provides a graphical example of this discussion. If Goldendale’s operation were grafted onto BPA’s load curve¹⁰ it would make BPA’s available power curve substantially less “smooth” and it would make the spread, the range of power, from low point to high point, available to consumers broader by about 2,400 aMW. The power currently available to contract customers exemplified by the green line, would instead follow the red line.

Would NW producers modify their production in recognition that Goldendale is operating in that fashion? The answer is undoubtedly yes, to at least some degree. However, it is important to remember that the curve shown by the green line is the result of BPA servicing load as well as chasing the same daily price curves in search of higher revenues as Goldendale will be chasing. In other words, yes, Goldendale’s operation will cause changes in the operations of other NW utilities, but it is not clear that the result will smoother or less chaotic. Absent any regulatory or contractual mandate, the opposite seems most likely.

Chart 4



As hinted at in the preceding paragraph, regulating the manner and the degree, the when and the how much if you will, to which Goldendale can enter the market could conceivably alleviate the potential for Goldendale to increase market uncertainty. That, of course, would reduce Goldendale’s ability to profit from swings in market demand and prices, and make their already precarious financial picture look even worse.

¹⁰ BPA is used here because their production numbers are roughly half of the NW, they are readily available and transparent. The inclusion of the remaining NW producers would tend to minimize this impact to some degree, but not eliminate it.

Contracting

As mentioned above, Goldendale is not directly linked to any one, or any group, of generating entities. As currently configured, it is a freelance operation.

To that end power producers in need of load shaping services may look to Goldendale for assistance. The question then becomes whether or not Goldendale can compete with other regional load shaping service providers. The evidence suggests not.

Again, Goldendale's breakeven production cost exceeds \$100/MWh.

Competing with Goldendale will be most of the other NW entities with excess capacity, particularly utilities with hydro power plants that have some potential to shift their time of day production schedules. This will include BPA that touts its load shaping ability for around \$40/MWh. Other hydro intensive utilities such as Idaho Power and Avista offer similar services for roughly similar prices.¹¹

For companies looking for load shaping services but hoping to avoid fixed contracts there is always the option of playing the same wholesale market as Goldendale. Here, the prices may be more volatile than would be seen with a fixed contract, but with average daily prices of around \$30/MWh it is hard to find justification for \$100 Goldendale power.

Finally, Goldendale will have to compete with new power producers that are increasingly entering the market with rates as low as \$20/MWh, including battery backup. This might seem especially galling to Goldendale since Goldendale will have trouble filling its upper reservoir for \$20/MWh, let alone generating power that inexpensively.

¹¹ And, those prices may be a bit high. CAISO staff concludes load shaping in California only adds about \$0.85/MWh to market prices. For this analysis that means Goldendale, with its \$100+ / MWh cost structure trying to compete with \$33/MWh market prices.

VI. APPENDIX – ALTERNATIVE DEBT STRUCTURES

Goldendale Without Amortization

In recognition that it is fairly common for utilities to not amortize debt on major projects, RME looked at the affect of Goldendale limiting its debt service to paying only the interest on the \$2.6 billion startup cost. This has the benefit of reducing the debt service charge by \$75 million from \$219 million to about \$144 million per year. Carrying the \$75 million annual cost reduction through to the bottom line reduces Goldendale's losses from \$192 million to \$117 million per year, a loss of \$33/MWh of production.

Goldendale With Bankruptcy

In the forgoing analysis RME used assumptions generally favorable to Goldendale. For example, for the market price spread, RME used the 2014 – 2018 spread of \$18/MWh. The 2009 – 2018 spread is perhaps more relevant, but with a spread of only \$16/MWh would have made the project look still worse. The same is true for interest rates. RME chose to use the lowest prime rate on record at the time of writing. Prime plus one or two is perhaps more accurate, especially given the speculative nature of this project, but that too would have made the project look even worse.¹²

Given that in this analysis RME made assumptions generally favorable to Goldendale and the financial results are still abysmal, RME is left to speculate on what it is that the project's sponsors see that RME does not.

Looking at the reports produced to date, and the resources at Goldendale's disposal, RME must assume the sponsors are intelligent, successful people. They must see all the same market forces and interest charges that RME sees. At the same time, the project as currently proposed appears from all angles to be destined to fail, in short order. RME is hesitant to make the following statement but feels it may be true and must be addressed: It is possible that the Goldendale Pump Storage Project is being proposed with full knowledge that it will fail. Further, bankruptcy may be an unstated but integral part of the Goldendale business plan as a means of shedding sufficient debt to survive in the current wholesale power market.

If we look at bankruptcy as an unstated but intended method of shedding the bulk of the construction cost, the project begins to make financial sense. If, in the course of a bankruptcy proceeding, the tunnels and reservoirs are declared sunk costs, and total debt is reduced to a hypothetical \$75 million by salvaging the turbines and generators (\$25 million apiece for three used turbines and control structures) annual debt service drops to a very reasonable \$4.9 million.

¹² At the time of this writing, November 28, 2019, the prime rate is 4.75% and RME in this analysis is using a rate of Prime plus 0.25%.

Adding M&O only brings the total up to about \$13.4 million. Using the same cash flow stream as in the previous examples, but with the restructured debt, Goldendale might see an annual profit of about \$6.18/MWh, \$21.7 million per year. Its cost of production would be about \$44/MWh, comfortably lower than the average peak wholesale prices of \$50/MWh.¹³

Goldendale - Without Amortization

Capital Cost

NOI Cost Estimate	\$2,200,000,000
WSST @ 6.5%	\$143,000,000
Total Estimated Direct Cost	\$2,343,000,000

Pre Const Interest (60 Months)	\$246,310,804
Installed Cost	\$2,589,310,804

Maintenance and Plant Cost

Cost	\$2,589,310,804
Interest Rate	5.0%
Term (Yrs.)	1000
Annual Interest Pmt.	\$129,465,540

Wages	\$3,860,000
Other	\$4,620,000
M&O	\$8,480,000
Total	\$137,945,540

Goldendale - With Bankruptcy

Capital Cost

NOI Cost Estimate	\$75,000,000
WSST @ 6.5%	\$4,875,000
Total Estimated Direct Cost	\$79,875,000

Pre Const Interest (60 Months)	\$8,396,959
Installed Cost	\$88,271,959

Maintenance and Plant Cost

Cost	\$88,271,959
Interest Rate	5.0%
Term (Yrs.)	1000
Annual Interest Pmt.	\$4,413,598

Wages	\$3,860,000
Other	\$4,620,000
M&O	\$8,480,000
Total	\$12,893,598

¹³ One simple way to eliminate the possibility of bankruptcy as an unstated but integral part of Goldendale's business plan is to include a clause in any regulatory approval of the project requiring Goldendale to set aside funding to remove the turbines and destroy the tunnel in the event the project fails.

Cash Flow From Operations**Generation**

Capacity	1,200
Hrs. / Day	8
Days /Yr.	365
Annual Prod (MWh)	3,504,000

Generation \$/MWh	\$50
Revenue from Generation	175,200,000

Pumping

Pumping Rate	1,200
Hrs. / Day	10
Days /Yr.	365
Annual Pumping (MWh)	4,380,000

Pumping \$/MWh	\$32
Annual Pumping Cost	140,160,000

Net Cash Flow from Operation \$35,040,000

Profit (Loss) **(\$102,905,540)**

Cost of Production (\$/MWh)	\$79.37
Profit (Loss) \$/MWh	(\$29.37)

Cash Flow From Operations**Generation**

Capacity	1,200
Hrs. / Day	8
Days /Yr.	365
Annual Prod (MWh)	3,504,000

Generation \$/MWh	\$50
Revenue from Generation	175,200,000

Pumping

Pumping Rate	1,200
Hrs. / Day	10
Days /Yr.	365
Annual Pumping (MWh)	4,380,000

Pumping \$/Who	\$32
Annual Pumping Cost	140,160,000

Net Cash Flow from Operation \$35,040,000

Profit (Loss) **\$22,146,402**

Cost of Production (\$/MWh)	\$43.68
Profit (Loss) \$/MWh	\$6.32

Shannon Stull

On behalf of Laborers Local 335, please find attached our local union's comments in this case.

Feel the Power

August 9, 2022

Via E-Filing

Attn: Sage Park
Regional Director, SEPA Responsible Official
Goldendale Energy DEIS
Department of Ecology
1250 W. Alder Street
Union Gap, WA 98903-0009

Re: Comments on the Goldendale Energy Storage Project Draft EIS by Laborers Local Union 335

Dear Director Park:

In response to the "State Environmental Policy Act Draft Environmental Impact Statement" for the proposed Goldendale Energy Storage Project, Laborers' Local 335 submits these comments for consideration.

1 The Laborers Local 335 represents 587 construction workers including many who live and work within commuting distance of the Goldendale Energy Storage Project. Laborers Local 335 has an office in Vancouver, Washington and dispatches workers to project sites in southern Washington, including Klickitat County where the pumped-water storage project will be located. Across the region and in Washington, Laborers members are employed on hydroelectric, energy, and infrastructure projects. Laborers members are highly skilled and receive free training, middle-class wages, affordable family health insurance, and a retirement benefit.

Socioeconomic Benefits of the Project

2 The Laborers urge the Department to include for consideration in the DEIS and account of the socioeconomic impacts related to the Goldendale project. Notably, because the applicant, Free Flow Power Project 101, LLC, has executed a Project Labor Agreement ("PLA") with the Washington State Building and Construction Trades Council, including the Laborers, the project will be constructed with union construction workers from Washington State and the surrounding area. As a result, the proposed project will create 3,000 high quality construction jobs over a five-year period that pay wages significantly greater than average, offer affordable family health insurance and a pension benefit, and spur reinvestment in the host community and Washington

LABORERS' LOCAL 335

2212 NE Andresen Rd, Vancouver, WA 98661

Phone: (360) 695-3318 Fax: (360) 699-6142

State. Moreover, because the project will span a five-year time horizon, it will provide a critical opportunity for entrants to the construction industry to complete their craft's multi-year apprenticeship training program, and create a new generation of skilled construction workers needed to build the clean energy infrastructure of tomorrow. In addition, the scope and scale of the project provides a pathway for workers who have historically worked in the fossil fuel sector to equitably transition to the clean energy economy.

If approved, the Goldendale project would be the largest pumped-water storage project in the Northwest region, providing up to 1,200 MW of energy, and fulfilling one-fifth of the region's energy storage needs. It would also anchor and complement the wind and solar resources needed to meet the state's 100% clean energy goals. Importantly, because construction workers on the project will be covered by a PLA, it will provide an opportunity for entrants to the construction industry to complete their apprenticeship requirements putting thousands of blue-collar workers on a path to the middle-class. The family-sustaining wages, and high quality benefits for local and state workers also means that the project will not increase demand on governmental services or healthcare systems, but, in fact, generate additional governmental revenues and improve socioeconomic conditions.

Conclusion

The full range of a project's socioeconomic impacts are oftentimes not fully studied or understood during the scoping process. The Goldendale project will create thousands of high quality construction jobs over five years during a time when working families are experiencing record inflation and financial insecurity. Investigation of the full range of the socioeconomic benefits of this project will provide the public and stakeholders a complete picture of the project's net costs and benefits, and improve public confidence in the scoping process.

The Laborers appreciate the opportunity to comment, and will submit further comments in this proceeding.

Thank you for your attention to this matter.

Sincerely,



Shannon Stull
Business Manager/Secretary Treasurer
Laborers' Local Union 335
2212 NW Andresen Rd.
Vancouver, WA, 98661

The below names have signed this letter in full and complete sincerity:

PUB-1514	Michael	Michael	PUB-1540
PUB-1515	Debra	Debra	PUB-1541
PUB-1516	Jonathan	Jeremy Searcy	PUB-1542_Searcy
PUB-1517	Frank		
PUB-1518	Michael		
PUB-1519_Keys	Gabriel Keys		
PUB-1520_Keys	Daniel Keys		
PUB-1521_Ebeling	Rob Ebeling		
PUB-1522	Lonnie Wampler		
PUB-1523	Amber Danner		
PUB-1524_Glantz	Aaron Glantz		
PUB-1525_Altherton	Gene R Altherton		
PUB-1526_Taylor	Justin Taylor		
PUB-1527_Call	Tom Call		
PUB-1528_Carrillo	Mano A. Carrillo		
PUB-1529_Garcia	Marco C. Garcia		
PUB-1530_Price	Robert Price		
PUB-1531_Jimenez	Jesus Jimenez		
PUB-1532_Bueno	Joran Bueno		
PUB-1533_Serna	JAVIER SERNA		
PUB-1534_Castro	Erasto Castro		
PUB-1535_Gonzalez	Ruben Gonzalez		
PUB-1536	Erasto		
PUB-1537	Harry M. Erickson		
PUB-1538_Morales	JOSE MORALES		
PUB-1539_Middleton	Mike Middleton		

The below names have signed this letter in full and complete sincerity:

PUB-1625

PUB-1602_Dobbins Cord Dobbins

PUB-1603 Miller Brunt

PUB-1604 Kevin Finner

PUB-1605_Guthrie Steve Guthrie

PUB-1606_Ochsner Ochsner

PUB-1607 David [unclear]

PUB-1608 [unclear]

PUB-1609 Deanna [unclear]

PUB-1610 Richard [unclear]

PUB-1611 [unclear]

PUB-1612 [unclear]

PUB-1613_Harman Shelia Harman

PUB-1614 Di [unclear]

PUB-1615_DeCent Jennifer DeCent

PUB-1616 [unclear]

PUB-1617_Irving Scott Irving

PUB-1618 [unclear]

PUB-1619 Harley [unclear]

PUB-1620_Wilmor Jeff Wilmor

PUB-1621 [unclear]

PUB-1622 [unclear]

PUB-1623 [unclear]

PUB-1624 [unclear]

DEE [unclear]

Naife Sellers PUB-1626

[unclear] PUB-1627

[unclear] PUB-1629

Chris Brown PUB-1630

[unclear] PUB-1631

Corina Guardino PUB-1632

Fanny Silva PUB-1633

Denise Joppa PUB-1634

[unclear] PUB-1635

Enrique E. PUB-1636_E

David E. PUB-1637_E

Fernando L. PUB-1638_L

[unclear] PUB-1639

Sharon Myers PUB-1640

Nylar [unclear] PUB-1641

Francisco Elguezabal

On behalf of Laborers' Local 348, please find our comments attached.



August 9, 2022

Via E-Filing

Attn: Sage Park
Regional Director, SEPA Responsible Official
Goldendale Energy DEIS
Department of Ecology
1250 W. Alder Street
Union Gap, WA 98903-0009

Re: Comments on the Goldendale Energy Storage Project Draft EIS by Laborers Local Union 348

Dear Director Park:

In response to the “State Environmental Policy Act Draft Environmental Impact Statement” for the proposed Goldendale Energy Storage Project, Laborers’ Local 348 submits these comments for consideration.

1 The Laborers Local 348 represents 1200 construction workers including many who live and work within commuting distance of the Goldendale Energy Storage Project. Laborers Local 348 has an office in Richland, Washington and dispatches workers to project sites in southern Washington, including Klickitat County where the pumped-water storage project will be located. Across the region and in Washington, Laborers members are employed on hydroelectric, energy, and infrastructure projects. Laborers members are highly skilled and receive free training, middle-class wages, affordable family health insurance, and a retirement benefit.

Socioeconomic Benefits of the Project

2 The Laborers urge the Department to include for consideration in the DEIS and account of the socioeconomic impacts related to the Goldendale project. Notably, because the applicant, Free Flow Power Project 101, LLC, has executed a Project Labor Agreement (“PLA”) with the Washington State Building and Construction Trades Council, including the Laborers, the project will be constructed with union construction workers from Washington State and the surrounding area. As a result, the proposed project will create 3,000 high quality construction jobs over a five-year period that pay wages significantly greater than average, offer affordable family health insurance and a pension benefit, and spur reinvestment in the host community and Washington State. Moreover, because the project will span a five-year time horizon, it will provide a critical

opportunity for entrants to the construction industry to complete their craft's multi-year apprenticeship training program, and create a new generation of skilled construction workers needed to build the clean energy infrastructure of tomorrow. In addition, the scope and scale of the project provides a pathway for workers who have historically worked in the fossil fuel sector to equitably transition to the clean energy economy.

An impact assessment that fails to mention the sweeping socioeconomic benefits of a project is inconsistent with state policy.¹ In addition, the Department has the option to combine the DEIS with other documents to include additional analyses to help identify issues of concern to citizens.² In order to ensure a robust review process, and boost public confidence in that process, the Department should study and consider socioeconomic impacts including employment impacts. The scale of the project, potential adverse impacts to Tribal resources, importance to clean energy development, and prospect to create thousands of middle-class construction careers demands a comprehensive study of the numerous social and economic effects of the Goldendale project.

With record inflation, and an increasing amount of Americans who are struggling financially, the socioeconomic impacts of major construction projects matter to average working families in Washington State. In fact, according to the most recent poll by the U.S. Census Bureau, a record 32.2% of Washington respondents report having difficulties paying their bills,³ up from 25.3% one year ago.⁴ Indeed, a recent survey conducted by the Seattle Times, KING 5, the University of Washington's Center for an Informed Public, and Washington State University's Murrow College of Communication found that one in five voters identified inflation as their most important concern, second only to reproductive rights.⁵ Another recent survey by the Washington State Hospital Association found that hospitals lost \$929 million in the first quarter of 2022, with all 52 rural hospitals and health systems reporting negative margins and accounting for nearly all the state losses.⁶

Conclusion

The full range of a project's socioeconomic impacts are oftentimes not fully studied or understood during the scoping process. The Goldendale project will create thousands of high quality construction jobs over five years during a time when working families are experiencing record inflation and financial insecurity. Investigation of the full range of the socioeconomic

¹ In establishing the State Environmental Policy, the legislature recognized that the policy should "fulfill the social, economic, and other requirements of present and future generations of Washington citizens," RCW 43.21C.020.

² WAC 197-11-448 (4).

³ <https://www.census.gov/data-tools/demo/hhp/#/?measures=EXPENSE&periodSelector=47>

⁴ <https://www.census.gov/data-tools/demo/hhp/#/?measures=EXPENSE&periodSelector=33>

⁵

<https://www.seattletimes.com/seattle-news/politics/these-are-the-issues-that-matter-most-to-washington-state-voters-new-poll-indicates/>

⁶

<https://www.king5.com/article/news/health/washington-hospitals-millions-financial-struggles/281-2becf70c-1099-4e2d-b1e4-a068d900f451>

2 cont.

benefits of this project will provide the public and stakeholders a complete picture of the project's net costs and benefits, and improve public confidence in the scoping process.

The Laborers appreciate the opportunity to comment, and will submit further comments in this proceeding.

Thank you for your attention to this matter.

Sincerely,

/sign



Francisco Elguezabal

Business Manager/Secretary Treasurer

Laborers' Local Union 348

2505 Duportail St.

Richland, WA, 99352

The below names have signed this letter in full and complete sincerity:

The below names have signed this letter in full and complete sincerity:

PUB-1543_Dawkins	MICHAEL L. DAWKINS	Isabel Lullie	PUB-1569
PUB-1544_Nelson	John Nelson	Barbara	PUB-1570
PUB-1545_Wadsworth	Jessica Wadsworth	David N. Esparza & Jani M. Esparza	PUB-1571_Nesparza
PUB-1546	James Thrift	Augusto Pastor	PUB-1572_Paxton
PUB-1547	Jeffrey Clay	Ivan Kru	PUB-1573
PUB-1548_Thrift	James Thrift	Robert Lepp	PUB-1574
PUB-1549_Percifield	Dennis Percifield Enstfeld *	Jeff M. & Sue	PUB-1575
PUB-1550_Jorgensen	Kyle Jorgensen - Kyle Jorgensen	Michelle Miller	PUB-1576
PUB-1551	Jack Amundson	Heather Jackson	PUB-1577_Jackson
PUB-1552_Madrigal	Pedro Madrigal	Hesley Jackson	PUB-1578
PUB-1553_Goodnight	Adam Goodnight	Beauford	PUB-1579_Clark
PUB-1554_Garcia	Joshua J Garcia	Theresa A Clark	PUB-1580
PUB-1555	Chris Sool	Jennit Livingston	PUB-1581
PUB-1556_Gonzalez	Gracie Gonzalez	Michelle Miller	PUB-1582_Miller
PUB-1557_Lindsay	Lahura Lindsay	Michelle Miller	PUB-1583
PUB-1558	Bradley	Michelle Miller	PUB-1584
PUB-1559	Font Ladway	Michelle Miller	PUB-1585
PUB-1560_Schneider	M. Julissz Schneider	Miguel Camacho	PUB-1586_Howard
PUB-1561	Rubella	Dean Howard	
PUB-1562	Krista		
PUB-1563	Lauren Outenhe		
PUB-1564_Deweber	Narrin Deweber		
PUB-1565	Miguel Perez		
PUB-1566	Doug Bata		
PUB-1567			
PUB-1568			

The below names have signed this letter in full and complete sincerity:

PUB-1642_Stelter

Richard Stetter

PUB-1643

Amy Hill

PUB-1644

PUB-1645

PUB-1646_Bull

David Bull

PUB-1647

Tracy Jones

PUB-1648

Al Det

PUB-1649

John Setz

PUB-1650

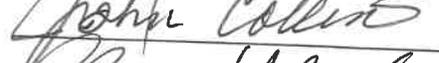
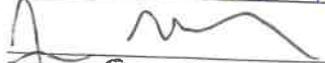
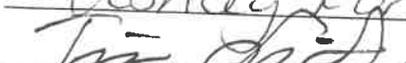
Michelle Stetter

PUB-1651

Dominic Wance

u

The below names have signed this letter in full and complete sincerity:

- | | | |
|--------------------|---|--|
| PUB-1652_Prieto | MIGUEL PRIETO | |
| PUB-1653_Fernald | Joshua Fernald |  PUB-1678 |
| PUB-1654_Flores | Manuel Flores |  PUB-1679 |
| PUB-1655_Galarza | Luis Galarza |  PUB-1680 |
| PUB-1656 | Joe Trevino |  PUB-1681 |
| PUB-1657 | Mike Scott |  PUB-1682 |
| PUB-1658_Kasko | MIKE KASKO |  PUB-1683 |
| PUB-1659_Garrison | Randy Garrison |  PUB-1684 |
| PUB-1660 | Carlos Larios |  PUB-1685 |
| PUB-1661_Rodriguez | Miguel Rodriguez |  PUB-1686 |
| PUB-1662_Bosewell | MIKE BOSEWELL | |
| PUB-1663_Palomarez | JOSEPH PALOMAREZ | |
| PUB-1664 | John Howe | |
| PUB-1665 | FRANCISCO J. ZALUZA | |
| PUB-1666_Valdez | Moses Valdez | |
| PUB-1667 | Jason Amel | |
| PUB-1668_Orr | Chelsea Orr | |
| PUB-1669_Ramsey | Marc Ramsey | |
| PUB-1670_Montoya | Ben Montoya | |
| PUB-1671 | Rotana Jullines | |
| PUB-1672_Crider | CLINT CRIDER | |
| PUB-1673 |  | |
| PUB-1674 | Ashley Forsink | |
| PUB-1675 |  | |
| PUB-1676 |  | |
| PUB-1677_Martinez | EDUARDO MARTINEZ | |

The below names have signed this letter in full and complete sincerity:

PUB-1687

PUB-1688

PUB-1689_Stelter

PUB-1690

PUB-1691

PUB-1692

PUB-1693

PUB-1694

PUB-1695

PUB-1696

PUB-1697

PUB-1698

PUB-1699

PUB-1700

PUB-1701_Briggs

PUB-1702_Simpson

PUB-1703_Simpson

PUB-1704_Mack

PUB-1705

[Handwritten signatures and names on lined paper]

[Signature]

[Signature]

Richard Stelter

[Signature]

[Signature]

[Signature]

Richard Stelter

Michelle

Bob Brown

[Signature]

[Signature]

Lambert-Bless

[Signature]

[Signature]

Brantley

Arthur Briggs

Clay Simpson

Kelly Simpson

Nathan Mack

[Signature]

Zack Culver

On behalf of Laborers' Local 737, please find attached our comments on the DEIS in this case.

August 9, 2022

Via E-Filing

Attn: Sage Park
Regional Director, SEPA Responsible Official
Goldendale Energy DEIS
Department of Ecology
1250 W. Alder Street
Union Gap, WA 98903-0009

Re: Comments on the Goldendale Energy Storage Project Draft EIS by Laborers Local Union 737

Dear Director Park:

In response to the “State Environmental Policy Act Draft Environmental Impact Statement” for the proposed Goldendale Energy Storage Project, Laborers’ Local 737 submits these comments for consideration.

1 The Laborers Local 737 represents 2,500 construction workers including many who live and work within commuting distance of the Goldendale Energy Storage Project. Laborers Local 737 has an office in Portland, Oregon and dispatches workers to project sites in southern Washington, including Klickitat County where the pumped-water storage project will be located. Across the region and in Washington, Laborers members are employed on hydroelectric, energy, and infrastructure projects. Laborers members are highly skilled and receive free training, middle-class wages, affordable family health insurance, and a retirement benefit.

Socioeconomic Benefits of the Project

2 The Laborers urge the Department to include for consideration in the DEIS and account of the socioeconomic impacts related to the Goldendale project. Notably, because the applicant, Free Flow Power Project 101, LLC, has executed a Project Labor Agreement (“PLA”) with the Washington State Building and Construction Trades Council, including the Laborers, the project will be constructed with union construction workers from Washington State and the surrounding area. As a result, the proposed project will create 3,000 high quality construction jobs over a five-year period that pay wages significantly greater than average, offer affordable family health insurance and a pension benefit, and spur reinvestment in the host community and Washington State. Moreover, because the project will span a five-year time horizon, it will provide a critical opportunity for entrants to the construction industry to complete their craft’s multi-year apprenticeship training program, and create a new generation of skilled construction workers needed to build the clean energy infrastructure of tomorrow. In addition, the scope and scale of the project provides a pathway for workers who have historically worked in the fossil fuel sector to equitably transition to the clean energy economy.

Dispatch phone: (541) 801-2210 email: dispatch@local737.org

Office 541-801-2209 * 17230 NE Sacramento St., Suite 202 * Portland, Oregon 97230

www.Local737.org

Union labor means construction workers on the project will have access to high quality training which improves worker safety and health outcomes¹ as well as ensure mitigation measures required to reduce environmental impacts are successfully implemented.² The employment of union labor also translates into lower emissions during the construction process because workers will be sourced locally reducing the distance of worker commutes.

Lastly, high quality construction jobs promote equity because they offer a path to the middle-class for workers who lack a college degree, and are from underrepresented communities. This is significant because workers with a bachelor's degree earn about \$20,000 more annually compared to their peers with only a high school diploma³ – resulting in a huge gap in life-time earnings. Workers who complete a union apprenticeship program, on the other hand, earn wages equivalent to workers with college degrees. Importantly, because union apprenticeship programs are free, and workers earn a wage while being trained on the job, a career in construction is accessible to all workers regardless of educational attainment, parental status, income and racial identity. Projects that rely on union apprentices and union labor create a path to the middle-class for thousands of working families. This is a critical but often neglected area of investigation in scoping processes.

Conclusion

The full range of a project's socioeconomic impacts are oftentimes not fully studied or understood during the scoping process. The Goldendale project will create thousands of high quality construction jobs over five years during a time when working families are experiencing record inflation and financial insecurity. Investigation of the full range of the socioeconomic benefits of this project will provide the public and stakeholders a complete picture of the project's net costs and benefits, and improve public confidence in the scoping process.

The Laborers appreciate the opportunity to comment, and will submit further comments in this proceeding.

Thank you for your attention to this matter.

Sincerely,



Zack Culver
Business Manager/Secretary Treasurer
Laborers' Local Union 737
17230 NE Sacramento Street, Suite 202
Portland, OR 97230

¹ The DEIS concluded: "With appropriate worker safety training and best practices in place, the potential temporary construction-related risks to physical safety would not result in a significant adverse impact," see DEIS, p. 173.

² For example, in order to reduce the spread of noxious weeds and invasive species, workers will receive training to increase their awareness and identification of noxious weeds and invasive plants, and procedures for reporting and confirming infestations, and prevention/control measures. See DEIS at p. 136.

³ <https://www.seattlepi.com/seattlenews/article/how-much-college-graduates-earn-in-seattle-16018134.php>

The below names have signed this letter in full and complete sincerity:

PUB-1587

John Cook

PUB-1588

Sheldon Warming

PUB-1589

Mario Caldi

PUB-1590

Lee Ly

PUB-1591

La Jey

PUB-1592

Al N

PUB-1593

Bumbr

PUB-1594

Amelich

PUB-1595

Christy

PUB-1596

Al J

PUB-1597

Penne Dehena

PUB-1598

John Salvaggio

PUB-1599

_Heaton

Michael S. Heaton

PUB-1600

Orilla

PUB-1602

Caroline



Columbia Riverkeeper
P.O. Box 950
Hood River, Oregon 97031
Phone: (541) 387-3030
www.columbiariverkeeper.org

August 9, 2022

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.

Submitted electronically via: <https://admin.ecology.commentinput.com/?id=KNBCY>

RE: Public Comments on the Proposed Goldendale Energy Storage Project, State Environmental Policy Act Draft Environmental Impact Statement, Publication No. 22-06-006

Dear Regional Director Park,

1 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 856 comments gathered through our website and virtual outreach.

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

Dear Washington Department of Ecology,

2

I oppose Rye Development's proposed Goldendale Energy Storage Hydroelectric Development (Development) because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) since 2017. Alleged "green energy" cannot be built at the expense of Tribal Nations, who are already on the front lines of climate change and extractive industrialization and practices.

Rye Development's application should be denied full stop. To allow the application to proceed with Environmental review ignores the intense opposition to building this Development in this location. However, if Ecology proceeds with a Final EIS, it must include the following:

3

- *Consideration of an appropriate range of alternatives, not just the proposed Project and a "no action alternative."*
- *Changing the "Aesthetics/Visual Quality" impacts to significant adverse impacts because of the impacts to Tribes.*
- *An analysis of the cleanup integration and oversight planned for the former Aluminum Smelter site.*
- *An analysis on the potential impacts to groundwater from excavation on the former Aluminum smelter site if construction moves forward.*
- *An acknowledgement that there are significant adverse environmental justice concerns with this development, including a disproportionate impact on tribal people.*

4

The Draft EIS fails to integrate the Development's destruction of irreplaceable tribal culture and religious resources, along with the intense disruption that this Development would cause to current tribal cultural practices, such as food and medicine gathering, into the full environmental analysis. The Final EIS must integrate these concerns throughout the full analysis and not just the "Cultural and Tribal Resources" sections.

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,

A handwritten signature in black ink, appearing to read "Simone", with a stylized flourish at the end.

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

#	First Name	Last Name	Zipcode	Additional comment
1	Do?an	vñzkan	99701	PUB-656_Doan Vnzkan
2	Joan	Agro	10913-2000	Changing the ,ÁAesthetics/Visual Quality,À impacts to significant adverse impacts because of the impacts to Tribes PUB-657_Joan Agro
3	Heidi	ahlstrand	55060-5688	PUB-658_Heidi ahlstrand
4	Brian	Ainsley	32714-1283	PUB-659_Brian Ainsley
5	Paul	Alexander	98632-9717	along with te amount of energy you will burn to build this thing, we need to let our native nations rest in peace and leave them alone as the creator intended PUB-660_Paul Alexander
6	Margaret	Alic	98245-9474	The project would interfere with Native American cultural/heritage sites. PUB-661_Margaret Alic
7	Teresa	Allen	98244-9513	PUB-662_Teresa Allen
8	Liz	Amsden	90042-1006	Greenwashing is NEVER an excuse. ESPECIALLY when used against native Americans PUB-663_Liz Amsden
9	Tom	Anderson	34488-5920	PUB-664_Tom Andersen
10	Glen	Anderson	98503-2723	PROTECT indigenous rights, culture, artifacts!!!! PUB-665_Glen Anderson
11	Coleen	Anderson	98902-2364	Environmental justice is essential as we transition to confront climate change. PUB-666_Coleen Anderson
12	Kevin	Andrews	97016-0824	PUB-667_Kevin Andrews
13	Steven	Andrychows	06051-4073	Green energy must be built; however Native Americans' rights must be protected also. Projects like this must not interfere with the routine activities of the people who after all were here first. PUB-668_Steven Andrychows
14	JL	Angell	95672-9411	PUB-669_JL Angell
15	But	Antonio	21617-2322	PUB-670_But Antonio
16	PATRICK	ARCHER	98177	PUB-671_Patrick Archer
17	Susanna	Askins	97230-3855	PUB-672_Susanna Askins
18	Gail	Atkins	98577-9492	PUB-673_Gail Atkins
19	Todd	Atkins	2324	PUB-674_Todd Atkins
20	Ellen	Atkinson	24502-1037	PUB-675_Ellen Atkinson
21	April	Atwood	97202-5442	This is the wrong project in the wrong place! The Tribes should have the last word (and that word is no.) PUB-676_April Atwood
22	Patricia	Auer	63021-7546	PUB-677_Patricia Auer
23	Mark	Aziz	34232-4203	PUB-678_Mark Aziz
24	Shary	B	98101-1075	PUB-679_Shary B
25	Shary	B	98101-1075	PUB-680_Shary B
26	Jacob	Bailey	98360-9638	We don't need to destroy culturally significant land for this. There are alternatives that should be looked into. PUB-681_Jacob Bailey

27	Stephen	Bailey	98244	ANY AND EVERY PROJECT INVOLVING FIRST NATION LANDS M U S T BE DONE WITH F U L L C O O P E R A T I O N AND SUPPORT FROM THOSE FIRST NATIONS! P E R I O D !! WE HAVE HURT THESE PEOPLES, WHO WE HAVE, IN ONE WAY OR ANOTHER, S T O L E N THESE LANDS FROM, E N O U G H ! ~ !	PUB-682_Stephen Bailey
28	Ellen	Bailey	97214-1179		PUB-683_Ellen Bailey
29	Jean	Bails	48081-1131		PUB-684_Jean Bailey
30	Patricia	Baker	80220-4528	tribal culture should be respected and not destroyed	PUB-685_Patricia Baker
31	Gerritt and	Baker-Smith	23703-3323		PUB-686_Gerritt and Baker-Smith
32	Joan	Balfour	33437-5504	I oppose Rye Development,Ãs proposed Goldendale Pumped Storage Development because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources. People come before profits!	PUB-687_Joan Balfou
33	Dylan	Bandy	98122		PUB-688_Dylan Bandy
34	Wesley	Banks	98682-0067		PUB-689_Wesley Banks
35	Pamela	Barber	98030-7699	Protect the rights of Native Peoples and their cultural heritage.	PUB-690_Pamela Barber
36	Eric	Bard	98826-1020		PUB-691_Eric Bard
37	John	Barger	97206-8418		PUB-692_John Barger
38	Geena	Barker	98584		PUB-693_Geena Barker
39	Lisa	Barrett	53511-3331		PUB-694_Lisa Barrett
40	Duncan	Baruch	97219-4067		PUB-695_Duncan Baruch
41	Gail	Battaglia	97530-9185		PUB-696_Gail Battaglia
42	Vernon	Batty	88047-1299		PUB-697_Vernon Batty
43	Sarah	Bauman	98229-6920		PUB-698_Sarah Bauman
44	Jody	Beaman	98620	No GOLDENDALE storage facility. We,Ãve taken enough from tribal lands and let,Ãs stop now! Thanks	PUB-699 _Jody _Beaman
45	Joan	Beard	10014-2010		PUB-700_Joan Beard
46	Craig	Beatley	97212-2625	I agree that you cannot call a project Green if it destroys Native lands	PUB-701_Craig Beatley
47	Pat	Becker	94949-5930	the development would directly interfere with several culturally significant sites to the Yakama Nation and other cultural property.	PUB-702_Pat Becker
48	frank	belcastro	52001-6327		PUB-703_Frank Belcastro
49	T	Bell	78731-4605	Insensitive to culture and the environment.	PUB-704_T Bell
50	Georganne	Bendall	04843-2056	Both Rye and FERC are ignoring federal law, and a recent submission continues an unacceptable and knowing pattern of ignoring federal law and regulations stipulated in 36CFR800.	PUB-705_Georganne Bendall
51	Derek	Benedict	98036-8606	I'm a firm believer in building fresh-water retention ponds and lakes to capture rain and snow melt. But if sacred tribal lands will be damaged, then I am against it.	PUB-706_Derek Benedict
52	Tora	Bengochea	97527-9721		PUB-707_Tora Bengochea

53	Mary Lou	Bennington	99203-3341		PUB-708_Mary Lou Bennington
54	Irene	Bensinger	98328-9496	We have broken our treaties with First Peoples with shameful impunity since arriving on yhis continent. Greed has always trumped honor. Do we not have the moral courage to do what is Right? Sacred lands and ways remind us that there is something more important than profit. Thank you for listening to your heart.	PUB-709_Irene Bensinger
55	Karen	Berger	91020-1284		PUB-710_Karen Berger
56	Ric	Berkholtz	98105-6650		PUB-711_Ric Berkholtz
57	Rebecca	Berlant	11215-4805		PUB-712_Rebecca Berlant
58	Barbara	Bernstein	97202-5932	This project desecrates Indigenous lands, violates treaty agreements and is the wrong place for such development	PUB-713_Barbara Bernstein
59	Jean	Berolzheim	98070-4963		PUB-714_Jean Berolzheim
60	Rachel	Bettles	98902		PUB-715_Rachel Bettles
61	Rachel	Bieber	97206		PUB-716_Rachel Bieber
62	K Kay	Bircher	97701		PUB-717_K Kay Bircher
63	Linore	Blackstone	97221-2113	So you continue to practice 'target' management instead of considering other life. You seem to see the natural habitats as commodity. What is your ethic, really. Act with integrity and wisdom. The answer is in your hands.	PUB-718_Linore Blackstone
64	Patricia	Blackwell-M	94552-1708		PUB-719_Patricia Blackwell-M
65	Barbara	Blackwood	99206-5728		PUB-720_Barbara Blackwood
66	Mark	Blandford	79124-2309		PUB-721_Mark Bandford
67	Dana	Bleckinger	97498-0904		PUB-722_Dana Bleckinger
68	Robyn	Bluemmel	97232-3239		PUB-723_Robyn Bluemmel
69	David	Bly	14850-4136		PUB-724_David Bly
70	Pablo	Bobe	10044-0052		PUB-725_Pablo Bobe
71	Matthew	Boguske	98052-3495		PUB-726_Matthew Boguske
72	Rv@me	Bohlin	98125	We should learn from our history and not repeat the past where we exploited and harmed tribal lands and peoples for our own gain. Green and renewable energy should not come at the cost of tribal peoples.	PUB-727_Rv@me Bohlin
73	Linda	Bolduan	97034-6447		PUB-728_Linda Bolduan
74	DK	Bolen	33733-1216		PUB-729_DK Bolen
75	Colleen	Bonin	98671		PUB-730_Colleen Bonin
76	Debbie	Boomhower	12205-4923		PUB-731_Debbie Boomhower
77	Paul	Borcherding	97850-4003		PUB-732_Paul Borcherding
78	Tika	Bordelon	98101-1965		PUB-733_Tika Bordelon

79	Michael	Bordenave	93728-2941		PUB-734_Michael Bordenave
80	Dean	Borgeson	56442-3081	The EIS is not adequate for this project.	PUB-735_Dean Borgeson
81	Gavin	Bornholtz	48439-9488		PUB-736_Gavin Bornholtz
82	Ernest	Boyd	94087-2747		PUB-737_Ernest Boyd
83	Lorraine	Brabham	07030-5108		PUB-738_Lorraine Brabham
84	Kathy	Bradley	29078-9626		PUB-739_Kath Bradley
85	Michael	Brandes	11566-2101		PUB-740_Michael Brandes
86	Vicky	Brandt	27705-6027		PUB-741_Vicky Brandt
87	Daniel	Brant	98368-6417		PUB-742_Dainel Brant
88	Joseph	Breazeale	97520-1662	beside the tribal heritage issues here we need to reduce and even eliminate any project that alters the natural flow of rivers and streams.	PUB-743_Joseph Breazeale
89	Barbara	Brock	98282-8292		PUB-744_Babara Brock
90	Lucile	Brook	97131-0136	oh please, do we have to fight this battle over and over again? it's time to stop raping/destroying the earth in the name of profit. we need to take less and give more to our planet. this is all we have, folks. stop destroying her!	PUB-745_Lucile Brook
91	Kimberly	Brown	63010-3629		PUB-746_Kimberly Brown
92	Deborah	Brown	97215-3830	Protect tribal lands and support renewables!	PUB-747_Deborah Brown
93	Frank	Brown	98683-7610	It is time that we listen to and work with the various tribes in this region. Period. Their needs should be respected as much as any others'.	PUB-748_Frank Brown
94	Leslie	Brown	84111-4514		PUB-749_Leslie Brown
95	Ian	Brown	V8L 5J5	We are suffering on a daily basis the consequences of very ignorant government and corporate exploitation of our beautiful planet. What on earth does it take for those in power to recognize the irreversible devastation they,Äöve caused ?? ü§Σüèª,Äç,ôÇÔ[]è	PUB-750_Ian Brown
96	Robert	Brown	98466-6640		PUB-751_Robert Brown
97	Alex	Brown	97202-1874		PUB-752_Alex Brown
98	Matt	Brzezinski	48081-1511		PUB-753_Matt Brzezinski
99	Christopher	Buckley	98115-7247	Destroying sacred native sites is NOT 'clean energy.'	PUB-754_Christopher Buckley
100	Tom	Bugad	97232-3239		PUB-755_Tom Bugad
101	Lys	Burden	98368-6417	My family and I (four voting and taxpaying residents of Washington State) agree that this development is NOT 'green' and not in the best interests of local tribes or electricity consumers. Where is there a conservation strategy in this senario? We MUST learn to use less energy... not more!	PUB-756_Lys Burden
102	Wolfgang	Burger	01832-4738		PUB-757_Wolfgang Burger
103	nancy	burger	3079		PUB-758_Nancy Burger
104	Miya	Burke	97239-4276		PUB-759_Miya Burke

105	Jeanette	Burkhardt	98672-0628	This pumped storage project is a flagrant example of how colonization of tribal lands perpetuates those injustices by not involving the affected Tribes in the decisionmaking. Federal and state agencies have tribal trust responsibilities that cannot be swept under the rug to consider significant adverse impacts to tribally important resources through proper consultation with those tribes. This process needs to be scrapped and started over, and done right. Or not done at all in this place.	PUB-760_Jeanette Burkhardt
106	Michael	Burmester	97086-6074		PUB-761_Michael Burmester
107	Juskwa	Burnett	74604	Please pay attention to the rights of the Yakima Nation, the rights of Nature and the rights of the Water. This project would destroy more than its supposed worth	PUB-762_Juskwa Burnett
108	Kathryn	Burns	78028	It's on tribal lands and the tribe in question doesn't want it there. Seems like a valid reason to oppose it in my book.	PUB-763_Kathryn Burns
109	Kate	Butt	98052-3779		PUB-764_Kate Butt
110	Jim	Byrne	98642-9139	This project uses more energy than it generates, and it intrudes on Yakama tribal lands and history. Do not support.	PUB-765_Jim Byrne
111	Lisa	Caine	97212-4655		PUB-766_Lisa Caine
112	Juan	Calvillo	97267-1571	Locate it elsewhere, or don't do it. The tribes have been messed around enough.	PUB-767_Juan Calvillo
113	Jane	Camero	97031-1725		PUB-768_Jane Camero
114	Levi	Campbell	97003		PUB-769_Levi Campbell
115	Maurine	Canarsky	97214-4851	It is time to respect indigenous peoples. This development is harmful to all of us.	PUB-770_Maurine Canarsky
116	M	Canter	94920-2036		PUB-771_M Canter
117	Lauren	Cardella	98106		PUB-772_Lauren Cardella
118	Enid	Cardinal	13027-9042	We have broken all our promises to the indigenous peoples, we don't respect their cultures and values. Theirs are better than ours. They respect nature and know we cannot keep destroying it. They can teach us much if we would but choose to listen. We took their land to begin with. How would we feel if someone treated us as we have treated them?	PUB-773_Enid Cardinal
119	Barbara	Carr	21087-1807		PUB-774_Barbara Carr
120	Linda	Carroll	99205-3178	Haven't we white people already taken too much from peoples who took much better care of our territory than we do?	PUB-775_Linda Carroll
121	Niall	Carroll	97103-2439		PUB-776_Niall Carroll
122	Sigrid	Casey	97211-5437	I am sickened that, once again, lands of historic and cultural significance to sovereign Indian nations are being considered for energy development. I am revolted that, once again, any effort by the developer to make plans to ensure that mitigation of these impacts on Indian nations is completely absent.	PUB-777_Sigrid Casey
123	Meg	Casey	98020-2905		PUB-778_Meg Casey
124	Lee	Chapman	97703-3139	Please protect our land from these dangers and destructive project!	PUB-779_Lee Chapman
125	Jerry	Charlson	97045-7618		PUB-780_Jerry Charlson

126	JL	Charrier	55391-9341		PUB-781_JL Charrier
127	Cale	Christi	97624-9711		PUB-782_Cale Christi
128	Kathryn	Christian	81501-3445		PUB-783_Kathryn Christian
129	Deborah	Christian-H	98367	A Project is not Green Energy if it Destroys Tribal Cultural and Religious Resources. Please find a way to respect our tribes and their cultures and religion. This is imperative.	PUB-784_Deborah Christian-H
130	Sandra	Christopher	91505-1856		PUB-785_Sandra Christopher
131	Allison	Ciancibelli	98856-9786	I have been following this development process closely, and would like to see the tribes position taken seriously. Rye Development does not have the tribe's position or climate change in mind no matter what spin they put on it; they are looking at profit as any private corporation does. We simply will not have environmental justice with out social justice.	PUB-786_Allison Ciancibelli
132	Todd	Clark	46219-2607		PUB-787_Todd Clark
133	Roger	Clark	98225-6213	The Developer has failed to identify any mitigation efforts to reduce the detrimental impacts to tribal resources caused by this development.	PUB-788_Roger Clark
134	Todd	Clark	46219-2607		PUB-789_Todd Clark
135	Trisha	Clark	98620	Have we not impacted native peoples enough with colonization? They had no voice in the past, we are standing with them this time.	PUB-790_Trisha Clark
136	Maxine	Clark	98391-0004		PUB-791_Maxine Clark
137	Rebecca	Clark	97203-4418		PUB-792_Rebecca Clark
138	Charissa	Clifford	97211-7619		PUB-793_Charissa Clifford
139	Mary Jo	Coblentz	99354-2974		PUB-794_Mary Jo Coblentz
140	Heidi	Cody	98664-5432	This great project is in the wrong place. Honor and respect to e tribes by moving it elsewhere.	PUB-795_Heidi Cody
141	Fritzi	Cohen	98637-0082	I think tribal culture is sacred, and whenever there is development that threatens it the tribe must be a major part of the conversation.	PUB-796_Fritzi Cohen
142	claire	cohen	97034-3201		PUB-797_Claire Cohen
143	Judith	cohen	98112-4606		PUB-798_Judith Cohen
144	Emma	Cohen	97217		PUB-799_Emma Cohen
145	Howard	Cohen	94306-3004		PUB-800_Howard Cohen
146	Jackie	Cole	98072-6501		PUB-801_Jackie Cole
147	Joan	Cole	98368-4807	This is not a 'green' project - it destroys cultural and religious resources of the Yakima people. We cannot ignore this.!!	PUB-802_Joan Cole
148	Madelynn	Conley	97202		PUB-803_Madelynn Conley
149	Norm	Conrad	98274-4758	It has ignored the cultural and religious interests of several native communities. It will destroy them. The developer has done zero consultation and redesign. It has done an inadequate job of remediating the pollution likelihood from the former Aluminum Smelter site.	PUB-804_Norm Conrad

150	Kristin	Conrad-Ant	97225-7114		PUB-805_Kristin Conrad-Ant
151	Pat	Copenhaver	50126-1427	The sacred sites of indigenous sites must be preserved, for both religious and cultural purposes.	PUB-806_Pat Copenhaver
152	Heide	Coppotelli	28718-9017		PUB-807_Heide Coppotelli
153	Fred	Coppotelli	28718-9017		PUB-808_Fred Coppotelli
154	Jared	Cornelia	19804-3505		PUB-809_Jared Cornelia
155	Justin	Cory	97216		PUB-810_Justin Cory
156	Marilyn	Costamagna	97504-7701	The development would excavate two, massive 60-acre reservoirs in Klickitat County, Washington, near the John Day Dam and would have significant implications for historic properties of religious and cultural significance to the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation), the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Nez Perce Tribe, and the Confederated Tribes of Warm Springs. The Developer has failed to identify any mitigation efforts to reduce the detrimental impacts to tribal resources caused by this development.	PUB-811_Marilyn Costamagna
157	Sandra	Couch	60564-4694		PUB-812_Sandra Couch
158	Rory	Cowal	97213-3822		PUB-813_Rory Cowal
159	Anna	Cowen	97045-8505		PUB-814_Anna Cowen
160	Lanie	Cox	99224		PUB-815_Lanie Cox
161	Tom	Craighead	98070		PUB-816_Tom Craighead
162	Linda	Cramer	60002-1843	Because you're screwing the native Americans AGAIN!	PUB-817_Linda Cramer
163	Julia	Cranmer	08088-8833		PUB-818_Julia Cranmer
164	Bruce	Cratty	44313-7204		PUB-819_Bruce Cratty
165	P.E.	Crawford	98648-4213	It's way past time for Rye Development to account for the cultural and environmental considerations of their proposed pumped storage project. Why not just be good citizens instead of trying to circumvent the normal and reasonable requirements.	PUB-820_P.E. Crawford
166	Jessica	Cresseveur	47150-2593		PUB-821_Jessica Cresseveur
167	Peter	Crowley	98501-3584		PUB-822_Peter Crowley
168	John	Cruz	98664-2836	I oppose Rye Development,Âs proposed Goldendale Energy Storage Hydroelectric Development (Development) because of proposal,Âs devastating impacts on irreplaceable tribal cultural-religious resources.	PUB-823_John Cruz
169	Celia	Cruz	98664	I oppose Rye Development,Âs proposed Goldendale Energy Storage Hydroelectric Development (Development) because of proposal,Âs devastating impacts on irreplaceable tribal cultural-religious resources.	PUB-824_Celia Cruz
170	Lyndee	cunningham	98607-1268	We must honor the rights of native tribes. We have taken so much from them already.	PUB-825_Lyndee Cunningham
171	Linda	Curry	98626-5308		PUB-826_Linda Curry
172	Virginia	Curtis Lee	84105-1923	Environmental racism is unacceptable.	PUB-827_Virginia Curtis Lee

173	Krista	Cushman	97031-7484	At this critical time of climate uncertainty we need to act with future people in mind. Who will use this energy? Where will they live? What life will be effected by this facility. Continue on with wind and enough of hydro power	PUB-828_Krista Cushman
174	Lil	D	94706		PUB-829_LII D
175	Adam	D'Onofrio	23803-7700		PUB-830_Adam D'Onofrio
176	Mr. Shelley	Dahlgren	98029-7520	Projects like this get a momentum and get pushed through by special interests to benefit a very few individuals. Once built, a project like this is very hard to remove. Mr. SDD, PhD	PUB-831_Mr. Shelley Dahlgren
177	Terry	Dalsemer	97205-2438	Considering and respecting the environment includes tribal people, all people as well as the ecology and geography.	PUB-832_Terry Dalsemer
178	Tomas	Daly	97402-1665	Since its founding, treaties with numerous indigenous groups have been ignored! Sacred land and indigenous rights should not be trampled upon!	PUB-833_Tomas Daly
179	Kian	Daniel	53213-0081		PUB-834_Kian Daniel
180	Carrie	Darling	85022-1508		PUB-835_Carrie Darling
181	Beth	Darlington	12604-0001		PUB-836_Beth Darlington
182	Virginia	Davis	98072-6505		PUB-837_Virginia Davis
183	kim	davis	97306-8802	We need to protect what is left, including the precious cultural resources that are at stake here!	PUB-838_Kim Davis
184	Virginia	Davis	98072-6505		PUB-839_Virginia Davis
185	Madisen	Davis lattan	97222		PUB-840_Madisen Davis Lattan
186	Juanita	Dawson-Rh	10590-1717		PUB-841_Juanita Dawson-Rh
187	Alan	De Anda-Ha	97202-3211		PUB-842_Alان De Anda-H
188	Jorge	De Cecco	95482	The Draft EIS fails to integrate the Development,Às destruction of irreplaceable tribal culture and religious resources, along with the intense disruption that this Development would cause to current tribal cultural practices, such as food and medicine gathering, into the full environmental analysis.	PUB-843_Jorge De Cecco
189	Marco	de la Rosa	98034-8316		PUB-844_Marco de la Rosa
190	Brandie	Deal	98021-8353		PUB-845_Brandie Deal
191	Alyssa	Deardorff	97038-9215		PUB-846_Alyssa Deardorff
192	Yves	DeCargoue	95458-8502		PUB-847_Yves DeCargoue
193	Theresa	Deery	29909-4410		PUB-848_Theresa Deery
194	natalie	defrance dr	97215		PUB-849_natalie defrance dr
195	Dr,	Demian	98146	Hi: Please do not ignore federal law. Please deny the Rye Development application. Thank you. Dr. Demian	PUB-850_Dr, Demian
196	Sheila	Dempsey	20463-0001		PUB-851_Sheila Dempsey
197	Paul	Densmore	2140		PUB-852_Paul Densmore
198	Karen	Deora	97212-3202		PUB-853_Karen Deora

199	Susan	DeWitt	33770-2838		PUB-854_Susan DeWitt
200	A Michael	Dianich	97018-0152	Please reject this proposal. In addition to very negative cultural and environmental impacts, the operational energy requirements for this project do not merit approval. Hydro pumping and subsequent release both operate at only about 50% efficiency or less. That is, moving water around to generate electricity takes as much or more energy than it produces. Alternate sources including solar, wind and conservation are much better solutions. Thank you for the opportunity to comment.	PUB-855_A Michael Dianich
201	Susan	Dickerson	20735-1542		PUB-856_Susan Dickerson
202	Amanda	Dickinson	98902-5264		PUB-857_Amanda Dickinson
203	Christi	Dillon	28117-6519		PUB-858_Christi Dillon
204	Angie	Dixon	98236-9622		PUB-859_Angie Dixon
205	Malorie	Dobyns	98642		PUB-860_Malorie Dobyns
206	Elisa	Dore			PUB-861_Elisa Dore
207	Ann	Dorsey	91325-3844		PUB-862_Ann Dorsey
208	Chris	Drumright	37130-4066		PUB-863_Chris Drumright
209	Tim	Duda	78209-6625	Native tribal culture must be protected. As environmental impact of any project must be considered, so too must any negative impact on traditional native societies be considered before beginning development. On this basis, I oppose Goldendale Pumped Storage.	PUB-864_Tim Duda
210	Maxine	Dunkelman	98506-1506		PUB-865_Maxine Dunkelman
211	kathy	durrum	80017-4609		PUB-866_kathy durrum
212	Stephen	Dutschke	40207-2846		PUB-867_Stephen Dutschke
213	Mary	Duvall	97016	I understand this project to take enormous amounts of river water to create energy but to what purpose? More land development? while endangering already endangered fish? while destroying indigenous people's treaty rights? while harming birds who depend on the river for food sources. I also understand that this facility is to be managed by an overseas corporation with no ties to our river, our land and our indigenous peoples. For all these reasons I object to this harmful project. When will men learn that leaving nature alone is the best way to heal and allow humans to survive as a species? Enough of the exploitation of every natural resource.	PUB-868_Mary Duvall
214	Cheryl	Dzubak	08620-1531		PUB-869_Cheryl Dzubak
215	Amanda	Eastman	98625-1600	I stand against this with the Native Americans for reasons listed in letter above	PUB-870_Amanda Eastman
216	Judith	Eda	97218-1948		PUB-871_Judith Eda
217	Kayla	Edelis	97035-7720	Please listen to the tribal nations that are telling you this would damage the ecosystem for lifetimes to come	PUB-872_Kayla Edelis
218	Sean	Edmison	98052-2785		PUB-873_Sean Edmison
219	David	Edwards	97404-1292	This expresses my feelings exactly!	PUB-874_David Edwards

220	Eric	Edwards	60185-5147		PUB-875_Eric Edwards
221	cynthia	edwards	48103-4172		PUB-876_cynthia edwards
222	Leah	Eister	98109-1843		PUB-877_Leah Eister
223	Jennifer	Elling	97101-2471		PUB-878_Jennifer Elling
224	Nancy	Ellingham	98040-3162		PUB-879_Nancy Ellingham
225	June	Elliott-Cattel	29169-5251		PUB-880_June Elliott-Cattel
226	Mike	Ellison	98663-3606	While I believe some projects like this one will probably be needed to address our transition to an electrified energy portfolio because of its energy storage capabilities, we must treat Tribal Nations on a government to government basis. Do the work necessary to make these kinds of projects a true collaboration with Tribal Nations.	PUB-881_Mike Ellison
227	Gregory	Ellsworth	97223-9466		PUB-882_Gregory Ellsworth
228	CAROL	ELSE	98498-1151		PUB-883_CAROL ELSE
229	Rebecca J	Emigh	91356	Dear Washington Department of Ecology, I oppose Rye Development,Âs proposed Goldendale Energy Storage Hydroelectric Development (Development) because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) since 2017. Alleged ,green energy, cannot be built at the expense of Tribal Nations, who are already on the front lines of climate change and extractive industrialization and practices. Rye Development,s application should be denied full stop. To allow the application to proceed with Environmental review ignores the intense opposition to building this Development in this location. However, if Ecology proceeds with a Final EIS, it must include the following: Consideration of an appropriate range of alternatives, not just the proposed Project and a ,no action alternative., Changing the ,Aesthetics/Visual Quality, impacts to significant ad	PUB-884_Rebecca J Emigh
230	Matt	Emmer	33324-1146		PUB-885_Matt Emmer
231	Ron	Ennis	97213-1247	We must all do what we can to protect and restore our environment...thank you for all your support.	PUB-886_Ron Ennis
232	Elizabeth	Enright	85251-7006		PUB-887_Elizabeth Enright
233	Dianne	Ensign	97219-7655		PUB-888_Dianne Ensign
234	Lori	Erbs	98220-0050		PUB-889_Lori Erbs
235	Eric	Esposito	11228-2205		PUB-890_Eric Esposito
236	Rowan	Everard	97266-5357		PUB-891_Rowan Everard
237	Frans	Eykel	98612-9716		PUB-892_Frans Eykel
238	Mook	F	98052		PUB-893_Mook F
239	Gill	Fahrenwald	98507-2323		PUB-894_Gill Fahrenwald
240	Judy	Fairless	07059-6708	Protect tribal rights and culture. Haven't we done enough harm to Native Americans?	PUB-895_Judy Fairless
241	Bonnie	Faith	02139-3506		PUB-896_Bonnie Faith

242	Bob	Farrell	4254		PUB-897_Bob Farrell
243	David	Farwell	93923-9740	I think the white man has done enough damage to the indigenous population of the United States!!!! It is time for reparations not more damage.	PUB-898_David Farwell
244	Sharon	Fasnacht	98512-9161	We would not be keeping our legal and ethical agreements regarding our tribal lands & people.	PUB-899_Sharon Fasnacht
245	Meagan	Fastuca	11554-4052		PUB-900_Meagan Fastuca
246	Alexa	Fay	98103-8114		PUB-901_Alexa Fay
247	Peter	Feichtmeir	98119-2918		PUB-902_Peter Feichtmeir
248	Tracy	Feldman	27713-2532	Dear Washington Department of Ecology, I oppose Rye Development,Äôs proposed Goldendale Energy Storage Hydroelectric Development (Development) because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) since 2017. Alleged ,Äúgreen energy,Äù cannot be built at the expense of Tribal Nations, who are already on the front lines of climate change and extractive industrialization and practices. Rye Development,Äôs application should be denied full stop. To allow the application to proceed with Environmental review ignores the intense opposition to building this Development in this location. However, if Ecology proceeds with a Final EIS, it must include the following: Consideration of an appropriate range of alternatives, not just the proposed Project and a ,Äúno action alternative.,Äù	PUB-903_Tracy Feldman
249	Debby	Felnagle	98465-1035	Please do not destroy the history and culture of the Native people. We have already done enough damage to Native Americans, it needs to stop.	PUB-904_Debby Felnagle
250	Lauren	Fenenbock	79902-2505		PUB-905_Lauren Fenenbock
251	Alicia	Fentress	97401		PUB-906_Alicia Fentress
252	Georgenne	Ferdun	97218-1744	In addition the above mentioned points about destruction of tribal resources and interference with current tribal practices the preparation of this draft EIS should have included government to government consultation with the Tribes according to federal law.	PUB-907_Georgenne Ferdun
253	Cheryl	Ferguson	84401-6957		PUB-908_Cheryl Ferguson
254	Mary	Ferm	98110-4538		PUB-909_Mary Ferm
255	Linda	Fielder	75006-2801		PUB-910_Linda Fielder
256	Yvonne	Fisher	90293-8601	Why? Mainly because it is on Native land which is HIGHLY disrespectful. This is sacred land and should be treated as such! How dare people take this right away from the Native Americans for business reasons? It is not ethical and it will also affect the environment negatively.	PUB-911_Yvonne Fisher
257	Gloria	Fisher	97220-5948		PUB-912_Gloria Fisher
258	Kaitlin	Fitch	12180-7305		PUB-913_Kaitlin Fitch
259	Gregory	Fite	94541-4328	Having been through this area many times, I can honestly say that this beautiful area and its native people must have priority over this unnecessary development.	PUB-914_Gregory Fite

260	Nan	Flaaten	98684-4945		PUB-915_Nan Flaaten
261	Karen	Fletcher	97206-6954	Because the tribes do. We have caused them enough harm.	PUB-916_Karen Fletcher
262	Betsy	Foley	98102		PUB-917_Betsy Foley
263	Ann	Ford	83703-5422		PUB-918_Ann Ford
264	MaryAnna	Foskett	02476-8005		PUB-919_Mary Anna Foskett
265	Joyce	Foster	99024	Please do what is best for the tribes!!!	PUB-920_Joyce Foster
266	Paula	Fougere	03874-4108		PUB-921_Paula Fougere
267	Darrell	Fowler	98620		PUB-922_Darrell Fowler
268	Amy	Franco	97213		PUB-923_Amy Fanco
269	Sharon	Frank	75077-7628		PUB-924_Sharon Frank
270	Carol	Freese	99336-6144		PUB-925_Carol Freese
271	Lorna	Frey	97455	The Goldendale project would clearly have huge negative impacts on the Yakama people.	PUB-926_Lorna Frey
272	Eileen	Fromer	97223-9305		PUB-927_Eileen Fromer
273	Kimie	Fujimoto	98926-3458		PUB-928_Kimie Fujimoto
274	Lyle	Funderburk	97266-5100		PUB-929_Lyle Funderburk
275	Kate	Fuqua	97215-1130	Unacceptable choice of location for environmental and cultural reasons. Just say NO.	PUB-930_Kate Fuqua
276	Francisco	Gadea	97212-2356		PUB-931_Francisco Gadea
277	Mal	Gaff	93436-6526		PUB-932_Mal Gaff
278	Kevin	Gallagher	98155-6620		PUB-933_Kevin Gallagher
279	Linda	Gannon	97103		PUB-934_Linda Gannon
280	Marie	Garescher	10566-2545		PUB-935_Marie Garescher
281	Kima	Garrison	97211-6341	Respect first people's opinions and rights.....	PUB-936_Kima Garrison
282	Steve	Gary	98118-2939		PUB-937_Steve Gary
283	Chuck	Gehling	97031-8666		PUB-938_Chuck Gehling
284	Madeline	Geil	97201		PUB-939_Madeline Geil
285	Emil	Gerth	97203-2750		PUB-940_Emil Gerth
286	Rae	Gholson	98277		PUB-941_Rae Gholson
287	Katy	GhostHorse	97304-4816	I vote NO on this project!	PUB-942_Katy GhostHors
288	Noah	Gibson	97014		PUB-943_Noah Gibson
289	Robert	Gigliotti	98232-9594		PUB-944_Robert Gigliotti
290	Thomas	Gilmore	98225-7910		PUB-945_Thomas Gilmore
291	Kjersten	Gmeiner	98125-5019		PUB-946_Kjersten Gmeiner
292	Amanda	Goeke	97031-1511		PUB-947_Amanda Goeke

293	Laurie	Gogic	98034-6336		PUB-948_Laurie Gogic
294	graham	golbuff	98112		PUB-949_graham golbuff
295	Martha	Gorak	77450-8248		PUB-950_Marth Gorak
296	Allison	Gordon	97201		PUB-951_Allison Gordon
					PUB-952_Steve Graff
297	Steve	Graff	90025-4732	I oppose Rye Development,Äôs proposed Goldendale Energy Storage Hydroelectric Development (Development) because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) since 2017. Alleged ‚úgreen energy,Äù cannot be built at the expense of Tribal Nations, who are already on the front lines of climate change and extractive industrialization and practices. Rye Development,Äôs application should be denied full stop. To allow the application to proceed with Environmental review ignores the intense opposition to building this Development in this location. However, if Ecology proceeds with a Final EIS, it must include the following: Consideration of an appropriate range of alternatives, not just the proposed Project and a ‚úno action alternative.,Äù Changing the ‚úAesthetics/Visual Quality,Äù impacts to significant adverse impacts because of the impacts to	
298	Claudia	Gray	97435-0668	The Draft EIS fails to integrate the Development,Äôs destruction of irreplaceable tribal culture and religious resources, along with the intense disruption that this Development would cause to current tribal cultural practices, such as food and medicine gathering, into the full environmental analysis. The Final EIS must integrate these concerns throughout the full analysis.	PUB-953_Claudia Gray
299	Fred	Greef	98672-8504	Tribal Nations have the right to protect their heritage and culture. They do not want us to exclude people from these lands, they merely want good stewardship practices, and respect for the land and its history rather than destruction.	PUB-954_Fred Greef
300	Jude	Green	98225-2625	There needs to be an environmental review.	PUB-955_Jude Green
301	Steve	Green	98233-3824		PUB-956_Steve Green
302	Rax	Green	KT228RF		PUB-957_Rax Green
303	Jamie	Green	93004-2884		PUB-958_Jaime Green
304	Stacy	Green	98644-0517	Stop putting profits before people!	PUB-959_Stacy Green
305	Helen	Greer	85705-1465		PUB-960_Helen Greer
306	Pamylle	Greinke	11958-0456		PUB-961_Pamylle Greinke
307	Mark	Grenard	85032-5880		PUB-962_Mark Grendard
308	kathy	grieves	85383-3160		PUB-963_kathy grieves
309	Scott	Grinthal	94402-3924		PUB-964_Scott Grinthal
310	Julie	Grobelny	98661-3927	Destroying native cultural lands is not the answer. Let,Äôs come back to the table and look for a better path forward.	PUB-965_Julie Grobelny

311	Deena	Grossman	97202-5831	To WA Dept. of Ecology, Please deny the permits for Goldendale Energy Storage Project, The Draft EIS fails to integrate the Development,Ãs destruction of irreplaceable tribal culture and religious resources, along with the intense disruption that this Development would cause to current tribal cultural practices, such as food and medicine gathering, into the full environmental analysis. Tribal rights must be paramount. Sincerely yours, Deena T. Grossman	PUB-966_Deena Grossman
312	Mark	Grzegorzew	33702-6424		PUB-967_Mark Grzegorzew
313	Peter	Guerrero	98368-4024		PUB-968_Peter Guerrero
314	ken	gunther	33478-6204		PUB-969_ken gunther
315	Perry	Gx	92780-7011	A Catastrophe Waiting To Happen.	PUB-970_Perry Gx
316	Susannah	Hale	98107-4444	I stand in solidarity with the Tribes! No development of this project!	PUB-971_Susannah Hale
317	Michael	Halloran	97305-2161	Filth.	PUB-972_Michael Halloran
318	Donna	Hammar	97209-3756		PUB-973_Donna Hammar
319	Bob	Hannigan	97330-1835	Sacred sites need to be included in decisions regarding storage development. Otherwise, such decisions are far from 'green.'	PUB-974_Bob Hannigan
320	Art	Hanson	48917-1773		PUB-975_Art Hanson
321	Susan	Harmon	98229		PUB-976_Susan Harmon
322	Barbara	Harper	95012-2926		PUB-977_Barbara Harper
323	Hope	Harris	97103-3758		PUB-978_Hope Harris
324	Florence	Harty	98672-8901	Tribal rights.	PUB-979_Florence Harty
325	Jo	Harvey	98047-1222		PUB-980_Jo Harvey
326	cynthia	harvey	99208	Please stop destroying the planet. You and your descendants need to be able to live, and your legacy of destruction is probably not what you want them to know about.	PUB-981_cynthia harvey
327	Elaine	Harvey	98620-3114	This is a sacred site to the Yakama Nation. Please do not destroy another sacred site along with many cultural resources. To drill a hole through this mountain and create 2 reservoirs is a total desecration to their sacred site and the mountain itself. From the top of the ridge all the way to the toe of the ridge where it meets the Columbia River is a sacred site and where the Yakama's continue to gather their first foods ranging from salmon, roots, and other medicines. Green Energy does not have to come at the burden of the tribe and the environment. The lower reservoir is in the vicinity of a Toxic Waste site that has not been cleaned up; however, they are proceeding and making empty promises.	PUB-982_Elaine Harvey
328	Carolyn	Haupt	22302-2102		PUB-983_Carolyn Haupt
329	Chris	Hazynski	08016-3034		PUB-984_Chris Hazynski
330	Jerry	Heath	98360-9449	They were here first and we took their land away now we need to step up and help them restore THEIR LAND!	PUB-985_Jerry Heath
331	Janet	Hedgepath	98660-1619		PUB-986_Janet Hedgepath

332	Dwayne	Hedstrom	97218-3542	Unless this project has the consent and support of the natives peoples of the areas impacted by this project it will still be business as usual which we can not afford to continue	PUB-987_Dwayne Hedstrom
333	Bonnie	Helmer	32903-2300		PUB-988_Bonnie Helmer
334	Randall	Henderson	98516-6652	As the first director of the Southwest Washington Area-Wide Agency on Aging (1970s) and later as a United Methodist pastor, I have lived and worked along the Columbia River Watershed. It is an awe inspiring part of Creation that has sustained an amazing ecosystem of life for aeons. For tens of thousands of years it has sustained human communities producing rich cultural and spiritual heritages. These First Peoples have lived in harmony with this ecostem knowing it to be a spiritually alive, holy gift held in trust. Proposing short-term profit projects dressed as 'green', such as the Goldendale Energy Storage Project is disturbing. I fully support the Yakama Nation's concern and their recommendations. This project, as currently conceived, is disrespectful and threatens their heritage, their humanity. It is shortsided and racist. Indeed, it 'is not green energy if it destroys Tribal, Cultural, and Religious resources.' PLEASE END THIS PROJECT AS CURRENTLY ENVISIONED. THANK YOU.	PUB-989_Randall Henderson
335	Todd	Henion	97213-3936		PUB-990_Todd Henion
336	Anne	Hepfer	98101-4200		PUB-991_Anne Hepfer
337	Kate	Hermann-W	02451-2228		PUB-992_Kate Hermann-W
338	Kaeli	Hertz	97034-6852		PUB-993_Kaeli Hertz
339	Craig	Heverly	97202-3757		PUB-994_Craig Heverly
340	Cynthia	Hicks	85015-3827		PUB-995_Cynthia Hicks
341	Lacey	Hicks	94538-5434		PUB-996_Lacey Hicks
342	Michael An	Hill	98355-9720		PUB-997_Michael An Hill
343	William	Hoffer	98672	We cannot allow the hot reservoir waters injected with nitrogen into the already warning Columbia river nor should we take anymore from our native indians!	PUB-998_William Hoffer
344	Mark	Hollinrake	10026-1539		PUB-999_Mark Hollinrake
345	Debi	Holt	14470-9328		PUB-1000_Debi Holt
346	Usha	Honeyman	97333-2010		PUB-1001_Usha Honeyman
347	Celeste	Hong	90027-1144		PUB-1002_Celeste Hong
348	Phillip	Hope	10009-1618		PUB-1003_Phillip Hope
349	Mark	Houdashelt	80521-1645		PUB-1004_Mark Houdashelt
350	Abigail	Houghton	98118-3937		PUB-1005_Abigail Houghton
351	Phil	Houston Go	97210-2986		PUB-1006_Phil Houston Go
352	Pamela	Howard	97210-3149		PUB-1007_Pamela Howard
353	Jared	Howe	98108-1684		PUB-1008_Jared Howe
354	Jared	Howe	98108-1684		PUB-1009_Jared Howe

355	Linda	Howie	91367-4329		PUB-1010_Linda Howie
356	Shaun	Hubbard	98122-6424	I oppose this proposed facility because of the lack of consideration of the Yakama Nation, the potential repeat of our state,Âs evil history of drowning indigenous peoples,Â culture, and the lack of any viable alternatives.	PUB-1011_Shaun Hubbard
357	James	Hubbard	90043-4840		PUB-1012_James Hubbard
358	TeriLee	Huff	87112	Destroying others or land is not an improvement.	PUB-1013_TeriLee Huff
359	Glenn	Hufnagel	14215-1612		PUB-1014_Glenn Hufnagel
360	Stephen an	Hulick	98606-6600		PUB-1015_Stephen an Hulick
361	Lise	Hull	97411-9651		PUB-1016_Lise Hull
362	Gary	Hull	84405-4036	...	PUB-1017_Gary Hull
363	Juanita	Hull	84405-4036	...	PUB-1018_Juanita Hull
364	Ken	Humke	97215-2912	Haven,Ât the Native people been fucked over enough?	PUB-1019_Ken Humke
365	Jordan	Hunnicut	30121-4728		PUB-1020_Jordan Hunnicut
366	Sharon	Hunt	97007-5795		PUB-1021_Sharon Hunt
367	Asiya	Hussein	98106		PUB-1022_Asiya Hussein
368	Teresa	lovino	38138-4628		PUB-1023_Teresa lovino
369	Martha	Izzo	90439		PUB-1024_Martha Izzo
370	Kathryn	Jacobs	98816-9501		PUB-1025_Kathryn Jacobs
371	Don	Jacobson	97201-6304		PUB-1026_Don Jacobson
372	River	Jacobson	83821	Opposed to the Goldendale Energy Storage Project. Irreversible damage to the land surrounding the project. Put up more wind and solar projects.	PUB-1027_River Jacobson
373	Michael	Jacobson	83811	I wish to offer my opinion and my opposition about the proposed Goldendale pump storage project. I feel that entire project will continue a dangerous decline in an already fragile and compromised Ecosystem. Not only will the hydro cause a significant rise in surrounding water temperature, the disturbed close proximity to the two 60acre smelter holding ponds could cause irreparable damage should those ponds suffer a breach. Despite the positive aspects of this project it will cause the damage that far outweighs the benefits and will affect everything and everyone for decades.	PUB-1028_Michael Jacobson
374	Karen	Jacques	95811-7105	This ill conceived project is an assault on tribal cultural/religious resources and is actively opposed by them. Tribes have already experienced massive harm. It is unacceptable to perpetrate still more harm at a time when every state in this country needs to be looking at how to make reparations. It would be a shameful act of cultural genocide to move forward with this ill conceived project	PUB-1029_Karen Jacques
375	Brenda	James	32960-3539		PUB-1030_Brenda James

				It is time for appropriate and meaningful changes in the Goldendale Pumped Storage Development which will honor both United States AND Native American Resources so that impacts of the project honor ALL UNITED STATES CITIZENS. It is time to move from the 1700, 1800 AND 1900'S view of Native Americans to today's laws and treatment of ALL Americans. ALL AMERICANS must be treated according to their cultural practices, legal standing and all previous minimization of their existence MUST be changed to EQUAL treatment under the laws and practices of these United States. This project has disproportionate NEGATIVE IMPACT UPON THE U. S CITIZENS CALLED NATIVE AMERICANS PARTICULARLY in the areas of culture, food acquisition, and religious practices as well as daily living. PUB-1031_Patricia Janesh
376	Patricia	Janesh	97205-2448	
377	Anna	Jasiukiewicz	63-400	PUB-1032_Anna Jasiukiewicz
378	Anna	Jasiukiewicz	63-400	PUB-1033_Anna Jasiukiewicz
379	Mary Ann	Jasper	97377-9734	PUB-1034_Mary Ann Jasper
380	Virginia	Jastromb	01060-1734	We need to protect cultural and tribal resources. PUB-1035_Virginia Jastromb
381	Sally	Jennings	97380-9721	I stand in solidarity with Tribal Nations in putting their rights to historic and religious sites above the plan to dig reservoirs. The environmental analysis for the site is inadequate and must be expanded. PUB-1036_Sally Jennings
382	Carol	Jensen	95004-0576	PUB-1037_Carol Jensen
383	Patricia	Jerrells	98584-7603	Somehow the Washington State Department of Ecology has missed what the word 'Green' means in terms of impact on the environment of the Yakima Tribe's cultural and religious grounds and waterways. I also consider this an ethical situation. The Yakima Tribe has already been disrespected too many times and the assault on their lives needs to stop now. PUB-1038_Patricia Jerrells
384	Debra	Jim	98948-5594	This will affect all waterlife and the temperature of Nchi wana (Columbia river) PUB-1039_Debra Jim
385	Lorna	Jim	98620	Please stop digging up mother earth. PUB-1040_Larna Jim
386	Susan	Jim	98933	PUB-1041_Susan Jim
387	Erica	Johanson	08525-2709	PUB-1042_Erica Johanson
388	Elizabeth	Johnson	98648-6425	Let's protect native cultural rights and forgo making the 1% wealthier! PUB-1043_Elizabeth Johnson
389	Peter	Johnson	97405-2110	PUB-1044_Peter Johnson

390	Darcy	Johnson	98934-0774	'Chief Seattle's 1854 Oration -ver.1. WHEN THE LAST REDMAN HAS VANISHED FROM THE EARTH, AND THE MEMORY IS ONLY THE SHADOW OF A CLOUD PASSING OVER THE PRAIRIE, THESE SHORES AND FOREST WILL STILL HOLD THE SPIRITS OF MY PEOPLE, FOR THEY LOVE THIS EARTH AS THE NEWBORN LOVES ITS MOTHER'S HEARTBEAT..... CONTINUE TO CONTAMINATE YOUR BED, AND YOU WILL ONE NIGHT SUFFOCATE IN YOUR OWN WASTE, WHEN THE BUFFALO ARE ALL SLAUGHTERED, THE WILD HORSES ALL TAMED, THE SECRET CORNERS OF THE FOREST HEAVY WITH THE SCENT OF MEN, AND THE VIEW OF THE RIPE HILLS BLOTTED BY TALKING WIRES, WHERE IS THE THICKET? GONE. WHERE IS THE EAGLE? GONE. AND WHAT IS IT TO SAY GOODBYE TO THE SWIFT AND THE HUNT? THE END OF LIVING AND THE BEGINNING OF SURVIVAL... 'CHIEF SEATTLE 1855'	PUB-1045_Darcy Johnson
391	Andy	Johnson	37069-1431		PUB-1046_Andy Johnson
392	Lorraine	Johnson	98125-2600		PUB-1047_Lorraine Johnson
393	Richard	Johnson	98227-3138		PUB-1048_Richard Johnson
394	Sandra	Joos	97239-7202	I oppose the Goldendale Energy Storage Development because this development would have significant adverse implications for historic properties of religious and cultural significance to the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation), the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Nez Perce Tribe, and the Confederated Tribes of Warm Springs. The Developer has failed to identify any mitigation efforts to reduce the detrimental effects on tribal resources caused by this development. A project is not green energy if it destroys Tribal cultural and religious resources.	PUB-1049_Sandra Joos
395	Dorothy	Jordan	98264-9401		PUB-1050_Dorothy Jordan
396	Melinda	Joye	83536	NO DEVELOPMENT/NO STORAGE	PUB-1051_Melinda Joye
397	Beth	Kahlen	97219-3421		PUB-1052_Beth Kahlen
398	Erika	Kane	97032-9448		PUB-1053_Erika Kane
399	Rachel	Kato	97222		PUB-1054_Rachel Kato
400	Tracey	katsouros	20601-3322	We should no better by now what we need to do for a clean healthy planet. Do better!	PUB-1055_Tracey katsouros
401	Sarah	Kavage	98112-4636	I fail to understand how this can be green energy when it involves destroying 120+ acres of land. This should not be happening anywhere, but especially not on land that is so culturally important to the tribes.	PUB-1056_Sarah Kavage
402	Justin	Kaye	97222		PUB-1057_Justin Kaye
403	Dustin	Kearns	97206-6467		PUB-1058_Dustin Kearns
404	Mary	Keithler	80111-4135		PUB-1059_Mary Keithler
405	Thomasin	Kellermann	02864-6219		PUB-1060_Thomasin Kellermann
406	Elizabeth	Kelly	30720-8777		PUB-1061_Elizabeth Kelly

407	J	Kelly	98359-8556	I oppose Rye Development,Ãs proposed Goldendale Energy Storage Hydroelectric Development (Development) because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) since 2017. Alleged ,Ãgreen energy,Ã cannot be built at the expense of Tribal Nations, who are already on the front lines of climate change and extractive industrialization and practices. PUB-1062_J Kelly
408	Diane	Kent	85255-3792	PUB-1063_Diane Kent
409	Alicia	Kern	90274-4034	PUB-1064_Alicia Kern
410	Laurie	Kerr	98604-7387	The EIS proposal needs to include alternatives, including alternate locations in the draft. The impacts to groundwater from the aluminum smelter and the subsequent clean up of the smelter also needs occur. Significant environmental justice issues are also apparent; the proposal fails to acknowledge these concerns and mitigate against these impacts. This would be a great loss to Indigenous people who have historic sites and artifacts located in or near the water. PUB-1065_Laurie Kerr
411	Matt	Ketkaroonk	98006	PUB-1066_Matt Ketkaroonk
412	Thomas	Keys	97080	Damage to sacred Native American lands & overall negative impact on the environment. PUB-1067_Thomas Keys
413	Dr. Mha Atr	Khalsa	90035-3314	As a very concerned American citizen I most strongly urge you to block this project PUB-1068_Dr. Mha At Khalsa
414	Rebecca	Kimsey	97385-9682	PUB-1069_Rebecca Kimsey
415	Tammy	King	01440-1505	PUB-1070_Tammy King
416	Judy	Kinsman	97439-9606	Unacceptable!!! PUB-1071_Judy Kinsman
417	jeff	kipilman	97212-1913	PUB-1072_jeff kipilman
418	Saran	Kirschbaum	90035-4110	We need analysis of the cleanup integration and oversight planned for the former Aluminum Smelter site and other things.. PUB-1073_Saran Kirschbaum
419	Karen	Kirschling	94117-2655	PUB-1074_Karen Kirschbaum
420	Jamie	Kitson	98252-9782	PUB-1075_Jamie Kitson
421	Shelley Z.	Klappholz	97405-2634	PUB-1076_Shelly Z. Klappholz
422	James	Klein	78411-1709	This, like numerous other issues (climate change, gun safety, immigration reform, prison reform, education reform, short-term lending regulation, healthcare reform, banking regulation, opioid regulation) remains a vexing problem primarily due to corporations' ability to curry favor with elected officials. The corrupting influence of money in our political system is undermining our democratic traditions and discouraging Americans from voting and/or running for office. This ominous development may well end our experiment in representative democracy unless we alter this decades-long trend. For the sake of the republic, we must amend the US Constitution to state that corporations are not people (and do not have constitutional rights) and money is not speech (and thus can be regulated by state and/or federal campaign finance laws). Short of accomplishing this, no other reform of significance will be achieved. PUB-1077_James Klein

423	Janice	Klinski	98506-4510		PUB-1078_Janice Klinski
424	Maureen	Knutsen	99633-0134		PUB-1079_Maureen Knutsen
425	Joann	Koch	06249-2026		PUB-1080_Joann Koch
426	Carolynn	Kohout	97124-2574	Inadequate or non-existing analysis of cleanup Affects of the former Aluminum Smelter site, - which can easily release and/or spread minerals and other chemicals uncontrollably into the environment, - for example the proposed groundwater from excavation, - if construction moves forward, despite human and mechanical intervention integration and without oversight planned.	PUB-1081_Carolynn Kohout
427	Ellen	Koivisto	94122-2866	Yeah, projects aren't green if they destroy Native lands, practices, or culturally important places. Should be obvious by now.	PUB-1082_Ellen Koivisto
428	Joshua	Konheim He	10021		PUB-1083_Joshua Konheim He
429	Diane	Korf	98026-7417	We need to respect Native rights and land.	PUB-1084_Diane Korf
430	Mark	Koritz	30338-7865		PUB-1085_Mark Koritz
431	fayette	krause	98368	Please dis-allow this project.	PUB-1086_fayette krause
432	Leslie	Kreher	98272-2322	There are serious environmental justice impacts of this development. Please consider all impacts to tribal communities.	PUB-1087_Leslie Kreher
433	Leslie	Kreher	98272-2322	We must listen to our indigenous brothers and sisters and not infringe on their treat and religious rights!	PUB-1088_Leslie Kreher
434	Tawn	Kreider	98664-1501	NO NO NO NO NO!!!!!!!	PUB-1089_Tawn Kreider
435	Evan	Krichevsky	20854-3016		PUB-1090_Evan Krichevsky
436	Lycett	Kristen	97525		PUB-1091_Lycett Kristen
437	Jeff	Kulp	27612-6111		PUB-1092_Jeff Kulp
438	Keren	Kumar	01581-1067		PUB-1093_Keren Kumar
439	John	Kus	99114		PUB-1094_John Kus
440	Vince	I	32765-7918		PUB-1095_Vince I
441	J J	L.	98501		PUB-1096_JJ L.
442	Doug	Landau	33707-1143	Rye Development,Âs application should be denied. I oppose Rye Development,Âs proposed Goldendale Energy Storage Hydroelectric Development (Development) because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) since 2017. Alleged ,Âugreen energy,Âu cannot be built at the expense of Tribal Nations, who are already on the front lines of climate change and extractive industrialization and practices.	PUB-1097_Doug Landau
443	Priscilla	Lane	97215-1850		PUB-1098_Priscilla Lane
444	Liana	Lang	18661	I support the protection of tribal resources!	PUB-1099_Liana Lang
445	Liana	Lang	18661		PUB-1100_Liana Lang
446	M	Langelan	20815-4051		PUB-1101_M Langelan

447	Erik	LaRue	98233-9670		PUB-1102_Erik LaRue
448	First Name	Last Name	Zip Code	Comment	PUB-1103_First Name Last Name
449	Carolyn	Latierra	97212-3637		PUB-1104_Carolyn Latierra
450	George	Latta, M.D.,	84020-7659		PUB-1105_George Latta, M.D.
451	Charlene	Lauzon	98036-6224		PUB-1106_Charlene Lauzon
452	Marc	Laverdiere	02019-1039		PUB-1107_Marc Laverdiere
453	Nadene	LeChemina	97302-2912		PUB-1108_Nadene LeChemina
454	Dennis	Ledden	98382-9267		PUB-1109_Dennis Ledden
455	Aleks	Legan	97058		PUB-1110_Aleks Legan
456	Patricia	Legan	97058-2878		PUB-1111_Patricia Legan
457	Rita	Lemkuil	54241-2007		PUB-1112_Rita Lemkuil
458	Francis	Lenski	98685-4147		PUB-1113_Francis Lenski
459	Patricia	Lenzen	98684-5051	I stand with and for our Native, neighbors.	PUB-1114_Patricia Lenzen
460	Beth	Levin	97213-2415		PUB-1115_Beth Levin
461	Jake	Lewis	97202-1995		PUB-1116_Jake Lewis
462	Sara	Libby	97203-2771		PUB-1117_Sara Libby
463	Judith	Lienhard	97225-2515		PUB-1118_Judith Lienhard
464	Nigel	Lim	53072		PUB-1119_Nigel Lim
465	Tami	Linder	87144-2543		PUB-1120_Tami Linder
466	Hannah	Liu	98686-2258		PUB-1121_Hannah Liu
467	Therese	Livella	98629-0839	I think the best way forward is for Ecology to develop language around a recommended number of humans living in an area. Humans are quickly out growing this planet and Ecology needs to step up and make some recommendations on this issue. Over population is the crux of our environmental problems today.	PUB-1122_Therese Livella
468	Laura	Long	60616-3903		PUB-1123_Laura Long
469	Laura	Long	60616-3903		PUB-1124_Laura Long
470	Sharon	Longyear	10598-3229		PUB-1125_Sharon Longyear
471	Sammy	Low	98292-7843		PUB-1126_Sammy Low
472	Sammy	Low	98292-7843		PUB-1127_Sammy Low
473	Tracey	Loyd	98208-4923		PUB-1128_Tracey Loyd
474	Riley	Lozano	97223		PUB-1129_Riley Lozano
475	Diane	Luck	97212-2524	Destroying religious and cultural resources is wrong!	PUB-1130_Diane Luck
476	Ann	Luft	49406-0096	Because of the environmental and cultural damage it would do.	PUB-1131_Ann Luft

477	J	Lukas	46143-8460	The tribes in the area need to be protected.	PUB-1132_J Lukas
478	Debra	Lutje	97058-9038	We cannot as a nation continue to poison ourselves and we certainly have NO right to keep shitting on Native Peoples!	PUB-1133_Debra Lutje
479	Jane	Lyon	94928-4603		PUB-1134_Jane Lyon
480	Denise	Lytle	07095-1141		PUB-1135_Denise Lytle
481	Morgan	MacConaug	99507-4408		PUB-1136_Morgan MacConaug
482	Alex	Mach	98466-3205	Environment.	PUB-1137_Alex Mach
483	Judith	Mackenzie	55403-1945	Interference and destruction of indigenous lands	PUB-1138_Judith Mackenzie
484	Craig	Mackie	97730-0636		PUB-1139_Craig Mackie
485	David	MacNally	98672-8972		PUB-1140_David MacNally
486	Michelle	Macy	77077-5860		PUB-1141_Michelle Macy
487	Michael	Madden	10956-2846		PUB-1142_Michael Madden
488	Michael	Madden	10956-2846		PUB-1143_Michael Madden
489	Jennifer	Maffei	97202-1377	Land grabs and toxic infrastructure that destroy nature and interfere with Tribal practices have no place in our communities. Stop the destruction and green-washing now!	PUB-1144_Jennifer Maffei
490	Millie	Magner	98199-1441	We must do the right thing now! We owe it to our children, our environment and our indigenous peoples. It is long overdue that we right this wrong.	PUB-1145_Millie Magner
491	Tania	Malven	85719-2441		PUB-1146_Tania Malven
492	diane	marks	98362-3502		PUB-1147_diane marks
493	Dani	Maron-Olive	98632-9280		PUB-1148_Dani Maron-Oliv
494	Benjamin	Martin	12903	Tribal Rights	PUB-1149_Benjamin Martin
495	Linda	Martin	92021-1303		PUB-1150_Linda Martin
496	priscilla	martinez	98065-9718	We need to take better care of what is left of our environment, for wildlife, marine life, plant life, and people.	PUB-1151_priscilla martinez
497	Holly	Masri	97202-3266	Its construction would significantly damage irreplaceable sacred sites and artifacts of the Yakama nation, as well as fish and wildlife. This is in NO way acceptable, nor can it in any way be considered „Ügreen,Äù.	PUB-1152_Holly Masri
498	francis	mastri	06525-1603		PUB-1153_francis mastri
499	Nadia	Matveeva	98105		PUB-1154_Nadia Matveeva
500	Ellen	McCann	95437		PUB-1155_Ellen McCann
501	Terry	McClain	97218-1951	Technology won't save humans or the planet; I stand with tribal nations and the values of reciprocity. Please come up with a better idea!	PUB-1156_Terry McClain
502	Mauria	McClay	97203-5241		PUB-1157_Mauria McClay

503	Daviann	McClurg	67550-2803		PUB-1158_Daviann McClurg
504	Marla	McCune	98663		PUB-1159_Marla McCune
505	Meghan	McCutcheo	98672-8911		PUB-1160_Meghan McCutcheo
506	Pamela	Mcdonald	92505-2221	It's past time but necessary to stop our eternal attempts to silence and ignore our Native Americans. We've stolen their lands, stolen, mistreated, and killed their children. They allowed us to populate their land, lie and steal to marginalize them, and we continue to do so. Our 'entitled ignorance' is ruining our continent, and still we persist. WE HAVE LEARNED NOTHING. LEAVE THESE PEOPLE, THEIR CULTURE, AND THEIR LAND ALONE! BY RECOGNIZING THE VALIDITY OF THEIR MESSAGE, YOU'LL SAVE NOT ONLY THEIR LIVES AND CULTURE, BUT OUR LAND AND ALL OF US AS WELL.	PUB-1161_Pamela Mcdonald
507	Linda	McKillip	08081-1613		PUB-1162_Linda McKillip
508	Tina	McKim	98225-3812		PUB-1163_Tina McKim
509	Nancy	McMahon	98501-5900		PUB-1164_Nancy McMahon
510	Mona	McNeil	98686-1533	Tribes have lost too much already. Find another site. Protecting tribal sovereign treaty rights benefits us all and protects our environment from greedy extraction.	PUB-1165_Mona McNeil
511	Nancy	McRae	01463-1688	Justice for the tribal communities that would be impacted by this proposal. Their voices need to be heard and their rights respected. Times have changed and projects this this storage development cannot be rammed through without through evaluation by ALL parties.	PUB-1166_Nancy McRae
512	Susan	McRae	98506-3382	The indigenous peoples of North America have suffered genocide for 600 years. It is past time to respect the treaties.	PUB-1167_Susan McRae
513	John	McSwigan	97124-5044		PUB-1168_John McSwigan
514	David	Medford	97223-7316	Take all Indigenous concerns as mandatory brakes on the project , until they are c	PUB-1169_David Medford
515	Anthony	Mehle	44406-8161		PUB-1170_Anthony Mehle
516	Victoria	Meier	97068-3824	The tribes of the Pacific Northwest have suffered at the hands of the dominating culture for years upon years. It's time to be mutually respectful when we develop the land, even when the development is done to support the environment.	PUB-1171_Victoria Meier
517	elsa	meinig	98801-1487	Native Americans are excellent guardians of our earth. Why do you want to destroy what is so essential to them and for us as well? We need to preserve our natural resources and protect what we have!! Your grandchildren will thank you. Elsa Meinig	PUB-1172_elsa meinig

518	VIRGINIA	MENDEZ	33020-6038	Rye Development,Âôs application should be denied full stop. To allow the application to proceed with Environmental review ignores the intense opposition to building this Development in this location. However, if Ecology proceeds with a Final EIS, it must include the following: Consideration of an appropriate range of alternatives, not just the proposed Project and a ,Áúno action alternative.,Äù Changing the ,ÄúAesthetics/Visual Quality,Äù impacts to significant adverse impacts because of the impacts to Tribes. An analysis of the cleanup integration and oversite planned for the former Aluminum Smelter site. An analysis on the potential impacts to groundwater from excavation on the former Aluminum smelter site if construction moves forward. An acknowledgement that there are significant adverse environmental justice concerns with this development, including a disproportionate impact on tribal people.	PUB-1173_VIRGINIA MENDEZ
519	Nicole	Mercier	97202		PUB-1174_Nicole Mercier
520	Paulette	Meyer	97215-3414		PUB-1175_Paulette Meyer
521	Ronald	Meza	13904-2920		PUB-1176_Ronald Meza
522	Lisa M.	Mintz Kavas	98087-6057	Time for Earth to come first. Period.	PUB-1177_Lisa M. Mintz Kavas
523	Kathleen	Mireault	02130-5192	It will cause great harm to tribes living in the area!	PUB-1178_Kathellen Mireault
524	Anne	Mitchell	97206-1203	I don't oppose it completely, I just think it must be altered to mitigate cultural values. The altered plan should be formed by the complete inclusion of tribal panelists involved in every step. A token change is not good enough, not the goal. The goal is meeting half way, 50 - 50.	PUB-1179_Anne Mitchell
525	LISA	MIYAMOTO	97056-2911		PUB-1180_LISA MIYAMOTO
526	Patricia	Mizutani	97212-4827		PUB-1181_Patricia Mizutani
527	Adrienne	Moat			PUB-1182_Adrienne Moat
528	Margaret	Mogg	56464-2005	There are other solutions than to take tribal land for these projects. Our Native peoples have a right to keep their lands. Find another solution other than to take this land. Our Native Americans deserve more respect and consideration. Let BIG BUSINESS find other locations that won't damage the environment or steal land they have no moral or legal right to.	PUB-1183_Margaret Mogg
529	Leila	Mohseni	80304-4124		PUB-1184_Leila Mohseni
530	Sherry	Monie	97089-6521		PUB-1185_Sherry Monie
531	James	Monroe	94521-4041		PUB-1186_James Monroe
532	James	Monroe	94521-4041	Dams are not the best strategy!	PUB-1187_James Monroe
533	Judy	Moran	32404-5312		PUB-1188_Judy Moran
534	Joy	Morgen	53716-1823	Once the land is ruined, it,Äôs gone forever.	PUB-1189_Joy Morgen
535	Jules	Moritz	97330-2824		PUB-1190_Jules Moritz
536	Jessica	Morley	97222		PUB-1191_Jessica Morley
537	Larry	Morningstar	97540-7005		PUB-1192_Larry Morningstar

538	Alexander	Mottern	97202		PUB-1193_Alexander Mottern
539	Rick	Mousley	97138-2200	Progress shouldn't mean erasing the past!	PUB-1194_Rick Mousley
540	Amy	Mower	98266-2004		PUB-1195_Amy Mower
541	Amy	Murray	97206-6628	Yakama Nation opposes this, and so do I. There's nothing 'green' about destroying tribal life.	PUB-1196_Amy Murray
542	BLAYNEY	MYERS	98651-0266	see above	PUB-1197_BLAYNEY MYERS
543	Ruth	Myers	98638		PUB-1198_Ruth Myers
544	Marjorie	Nafziger	97202		PUB-1199_Marjorie Nafziger
545	Joseph	Naidnur	61614-1929		PUB-1200_Joseph Naidnur
546	Jason	Nardell	80504-3017		PUB-1201_Jason Nardell
547	Marie	Nedich	94131-2704		PUB-1202_Marie Nedich
548	Janet	Neihart	55016-1019	This is sacred land, and shouldn't be on the chopping block in the first place. This would be bad for the environment alone, but also would create a high risk of an environmental catastrophe.	PUB-1203_Janet Neihart
549	Katherine	Nelson	98031-3166		PUB-1204_Katherine Nelson
550	James	Neu	97404-1548		PUB-1205_James Neu
551	mary	neuendorf	97304-4349		PUB-1206_mary neuendorf
552	Jane	Nicolai	98664-5385	It's time to give back. It's time to actively renew a healthy relationship with the land and waters that sustain us. We have already practiced wide scale destruction. Now is time to restore and repair. Deny Rye Development's application.	PUB-1207_Jane Nicolai
553	Jennifer	Nitz	59802-3937		PUB-1208_Jennifer Nitz
554	Kelly	Norton	98101	Move this project off tribal lands. Demonstrate respect for history, and recalibrate the project to ensure it complies with regulations stipulated in 36CFR800.	PUB-1209_Kelly Norton
555	Russell	Novkov	53705-3253		PUB-1210_Russell Novkov
556	Theresa	Nuccio	98136-1997		PUB-1211_Theresa Nuccio
557	Bill	O'Brien	97005-1360	This proposed Storage Development would result in irrevocable to the environment surrounding the GOLDENDALE storage facility as well harm the Yakims Tribal lands and their environment.	PUB-1212_Bill O'Brien
558	Phoenix	Oaks	97217-2360		PUB-1213_Phoenix Oaks
559	Kelly	O'Hanley	97213-4056		PUB-1214_Kelly O'Hanley
560	Flynne	Olivarez	97217		PUB-1215_Flynne Olivarez
561	Steve	Ongerth	94801-4145		PUB-1216_Steve Ongerth
562	Becky	Orf	97520-2826	We must honor the sacred and religious practices of our Indigenous brothers and sisters, who have much to teach us if we will only listen.	PUB-1217_Becky Orf
563	Miguel	Orr	99350-1403		PUB-1218_Miguel Orr
564	Tracy	Ouellette	98232-9246		PUB-1219_Tracy Ouellette

565	Tabitha	Ouellette	98671		PUB-1220_Tabitha Ouellette
566	Suzanne	Oylear	97223-8918	I have had enough of projects that are detrimental to the beauty and health of my home. Enough!	PUB-1221_Suzanne Oylear
567	John	Palenik	07016-3257		PUB-1222_John Palenik
568	Paul	Palla	17225-1421	PLEASE DO THE RIGHT THING!!	PUB-1223_Paul Palla
569	Lowell	Palm	43160-2510		PUB-1224_Lowell Palm
570	Sharon	Paltin	95454		PUB-1225_Sharon Paltin
571	Alexandra	Pappano	04459-3229		PUB-1226_Alexandra Pappano
572	Adina	Parsley	98292-7843		PUB-1227_Adina Parsley
573	Adina	Parsley	98292-7843		PUB-1228_Adina Parsley
574	Michael	Parsons	81020-0647		PUB-1229_Michael Parsons
575	Carol	Patterson	72632-9812		PUB-1230_Carol Patterson
576	Brandon	Paul	92545		PUB-1231_Brandon Paul
577	Michele	Paxson	11554-4250		PUB-1232_Michele Paxson
578	Lindsay	Pearson	97220	Stop ruining the environment and start respecting native land.	PUB-1233_Lindsay Pearson
579	Gregory	Penchoen	98580-9731		PUB-1234_Gregory Penchoen
580	Michele	Penner	97701-9651	This entire project is wrong in so many ways. When are the powers that be going to stop destroying the environment for personal gain? That's all this really is, isnt it?	PUB-1235_Michele Penner
581	Sherry	Pennington	98032-6112		PUB-1236_Sherry Pennington
582	Lela	Perkins	98208-8800		PUB-1237_Lela Perkins
583	MARY	PETERSON	97365-9605		PUB-1238_MARY PETERSON
584	linda	petrulias	95421-9690		PUB-1239_linda petrulias
585	Rita	Pinchot	98672-0100	Please respect cultural rights and treaty agreements and stop this project. There are other options that are better for our communities.	PUB-1240_Rita Pinchot
586	Chris	Pinney	99362-2169	No more electricity needed. Just open up the existing grid with lower Snake River 4 dam breaching NOW in winter 2022. Just a scheme to supply bit-coin factory proposals that have been rejected in past 10 years. Not sustainable like the defunct aluminum plants scheme for weapons manufacturers to get cheaper energy. Proven detrimental. Crosses salmon spawning grounds that are mitigation for John Day dam, hence significant impacts with losses toward extinction, as well as interference to kite- and wind-surfer recreation in well established zone.	PUB-1241_Chris Pinney
587	Robert	Plata	97303-9610		PUB-1242_Robert Plata
588	Corrie	Podolak	97031-9665		PUB-1243_Corrie Podolak
589	Lisa	Podolsky	91401-4314		PUB-1244_Lisa Podolsky
590	Joel	Porter	97293-0515	Waste of time, money, & imposes on tribal & environmental concerns.	PUB-1245_Joel Porter

591	Susan	Porter	18428-9074		PUB-1246_Susan Porter
592	debra	poscharsck	97233-3536	No destruction to the environment and to Native Peoples resources.	PUB-1247_debra poscharsck
					PUB-1248_Paul Potts
				I oppose Rye Development,Âs proposed Goldendale Energy Storage Hydroelectric Development (Development) because of the detrimental, unavoidable impacts that it will have on tribal cultural-religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) since 2017. Alleged ,Äúgreen energy,Äù cannot be built at the expense of Tribal Nations, who are already on the front lines of climate change and extractive industrialization and practices. Rye Development,Äs application should be denied full stop. To allow the application to proceed with Environmental review ignores the intense opposition to building this Development in this location. However, if Ecology proceeds with a Final EIS, it must include the following: Consideration of an appropriate range of alternatives, not just the proposed Project and a ,Äúno action alternative.,Äù Changing the	
593	Paul	Potts	98577	,ÄúAesthetics/Visual Quality,Äù impacts to significant adverse impacts because of the impacts to Tribes.	
594	Clifford	Provost	10065-6431		PUB-1249_Clifford Provost
595	Nicholas	Prychodko	11932-2138		PUB-1250_Nicholas Prychodko
596	Louise	Quigley	02184-1513		PUB-1251_Louise Quigley
597	Joseph	Quirk	10009-4946		PUB-1252_Joseph Quirk
598	Sally	Radford	98409-4007		PUB-1253_Sally Radford
599	Ben	Rall	99205-5635		PUB-1254_Ben Rall
600	Julianne	Ramaker	97701-7947		PUB-1255_Julianne Ramaker
601	James	Ramirez	97330-6070		PUB-1256_James Ramirez
602	Kay	Randall	56560-4943		PUB-1257_Kay Randall
603	Natalie	Ranker	97459-3659		PUB-1258_Natalie Ranker
604	Robert	Ranta	97217-5714	It would have a negative impact on tribal cultural resources. The tribe has already suffered for years at the hands of the dominant culture.	PUB-1259_Robert Ranta
605	Rick	Ray	97060-9380	'THE PROPOSED PROJECT IS LIKELY TO HAVE SUBSTANTIAL, HARMFUL IMPACTS ON TRIBAL CULTURAL RESOURCES, INCLUDING SITES AND ARTIFACTS,ÄiPOTENTIALLY BOTH THOSE LOCATED IN-WATER, OR BELOW THE ORDINARY-HIGHWATER-LINE, AND THOSE ABOVE AND BEYOND THE SHORELINE. EXTENSIVE POTENTIAL TRIBAL CULTURAL RESOURCES IMPACTS HAVE BEEN DOCUMENTED IN MATERIALS DEVELOPED BY THE YAKAMA NATION (INCLUDING ARCHEOLOGICAL, CEREMONIAL, BURIAL PETROGLYPH, MONUMENTAL AND ANCESTRAL USE SITES). THE CTUIR HAS ALSO DETERMINED THAT THE PROJECT COULD HAVE SIGNIFICANT IMPLICATIONS FOR HISTORIC PROPERTIES OF RELIGIOUS AND CULTURAL SIGNIFICANCE TO THE CTUIR.'	PUB-1260_Rick Ray

606	Ellen	Redish	92264-0649		PUB-1261_Ellen Redish
607	Robert	Reed	92651-2455	better alts...Gate-5.com	PUB-1262_Robert Reed
608	Sparrow	Reed	97202		PUB-1263_Sparrow Reed
609	Lenore	Reeves	60448-1368		PUB-1264_Lenore Reeves
610	Laura	Regan	55741		PUB-1265_Laura Regan
611	melissa	rehder	97206-9067		PUB-1266_melissa rehder
612	Debra	Rehn	97202-4557		PUB-1267_Debra Rehn
613	Robyn	Reichert	33467		PUB-1268_Robyn Reichert
614	Robin	Reinhart	92104-4907		PUB-1269_Robin Reinhart
615	Brian	Resh	17565-9003		PUB-1270_Brain Resh
616	KALAMA	REUTER	98672-2376	We need to respect and honor the lands and traditions of the tribes impacted. We cannot keep taking dominion over these peoples.	PUB-1271_KALAMA REUTER
617	Jeff	Reynolds	04401-5933		PUB-1272_Jeff Reynolds
618	Dale	Riehart	94107-1807		PUB-1273_Dale Riehart
619	Nancy	Riggleman	93667-9506	Because it is planned as another way to irritate the indigenous peoples.	PUB-1274_Nancy Reggleman
620	Susan	Ring	98126		PUB-1275_Susan Ring
621	Dave	Ringle	18062-9432		PUB-1276_Dave Ringle
622	Janet	Riordan	98177-4231		PUB-1277_Janet Riordan
623	Janet	Riordan	98177-4231		PUB-1278_Janet Riordan
624	Jeanne	Ripp	98225		PUB-1279_Jeanne Ripp
625	Javier	Rivera-Diaz	11249-5128		PUB-1280_Javier Rivera-Diaz
626	Brad	Roberts	98672-1068	The developers have failed to acknowledge that there are significant adverse environmental justice concerns with this development, including a disproportionate impact on tribal people.	PUB-1281_Brad Roberts
627	Nancy	Roberts-Mo	33009-6745		PUB-1282_Nancy Roberts-Mo
628	Steve	Robey	94708-1229		PUB-1283_Steve Robey
629	Diana	Robinson	97051-2351	I believe any federal agency is aware of what will happen if this goes through. I was an employee of Boise Cascade paper mill for 22 years and contaminated the river in the land around here during my employment. And nobody cares especially are they employees of the government. Unfortunately I believe it's too late.	PUB-1284_Diana Robinson

630	Kathleen	Robson	98674-9540	Not only would this project destroy cultural resources, but building massive facilities and pumping a huge amount of water out of the Columbia does not sound like 'green energy' to me; it sounds more like water hoarding. The project has ignored laws and regulations protecting cultural and natural resources. It must not be allowed to go forward. PS Energy is far too centralized as it is - we need residential and commercial building codes that require solar panels on roofs, perhaps small wind turbines, and plumbing with a focus on water conservation.	PUB-1285_Kathleen Robson
631	Kathleen	Roche	97701-8232	This pumped storage project is in the wrong place.	PUB-1286_Kathleen Roche
632	Roger	Rocka	97103-4419	How is this different from what we have done since the time of Columbus? When will we stop taking from Native Americans and obliterating their culture?	PUB-1287_Roger Rocka
633	Brent	Rocks	97201-6132		PUB-1288_Brent Rocks
634	donna	roddvik	97031-1142		PUB-1289_donna roddvik
635	Jelica	Roland	52420		PUB-1290_Jelica Roland
636	Henry	Roller	99362		PUB-1291_Henry Roller
637	Diane	Rose	98007-7110	Please preserve culturally significant native sites. Thank you	PUB-1292_Diane Rose
638	Jean	Rosenbalm	97007-6900		PUB-1293_Jean Rosenbalm
639	Patricia	Rossi	19056-1016		PUB-1294_Patricia Rossi
640	Frank	Rouse	97017-9776		PUB-1295_Frank Rouse
641	Danielle	Rowland	98007-6140		PUB-1296_Danielle Rowland
642	Elena	Rumiantsev	98052		PUB-1297_Elena Rumiantsev
643	Elena	Rumiantsev	98052		PUB-1298_Elena Rumiantsev
644	Donald	Rumph	27858-7335	As a former resident of Washington State, living in Spokane, Everett and Bellingham, and understanding the need to respect the Yakama Nation, I disagree with the continuance of this project unless all conditions are met. And knowing the heat and dryness of the area for this project I wonder whether there has been any consideration of covers or some other mechanism for the reservoirs in order to stop the evaporation of the waters due to the heat and low humidity at this location.	PUB-1299_Donald Rumph
645	Jen	Rund	94947-3764	I urge you to do the right thing, and consider the effects on Tribes and the environment of your proposed actions. It is long past time we stop destroying important resources when there are alternative actions which do not destroy people's cultural heritage and the land they depend on.	PUB-1300_Jen Rund
646	terrance	ryan	98376-9702		PUB-1301_terrance ryan
647	William	Ryerson	46228-2226		PUB-1302_William Ryerson
648	Michael	Rynes	60565-2006		PUB-1303_Michael Rynes
649	Alicia	Salazar	90032-1505		PUB-1304_Alicia Salazar
650	Sierra	Sanchez	98125-3934		PUB-1305_Sierra Sanchez
651	jeffrey	sanders	60203-1650	it would have negative results for native american lands, culture and religion.	PUB-1306_jeffrey sanders

652	Gloria	Sanders	98632-3964	Because of the detrimental impact on the various tribal nations.	PUB-1307_Gloria Sanders
653	Christie	Sanders	06040-3805		PUB-1308_Christie Sanders
654	Daniel	Sandvig	98272-8752		PUB-1309_Daniel Sandvig
655	Robert	Sargent	01832-1354		PUB-1310_Robert Sargent
656	Debra	Saude	97367		PUB-1311_Debra Saude
657	Laura	Saunders	94107-1917		PUB-1312_Laura Saunders
658	Diana	Saxon	97301-1918		PUB-1313_Diana Saxon
659	Steven	Schafer	97225-4404		PUB-1314_Steven Schafer
660	Keith	Scheid	98685-1102		PUB-1315_Keith Scheid
661	Kim	Schmidt	97760	I am a member of the Klamath, Modoc, and Yahooskin tribe. I grew up in Goldendale Washington and I am strongly opposed to the Rye Development and it's impact to the Yakama Tribes and the environment. It's time to stop harming tribes and their cultural way of life. The earth is life and we all stand strong at protecting tribes and the environment.	PUB-1316_Kim Schmidt
662	Daniel	Schnabel	98611	As a Christian pastor, I believe we need to respect the religious beliefs and traditions.	PUB-1317_Daniel Schnabel
663	Lucy	Schneid	98607-9308	These people are not invisible. Stop acting like they are.	PUB-1318_Lucy Schneid
664	Hopi	Schott	97470-5449	Leave these sites alone	PUB-1319_Hopi Schott
665	John	Schreiber	08690-3815		PUB-1320_John Schreiber
666	Alicia	Schubert	97006-5306	A project is not green energy if it destroys Tribal cultural and religious resources. Tribal input must be considered. Tribes oppose this project. The project needs to be modified such that the tribes agree to it.	PUB-1321_Alicia Schubert
667	noella	schum	14607-1113		PUB-1322_noella schum
668	Tom	Schwegler	64152-1744		PUB-1323_Tom Schwegler
669	Tom	Schwegler	64152-1744		PUB-1324_Tom Schwegler
670	Jean	Schwinberg	98115		PUB-1325_Jean Schwinberg
671	Stan	Seeberg	98665-9141		PUB-1326_Stan Seeberg
672	Debbie	Sequichie-K	73527-0701		PUB-1327_Debbie Sequichie-K
673	Peter	Sergienko	97210-5242		PUB-1328_Peter Sergienko
674	Michelle	Sewald	80202-1257		PUB-1329_Michelle Sewald
675	Dana	Sewall	97030-6653		PUB-1330_Dana Sewall
676	Lauren	Sewell	98102-5170		PUB-1331_Lauren Sewall
677	Mike	Seyfried	89005-3721		PUB-1332_Mike Seyfried
678	Kathleen	Shabi	32137-8496		PUB-1333_Kathleen Shabi
679	Paula	Shafransky	98284-8586		PUB-1334_Paula Shafransky

680	Meghna	Shankar	98052	I support renewable energy, but if we move towards renewable energy, we cannot encroach upon the very little land indigenous people have left and destroy their cultural resources. The US government has subjugated indigenous people throughout its history, and this is only another step following the pattern of disregarding indigenous people's right to the land they occupied for millenia. Instead of continuing to add to the issue, we should take a step in the other direction and install renewable energy that does not adversely impact indigenous people's land.	PUB-1335_Meghna Shankar
681	Georgia	Shankel	60624-2953		PUB-1336_Georgia Shankel
682	Molly	Shaughnessy	46217-0296		PUB-1337_Molly Shaughnessy
683	BC	Shelby	97209-3464		PUB-1338_BC Shelby
684	Michelle	Sheldon	97048-4102		PUB-1339_Michelle Sheldon
685	Corinne	Sheraton	97306-1007		PUB-1340_Corinne Sheraton
686	Dan	Sherwood	97214-5038		PUB-1341_Dan Sherwood
687	Trina	Sherwood	98951-9140	My ancestors were food gatherers within this area, I hold sacred our sacred sites and the indigenous communities have sacrificed enough already. Once this cultural landscape is changed, it can never return to its pristine condition. Our Kah-Milt-Pah Band is one of many groups that utilize this area. Our food gathering is to be conducted in feeling sense of belonging and spiritual connectivity to the land which is difficult enough with the 'green energy' (wind farms) that dot the landscape night and day.	PUB-1342_Trina Sherwood
688	Jamie	Shields	97229-8985		PUB-1343_Jamie Shields
689	John	Shirley	98665-8540	Not really green, and disrupts Native American sacred spaces and property.	PUB-1344_John Shirley
690	Lynn	Shoemaker	53190-1313		PUB-1345_Lynn Shoemaker
691	Forest	Shomer	98368-0639		PUB-1346_Forest Shomer
692	Forest	Shomer	98368-0639		PUB-1347_Forest Shomer
693	Philip	Shook	85281-0033		PUB-1348_Philip Shook
694	Carol	Sibley	98103	It does not balance out for energy input/output and more importantly, flies in the face of treaties with numerous Tribal Nations.	PUB-1349_Carol Sibley
695	D.G.	Sifuentes	93546-0100		PUB-1350_D.G. Sifuentes
696	brian	simpson	98362		PUB-1351_brian simpson
697	Drew	Simrin	97404		PUB-1352_Drew Simrin
698	Kimberly	Sims		Actions to mitigate climate change cannot come at the expense of those working on the front lines of protecting the environment. Please reconsider having the Rye Development Project sited somewhere else. Thank you.	PUB-1353_Kimberly Sims
699	Janet	Sipe	97304-1829		PUB-1354_Janet Sipe

700	Jarad	Skeels	99354	Further development of water storage ignores overuse by agriculture, which encourages nitrogen deposition and degrades our riparian habitats. Newhouse,Â's pet project ignores the needs of the average resource user, and promotes agricultural exploration over all else. PUB-1355_Jarad Skeels
701	Kate	Skolnick	11238-2789	PUB-1356_Kate Skolnick
702	Steven	Sleeper	34135-7623	Stop breaking treaties and stealing more land from the people who's land this country stole from, in order to be from sea to shining sea, in the first place. This is as bad as what israel is doing to Palestine. Both are crimes against humanity and wholeheartedly unnecessary. Even if it were for the good of all, it is an abomination and has to be stopped! PUB-1357_Steven Sleeper
703	Joy	Smiley	11756-1130	Don't destroy the land or hurt people or animals PUB-1358_Joy Smiley
704	Jacky	Smith	GL16 7HX	Even from this distance - I live in the UK! - I can see that this development has not received the full & free consent of the indigenous people who will be affected by it. This is in breach of the agreement the US made. I would hope the US has enough respect for international agreements to abide by them. Otherwise you're no better than Johnson's government here in the UK. And by the way - consultation is not consent. PUB-1359_Jacky Smith
705	Richard	Smith	48122-1010	PUB-1360_Richard Smith
706	Joan	Smith	94904-1316	We cannot continue to destroy people in the name of ecology or economic advancement. For too long we have disrespected the rights and humanity of first nations. Now is the time to stop doing so. PUB-1361_Joan Smith
707	Donna	Smith	19083-2028	PUB-1362_Donna Smith
708	S	Smith	11789-0253	Hands off tribal lands! PUB-1363_S Smith
709	Kim	Smith	26253-4699	PUB-1364_Kim Smith
710	Taylor	Smith	45344-9011	PUB-1365_Taylor Smith
711	Kent	Smith	98119	Hear, hear! PUB-1366_Kent Smith
712	Donna	Snelling	98663	Besides the tribal concerns, Goldendale is a great place to call home for Washingtonians in the future. Think critically. Please. PUB-1367_Donna Snelling
713	Richard	Snook	98501	PUB-1368_Richard Snook
714	Raquel	Snow	98003	PUB-1369_Raquel Snow
715	Jennifer	Sofinowski	97031	PUB-1370_Jennifer Sofinowski
716	Earth-Feath	Sovereign	98507	I am an enrolled Tribal member of the Confederated Tribes of the Colville Reservation as well as a descendant of the Okanogan in Canada. My people reside on the Columbia and are the keepers of all that is Sacred. PUB-1371_Earth-Feath Sovereign
717	Scott	Species	98101-1329	I strongly oppose this proposal. a Project is not Green Energy if it Destroys Tribal Cultural and Religious Resources. The largest pumped-storage hydroelectric development in the Pacific Northwest will negatively affect the local native Indian culture. The extractive industrialization of this project cannot be mitigated. At least offer a number of alternatives. PUB-1372_Scott Species
718	Cheryl	Speer	98607	PUB-1373_Cheryl Speer

719	Karen	Spradlin	36265-2751		PUB-1374_Karen Spradlin
720	Holly-Marie	St Pierre	98625-0702		PUB-1375_Holly-Marie St Pierre
721	Ruchi	Stair	98133-7008	Consultation with Tribes cannot be an afterthought and the outcome cannot be a foregone conclusion. Treat Indigenous land with the same respect you would accord with Mercer Island or Bellevue. Yes to pumped storage hydroelectric and Yes to respectful Tribal consultation.	PUB-1376_Ruchi Stair
722	Katherine A	Stansbury	97045		PUB-1377_Katherine Stansbury
723	Burton	Steck	60618-6028		PUB-1378_Burton Steck
724	Lori	Stefano	98597-9086		PUB-1379_Lori Stefano
725	Cindy	Stein	91360-1522		PUB-1380_Cindy Stein
726	A.L.	Steiner	12418		PUB-1381_A.L. Steiner
727	Lorenz	Steininger	22554-5833		PUB-1382_Lorenz Steininger
728	Jim	Steitz	37738-5671	This model of 'pumped storage' is physically, thermodynamically equivalent to damming a river and creating a reservoir, with the distinction being that the reservoir holding the gravitational energy is established in a novel location. The ecological destruction of drowning a low-elevation location, and all its cultural value to native peoples of that location, remains unacceptable as for any dam that submerged sites claimed by the Yakima Nation. Moreover, we now know that reservoirs are a potent source of methane, an ultra-potent global warming pollutant, due to their creation of unnaturally steep, narrow lateral profiles that leave unoxygenated reservoir bottoms full of organic matter from the prior terrestrial ecosystem.	PUB-1383_Jim Steitz
729	Richard	Stern	10023-2504		PUB-1384_Richard Stern
730	Richard	Stern	10023-2504		PUB-1385_Richard Stern
731	Gavi	Stevens	33771-1113	It will be ruinous for the environment	PUB-1386_Gavi Stevens
732	Ben	Stevenson	97202-5942		PUB-1387_Ben Stevenson
733	Barbara	Stevenson	98027-8335		PUB-1388_Barbara Stevenson
734	Sarah	Stewart	02472-4914		PUB-1389_Sarah Stewart
735	Ben	Stickney	97217-7310		PUB-1390_Ben Stickney
736	Karen	Stickney	04240-5213		PUB-1391_Karen Stickney
737	Dianna	Stirpe	97214-1633		PUB-1392_Dianna Stirpe
738	Jan	Stone	97007-4732		PUB-1393_Jan Stone
739	Catherine	Stoothoff	98908-8505		PUB-1394_Catherine Stoothoff
740	kent	Sugnet	97215-3527		PUB-1395_kent Sugnet
741	Diane	Sullivan	98277-4556		PUB-1396_Diane Sullivan
742	Casey	Sunderman	97211-6739	Haven't we taken enough from Native Americans?	PUB-1397_Casey Sunderman

743	Scott	Sutton	87571	I was born and raised in the Columbia River Gorge where my family still lived. This proposal will destroy ancestral tribal lands and ecological habitat that is important to both the culture and nature of the Columbia River Gorge. PUB-1398_Scott Sutton
744	Cynthia	Svensson	98625-1800	We sacrificed Celilo Falls. We haven't cleaned up Hanford. We have to work smarter and stop destroying our home. We need to conserve energy, not waste it. Stop this latest travesty, please. PUB-1399_Cynthia Svensson
745	John	Swaner	97215-3615	The developer must take into account Native American land. PUB-1400_John Swaner
746	Carrie	Swank	19608-1361	 PUB-1401_Carrie Swank
747	Lee	Swedin	98125	good job denying the permit in June 2021! we must fully consider the ecological and social impacts of this work. If we do, we will see that the calculus does not add up for this project! thank you for your efforts! PUB-1402_Lee Swedin
748	Janet	Swihart	98631-1506	Respect the earth, respect the treaties, respect the People. PUB-1403_Janet Swihart
749	Diana	Talcott	97202-2208	 PUB-1404_Diana Talcott
750	Cornelia	Teed	98225-7154	 PUB-1405_Cornelia Teed
751	John	Teevan	91914-2504	 PUB-1406_John Teevan
752	Kathryn	TenHoopen	97080	For all of the obvious reasons! PUB-1407_Kathryn TenHoopen
753	Elizabeth	Terhaar	97031-1182	 PUB-1408_Elizabeth Terhaar
754	Kevin	Test	97063-8739	 PUB-1409_Kevin Test
755	Ellen	Thayer	98672-0710	I want to protect Native American lands. PUB-1410_Ellen Thayer
756	James	Thoman	37076-2909	 PUB-1411_James Thoman
757	Tabitha	Thomasson	30533-5410	 PUB-1412_Tabitha Thomasson
758	Don	Thompson	02139-3783	Because It Is Pure Unadulterated EVIL!!! PUB-1413_Don Thompson
759	Heather	Thompson	97229-6605	 PUB-1414_Heather Thompson
760	Frank K.	Thorp	60464-1546	Destruction of the environment. Indigenous rights. PUB-1415_Frank K. Thorp
761	Susan	Thurairatna	44070-4142	 PUB-1416_Susan Thurairatna
762	Judy	Todd	97232-1425	It's a ridiculous idea of a solution that causes more harm than good. PUB-1417_Judy Todd
763	Pela	Tomasello	95062-2543	The development would excavate two, massive 60-acre reservoirs in Klickitat County, Washington, near the John Day Dam and would have significant implications for historic properties of religious and cultural significance to the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation), the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Nez Perce Tribe, and the Confederated Tribes of Warm Springs. The Developer has failed to identify any mitigation efforts to reduce the detrimental impacts to tribal resources caused by this development. PUB-1418_Pela Tomasello
764	Charles	Townsend	97212-3162	 PUB-1419_Charles Townsend
765	Pepper	Trail	97520-3515	 PUB-1420_Pepper Trail
766	Sheila	Tran	55122-1634	Because we must all realize that everything us humans do has an impact on our environment. We must do everything that we can to protect our environment. PUB-1421_Sheila Tran

767	Roy	Treadway	98503-2561		PUB-1422_Roy Treadway
768	Carolyn	Treadway	98503-2561	Goldendale Energy Storage Hydroelectric Development is a VERY, VERY VERY BAD idea for countless reasons. Cease and desist, and go home. Leave Washington alone.	PUB-1423_Carolyn Treadway
769	Emma	Tresemmer	97031-1461		PUB-1424_Emma Tresemmer
770	Tom	Tripp	80524-6415		PUB-1425_Tom Tripp
771	Lindy	Trolan	97304	I stand in solidarity with Tribes and vehemently oppose the Goldendale hydroelectric development. It destroys irreplaceable cultural and religious resources on people who are already suffering at the hands of global warming. This is a NO. Green resources MUST consider Tribes. Period.	PUB-1426_Lindy Trolan
772	Cheryl	Trosper	97206-4117		PUB-1427_Cheryl Trosper
773	stephanie	trotter	97206-4339		PUB-1428_stephaie trotter
774	christina	tseu	98603-9736	People's heritage matters!	PUB-1429_christina tseu
775	Theodora	Tsongas	97215-2940	This project is neither clean nor sustainable. It is just another version of a dam and an artificial reservoir that destroys the land and all its resources! Haven't we done enough damage daming rivers and watercourses in the name of producing electricity and destroying everything in their way??? Don't you see that this is just another fake, green-washed project that is not useful and wastes energy and resources and is a distraction from really sustainable work to avert climate disruption? DO your job and PROTECT The ECOLOGY and LIFE!	PUB-1430_Theodora Tsongas
776	Naomi	Tsu	97031		PUB-1431_Naomi Tsu
777	D	Tyler	98105		PUB-1432_D Tyler
778	Alison	Underdahl	98104		PUB-1433_Alison Underdahl
779	Victoria	Urias	98125-3705		PUB-1434_Victoria Urias
780	Jennifer	Valentine	11762-1850		PUB-1435_Jennifer Valentine
781	Raymond	Valinoti	07974-2754		PUB-1436_Raymond Valinoti
782	Emily	Van Alyne	99353-7405		PUB-1437_Emily Van Alyne
783	Natalie	Van Leekwi	68844		PUB-1438_Natalie Van Leekwi
784	Nick	Verbos	53214		PUB-1439_Nick Verbos
785	Victor	Villasenor	98833		PUB-1440_Victor Villasenor
786	Angel	Villegas	98902		PUB-1441_Angel Villegas
787	Tara	Violetta	97203	Please listen to the Yakima Nation! This is a project that will help some at the expense of the most marginalized. Be on the right side of history	PUB-1442_Tara Violetta
788	Susan	Vosburg	97117-9419		PUB-1443_Susan Vosburg
789	Theodore	Voth	53704-4904		PUB-1444_Theodore Voth
790	Howard	Wade	97267-3523		PUB-1445_Howard Wade
791	cheryl	waitkevich	98506-3377		PUB-1446_cheryl waitkevich

792	Marie	Wakefield	97365-9519		PUB-1447_Marie Wakefield
793	Aloysius	Wald	43214-1337		PUB-1448_Aloysius Wald
794	Elizabeth	Waldron	97330-3134	Please, finally show some respect for our indigenous peoples & the land!	PUB-1449_Elizabeth Waldron
795	Liisa	Wale	98225-3080		PUB-1450_Liisa Wale
796	Sara	Walker	97217		PUB-1451_Sara Walker
797	Joan	Walker	93513		PUB-1452_Joan Walker
798	Kevin	Walsh	06443-3359		PUB-1453_Kevin Walsh
799	Joanne	Walters	97217-5427		PUB-1454_Joanne Walters
800	Ernie	Walters	94587-4331		PUB-1455_Ernie Walters
801	Rosemary	Ward	38701-6438		PUB-1456_Rosemary Ward
802	Tom	Wardell	19382		PUB-1457_Tom Wardell
803	Sam	Wardwell	97027-2232		PUB-1458_Sam Wardwell
804	Harold	Watson	65802-2904		PUB-1459_Harold Watson
805	Ann	Watters	97301-4352		PUB-1460_Ann Watters
806	Elizabeth	Watts	33435-8904		PUB-1461_Elizabeth Watts
807	Annika	Weber	98116	Tribal interests have been ignored for too long. It's disrespectful, discriminatory, and counter to all of our interests to cast aside their experiences. If tribal members say this isn't green energy, we all should have learned by now that means it's not green energy. Please do not go forward with this project.	PUB-1462_Annika Weber
808	Susan	Wechsler	97330-9207		PUB-1463_Susan Wechsler
809	Tamara	Wecker	97223-9112		PUB-1464_Tamara Wecker
810	Janet	Weidman	97103-8506	I believe in the importance of cultural resources for the Yakima Nation, and for environmental safeguards for all peoples. I oppose this project being located in this area.	PUB-1465_Janet Weidman
811	elyette	weinstein	98501-4765		PUB-1466_elyette weinstein
812	Dana	Weintraub	97003-4249		PUB-1467_Dana Weintraub
813	richard	weiss	98177-4424	Traditional tribal lands must be respected. Our history is so blotted with genocidal greed toward our native peoples that in these times insensitivity is just no longer acceptable.	PUB-1468_richard weiss
814	Russell	Weisz	95060-6109		PUB-1469_Russell Weisz
815	Sarah	Welte	97007-5623		PUB-1470_Sarah Welte
816	Alice	West	97215-2646	Protecting Indigenous sacred sites and lands is essential. Thank you.	PUB-1471_Alice West
817	Jack	West	97222-8835	Indian culture needs to be respected. So much was taken from them historically and this needs to stop.	PUB-1472_Jack West
818	Eric	West	32127-6515		PUB-1473_Eric West
819	Cabell	Westbrook	22480-2300		PUB-1474_Cabell Westbrook

820	Lois	White	97527-5584		PUB-1475_Lois White
821	Nancy	White	99216-0202		PUB-1476_Nancy White
822	Donna	Whitefield	98607-8049	A full analysis and mitigation plan needs to be done. We can not destroy irreplaceable cultural sites to create energy.	PUB-1477_Donna Whitefield
823	Joe	Wiederhold	98229-5714	Respect the Tribal Governments, don't do it.	PUB-1478_Joe Wiederhold
824	Mira	Wiegmann	97225-3509		PUB-1479_Mira Wiegmann
825	Katherine	Wiese	98642-1105		PUB-1480_Katherine Wiese
826	Judy	Wilcox	97060-1552		PUB-1481_Judy Wilcox
827	Mary Jo	Wilkins	99337-4614	The Draft EIS fails to integrate the Development,Âs destruction of irreplaceable tribal culture and religious resources, along with the intense disruption that this Development would cause to current tribal cultural practices, such as food and medicine gathering, into the full environmental analysis	PUB-1482_Mary Jo Wilkins
828	Carole	Williams	26505-3065		PUB-1483_Carole Williams
829	Annski	Williams	97405-4150	It is clear we can respect the tribal people's. Now is the time.	PUB-1484_Annski Williams
830	Michael	Williams	98664		PUB-1485_Michael Williams
831	Daryl	Wilson	97225-1023	Please recognize many interests and heritages must be balanced I this decision.	PUB-1486_Daryle Wilson
832	Alexandria	Wilson	98290		PUB-1487_Alexandria Wilson
833	Doris	Wilson	98034-3265	Honor tribal nations. Always consult with them before initiating projects on their lands.	PUB-1488_Doris Wilson
834	JESSICA	WINTER-S	98103-4611		PUB-1489_JESSICA WINTERS-S
835	Hans	Woicke	97211-7621		PUB-1490_Hans Woicke
836	John	Wood	97031-1871		PUB-1491_John Wood
837	J.	Woodworth	99025-9510		PUB-1492_J. Woodworth
838	Michael	Workman	97501		PUB-1493_Michael Workman
839	Don	Worley	99141-9654	Green must also be clean; the proposed Goldendale project is not clean. Destroying Indigenous Cultures is never clean.	PUB-1494_Don Worley
840	John	Worsley	97040-0596		PUB-1495_John Worsley
841	Owen	Wozniak	97214		PUB-1496_Owen Wozniak
842	Janet	Wright	98250-8966		PUB-1497_Janet Wright
843	Yvonne	Wright	97146-9425	Historically Native American people have suffered immeasurably from arrogant, unthinking treatment. It is not asking too much to now show respect for tribal beliefs!	PUB-1498_Yvonne Wright
844	Jean	Wynn	97222-4485	No attempt has been made by Goldendale developers to address the concerns of the Yakama Nation.	PUB-1499_Jean Wynn
845	Guadalupe	Yanez	79938-7743		PUB-1500_Guadalupe Yanez
846	Joan	Yater	22308-2123		PUB-1501_Joan Yater
847	Yonit	Yogev	98502-2619		PUB-1502_Yonit Yogev

848	Kathryn	Young	90046-3712		PUB-1503_Kathryn Young
849	Gisela	Zech	83706-2513		PUB-1504_Gisela Zech
850	Angela	Zehava	97202-6631	Native American rights are American rights.	PUB-1505_Angela Zehava
851	Mary Lou	Zeis	14075-7321	Keep the Yakama Nation safe from the detrimental impacts of this development!	PUB-1506_Mary Lou Zeis
852	Ms	Zentura	82609-2873		PUB-1507_Ms Zentura
853	russ	ziegler	60516-2032		PUB-1508_russ ziegler
854	R.	Zierikzee	94118-2520	Because it will destroy a tribal ceremonial and culturally important ecosystem. Respect people!	PUB-1509_R. Zierikzee
855	Wendy	Zieve	98020		PUB-1510_Wendy Zieve
856	Suzanne	Zuniga	97213-5013	Please, finally, we must honor the tribes.	PUB-1511_Suzanne Zuniga



August 9, 2022

Sage Park
 Department of Ecology
 Central Region Office
 Attn: Goldendale Energy DEIS
 1250 W. Alder Street
 Union Gap, WA 98903-0009

Submitted electronically via: <https://admin.ecology.commentinput.com/?id=KNBCY>

RE: Comments on the Proposed Goldendale Energy Storage Project, State Environmental Policy Act Draft Environmental Impact Statement, Publication No. 22-06-006

Dear Regional Director Park,

1 The following comments are submitted on behalf of Columbia Riverkeeper, Washington
 Chapter of the Sierra Club, Washington Environmental Council, and Friends of the White
 Salmon (together “Commenters”) on State Environmental Policy Act (“SEPA”) Draft
 Environmental Impact Statement (“DEIS”), Publication No. 22-06-006, issued by the
 Washington Department of Ecology (“Ecology”), on June 6, 2022. For reasons described below,
 before issuing a final Environmental Impact Statement, Ecology must conduct a more thorough
 analysis of the direct, indirect, and cumulative impacts of the proposed project on the people and
 environment. In addition, Ecology must identify and analyze the alternative to this project that
 2 will have less environmental impact.

Factual Background

3 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.

3 cont. 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 contaminated site, which includes 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 14.¹

4 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) (Appendix 1). 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 SEPA process.

5 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.

State Environmental Policy Act

6 The State Environmental Policy Act (“SEPA”) is Washington’s core environmental policy and review statute. Like its federal counterpart, the National Environmental Policy Act (“NEPA”), SEPA broadly serves two purposes: first, to ensure that government decision-makers are fully apprised of the environmental consequences of their actions and, second, to encourage public participation in the consideration of environmental impacts. *Norway Hill Preservation*

3 cont. ¹ 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).

and Prot. Ass'n v. King Co, 87 Wn.2d 267, 279 (1976). For decades, SEPA has served these purposes effectively, requiring full environmental reviews for projects with significant environmental impacts.

SEPA was enacted to “encourage productive and enjoyable harmony between humankind and the environment” and to “prevent or eliminate damage to the environment and biosphere.” RCW § 43.21C.010. Thus in adopting SEPA, the Washington legislature declared the protection of the environment to be a core state priority, “recognize[ing] 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 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).

SEPA is more than a purely “procedural” statute that encourages informed and politically accountable decision-making. SEPA requires agencies to integrate environmental concerns into their decision making processes by studying and explaining environmental consequences before decisions are made. *See Stempel v. Dep't of Water Resources*, 82 Wn.2d 109, 117–18 (1973). In enacting SEPA, the state legislature gave decision-makers the affirmative authority to deny projects where environmental impacts are significant, cannot be mitigated, and collide with local rules or policies. SEPA provides substantive authority for government agencies to condition or even deny proposed actions—even where they meet all other requirements of the law—based on their environmental impacts. RCW § 43.21C.060. As one treatise points out, when this premise was challenged by project proponents early in SEPA’s history, “the courts consistently and emphatically responded that even if the action previously had been ministerial, it became *environmentally discretionary* with the enactment of SEPA.”²

Discussion

A. Purpose and Objectives

Under SEPA, each EIS must “specify[] the purpose and need to which the proposal is responding. . . .” WAC 197-11-440(4). Because the stated purpose and need for an action determines the range of alternatives, it is essential that the agency articulates the project’s purpose and need from the agency’s perspective rather than simply adopting the project proponent’s objectives for the project as its own. As courts have cautioned, “[o]ne obvious way for an agency to slip past the structures of NEPA is to contrive a purpose so slender as to define competing ‘reasonable alternatives’ out of consideration (and even out of existence.)” *Davis v. Mineta*, 302 F.3d 1104, 1119 (10th Cir. 2002).

According to Rye, the purpose of and need for this project 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

² Richard Settle, *SEPA: A Legal and Policy Analysis*, §18.01[2] (2014) (emphasis added).

8 3. Commenters agree this laudable goal is the true purpose of this project. As such, 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.

9 Nonetheless, here, Ecology has identified the objectives of the proposed action as building a pumped-storage hydropower facility along the Columbia River capable of generating 1,200 MW of electricity. Draft EIS at 6. By adopting the proponent’s purpose and need statement for the proposed action, Ecology has unnecessarily limited the range of potential alternatives that could meet the true objective—namely, developing a green energy storage project.. Indeed, as discussed below, to date, Ecology has failed to identify any “reasonable alternatives,” WAC 197-11-440(5)(b), to the proposed action. This indicates that the purpose and need is too narrowly defined. The purpose and need, as stated, do not allow the consideration of viable alternatives that could allow this to happen, with less environmental impacts than the proposed action.

B. Reasonable Alternatives

10 “The Washington Supreme Court has emphasized that the focus of SEPA is environmental impacts, explaining that a reasonable alternative is one that could feasibly attain or approximate a proposal's objectives *at a lower cost to the environment.*” *Pub. Util. Dist. No. 1 of Clark Cty. v. Pollution Control Hearings Bd.*, 137 Wash. App. 150, 161–62, 151 P.3d 1067, 1072 (2007) (citing *King County v. Cent. Puget Sound Bd.*, 138 Wash.2d 161, 184–85, 979 P.2d 374 (1999)). To this end, SEPA requires that an EIS contain a detailed discussion of alternatives to the proposed action. RCW § 43.21C.030(c)(iii). Indeed, “[t]he required discussion of alternatives to a proposed project is of major importance, because it provides a basis for a reasoned decision among alternatives having differing environmental impacts.” *Weyerhaeuser v. Pierce Cty.*, 124 Wash. 2d 26, 38, 873 P.2d 498, 504 (1994). To ensure this analysis is robust, “[t]here must be a reasonably detailed analysis of a reasonable number and range of alternatives” *Id.*, 124 Wash. 2d at 41 (citing *Settle, The Washington State Environmental Policy Act: A Legal and Policy Analysis* § 14(b)(ii) (4th ed. 1993)).

SEPA’s regulations provide that an EIS must consider as alternatives those “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). The discussion of alternatives in an EIS need not be exhaustive, but the EIS must present sufficient information for a reasoned choice among alternatives. *Toandos Peninsula Ass’n v. Jefferson Cy.*, 32 Wash. App. 473, 483 (1982). In this instance, because the proposal is for a private project on a specific site, Ecology must evaluate the “No Action Alternative” and “other reasonable alternatives for achieving the proposal’s objective on the same site.” WAC 197-11-440(5)(d).

Here, Ecology has failed to consider a range of “reasonable” alternatives. Instead, Ecology admits that it identified two alternatives to be evaluated in this EIS, the proposed project and the No Action Alternative. DEIS at 4. As a result, Ecology has failed to comply with SEPA. Indeed, Rye admits that there are other “viable, least-cost energy storage options available,” in addition to its preferred pumped storage technology. FLA at 1. Ecology must 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.

1. Alternatives for Renewable Energy Storage

First, Ecology improperly dismissed from consideration an alternative of installing pumps at existing dams and reservoirs instead of constructing new reservoirs. As Ecology notes, “[t]his could result in a lesser environmental impact compared to the proposed project.” DEIS at 18. Yet, Ecology failed to develop and analyze this alternative because “no specific suggestions were provided for such an alternative’s location, design, or the circumstances of existing water rights.” *Id.* Thus, according to Ecology, “this alternative does not meet the criteria to attain the proposal’s objectives.” Ecology’s failure to fully analyze these potential alternatives violates SEPA. *See* SEPA Handbook at 36. It is Ecology’s duty to determine the reasonableness of an alternative based on whether the alternative in question feasibly attains or approximates the proposal’s objectives; and whether the alternative provides a lower environmental cost or decreased level of environmental degradation than the proposal. *Id.* Ecology cannot shirk this responsibility once a potentially viable alternative is identified simply because it is not handed all of the information needed to analyze the alternative. Instead, Ecology must gather the relevant, necessary sufficient to develop, describe, and study the alternative. RCW § 43.21C.030(e).

10 cont.

Next, Ecology failed to analyze the potential development of other renewable and/or decarbonized energy storage technologies at the site. For example, Ecology notes that the scoping comments discussed stacked blocks, liquid air, underground compressed air, flow battery storage, and solar and lithium-ion battery storage, as potential alternatives. DEIS at 18. Ecology dismissed these alternatives, without explanation, summarily stating only that “[n]one of these alternative energies meet the criteria to attain the proposal’s objectives.” *Id.* This cursory analysis violates SEPA in two ways. First, When an agency eliminates an alternative from its consideration, it must document its reasoning in the DEIS. SEPA Handbook at 36; *cf. Westlands Water Dist. v. U.S. Dept. of Interior*, 376 F.3d 853, 870 (If an agency rejects an alternative, it must adequately explain why it has chosen not to analyze an alternative in depth). Here, the public is left to guess what “criteria” these otherwise viable alternatives fail to meet. Ecology’s failure to articulate its reasoning under the criteria outlined by SEPA means the DEIS does not serve as a “means of assessing the environmental impact” of the proposed agency action, but “rather ... jutsif[ies] [a] decision already made.” WAC 197-11-402(10).

Second, given the potential for these alternative to meet the true purpose of this project—namely, the development of an energy storage project that will 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”—Ecology must analyze these alternatives. Failing to do so violates the central tenets of SEPA by failing to ensure the decision-makers are fully apprised of the environmental consequences of their actions and public participation in the consideration of environmental impacts. By purposefully omitting the detailed review and consideration of these viable alternatives, Ecology is in effect rubber stamping the project as proposed. This misses the point of SEPA.

Ecology cannot point to the other alternatives “eliminated from detailed evaluation” to save the DEIS. Although Ecology certainly is permitted to “indicate the main reasons for eliminating alternatives from detailed study,” it must nonetheless, “[p]resent a comparison of the environmental impacts of the reasonable alternatives, and include the no action alternative.” WAC197-11-440(5)(c)(v),(vi). Here, by not providing a more detailed analysis of the other alternatives Ecology has failed to include the required analysis of “reasonable alternatives.”

2. On-site Design Alternatives

Ecology’s limited consideration of on-site design alternatives suffer from the same basic flaws.

To begin with, Ecology’s inclusion of larger project designs is inconsistent with SPEA and does not move this analysis forward. In short, as Ecology recognizes, the larger project designs are not viable alternatives by definition because they are not less environmentally harmful, and therefore do not meet the “reasonable alternatives” criteria. WAC 197-11-440(5). SEPA’s regulations provide that an EIS must consider as alternatives those “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) (emphasis added). Ecology cannot point to these alternatives to suggest it has considered a reasonable range of viable alternative designs.

Ecology’s cursory review of the 4,800 Acre-Foot Reservoir Alternative also fails to comply with the law. Ecology concludes that “[t]he size and design of this alternative would create economic and power generation inefficiencies. The cost of energy generation would be excessive due to the spread over four turbines and the 8-hour continuous run time would be less compatible with the anticipated needs of the electrical grid.” DEIS at 19. Again, Ecology fails to provide sufficient explanation of the “economic and power generation inefficiencies,” to help the public understand why this is not a viable alternative. For example, Ecology suggests the cost of generating power under this alternative would be “excessive.” Excessive compared to what and on what scale? Would the lower environmental impact of this design justify the additional costs? Further, Ecology suggests that the shortened run time would be “less compatible” with the energy demands. How much less and what impact would that have on the potential for the project to contribute to the region’s energy goal? And again, would the tradeoff of a less impactful project be sufficient to justify the reduced compatibility. These are the types of questions Ecology must ask and answer in the EIS to ensure a reasoned decision making process and an informed public.

If Ecology truly cannot envision a less environmentally harmful alternative for consideration and analysis, not complying with SEPA is not the correct action. Instead, as discussed above, Ecology likely needs to reevaluate the purpose and object of the proposed action, and broaden the definition to allow the consideration of additional, reasonable measures that could meet the newly defined purpose. Alternatively, Ecology could return the question to the project proponent for them to develop the information necessary for the agency to consider truly reasonable alternatives. Absent taking such a step, Ecology has no choice but to deny the proposed action because it cannot comply with SEPA. RCW § 43.21C.060.

C. Adequacy of the Environmental Review

An EIS must evaluate the likely impacts related to the project. WAC 197-11-060(4). Decision makers must provide a “detailed statement” of environmental impacts. RCW § 43.21C.030(c). SEPA requires full disclosure and “detailed” consideration of all affected environmental values. At its heart, SEPA is an “environmental full disclosure law.” *Norway Hill Preservation and Protection Association v. King Cnty. Council*, 87 Wn.2d 267 (1976). The *Norway Hill* court also highlighted the legislature’s intent that “environmental values be given full consideration in government decision making,” and its decision to implement this policy through the procedural provisions of SEPA which “specify the nature and extent of the information that must be provided, and which require its consideration, before a decision is made.” *Id.* at 277–78.

“A proposal’s effects include direct and indirect impacts caused by the proposal. Impacts include . . . the likelihood that the present proposal will serve as precedent for future actions.” WAC 197-11-060(4)(d). The scope of impacts includes direct, indirect, and cumulative impacts. WAC 197-11-792(2)(c)(i)-(iii). “The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC 197.11.792) may be wider than the impacts for which mitigation measures are required of applicants.” WAC 197-11-060(4)(e). It is implicit in SEPA that an “agency cannot close its eyes to the ultimate probable environmental consequences of its current action.” *Cheney v. City of Mountlake Terrace*, 87 Wn.2d 338, 344 (1976).

12

Environmental reviews under SEPA must identify significant impacts on the natural and built environment. WAC 197-11-440(6)(e). Such reviews must use sufficient information and disclose areas where information is speculative or unknown. WAC 197-11-080(1), (2). Where there is scientific uncertainty, Washington courts have required agencies to disclose responsible opposing views and resolve differences. These requirements feed into the ultimate standard of review for EISs: adequacy is based on a rule of reason. *Cheney v. Mountlake Terrace*, 87 Wn.2d 338, 344 (1976). Courts require reasonably thorough information disclosure and discussion, good data and analysis to support conclusions, and sufficient information to make a reasoned decision. *Klickitat County Citizens Against Imported Waste v. Klickitat County*, 122 Wn.2d 619, 633 (1993). Sufficiency of the data is also assessed under the “rule of reason,” which requires a “‘reasonably thorough discussion of the significant aspects of the probable environmental consequences’ of the agency’s decision.” *Weyerhaeuser v. Pierce Cnty.*, 124 Wn.2d 26, 38 (1994) (citations omitted).

In making a similar assessment under NEPA, federal courts require agencies to take a “hard look” at environmental impacts. More specifically, for review of the NEPA claims, the Court must “ensure that an agency has taken the requisite hard look at the environmental consequences of its proposed action, carefully reviewing the record to ascertain whether the agency decision is founded on a reasoned evaluation of the relevant factors.” *Te-Moak Tribe v. Interior*, 608 F.3d 592, 599 (9th Cir. 2010) (quoting *Greenpeace Action v. Franklin*, 14 F.3d 1324, 1332 (9th Cir. 1992) (internal quotation marks and citations omitted)). This review must be “searching and careful.” *Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846, 858 (9th Cir. 2005).

12 cont. Washington Courts have employed the “hard look” doctrine directly or in other cases have required full disclosure and consideration of environmental values. *See Pub. Util. Dist. No. 1 of Clark Cnty. v. Pollution Control Hearings Bd.*, 137 Wash. App. 150, 158, 151 P.3d 1067, 1070 (2007); *Toward Responsible Dev. v. City of Black Diamond*, 179 Wash. App. 1012 review denied, 180 Wash. 2d 1017, 327 P.3d 54 (2014) (unpublished opinion) (“Courts review an EIS as a whole and examine all of the various components of [the] agency’s environmental analysis ... to determine, on the whole, whether the agency has conducted the required ‘hard look.’”); *see also Coalition for a Sustainable 520 v. U.S. Department of Transportation*, 881 F. Supp. 2d 1243, 1259 (W.D. Wash. 2012) (holding implicitly that “hard look” under NEPA sufficient for SEPA review). Where “hard look” is not discussed or employed directly, courts have required a “reasonably thorough discussion” of environmental impacts. *See Toward Responsible Dev. v. City of Black Diamond*, 179 Wash. App. (2014); *PT Air Watchers v. State, Dep’t of Ecology*, 179 Wash. 2d 919, 927, 319 P.3d 23, 27 (2014) (citing *Norway Hill*, 87 Wn.2d at 275) (requiring “full disclosure and consideration of environmental values”).

1. Water Resources

13 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). Ecology must analyze the water quality issues identified in Columbia Riverkeeper et al.’s 401 certification comments in the EIS.

2. Aquatic Species and Habitats

14 Ecology has failed to acknowledge, much less address, the potential impacts to fish species from this project. The Columbia River, near the project, provides habitat for numerous species including, but not limited to, chinook (*Oncorhynchus tshawytscha*), coho (*Oncorhynchus kisutch*), and sockeye salmon (*Oncorhynchus nerka*), steelhead (*Oncorhynchus mykiss*), Pacific lamprey (*Entosphenus tridentata*), river lamprey (*Lampetra ayresi*), American shad (*Alosa sapidissima*), white sturgeon (*Acipenser transmontanus*), bluegill, black crappie (*Pomoxis nigromaculatus*), largemouth bass, smallmouth bass, pumpkinseed (*Lepomis gibbosus*), walleye, white crappie (*Pomoxis annularis*), and yellow perch. Rye intends to purchase the water supply used to initially fill the reservoir, and any necessary make-up water for the project, from Klickitat Public Utility District (KPUD), which collects its water from an existing intake pond on the Columbia River. Rye and KPUD have offered several inconsistent and conflicting descriptions of the current intake and whether KPUD will install a fish screen that meets NMFS’ criteria. As both FWS and WDFW have noted the current intake does not meet NMFS’ criteria and the

14 cont.

design likely is not sufficient to ensure native fish are not entrained or impinged at the facility. *See* U.S. Department of Interior Comment on Federal Energy Regulatory Commission’s Notice of Application Ready for Environmental Analysis for the Goldendale Energy Storage Project, FERC No. 14861-002, Klickitat County, Washington, and Sherman County, Oregon (May 23, 2022) at 6; WDFW, WDFW Preliminary Recommendations For Terms and Conditions For The Goldendale Energy Storage Project, FERC Project No. 14861 (May 18, 2022) at 8-9. Given the direct and indirect significant impacts the initial withdrawal and subsequent makeup withdrawals may have on Columbia River fish species, some of which are critically imperiled, Ecology must study this issue closely in the EIS.

3. Terrestrial Species and Habitats

Ecology’s conclusion that the project will not have significant impacts on terrestrial species and their habitats is flawed for at least two reasons. First, Ecology does not have the information necessary to reach a reasoned decision for most of the species impacted by the project. Second, the available information demonstrates the project will have significant impacts on wildlife.

First, Ecology has identified numerous species that may be impacted by this project. For example, Ecology has identified dozens of bird species that use or likely use the site, including some state and federally protected species, including but not limited to golden eagles, bald eagles, peregrine and prairie falcons, northern harrier, and ferruginous hawk. In addition, mammals large and small, such as elk, mule deer, mice, voles, gophers, skunks, badgers, foxes, and squirrels, including the state protected western gray squirrels may use the site. Bats, including Townsend’s big-eared, big brown bat, pallid bat, California myotis, western small footed myotis, hoary bat, silver-haired bat, and Little brown bat, all are known to, or may use the site.

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Yet, as Ecology recognizes, there is very little information on how these species may use the site, and what information is available is dated. For example, on March 10, 2020, in comments to the Commission, 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. Indeed, 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 the Commission, 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 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).

Yet despite this important information, Ecology appears to rely exclusively on survey data from nearly twenty years ago when discussing the potential impacts on bald and golden eagles. *See* DEIS at 123-24. Ecology has failed to explain why it is relying on such stale information, when newer information is both available, and where there are still gaps, reasonably obtainable. WAC 197-11-080(1), (2).

Ecology’s analysis of the potential impacts on other bird species suffers from similar problems. Ecology notes that:

There is a potential for significant indirect adverse impacts on talus and cliff habitat if they can no longer support breeding raptors because of the proximity of human development and reduced prey availability. Such impacts could result in ongoing or repeated disturbance of habitat that is critical to species viability. The impact level would be dependent on the current presence of breeding raptors in this habitat determined during wildlife surveys.

DEIS at 133. Ecology has in effect admitted it has failed to obtain the information necessary to make a reasoned decision on the potential impact of this project on these species.

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. Yet, despite this, Ecology has not required any surveys of bats in the areas, and again is relying on extremely dated information. In addition, Ecology’s analysis of the potential impacts on bats and bat populations is insufficient. First, there is no analysis of the potential impact to bat and bat populations from the construction activities. *See* Terrestrial Species and Habitats Resource Analysis Report Proposed Goldendale Energy Storage Project (June 2022), at 23-28 (“Terrestrial Species Report”). Next, Ecology concluded that “[b]ecause most flying species would be able to avoid the study area, there would be no significant adverse impacts.” *Id.* at 32. This conclusion wholly ignores the potential that bats will in fact be attracted to the project site, and thus placed at greater risk. In fact, Ecology notes this potential for Little brown bats, a state species of concern, but without addressing the scope of this risk. *Id.* Ecology acknowledges that Rye has not proposed any mitigation measures to prevent attracting bats to the project site. DEIS at 133. Moreover, to the extent that bats currently use the project site, Ecology offers no analysis of the impact displacing them for the area will have on individuals or the populations as a whole.

15 cont. This lack of meaningful analysis continues with respect to terrestrial mammals. For example, the DEIS fails to address the potential impacts on the western gray squirrel. As Ecology notes, the western gray squirrel, a state threatened species, is potentially present in the project area. Terrestrial Species Report at 21. The proposed project has the potential to increase key identified threats to western gray squirrels in Washington State including habitat destruction and degradation from development and forest management, roadkill mortality, and wildfire risk. For example, western gray squirrels are wary of humans. The planned construction of the project over several years will undoubtedly occur during western gray squirrel breeding seasons and when juveniles are emerging from nests. Such disturbance during these key periods in the squirrels’ life cycles could have significant impacts on the squirrel population in the region. And because of the particular significance of the squirrel population in Klickitat and Yakima counties, this could have implications for the species status statewide. Indeed, Ecology appears to recognize the potential significant direct and indirect impacts to the species.

Yet, Ecology ultimately finds that those impacts will not be significant. This conclusion is based on two flawed assumptions. First, Ecology repeatedly qualifies its assessment of the potential impacts to the western gray squirrel by noting the impacts will occur “if” squirrels are present. However, as Ecology acknowledges, “western gray squirrel presence is unknown because of the lack of recent wildlife surveys in the study area.” Relying on this lack of information to avoid a meaningful analysis of the impacts of a project is inconsistent with SEPA.

16 Second, Ecology concludes that “with mitigation, there would be no significant adverse impacts on special status species from operation of the proposed project.” Terrestrial Species Report at 33. Yet, there are no mitigation measures specifically designed to mitigate the potential harms to squirrels. The vague and nonspecific measures such as “[s]et[ting] appropriate speed limits for the project area to minimize collisions with wildlife,” are not sufficient. First, there is no indication that Rye will set speeds sufficient to protect western gray squirrels, particularly if it proceeds with the implied presumption that squirrels are not present. Second,

16 cont. simply minimizing, and not eliminating, such collisions is not protective of an already at risk species. Similarly, the proposed mitigation plan does not include measures to protect squirrel habitat or protect individuals during critical life stages, such as breeding and juvenile emergence. As such, Ecology cannot reasonably conclude that the proposed mitigation measures will eliminate the potential significant impacts to western gray squirrels.

4. Aesthetics/Visual Quality

The DEIS concluded, “the proposed project would have no significant and unavoidable adverse impacts related to aesthetics and visual quality.” DEIS at 171. However, the DEIS also mentions that, “[t]here would also be impacts to Tribes from the view changes, which are described in Section 4.9 and the Tribal Resources Analysis Report (Appendix H).” DEIS at 171. It is incredibly problematic that the DEIS chose to relegate any and all impacts to Tribes to Section 4.9 instead of including impacts throughout the analysis. To exclude any aesthetics/visual quality impacts to Tribes and Native people seems to suggest that those impacts do not matter in the analysis.

17 “Visual quality, or aesthetics, refers to natural and human landscapes and how people see them. Visual quality is the value that people place on observing their surrounding environment.” DEIS at 171. In an interview discussing the Goldendale project and other sacred sites that have been under threat, Jerry Meninick, Yakama Nation’s deputy director of culture, stated “In this place... the slightest noise – voices from nearby hikers, feet crunching up a trail – would disturb the “pristine atmosphere.” (when referring to Laliik or Rattlesnake Mountain). Courtney Flatt, *It’s Irreversible: Goldendale Green Energy Project Highlights a History of Native Dispossession*, NWPB (Apr. 2, 2021).³ If slight noises are enough to disturb the atmosphere of another highly sacred site, construction and operation of the Northwest’s largest pump storage project would significantly impact how Native people see this area.

Meninick went on to compare the sacred site of Laliik to Notre Dame, “The whole world is in pain right now and in sorrow because of a fire (at Notre Dame). How do you think we feel? Because this, too, is like that church to us.” *Id.* No one would think to ignore the aesthetic/visual quality of Notre Dame, so why is it so easy to do so here? The DEIS inaccurately and inappropriately narrowly defines who is eligible to be considered impacted by aesthetic/visual impacts. Tribal Nations and Native people must be included in this evaluation and consideration of impact.

5. Cultural and Tribal Resources

18 The EIS conducted an analysis of potential Tribal and cultural resources that are within the project area. Ecology states that there are no potentially historic standing structures in the area, and no Cultural Landscapes (“CL”) have been identified. Further, no human remains or cemeteries have been identified in the project area. Therefore, the impact analysis done by Ecology focuses on archeological resources, Traditional Cultural Properties (“TCP”), and other Tribal resources. Commenters are in agreement with the DEIS that there are significant adverse

17 cont. ³<https://www.nwpb.org/2021/04/02/its-irreversible-goldendale-green-energy-project-highlights-a-history-of-native-dispossession> (last visited Aug. 8, 2022).

impacts to tribal cultural resources and that there is no mitigation that could avoid those impacts. Below Commenters have included additional points that must be included and addressed in the Final EIS.

The project area is within ceded Yakama Nation land and the area has historically been used by the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Confederated Bands of the Warm Springs Reservation of Oregon (Warm Springs), and the Nez Perce Tribe for hunting, traditional gathering, fishing, camping, and traditional ceremonies. As a result, there is a dense concentration of archaeological sites in the area. The DEIS states that, according to the Department of Archaeology and Historic Preservation, 79% of the study area is within high risk or very high risk areas for the possibility of encountering archaeological sites. (DAHP (Department of Archaeology and Historic Preservation), 2022a. Probability of Encountering Archaeological Resources within the Goldendale Energy Storage Project Area. Map Authors: A. Hsu, M. McLemore. March 22, 2022.)

The Yakama Nation has identified two TCPs in the area; *Pushpum* and *Nch'ima*. Warm Springs supports the Yakama Nation on the significance of these TCPs. *Pushpum* is the location of ongoing harvests of traditional resources and of ceremonies and other traditions. *Nch'ima* is a traditional fishing ground and village site. CTUIR identified two TCPs: one is *Pushpum* and the other is confidential to non-Tribal members. CTUIR has indicated that they have used the other TCP area for traditional activities since time immemorial. The Nez Perce Tribe provided documentation to Ecology demonstrating a similar evaluation of the importance of traditional gathering and ritual activities in the project area. Warm Springs supports the Nez Perce Tribe on the significance of these TCPs.

Beyond the archeological sites and TCPs, First Foods are also present in the project area. Plants and root gathering in the project area is an essential cultural practice. Ecology has documented smooth desert parsley, biscuitroot, and serviceberry as some of the important plant species in the area. Culturally significant animal species are also present in the area. Several aquatic species such as salmon, trout, and lamprey are present in the area, as are deer, elk, porcupines, waterfowl, birds, and other small mammals.

The DEIS concludes that **the proposed project would result in significant and unavoidable adverse impacts related to Tribal and cultural resources, starting during construction and continuing through operation of the project.** The DEIS further states **that they have not received information about mitigation proposed or supported by the Tribes that would reduce the level of impact.** Instead, the Yakama Nation has stated that the proposed action will have significant impacts, many of which cannot be avoided or mitigated. The Yakama Nation specifically said: “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 of ancestral sites that are still used to observe ceremonial and cultural practices.” DEIS at 164-165.

Yakama Nation has opposed the project since its inception. Yakama Nation also opposed earlier iterations of a pumped-storage hydroelectric project proposed at the site. According to the Tribe, Rye’s development would destroy archeological, ceremonial, burial, petroglyph,

18 cont.

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. 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. 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.

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, and the DEIS does not address this either.

The DEIS further states that “[p]reservation of land and culture is essential to the identity of the Tribes. It provides the living space, the sacred and cultural sites, and the natural resources that sustain Tribal peoples and cultures. It provides spiritual and physical sustenance, and the means for economic self-sufficiency.” DEIS at 160. However, with this observation, the conclusion that there will be significant impacts to Tribal and cultural resources, and the clear message from the Yakama Nation that no mitigation will address the negative impacts of this project to their cultural resources, the DEIS does not adequately address how this project can go forward without detrimental impacts to these resources. It is clear that this project cannot continue as planned in this location, without severely impacting the Tribes’ cultural practices.

Further, Ecology must analyze how the Project’s construction and cultural resource destruction cumulatively impacts the Yakama Nation, CTUIR, Nez Perce, and Warm Springs. See section C.6., below for a detailed analysis.

Additionally, the DEIS fails to acknowledge the ongoing inadequacy with consultation, at the federal level. Consultation under Yakama Nation’s Tribal Codes and Resolutions must be between the highest ranking government officials/those empowered to make decisions and with the Tribal Council in Toppenish, Washington, the seat of Tribal government. To date this level of consultation has not happened for this project. FERC delegated consultation responsibility to Rye, a private company, and Rye hired an outside private consultant, who has repeatedly asked for information and knowledge that the Tribe cannot and will not share regarding cultural resources and practices. This is unacceptable. The exploitation, destruction, and theft of Tribal cultural and religious resources requires the specific location and details to be shared privately in the consultation process and not made publicly accessible in order to protect these resources. *See generally*, Kathleen Sharp, *An Exclusive Look at the Greatest Haul of Native American Artifacts, Ever*, *Smithsonian Magazine* (Nov. 2015) (Describing the largest artifacts sting operation in 2009 that arrested 32 and recovered hundreds of thousands of Native American artifacts that had been illegally stolen and unearthed, violating the federal Archaeological Resources Protection Act

and the Native American Graves Protection and Repatriation Act, among other laws.).⁴ If FERC cannot consult with the Yakama Nation adequately, they need to provide solutions on how to receive the information they need rather than putting a burden on the Tribe and requiring the Tribe to share this sensitive information publicly.

20 cont. President Biden’s January 26, 2021 memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships, “charges all executive departments and agencies with engaging in regular, meaningful, and robust consultation with Tribal officials in the development of Federal policies that have Tribal implications.” FERC has not complied with this memorandum and needs to engage in meaningful consultation with the Tribe. Handing off the consultation responsibility to an outside private consultant is insulting to tribal sovereignty and threatens sensitive cultural resources. Ecology must acknowledge the ongoing failure of FERC and Rye to meet these important consultation obligations and should assess in the EIS the impact these ongoing failures may have on the tribes and the project.

6. Environmental Justice

The DEIS found that there would be no significant and unavoidable adverse effects related to environmental justice and that there would be no disproportionate impact on communities of color or low-income populations, and therefore no mitigation is required.

21 Environmental Justice impacts were analyzed by looking at potentially significant adverse direct and indirect impacts from construction and operation of the proposed project and from the no action alternative. If the analyses identified significant adverse impacts to a resource area, those impacts were further assessed for their potential to disproportionately affect communities of color and low-income populations. Looking at construction and operation, Ecology concluded that there will be no direct or indirect significant impacts, and as such, no mitigation measures are proposed.

For the environmental justice analysis, the focus is on communities of color and low-income populations, with Ecology stating that impacts to Tribal communities are discussed in Section 4.9. Therefore, impacts to Tribes and Tribal communities were not considered through the lens of environmental justice specifically, which is a gross oversight.

22 The Final 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 environmental 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. SEPA requires consideration of cumulative effects. WAC 197-11-0060(4)(e); WAC 197-11-330(3)(c) (“Several marginal impacts when considered together may result in a significant adverse impact.”); *White v. Kitsap Cnty.*, SHB No. 09-019 at 17 (2009) (cumulative impacts of a proposed action together with the impacts of

20 cont. ⁴<https://www.smithsonianmag.com/history/exclusive-greatest-haul-native-american-artifacts-looted-180956959/> (last visited Aug. 8, 2022).

22 cont.

pending and future actions should be considered when making a threshold determination). The DEIS does not adequately consider the cumulative effects of this project, and the cumulative impacts of green energy development on tribes specifically. The Yakama Nation, for example, already had to protect this site from another developer proposing a pumped storage project, and now they are forced to protect their culturally significant land yet again.

On July 27, 2022, Yakama Nation, joined by 17 treaty tribes across Washington state, sent a letter to Governor Inslee urging him to deny this project. The letter stated in part

Our medicines, foods, lands, and waters are sacred to us. For too long, these sacred places where we gather our foods and hold our ceremonies, have been threatened by development without consultation with, or consent from, our sovereign tribes. This is unacceptable.

23

Our ancestors signed Treaties with the United States, often under threat of violence and death, in exchange for our ancestral lands and sacred places. Through these treaties, we retain the rights to practice and live in our traditional ways in these places. Yet, the promises made by the government have been broken time and time again. Development and industry have threatened our ways of life for hundreds of years and continues to do so today. Our salmon populations are near extinction. Our ancient villages and ceremonial sites have been flooded. Our ways of life are under constant threat from development and climate change. We must protect our sacred places for our future generations. Letter from Yakama Nation to Governor Inslee, RE: Goldendale Pumped Storage Project Violates Yakama Nation’s Sovereign Rights (July 27, 2022).

24

Yakama Nation, CTUIR, Nez Perce, and Warm Springs have had places of cultural and religious significance forcibly taken as locations for the Hanford Nuclear Site, the Bonneville Dam, and many other projects. These projects have caused toxic, chemical, and radioactive pollution, flooded traditional village sites and burial grounds, destroyed fishing sites, displaced Native people, and threatened lifeways. Over a hundred years of detrimental impacts to culturally significant and sacred lands by energy projects cannot be ignored or glossed over, and needs to be addressed fully in the environmental justice section of the DEIS. The DEIS does not attempt to address or analyze these historic wrongs and the impact this current project would have on the Tribes. For the DEIS to conclude that there are no significant adverse impacts to communities of color again ignores the detrimental impacts to Tribes and Native People.

25

7. Climate Change

The DEIS fails to consider the uncertainty around the viability of this project. In general, Commenters are supportive of good, viable renewable energy projects that are sited in consultation with Tribes, but this project is not that.

26

First, 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). The state’s analysis is still underway and, to date, does not demonstrate a “need”

26 cont. 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 that this 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.

27 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 the 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.

28 Second, 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). The Rocky Mountain Econometrics analysis concludes that a combination of rising construction costs and decreasing open-market energy prices undercut the project purponent’s claims that the project is necessary to meet the state’s decarbonization goals.

29 Third, Ecology should evaluate the benefit of an environmental cleanup at the former CGA smelter site by evaluating the incremental *increased* benefit the project brings to the cleanup. Whether the project moves forward or not, state and federal law require CGA site cleanup. In turn, Ecology must evaluate the project’s benefit by comparing the baseline cleanup requirements to the “add on” cleanup Rye promises when it builds the lower reservoir. Ecology should only include the “add on” cleanup in the proverbial benefits bucket.

30 Finally, the project proponent's jobs numbers demonstrate that, while the project will produce construction jobs, the project supports a relatively small number of permanent jobs (20 to 30 jobs per year post-construction in Washington). *See* FLA Exhibit E at 85. Ecology must consider whether the 20 to 30 permanent jobs per year outweighs sweeping and permanent cultural resource and environmental impacts.

Ecology’s DEIS section on climate change should include this analysis.

Conclusion

31 Commenters respectfully reiterate that the Final 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 final 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
simone@columbiariverkeeper.org



Andrew Hawley
Staff Attorney
Western Environmental Law Center
On behalf of Columbia Riverkeeper



Patricia L. Arnold
President
Friends of the White Salmon
pat.arnold@friendsofthewhitesalmon.org



Margie Van Cleve
Sierra Club - Washington State Conservation Chair



Rebecca Ponzio
Climate and Fossil Fuel Program Director
Washington Environmental Council

Nicole Lundin

Greater Goldendale Area Chamber of Commerce
903 E Broadway
Goldendale, WA 98620

Department of Ecology
State of Washington
Re: Comment on Goldendale Energy Storage Project

August 9, 2022

Good day,

Several years ago, the Goldendale Chamber decided to focus on long term economic development that would bring companies and industries to Goldendale with the goal to generate sustainable, long-term employment and prosperity to our community. The Goldendale Energy Storage Project is just such an opportunity.

Klickitat PUD had started the preliminary Federal Energy Regulatory Council (FERC) permit process with goal of bringing in additional partners to finish the permit process. Rye Development in Portland and National Energy stepped up. Copenhagen Infrastructure Partners CIP has taken over National energy's roll and is a better fit for this project.

1 The Goldendale Energy Storage project is designed to capture renewable energy produced by solar and wind generation when there is an excess amount of it. This is accomplished by pumping water from the lower reservoir that will be located near the old aluminum smelter plant, to upper reservoir which is located due north at the top of bluff. The lower reservoir will be visible from the highway 14 the upper reservoir will not be visible, nor will the pump house or piping that connect the two reservoirs.

This initial public comment period on the environmental impact statement is a major milestone in the process. This project will provide 3000 construction jobs over the build period with 50 to 70 long term jobs once it is complete. The local college is setting up to help with apprenticeship training to help provide skilled labor for this storage project. This will bring money into our community. It will help our local merchants prosper. It will provide tax revenue to Klickitat County.

The more one considers this project the better it looks for our community.

Sincerely,
Nicole D. Lundin
Executive Director
Greater Goldendale Area Chamber of Commerce



Greater Goldendale Area Chamber of Commerce
903 E Broadway
Goldendale, WA 98620

Department of Ecology
State of Washington
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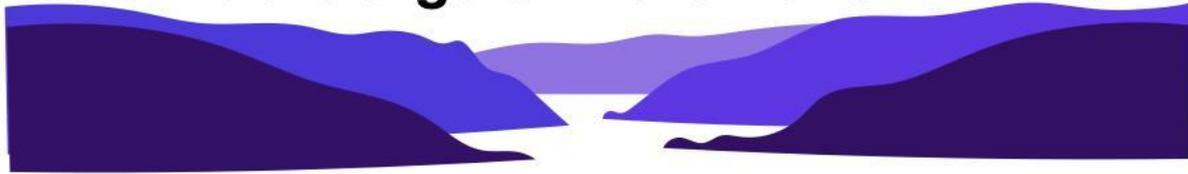
The more one considers this project, the better it looks for our community.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nicole D. Lundin".

Nicole D. Lundin
Executive Director
Greater Goldendale Area Chamber of Commerce

Columbia Gorge Climate Action Network



August 9, 2022

RE: Goldendale Energy Storage Project, Project 101, LLC, Draft Environmental Impact Statement

Dear Washington Department of Ecology,

1 Thank you for this opportunity to opine on this proposed project. The Columbia Gorge Climate Action Network (CGCAN) educates, organizes and motivates Columbia Gorge activists to reduce and eliminate fossil fuel usage and climate change, at all levels from individual to global. We encourage clean local renewable energy, conservation, community sustainability and resilience throughout our National Scenic Area.

2 CGCAN opposes Rye Development's proposed Goldendale Energy Storage Hydroelectric Development as proposed in the current Draft EIS. The impact of this proposed project is more harmful than it is good. The greatest impact would be on the tribal, cultural and religious resources as submitted by the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, and the Kah-Milt-Pah (Rock Creek Band of the Yakama Nation). Historically Tribal Nations have been ignored along with the violation of Treaty Rights. This is true today in regards to Rye Development's Project 101.

3 We believe that the application should be denied in its current state. If this project is pursued further, it must include the following:

- 4 • A robust mitigation plan available to Tribal Nations. Currently as it stands the mitigation plan has not been accepted or supported by the Tribes. The impact would be significant and unavoidable in its current state.
- 5 • Consideration for the fish and wildlife that will be significantly impacted. Biologists have raised concern about the increase in wind turbine bird kill. The U.S. Fish and Wildlife have discussed at great length the concern over the Golden Eagle population being significantly impacted while the developer has not offered a viable mitigation plan for this potentially significant loss. Questions remain about how the project will mitigate the loss of stream and riparian habitat in wetlands and other ephemeral streams.
- 6 • In 2016, a pump storage project was denied due to the toxic pollution at the Aluminum smelter site. We request a full analysis of all the mediation impacts on the site.
- 7 • The project must show through market analyses that it will be economically competitive. Why will utilities commit to long-term contracts for all the generation of this project at \$85

7 cont. | to \$95 per MWh? Meanwhile the cost trajectories of competing battery, distributed EV storage and other technologies for grid balancing are getting cheaper while pumped storage is mature and costs are fixed.

- 8 |
- In its current state ~100,000 MTCO₂e will be consumed during construction, a large amount of gasoline and diesel. In addition, a substantial amount of electricity will also be consumed. It is said that it would not impact the environment, this is false. We request an analysis of the impacts on the environment during construction of the project along with how long such an operation of this size would need to function in order to make up for the energy used.

2 cont. | Currently, financial viability is unknown for this project. We are concerned that the environmental and cultural impacts for a failing project is more important than the detrimental impacts it will have on land, water, and wildlife. Above all else the Tribal Nations concerns should be considered at the forefront of this project. Tribal Nations have suffered from the industrialization of their land and further are the most impacted by climate change. We urge you to put the Tribal Nations concerns at the forefront of this project before moving any further.

Sincerely,



Eric Strid
Co-convener, Columbia Gorge Climate Action Network

Appendix: Detailed comments

I. Community impacts are a net negative

9

A. The tribal communities have not accepted that any development could incorporate acceptable mitigations

After years of engagements, the tribes affected continue to reject all proposals for mitigations. Unless the project can constructively collaborate with tribes over their needs, the no action option is indicated.

B. 3000 construction jobs would create a boom-and-bust cycle for Goldendale and The Dalles

Goldendale's population is 3600 people, or about 1400 households; Goldendale is about a 20 minute commute to the proposed project. The Dalles' population is 15,500 people, or about 6200 households; The Dalles is about a 32 minute commute to the project. Together the cities total about 7600 households.

10

Adding 3000 construction workers would cause a 40% increase in demand for affordable housing, local traffic, school capacity, associated infrastructure, social services, etc. at both cities. As soon as some of these are in place, the collapse of housing prices and tax base create more problems in the opposite direction after the 5 year construction period.

The EIS has no mention of a plan for temporary housing or mitigations for the boom and bust at local communities.

The 40 direct jobs projected would be welcome, although that isn't much different from the employment from an additional gorge brewery.

II. The market for grid balancing

11

A. We agree that there are increasing needs for much more grid balancing

Grid Impacts of Increasing Renewable Energy Penetration

Selected ISO negative pricing behavior, 2014 – 2020 (% of hours <\$10/MWh)

Selected ISO curtailments, 2014 – 2020 (GWh)

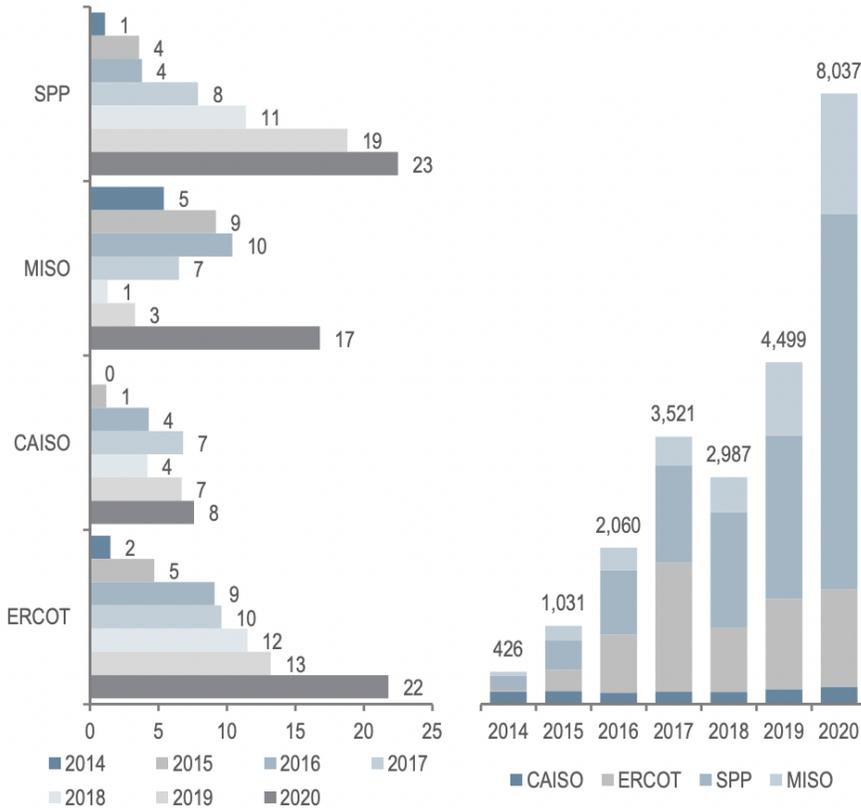


Figure 1. Grid impacts of more renewables from [Lazard LCOS 2021](#).

Figure 1 shows that the instances of negative pricing are generally increasing, although CAISO was the lowest in 2020; this could be due to relatively more storage buildouts in California. Also note that the cheaper the generation from solar and wind, the less the economic impacts of curtailments or zero pricing, in other words, when solar is half the capital cost, then curtailment has half the economic impact.

We note that utilities in the Northwest willingly signed up for 100% renewable electricity by 2045 in Washington state and 2040 in Oregon, without any caveats about the costs or availability of grid-balancing resources. There was no call for a storage mandate or policies that accelerate pumped hydro or any type of storage. The main utilities have studied the future grid options and are willing to sign up for 100% renewables with business-as-usual policies and market forces. Thus, any grid-balancing technology like pumped hydro must compete in the free market with other options.

B. Comparing pumped hydro to Li ion batteries

1. Cost per kWh already cheaper with Li-ion

The proposer asserts that “Pumped 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. Pumped storage is increasingly compared and contrasted with Lithium Ion (Li-ion) batteries. In general, Li-ion batteries have excellent energy and power densities and round-trip efficiency. However, the average duration of Li-ion batteries is 4 hours, which limits their ability to support the integration of high percentages of renewable energy.”

This statement is misleading and questionable when compared to the cost/performance trajectories of competing technologies in the 2030 timeframe, the year the proposed project is expected to be complete. Pumped hydro is now the largest installed base of energy storage but certainly not the fastest growing. Most of the pumped hydro systems are associated with large nuclear or coal generation to provide load stabilization. Asserting that pumped hydro will be the best technology in 2030 is highly questionable, given the \$500 billion the auto industry is investing in electrifying transportation.

Claiming that Li ion batteries are limited to four hours of energy is nonsense—pumped hydro is just as limited to the discharge times and neither have the long-term storage capacity necessary for weeks or months of energy storage.

11 cont.

For a simple cost comparison, the proposed project’s estimated cost of [\\$2.836 billion](#) in 2019 for 14,400,000 kWh of capacity (1200 MW X 12 hours) implies a basic capital cost of \$197 per kWh.

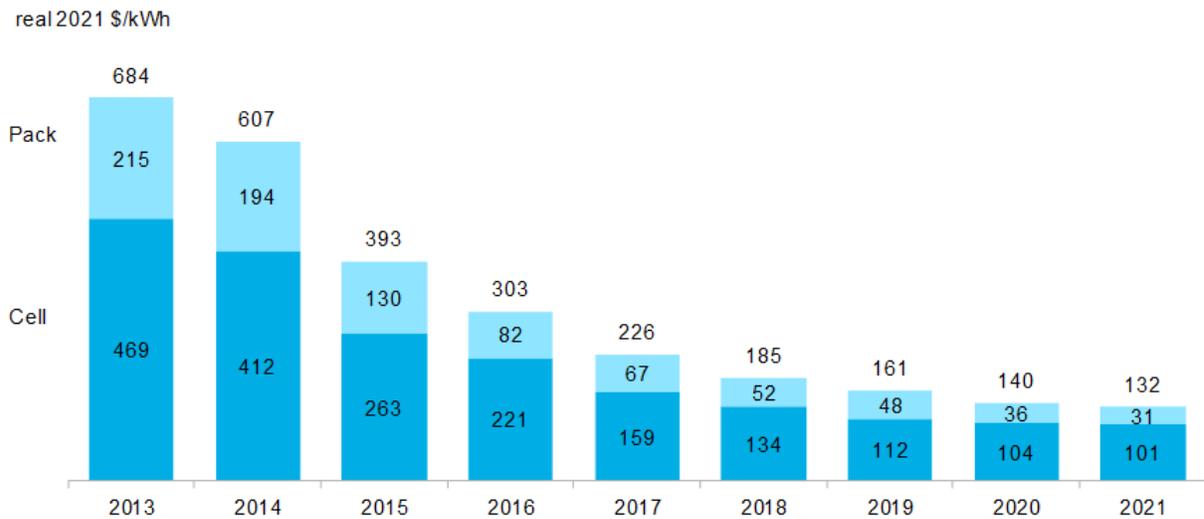
Li-ion battery packs for electric vehicles now cost about \$135 per kWh. We note that battery systems for utility storage cost more than EV batteries, such differences depending on multiple project details.

(For utility storage, the currently pending Inflation Reduction Act would enable a 30% investment tax credit of 30% for both off-stream pumped hydro and batteries of all types.)

2. Cost trajectory of Li-ion batteries

The costs of pumped hydro are mature and well known; by contrast, the costs of Li-ion batteries are decreasing due to a production learning rate of about 20% (cost reduction for a doubling of cumulative production volumes), as well as aggressively funded R&D on new battery chemistries.

In November 2021 [Bloomberg NEF reported](#) that the average cost of EV battery packs had reached \$132/kWh (Figure 2), although rising raw materials prices were likely to pause the downward trend in the near term until supply chains caught up with the rising demand.

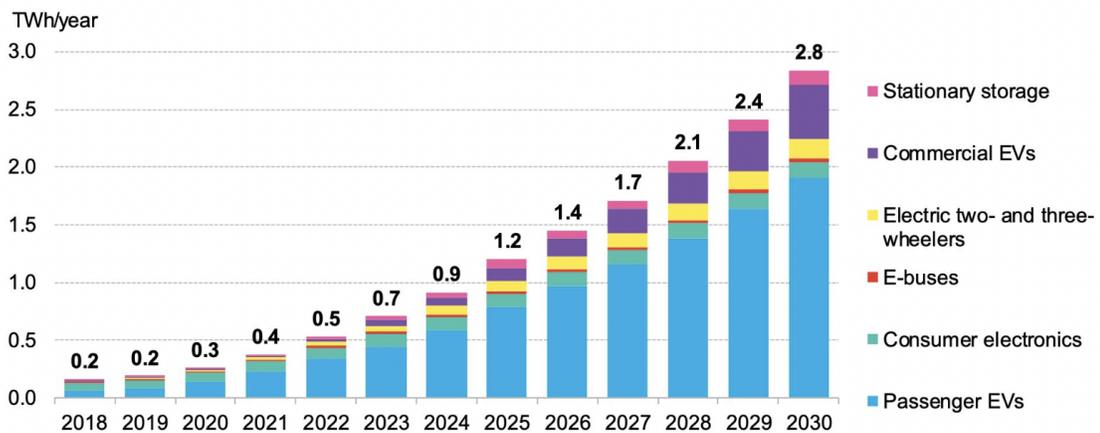


Source: BloombergNEF.

Figure 2: Volume-weighted average battery pack and cell price history.

In [May 2022 Bloomberg NEF](#) reported on battery demand for grid storage. Figure 3 shows the Li-ion battery demand history and forecast.

Lithium-ion battery demand outlook



Source: BloombergNEF

Figure 3. Global Li-ion battery demand in TWh (million MWh) per year.

Note that “Stationary storage” in Figure 3 is demand for utility-scale battery installations, which is dwarfed by the demand for EV batteries. Thus, the cost-performance of utility Li-ion battery technology will be driven by EV demand, which is of course growing exponentially and attracting the largest R&D efforts.

[BloombergNEF estimates](#) that “California will add roughly 12.4GW/48.2GWh of utility-scale batteries between 2022 and 2026.” By 2030, the proposed project’s pumped hydro sales will be competing against the cost structure of far more battery storage on the grid.

3. Versatility of distributed battery storage

The costs of transmission and distribution (T&D, the wiring and transformers of the grid) range from 3 cents to over 7 cents per kWh (\$30 to >\$70 per MWh). Li-ion batteries are typically deployed in substations where the load balancing needs are greatest, often to avoid the costs of increasing distribution capacity. Consumers are starting to install batteries in their garages. The ability to locate batteries closer to loads than pumped-hydro generation cuts T&D costs and line losses, and enables islanding microgrids for energy resilience.

4. Li-ion batteries are about 10% more energy-efficient

The charge-discharge cycle net energy efficiency is around 90% for Li-ion vs 80% for pumped hydro. Thus, the energy used by LI-ion storage is about half of the energy used by pumped hydro.

5. Emerging access to EV batteries for grid batteries

The huge storage capacity of the EV batteries in Figure 3 has engendered pilot projects with bidirectional EV connections to power buildings or to provide storage to the grid. The first instance was Nissan offering emergency power to Japanese homes for earthquake preparedness; recently, the vehicle-to-building capabilities of the Ford Lightning pickup are popular.

The hardware exists for vehicle-to-building (V2B) or vehicle-to-grid (V2G) applications, and these make sense from an asset deployment perspective—US vehicles are parked over 90% of the time, and bidirectional chargers at homes or businesses could be servicing other loads as well as supplying enough charge for driving needs. (The battery cycling parameters can be managed to minimize battery degradation.)

What is missing is interconnection standards for V2B and far more standardization for V2G applications. V2B requires more standardization with building codes, chargers, and vehicles. For V2G, there are 3000 electric utilities in the US with 7,000 different rate structures, so the standardization is a complex task. To address this gap, vehicle-grid integration (VGI) [standards are being urgently developed](#) at the US DOT, DOE, and EPA. While the schedule for V2G deployment is highly uncertain, the opportunities for automakers, homes, businesses, and utilities are so large that eventual standardization and deployments are inevitable. For electric utilities, the costs of V2G could be very low because it would use EV batteries that are otherwise idle. For consumers, signing up for V2G would offset their monthly bill with minimal

disruption of their transportation needs. Automakers like Ford see opportunities to add new features to vehicles.

In summary, the economic competitiveness of new pumped hydro is questionable and gets weaker as other storage options become cheaper.

C. Other technologies for grid-balancing technologies also getting cheaper

Besides Li-ion batteries, there are many other grid-balancing technologies in various stages of R&D or deployment. Demand response, the control of loads, has been used forever in some form—such as calling up industrial customers to have them shut down large loads. PNNL did a pilot project that controlled the hours that hundreds of water heaters were powered up. Today many utilities are installing smart meters (advanced metering infrastructure or AMI) to enable time of use (TOU) pricing. TOU is ideal for helping consumers choose when to charge their EVs; thus, the increasing load from EVs is also an increasing load that can be shifted to balance the grid.

Distributed energy resources such as rooftop solar are increasingly paired with batteries, to provide resilience as well as shift the building's energy flows to optimize electricity rates. [Smart load centers](#) can island homes or businesses, reconfigure which circuits are powered by home batteries or vehicles, and manage charging and discharging of the microgrid's resources, etc.

From 2017 to 2021 CAISO's [annual peak loads](#) fell by more than 10% (slide 7). This is not enough data points, but it may be indicating the macro impacts of more grid balancing through various techniques.

D. Pumped hydro doesn't address the big problem, which is seasonal storage.

Few of the storage technologies being pursued address the largest unmet need, which is seasonal storage. The main alternative strategy is increased transmission, such that different regions can share more wind or solar power over long distances.

Two of the promising seasonal storage technologies are flow batteries and generation of green hydrogen with low- or negative-cost electricity and storing the hydrogen for later electricity generation by fuel cells. The [2018 report by Flink Energy](#) compared the cost of batteries, pumped hydro, and hydrogen storage at the scale of BPA's needs. Figure 6 in that report shows estimated costs of providing 8.7 billion kWh of storage using batteries at \$100/kWh, pumped hydro at \$500/kWh, and green hydrogen at 70% efficiency and \$500/kWh. The capital costs were vastly different, with hydrogen at \$3.5 billion, batteries at \$870 billion, and pumped hydro at \$4,350 billion.

12 If Rye Development could invest in a seasonal storage facility, the returns might be much higher than pumped hydro.

III. Revenue generation of the proposed project is uncertain and potentially weak

A. How will the proposed project generate revenue?

13 The above discussion of grid-balancing needs and technologies is relevant to the basic question of how the proposed project will derive operating revenue. If other balancing resources—whether demand response to modulate loads or transmission options or batteries—are cheaper than pumped hydro, then where will the project’s revenue come from? BPA currently markets load-balancing from the Columbia dams for about \$40 per MWh.

The proposer discloses some operating cost and revenue numbers in the [FLA Exhibit D](#). The annual operating costs (section 4.0) are expected to average \$278,796,000, including \$115,620,000 in income and property taxes, indicating an expectation of high profitability, and thus strong revenue.

14 Section 5.0 begins with, “The Pacific Northwest region’s energy market is expected to have a strong demand for peak capacity by 2028.” Then, “...the Applicant is expecting to sell capacity on long-term contracts to utilities in the region...” The expected annual revenue of \$300 million to \$330 million implies the full-capacity output of 1200 MW for 8 hours a day, 365 days a year, (the quoted 3,561,000 MWh per year) and selling it for \$85 to \$93/MWh.

13 cont. But running the pumped hydro at maximum capacity every day of the year doesn’t sound like it would be addressing peak capacity needs. Why would utilities sign up for long-term contracts for so much power at such high prices? The costs of wind and solar farms keep dropping; California is installing many GWh of battery storage that would compete with any pumped hydro.

[PacifiCorp’s 2021 IRP](#) calls for 4781 MW of batteries co-located with solar farms, 1400 MW of stand-alone batteries and 500 MW of pumped hydro by 2040; Goldendale pumped hydro is not indicated. Thus, PacifiCorp’s strategy has pumped hydro at less than 10% of the planned storage.

14 cont. [Portland General Electric](#) plans a mix of large and small storage resources, not mentioning pumped hydro.

[Puget Sound Energy’s 2021 IRP](#) included a comparison of capital costs for various generation and storage options (Figure 4). Note the much higher cost of Wind+pumped hydro (dashed orange) vs Wind+batteries (dashed purple).

Figure D-25: Capital Cost Curve for Renewable Resources

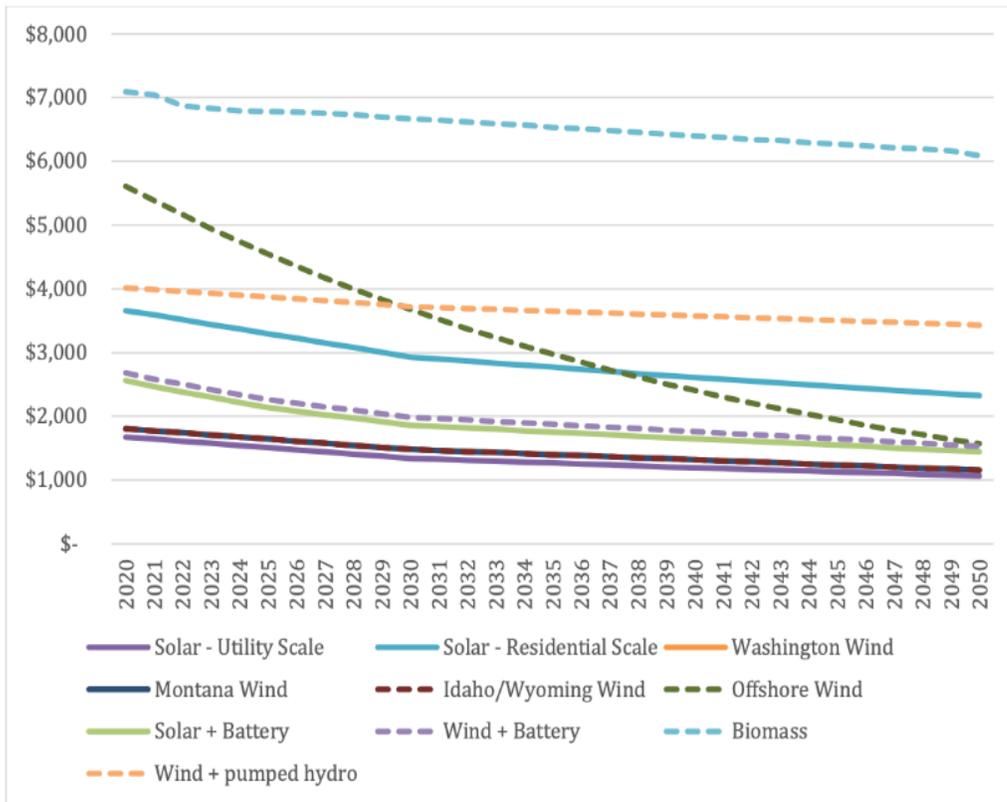


Figure 4. PSE's capital cost data for various renewable sources and renewables + storage.

This proposal is incomplete without a believable, fundamental revenue plan. The cost trajectories of competing technologies, especially batteries, indicate lower cost solutions even in the first year of operation. The storage plans of regional utilities include pumped hydro as an asterisk at best.

B. Such incomplete financials become an environmental concern

With less than roughly half the expected revenues, this project cannot make money and would likely be shut down.

The worst case could be abandoning the project before construction is complete, thus creating even more environmental impacts and no path for mitigations.

Project profitability apparently was not considered in the scoping, but it should have been.

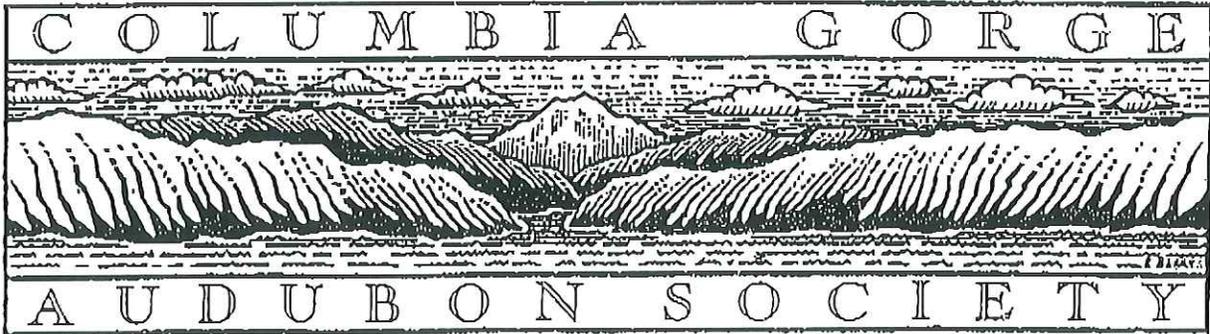
The financial viability of this project is potentially weak enough that risks of shutdown or abandonment should be considered. What is the recourse and environmental impacts of decommissioning the project? Are there any useful options for operating it differently, so that it could break even? Etc.

14
cont.

13
cont.

David Thies

Columbia Gorge Audubon Society Comment was faxed.



TO: Sage Park
Washington Department of Ecology
Fax #: 509-575-2809

RECEIVED

AUG 09 2022

**Dept. of Ecology
Central Regional Office**

FROM: David Thies
Columbia Gorge Audubon Society
PO Box 1393
White Salmon, WA 98672

DATE: August 9, 2022

RE: Goldendale Energy Storage Draft EIS. (Public comment III)

Kind People,

1

In 2005 the Tuam Sauk Pump Storage Plant dam in Missouri suffered a 656 foot-wide breach in 25 minutes resulting in approximately a billion dollar monetary loss and the destruction of a 281 acre state park. Four people were injured, and by chance alone, there were no fatalities. Source: (<https://damfailures.org/>)



2

According to my count, there are only ten other pump storage facilities in the United States. If I am correct, one failure out of eleven is not a good track record.



Of course, there are always excuses about why a breach cannot happen to the Klickitat County project, just as the folks in Missouri were no doubt assured that the Tuam Sauk pump storage dam was safe. This kind of denial only serves to erode public safety.

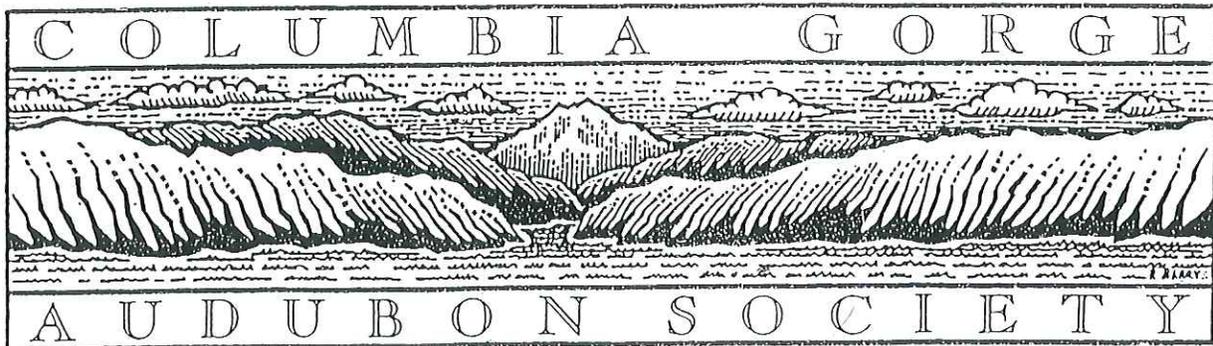
Sincerely,

David Thies



David Thies

Columbia Gorge Audubon Society



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

RECEIVED

AUG 04 2022

**Dept of Ecology
Central Regional Office**

FROM: David Thies
Columbia Gorge Audubon Society
PO Box 1393
White Salmon, WA 98672

DATE: August 2, 2022

RE: Goldendale Energy Storage Draft EIS (Public Comment II)

Kind People:

I talked with "Joy" (Sage Park's assistant) today and she confirmed that Columbia Gorge Audubon's public comment letter of 7-13-22 has been received.

Thank you for extending the public comment period.

- 1 The local Goldendale Sentinel Newspaper has reported that a "huge" crowd of people (fifty people were reported) attended the DOE hearing in Goldendale, and that they were all in support of the energy storage project. Just as I noted in my previous letter, these are the boosters that stand to gain if the project is built. The most recent accounting (2022) of Klickitat County citizens lists a population of 22,055 people. The boosters at your hearing represent a very tiny micro-minority of this county's citizens.
- 2 In our previous letter (on pages 16-17) we noted that the pump storage holding ponds would attract even more birds to the Columbia Hills, and into the wind power kill zone. We did not mention the windmill towers themselves as another attraction for birds, particularly the raptors. Raptors use "safe" high points for roosting and perching,
- 3 especially around water, but also from distant in-sight points. We do not believe that restricting wind towers immediately around the ponds will solve this problem.

4

5

Our previous letter described how renewable energy build-out cannot occur without energy storage (p. 8), but did not clearly state that energy storage cannot exist without renewable energy build-out. Energy storage and renewable energy build-out are joined at the hip, and they cannot be separated and survive. This is why we believe it would be a huge mistake to artificially limit the EIS to energy storage. Reviewing the impacts of this energy storage proposal must include the impacts of the renewable energy build-out because that is where most of the impacts of energy storage will occur, and those impacts will only occur if energy storage is built.

Sincerely.



David Thies, President
Columbia Gorge Audubon Society

Jeff Fernandes

Hard no. Human interference and attempted control of natural systems has been catastrophic to other living creatures on this planet. Stop building dams.

Constance Anderton

No more dams! Solar and wind are viable alternatives and do not affect the salmon runs and the natural course of the river. NO MORE DAMS!

Virgene Link-New

This is an excellent idea to cover electrical generation when wind and solar are not generating enough.

Please just be careful and ecologically aware to do no harm. This may also create a calm pool to benefit wildlife.

d robinson

This project makes sense but it CANNOT proceed with out prior consent of the Tribes! If Tribal religious and or cultural sites are affected: STOP! Because of broken promises made in the past by state and federal governments, the salmon are in danger of extinction! NO MORE BROKEN PROMISES!

Mary Landrum

This is a wonderful idea! It fills in potential down time when the sun may not be shining or the wind may not be blowing. It is the future. Please approve and build the Goldendale Energy Storage Project as quickly and safely as possible.

Carolyn Ryan

My concerns are for the environment. Dams are currently being taken down because of their destructive to local environments. Fish cannot spawn, wildlife cannot drink, birds cannot nest, and people cannot enjoy areas around dams. The dam's impact reaches far greater around the dam than just the dam acreage.

The future is posed for renewable energy that hopefully will have a less negative impact on our environment and us. Jobs should be created in energy that do not destroy everything else in their creation. We don't have a lot more land to waste.

Susanna Askins

- 1 | The new hydroelectric project in Goldendale threatens the Columbia River and its wildlife, is fiscally irresponsible and disregards the Yakama Nation's treaty rights. It is not enough to consult with tribal nations; they must be listened to! Only the Northwest Tribal Nations can determine what is significant to the tribe. Their treaty rights must be respected and siting clean energy projects in places of cultural significance must be avoided.
- 2 | Similar projects at this exact site have been denied in the past because state and federal agencies have raised substantial concerns about this project's impacts to golden eagles, bald eagles, prairie falcons, other fish and wildlife species, and aquatic habitats.
- 3 | An independent economic analysis by Rocky Mountain Econometrics of costs and electricity markets indicates that this project is "unlikely to operate profitably" thus creating even greater risks in the case of bankruptcy.
- 4 | No! No! No!

Daniel Dannenberg

| This project should be developed with minimal harm to wildlife and the environment in general.

Phelan Rolloson Halbhuber

The fact that this project will have an adverse effect on Indigenous tribes in the area is clear grounds for scrapping the project. The racist practice of abusing Indigenous tribes for our gain must end. Find a different way.

Derek Benedict

I strongly prefer that we dismantle dams instead of building new ones. And as long as we're phasing out dams, maybe we could create channels that would funnel excess water during storms into retention ponds or lakes.

Our focus truly has to be on building a solar and wind-based infrastructure.

Derek Benedict

- 1 | It makes no sense to spend billions of dollars on an environmentally destructive project that will yield few returns.
- 2 | Our money would be better spent on investing in land-based solar and wind projects that are non-invasive to the ecology, and that are portable.

V Mangum

I would rather see us use solar or wind power. Building ANYTHING next to the river could be a disaster! We need to clean up our rivers not build next to them! It bothers me that they plan to use the power to move the water back up to the first pond. This seems pointless to me. ALSO this just sounds like a way to get money, not a conservation thing at all.

Protect our WATER!

Jeanne Poirier

Have heard of this project - and while it sounds good as an energy project initially, if I'm not mistaken - this project is being opposed by tribes as it impacts their lands and territories. Water may not be pipelines - but we cannot continue to deface and destroy sacred land for our consumption and comfort. I put any weight of my voice in this public comment period behind the natives who speak against this project.

Anthony Umek

The Project has a number of benefits that support a Record of Decision preferred alternative result. An extremely important benefit is that The Project will provide a source of electrical energy for up to 20 hours @ 100%, using existing wind or solar to pump water uphill. 100% available electricity is needed to power critical facilities including hospitals, fire stations, police and emergency centers. Solar and wind power are intermittent at best. 20 hours of power provides a cushion to accommodate a range of outages. Wind turbines do not generate 100% name plate output until wind speed reaches ~ 35 mph and shutdown at 55 mph, so they are ~ 33% efficient. Solar panels require ~ 1000 wattts per square meter to generate at 100%. There are approx 191 sunny days in Goldendale and there are on average 12 daylight hours per day. So, at best, solar panels will generate at 100% for ~ 96 days. There are economic benefits: construction will add \$2 billion to the area and employ ~ 3000 people. Operation will provide ~ 50 permanent jobs and generate tax dollars for local use. The 1200 MWe Project footprint of 600 acres compares to 7300 acres for an equivalent windmill farm; or 54,000 acres of solar panels. The water will benefit wildlife, whereas windmill farms adversely impact wildlife habitat and kill birds and insect eating bats. 54,000 acres (84 sq miles) of solar panels are required.to generate 1200 MWe. Data reports that ~ 1 million birds and nearly a million bats are killed in the USA annually by windmills. An Iowa State U study shows that the downdrafts of windmills draws carbon dioxide from the soil. The Project's ponds will create vegetation that absorbs C02. Unlike wind turbine blades, the Project will not need to dispose of end of life blades. There are acres of defunct windmill blades in Wyoming, with no approved disposal path. Solar panels limit the type of vegetation that can grow around them, the Project ponds will not. Solar panels contain a variety of hazardous materials including: cadmium telluride," lead, polyvinyl fluoride, gallium arsenide and crystalline silicon. All things considered, the Goldendale Energy Storage Project should be the preferred alternative of the EIS.

saundra holloway

I stand with the Confederated tribes and Bands of the Yakama Nation and strongly oppose the Goldendale Energy Storage project. Constructing the storage system would essentially destroy Pushpum: The place would have to be blasted to create the two reservoirs and to carve a tunnel through the hillside. This would irreversibly damage or impact at least nine culturally significant sites found in the Pushpum area, including important archaeological and ceremonial areas, burial petroglyphs, and fishing and food-gathering locations, according to a cultural resources study the Yakama conducted in 2019 as well as several other previous assessments.

Please protect these cultural sites and deny this project. Thank you.

Robert Puca

| save earth and animals.

Steve Tilton

Perspective of health physicist, retired, and resident. Using the lens of B(est)A(vailable)R(esource)C(onservation)T(echnology) my estimate of the cost benefit analysis concludes that the project provides significant benefit both local and diffuse including bench-marking while incurring deminimus costs all local. Resident attitudes have been positive in my experience.

George Winn

- 1 | Please include in the study info about how this project will aid economic resiliency, reduce greenhouse gas emissions, and re use a parts of a former brownfield.
Please include full study of the opportunity costs associated with delaying or denying this project.
- 2 | Please include study of pedestrian trails/sidewalks, bicycling routes, and EV charging stations at or near the proposed project. Please study the opportunity to require these improvements as part of the SEPA mitigation.
- 3 | Please study the aesthetic improvements associated with removal of the former industrial site, and the installation of this proposed project.
- 4 | Thank you. I support this project and hope a rigorous and expedited review yields an obvious and resounding need for similar climate change abating infrastructure in the region.

Stephen Zettel

I approve of the details of the Environmental Impact Statement (EIS) for the Free Flow Power (FFP) Project 101, LLC proposal to develop the Goldendale Energy Storage Project - a hydropower water storage system that releases water from an upper reservoir downhill to a lower reservoir to create renewable energy. I believe the EIS shows that the benefits to the region and nation far outweigh any adverse impact to the environment and species, and that the EIS be accepted and the Project approved without delay.

Bonnie Miller

Let us do the least damage. We need to think of the importance of the area to the future generations who will not want to deal with the environmental damages we could do in this project. Protect and conserve.

Roberta Copenhefer

I AM AGAINST THIS PROJECT FOR YET ANOTHER INDUSTRIAL COMPLEX ON THE COLUMBIA RIVER. THIS WILL IMPACT IN WAYS THAT ARE NOT DISCLOSED. THE TRIBAL RIGHTS AND ORIGINAL OWNERSHIP OF THIS SITE NEED TO PREEMINENT IN ANY DECISION. I AM A PROPERTY OWNER IN KLICKITAT COUNTY AND AM QUITE FAMILIAR WITH HOW ONE ENTITY WITH ENOUGH INFLUENCE CAN BUY PERMISSION. THE OWNERSHIP OF THIS IS IN FACT A MULITNATIONAL CORPORATION, YES? SINCERELY, ROBERTA COPENHEFER

Joseph Hale

- 1 | It is my opinion that this project should not be approved in any way. The environmental impacts of this project are poorly understood and there is an inadequate plan in place for mitigation. In addition, the loss of important archeological sites cannot be understated. Finally, this project faces dubious economic prospects, and many projections clearly show that it will not be profitable. This is simply another boondoggle of a project that will fail to deliver its stated benefits while having a much larger ecological impact than the project supporters believe. In a time of a rapidly changing environment and increasing needs for power in the region there are far better options than this project.
- 1 cont. |
- 2

Gary Dukelow

I totally object to this project on the basis of what electricity will cost. The estimated \$102 per megawatt hour to turn a profit is outrageous. Even in April, during an unseasonal cold snap, the BPA price averaged \$45. The Northwest Power and Conservation Council projects that by 2026, electricity in the region will cost between \$12 and \$17 per megawatt hour. There are better, and less costly alternatives.

Susan Ballinger

I support the "no action" alternative for 2 reasons, as described in the EIS documents:

1

1. *Lomatium laevigatum* (smooth desert parsley) is a state-listed threatened plant species in Washington, and construction would result in direct mortality of this species.

2

2. As described in the EIS, "Five archaeological sites would be adversely affected by ground disturbance. These sites are NRHPeligible for their association with traditional use and practices, and one of the sites is also significant for its scientific data potential. This means that important questions about human history can only be answered by the physical materials at the site. The sites, and the Columbia Hills Archaeological District, would be disturbed by construction, which constitutes a significant adverse impact. Ground disturbance would also occur in areas where no archaeological sites have been identified during recent surveys, but there is still a potential for previously unrecorded sites to be identified during construction. " And, "Operation of the proposed project would also mean that the archaeological sites in the reservoir areas willbe inaccessible or would have been previously destroyed by construction. This inaccessibility of remaining sites constitutes a significant adverse impact."

Paul Wellman

You should look into The Fuel Cell & Hydrogen Energy Association (FCHEA) <https://www.fchea.org/> to see what is really going on and where we should be headed for energy storage and transport. I highly recommend two books with the same title - The Hydrogen Economy by Jeremy Rifkin and The Hydrogen Economy by Stan Ovshinsky. I also highly recommend The Coming Hydrogen Civilization By Roy McAlister.

Don Worley

I oppose the Goldendale pump storage project because of its detrimental impacts to tribal cultural and religious resources, water quality, fish, and wildlife.

The fourth and fifth paragraphs of the DOE's NEWS RELEASE should be enough to give any one pause- and require rejection of this proposed project.

Melba Dlugonski

My concerns will be discounted because they relate to the overview. Humanity persists in kicking the can down the road, destroying a few more acres of the planet permanently in a desperate attempt to avoid reducing our consumption of energy and finite resources. The clock toward climate collapse is approaching irreversible disaster. The brilliant minds should focus on reducing energy consumption.

But governments aren't allowed the concept that we have to make do with what we've got.

Bob Schroder

I support the project. While I can appreciate the concerns expressed by opponents, climate change caused by runaway global warming will do far more harm than projects that reduce carbon emissions. I agree that reduced consumption is the best approach, but I have learned that few people are willing to reduce enough to significantly reduce their carbon emissions. I hope that hydrogen production and storage will help. We need to take an "all of the above" approach.

Philip Jensen

Dear WA State Department of Ecology,

I strongly support the Goldendale Pumped Storage project. The benefit this project will provide to the state and the region are tremendous. Please build this project.

Rodney Anonymous

I say a big NO to this project. We don't need anymore scars on the land in Eastern Washington. Wind mills littering the landscape, solar farms smothering wildlife habitat and now this. You can build the thing on Pike Street and suck the water out of Puget Sound and do the same thing. Go for it.

Rick Brumble

Me thinks you are trying to hood wink people into believing pumped storage generates electricity. Be honest and tell people how much electricity is generated and how much is required to pump water uphill. A more honest explanation (but probably not approved by the marketing team) is that water will be pumped to the upper reservoir every night during low demand and released during times when power prices are highest. Prove me wrong.

Galen Sorenson

Another incident of "Energy Sprawl" being perpetrated on the land and citizenry of the Eastern Washington area of the State in order to advance the agenda of Gov. Inslee, et al, in order to advance the Green Energy program goals of ending the use of fossil fuels, oil, gas, and natural gas at the expense of both our natural environment, national energy security, and lifestyles, which are built on an appreciation of nature. Also we here on this side of the state have the best alternative to the production of clean, carbon free electrical production. Our hydroelectric dams, which have proven a boon both to the economy and the environment, while preserving the anadromous fish runs for future generations in truth, as opposed to the false narrative of the so-called environmental groups.

MARK RUTHERFORD

As a retired wildlife biologist and AK DNR retiree residing in Washington I'm comfortable with the wildlife and habitat mitigation options to achieve the massive green energy benefits of this project. I strongly support collaborating with the tribes to address their concerns.

Ryan Crompton

Hello,

I am very supportive of this project as I believe long duration, high MW nameplate capacity is critical to enabling a clean energy future. This project would allow renewables to avoid curtailment, maximizing the value of their power and helping make other renewable projects feasible, and at the same time this project would provide supplemental renewable power over multiple days. While I understand there are findings in this environmental impact I believe that inaction on long duration storage would lead to far great wildlife, cultural, and heritage losses. Hopefully mitigations can be found that satisfy everyone but we also have no time to afford a delay in our fight against climate change.

Larry Best

- 1 I am a resident of Klickitat county in the vicinity of this proposed pump storage project. I fully support this project on every level. The decision to use signatory labor I totally approve for the degree of skilled craftsman whom have so much to bring to employers and our community. As far as I can ascertain there actually should be a series of these built for the benefit is significant and the impact is extremely low. Perhaps a dam on Rock Creek has merit as well, providing a larger reservoir and a benefit for Ag, fire suppression, fish rearing, recreation, ect. My name is Larry and I
- 2 cleary want to offer my support.

James Nelson

Please do not move forward with this project until "significant impacts to indigenous rights, cultures, traditions, and heritage at the proposed project site" has been analyzed and FEASIBLE/RELEVANT mitigation strategies have been developed. Thank you for reviewing my comments.

Sincerely,
James Nelson

Alyssa Poletti

Date: July 13, 2022

Subject: 22-06-006 Goldendale Energy Storage Project - Draft Environmental Impact Statement

To: Sage Park

Department of Ecology

Central Region Office

Attn: Goldendale Energy DEIS

1250 W. Alder Street

Union Gap, WA 98903-0009

Dear Regional Director Park,

Thank you for the open comment period on the draft environmental impact statement (EIS) for the proposed Goldendale Energy Storage Project. As a University of Washington (UW) climate scientist, UW Future Rivers Fellow, and Aspen Tech Policy Climate Cohort Fellow, I recommend that the Goldendale Energy Storage Project draft EIS be amended to include:

1. Emphasis on the immense and adverse impact on the Yakama Nation from a cultural, aesthetic, ecological, and environmental justice perspective.
2. Further assessment of present and future water stress concerns.

While the EIS would be incomplete without a further assessment of water stress concerns, the significant and unmitigated impact of the Goldendale Energy Storage Project on the Yakama Nation should immediately disqualify this project from further consideration.

1. Explicitly focus on the immense and adverse impact on the Yakama Nation, from an aesthetic, ecological and environmental justice perspective in accordance with the Biden administration's Justice 40 mandate.

- i. The Goldendale Energy Storage Project should amend the EIS Executive Summary Table S-1 (and subsequent documents) to state that there are "significant adverse impacts" to (a) Aesthetics/Visual Quality, (b) Terrestrial Species and Habitats, and (c) Environmental Justice.

The EIS states that there will be significant and unavoidable adverse impacts to the Yakama Nation in the section on Cultural and Tribal Resources. However, there are also significant adverse impacts to aesthetics/visual quality, the terrestrial species and habitats, and environmental justice. Thus, the EIS draft, the Executive Summary, Appendix G, and Appendix J should all be amended to reflect the cultural, aesthetics/visual quality, ecological, and environmental justice impacts.

- a. Aesthetics

- The EIS Executive Summary should include the significant adverse impact to Aesthetics/Visual Quality for both visitors and indigenous residents. For example, Rattlesnake Mountain is a popular

3 cont.

hiking location and a tribal sacred site near the proposed project. The Yakama Nation's Deputy Director for Culture describes the lake as a pristine location with both religious and aesthetic significance, which will be disrupted by the Goldendale Energy Storage Project [1].

b. Ecological

4

The EIS Appendix G: Terrestrial Species & Habitats Report should be amended to include considerations regarding the unavoidable impact of the proposed Goldendale Energy Storage Project on tribal food gathering. Not only is the location of the proposed Goldendale Energy Storage Project on sacred land, but the land is a site for traditional food and medicine collection [2].

c. Environmental Justice

5

Finally, the EIS Appendix J: Environmental Justice Report should include the significant adverse impact to the local tribal community. The EIS draft states that this project has no disproportionate impact on a minority community, while simultaneously acknowledging the significant and unavoidable adverse impact on the tribal community. This contradiction should be corrected.

ii. The Goldendale Energy Storage Project should draft a new EIS collaboratively with the local tribes.

Currently, the EIS draft overlooks aspects of the ecology, aesthetics, and environmental justice important to the Yakama Nation because the Yakama Nation was given little voice in the creation of this EIS. The impacted tribes were notified of the Goldendale Project only by a letter or email. To amend this grave injustice, the Goldendale Energy Storage Project should consider a new EIS with tribal input. The Goldendale Energy Storage Project could consider a smaller reservoir or alternative location.

2. Further assessment of present and future water stress concerns

i. For more informed comments, the Department of Ecology should make the Cliffs Water Right readily available to the public.

6

On February 11, 2021, you stated that the Goldendale Energy Storage Project will not use water from the Columbia River. However, the EIS does not clearly state the source of water beyond the "Cliffs Water Right." I recommend clearly stating that the water will not come from the Columbia River on page S-1 of the draft EIS. Additionally, the Cliffs Water Right document is not readily available to the public. This reduces the public's ability to comment on the impact of the Goldendale Energy Storage Project on Klickitat municipal water.

7

ii. The EIS Appendix B: Surface and Groundwater Hydrology Resource Analysis Report needs to clearly state (a) the project's water source, (b) whether the Goldendale Energy Storage reservoirs count as consumptive use, and (c) why this project necessitates more than half of Klickitat's total yearly water allotment.

Without access to the Cliffs Water Right text, I infer from the EIS that the Goldendale Energy Storage Project does not use Columbia River water because it is using Klickitat municipal water which has already been allocated away from the Columbia River. Public Utility District #1 of Klickitat County has been allocated 13,911 acre-feet per year, with 4,861 acre-feet available for

7 cont. | consumptive use annually. Yet, the Goldendale Energy Storage Project requires an initial 7,640 acre-feet over the first 6.5 months, far exceeding the annual allocation from the Cliffs Water Right. Therefore, the EIS needs to clarify the source and classification of the Goldendale project water use.

iii. The EIS Surface and Groundwater Hydrology Resource Analysis Report should include projections of the future decline in the Columbia River basin streamflow.

8 | While the Goldendale Energy Storage Project is using already allocated water, this water still originates from the Columbia River, which is an essential source of water and food across Washington state. Understanding that the Columbia River streamflow has declined by 15% from 1951 to 2008 - and will continue to decrease - the EIS does not consider how use of municipal water from the Columbia River will increase future water stress[3].

In summary, the Goldendale Energy Storage Project poses known and unavoidable damage to tribal culture, resources, food gathering, recreation and aesthetics, as well as potential damage to future water resources. The draft EIS should be amended to reflect this. Please, do not hesitate to contact me for further information.

Thank you,
Alyssa Poletti, MS
(856) 651 8566
apolet@uw.edu

3 cont. | 1. Courtney Flatt, NWPD (2021) 'It's Irreversible': Goldendale Green Energy Project Highlights A History Of Native Dispossession

4 cont. | 2. Confederated Tribes and Bands of the Yakama Nation (2021) Yakama Nation Advocates for Protection of Cultural Sites; Opposes Proposed Goldendale Pump Storage Project

8 cont. | 3. Whitney L. Forbes, GRL (2019) Streamflow in the Columbia River Basin: Quantifying Changes Over the Period 1951-2008 and Determining the Drivers of Those Changes

Date: June 17, 2022

Subject: 22-06-006 Goldendale Energy Storage Project - Draft Environmental Impact Statement

To: Sage Park
Department of Ecology
Central Region Office
Attn: Goldendale Energy DEIS
1250 W. Alder Street
Union Gap, WA 98903-0009

Dear Regional Director Park,

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While the EIS would be incomplete without a further assessment of water stress concerns, **the significant and unmitigated impact of the Goldendale Energy Storage Project on the Yakama Nation should immediately disqualify this project from further consideration.**

1. Explicitly focus on the immense and adverse impact on the Yakama Nation, from an aesthetic, ecological and environmental justice perspective in accordance with the Biden administration's Justice 40 mandate.

i. The Goldendale Energy Storage Project should amend the EIS Executive Summary Table S-1 (and subsequent documents) to state that there are "significant adverse impacts" to (a) Aesthetics/Visual Quality, (b) Terrestrial Species and Habitats, and (c) Environmental Justice.

The EIS states that there will be significant and unavoidable adverse impacts to the Yakama Nation in the section on Cultural and Tribal Resources. However, there are also significant adverse impacts to aesthetics/visual quality, the terrestrial species and habitats, and environmental justice. Thus, the EIS draft, the Executive Summary, Appendix G, and Appendix J should all be amended to reflect the cultural, aesthetics/visual quality, ecological, and environmental justice impacts.

a. Aesthetics

The EIS Executive Summary should include the significant adverse impact to Aesthetics/Visual Quality for both visitors and indigenous residents. For example, Rattlesnake Mountain is a popular hiking location and a tribal sacred site near the proposed project. The Yakama Nation's Deputy Director for Culture describes the lake as a pristine location with both religious and aesthetic significance, which will be disrupted by the Goldendale Energy Storage Project¹.

b. Ecological

The EIS Appendix G: Terrestrial Species & Habitats Report should be amended to include considerations regarding the unavoidable impact of the proposed Goldendale Energy Storage Project on tribal food gathering. Not only is the location of the proposed Goldendale Energy Storage Project on sacred land, but the land is a site for traditional food and medicine collection².

c. Environmental Justice

Finally, the EIS Appendix J: Environmental Justice Report should include the significant adverse impact to the local tribal community. The EIS draft states that this project has no disproportionate impact on a minority community, while simultaneously acknowledging the significant and unavoidable adverse impact on the tribal community. This contradiction should be corrected.

ii. The Goldendale Energy Storage Project should draft a new EIS collaboratively with the local tribes.

Currently, the EIS draft overlooks aspects of the ecology, aesthetics, and environmental justice important to the Yakama Nation because the Yakama Nation was given little voice in the creation of this EIS. The impacted tribes were notified of the Goldendale Project only by a letter or email¹. To amend this grave injustice, the Goldendale Energy Storage Project should consider a new EIS with tribal input. The Goldendale Energy Storage Project could consider a smaller reservoir or alternative location.

2. Further assessment of present and future water stress concerns

i. For more informed comments, the Department of Ecology should make the Cliffs Water Right readily available to the public.

On February 11, 2021, you stated that the Goldendale Energy Storage Project will not use water from the Columbia River. However, the EIS does not clearly state the source of water beyond the “Cliffs Water Right.” I recommend clearly stating that the water will not come from the Columbia River on page S-1 of the draft EIS. Additionally, the Cliffs Water Right document is not readily available to the public. This reduces the public’s ability to comment on the impact of the Goldendale Energy Storage Project on Klickitat municipal water.

ii. The EIS Appendix B: Surface and Groundwater Hydrology Resource Analysis Report needs to clearly state (a) the project’s water source, (b) whether the Goldendale Energy Storage reservoirs count as consumptive use, and (c) why this project necessitates more than half of Klickitat’s total yearly water allotment.

Without access to the Cliffs Water Right text, I infer from the EIS that the Goldendale Energy Storage Project does not use Columbia River water because it is using Klickitat municipal water which has already been allocated away from the Columbia River. Public Utility District #1 of Klickitat County has been allocated 13,911 acre-feet per year, with 4,861 acre-feet available for consumptive use annually. Yet, the Goldendale Energy Storage Project requires an initial 7,640 acre-feet over the first 6.5 months, far exceeding the annual allocation from the Cliffs Water Right. Therefore, the EIS needs to clarify the source and classification of the Goldendale project water use.

iii. The EIS Surface and Groundwater Hydrology Resource Analysis Report should include projections of the future decline in the Columbia River basin streamflow.

While the Goldendale Energy Storage Project is using already allocated water, this water still originates from the Columbia River, which is an essential source of water and food across Washington state. Understanding that the Columbia River streamflow has declined by 15% from 1951 to 2008 - and will continue to decrease - the EIS does not consider how use of municipal water from the Columbia River will increase future water stress³.

In summary, the Goldendale Energy Storage Project poses known and unavoidable damage to tribal culture, resources, food gathering, recreation and aesthetics, as well as potential damage to future water resources. The draft EIS should be amended to reflect this. Please, do not hesitate to contact me for further information.

Thank you,

Alyssa Poletti, MS
(856) 651 8566
apolet@uw.edu

1. Courtney Flatt, NWPD (2021) [‘It’s Irreversible’: Goldendale Green Energy Project Highlights A History Of Native Dispossession](#)
2. Confederated Tribes and Bands of the Yakama Nation (2021) [Yakama Nation Advocates for Protection of Cultural Sites; Opposes Proposed Goldendale Pump Storage Project](#)
3. Whitney L. Forbes, GRL (2019) [Streamflow in the Columbia River Basin: Quantifying Changes Over the Period 1951-2008 and Determining the Drivers of Those Changes](#)

Steve Davis

EIS review panel

Yet another project to help California and Oregon mitigate their refusal to site any of these " new green deal" boondoggles in their own states. Keep this up and we can be more like Germany, restarting the coal and nuclear plants that they have shut down over the last 12 years, as their residential electrical rate went from .20c per kWh to more than .30c per kWh (our state ave. Is 8.5c per kWh).

- 1 What I do know is that every one of these projects in KPUD territory increases my residential rate in White Salmon, already well above the state average. We have enough green energy in Washington, end extra to export to the rest of the west coast due to our dams and commercial nuclear plant, all VERY green.
Our hope should be in new the generation nuclear power small modular reactors to provide us with 95%+ efficiency base load power.

Thanks for your consideration

Steven Davis

Retired engineer - 45 years in the power production industry

Kevin Richardson

Dear Washington Department of Ecology,

I oppose the proposed Goldendale Pumped Storage Hydroelectric Project. There's really no excuse to further infringe of tribal ancestral lands or to disrupt the fragile wildlife and water quality in the area. By the way, my family are homesteader from the 1880 in Goldendale. I still have family running farms and ranches in the area and enjoy the rivers and mountains. The area has immeasurable intrinsic value, but also has irreplaceable history and practices for our tribal neighbors and friends. The project will have damaging impacts on tribal cultural and religious practices and risk destruction of archeological areas as well.

I agree with the Draft EIS finding that there will be "significant and unavoidable adverse impacts."

1

Any proposed mitigation for these impacts are likely insufficient to offset the harm. The plants and roots that I have gathered at

We in the NW have benefit from our hydroelectric power, but we need to improve even those dams that have so negatively impacted our multi-million dollar fisheries. Our future "Clean energy" must not be licensed so that more harm is done even before we've taken on the reparations needed for prior harm.

Thank you for consideration of my comments.

Sincerely,

Kevin Richardson
(253) 848-4208

Dear Washington Department of Ecology,

1

I oppose the proposed Goldendale Pumped Storage Hydroelectric Project "Project" because of the damaging impacts that it will have on tribal cultural and religious resources, as expressly stated by members of the Yakama Nation Tribal Council. This Project threatens to destroy numerous archeological, ceremonial, and ancestral use sites sacred to the Yakama Nation. Construction and operation of the pumped storage facility would interfere with the exercise of my gathering and fishing practices. I agree with the Draft EIS finding that there will be "significant and unavoidable adverse impacts" to my cultural and tribal resources.

2

3

Any proposed mitigation for these impacts is insufficient and none are supported by Tribal Nations. The plants and roots that I have gathered at Juniper Point for food and medicine will not be available for future traditional practices if this project moves forward. Tackling the climate crisis needs to also achieve environmental justice and prevent further burdens on Indigenous communities. "Clean energy" must not be licensed to flood tribal cultural sites. Thank you for consideration of my comments.

1 cont.

Sincerely,



Ronnie Washines

I am compelled to speak out about why I am against the wished-for pumped storage hydroelectric project near Goldendale, Washington.

Creator felt it necessary to place my people to live, use and protect the foods and medicines He placed on the land of the Goldendale region. My people have, since time immemorial, been birthed, lived, died and buried among the lands we speak of and we have unwritten Creator's rules, regulations and laws that govern how we are left to ensure all of that is protected, preserved and is perpetually kept alive for our continued use.

It was done for us by those that signed the Yakama Treaty of 1855 because they received their instructions to do so from their ancestors.

I hear that there have been people who have looked into how this project would affect all that I speak of and more, and I feel that if the project goes forward, we will lose forever all those things I speak of.

There may be smart people who use science to say this is a good thing, but I don't think they take into consideration how it will harm the ground, the water, the air, and the lives of those of us who count on it being kept the way we found it.

I and, I believe, that my ancestors do not want such a project to be built as it is wished for.

I thank you for listening to my words. - Ronnie Washines, Toppenish, Wash.

Debra Byrd

Hello:

- 1 | When you reviewed for significant harm to the Yakama Nation's Cultural Resources did the Yakama Nation Archeologists, cultural specialist, hydrologist, etc., give their opinions? I know that if I wanted to go through with a project, I would hire the person or persons most likely to agree that their study would be show no significant impact in any way to the tribe. I have no problem with
- 2 | progress, but if there is an adverse impact in any way to the Yakama Nation this project should be stopped. Thank you, Debra Byrd

Christopher Ward

1 I am writing this comment in opposition to the proposed hydro pump & storage reservoir project
2 being considered for construction. As with previous energy projects, this short-sighted project
would continue the legacy of damaging and destroying historical indigenous lands. This not only
includes permanent damage to local ecosystems and animal habitats, but also to cultural sites and
resources considered irreplaceable by the Kah-milt-pah band in Rock Creek. Such sites include
ancient root gather fields, and many sacred sites. As a result, many tribal agencies and their allies
have voiced opposition to the hydro-pump project in its current location and form. The fact that the
EIS contains absolutely no plan to mitigate losses to the local indigenous population is telling.

3 Columbia River Natives have long been ignored in the name of "progress." Throughout the last
century and a half they have seen their traditional fishing sites flooded over by hydro-electric dams.
They've seen their traditional hunting grounds constricted due to destructive cattle ranching in the
area. They've also witnessed their historical lands destroyed by previous "green" energy projects
such as the eyesore windmills which now blanket the landscape, and in no direct way benefit the
band.

4 Over the last year, I have spent considerable time in and around Goldendale with the Kah-milt-pah
band and indeed they are deeply worried by the proposal of this project and the effects it would
bring about. During Goldendale's Community Days, I witnessed tribal members talking with
Goldendale citizens about the project, most of whom previously had no idea the damages the
project do and were appalled by the fact that these possible effects have largely gone undiscussed.

3 cont. Make no mistake—the Goldendale Energy Storage project is short-sighted and once again deals
another direct blow to First Nations families and communities. "Progress" has already restricted or
outright eliminated their physical abilities to fish, hunt, and gather, but going after cultural sites and
resources, as this project does, tramples the very heart of Indigenous culture on the Columbia
Plateau.

1 cont. Because of this, I stand alongside Yakama Nation, the Confederated Tribes of the Umatilla Indian
Reservation, the Confederated Bands of the Warm Springs Reservation of Oregon, and the Nez
Perce Tribe in vociferous opposition to this project in its current location.

Paul Pickett

- 1 | This is an important project for the long-term needs of renewable energy, and I support it in concept. However, the impacts on Tribal cultural resources is a serious flaw. I strongly recommend
- 2 | that Ecology put the EIS process on hold and serve as a mediator to get the proponent and the Tribes to negotiate an agreement on acceptable mitigation for the impacts on Tribal cultural resources.

August 4, 2022

Meg Bommarito, Regional Planner
Department of Ecology
Ecology Northwest Regional Office
15700 Dayton Ave. N.
Shoreline, WA 98133

Re: Goldendale Energy Storage Project Draft EIS

Dear Regional Planner Meg Bommarito,

I am a proud member of the International Brotherhood of Electrical Workers, and although the Draft Environmental Impact statement does not speak to the positive social and economic impacts of this project, I think it is essential to note that this energy storage facility will be built by over 3 thousand skilled union workers from the area. The jobs created by building this project will allow those tradespeople to support their families, and their local spending will support the families of business owners in the area. The 14 million dollars in annual tax revenue generate by this facility can be used for improvements to roads and schools, and will provide funding for local essential services. This project will also allow Building Trades Unions the opportunity to start more apprentices, giving those folks a chance to start rewarding careers that come with the quality wages and benefits needed in today's economy.

I understand that moving forward with this project will impact environmental and Tribal resources, and that is not something to ignore. The Draft EIS states the environmental impacts can be reduced through mitigation, but the Tribal impacts are more challenging to address. I am hopeful that the parties can work together to find an equitable compromise, because the alternative is a loss for us all. And I'm not just referring to the members I represent who would miss out on years of employment if this project isn't permitted, although that is important. I live in an area that is significantly economically depressed and a project like this would literally change people's lives. But jobs are only a small piece of why I support construction of this facility.

Washington has committed to a renewable energy future. We cannot add more renewable energy sources to the grid without ways to store that energy. Lithium-ion batteries are not going to be able to provide all the storage we need, and mining lithium comes with its own environmental concerns. If we truly intend to combat climate change, we need this project, and more projects like it. If we don't start moving forward with actual ways to make our goals into reality, we are going to fail.

And that failure doesn't just mean we blew an arbitrary deadline in a law – it means we are not doing what we need to do address the impacts of climate change. The land throughout our state, whether sacred or not, will be impacted negatively by inaction. So I support this project

continuing to move forward. To prevent its construction means we are maintaining the unacceptable status quo we have now, and no one – not Union workers, not Tribal members, not small business owners, not members of this community, not Washingtonians throughout the state – will be served by that failure.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Winther', with a long horizontal line extending to the right.

Diana Winther
Pronouns: she/her/hers
General Counsel
IBEW Local 48
Direct: (503) 889-3669
Mobile: (503) 360-5017
Fax: (503) 251-9753
diana@ibew48.com

Tracey Tomashpol

1 I am opposed to the Goldendale Energy Storage Project for several reasons. First, the Yakama Nation is opposing the project due to its location on land that is sacred to the Yakama people. We signed treaties with the Yakama, and for too long projects for "the greater good" - whether westward expansion or the dams destroying the flow of rivers in the Pacific Northwest - have been done in violation of those treaties. The people whose land this was have had their culture threatened, have faced genocide, and have been pawns in numerous land grabs for centuries. This has to stop.

While the old aluminum site would benefit from remediation and new uses, I cannot support a use that is opposed by the Yakama Nation.

Second, there are reasons to believe that the economics of the project itself are untenable, and will likely cost more than they will ever generate in revenue. Construction will also generate greenhouse gases as well, and the additional drain on waters being drawn from the Columbia River, already at risk with rising temperatures and melting snowpack, is significant.

2 The State of Washington would do better to help consumers invest in rooftop solar and individual
3 batterypacks to eventually eliminate reliance on massive grids that take up inordinate amounts of land and other resources. As for the 2 reservoirs that will be used as "batteries" in this pumped storage project, there are more battery projects that continue to produce batteries with smaller footprints more capable of large storage capacities, along with thermal and pumped hydro that goes underground rather than residing in above ground pools. This project, besides its impact on the Yakama Nation, is relying on old technology that will be outmoded before construction is ever completed. Better to invest in new technologies and, if necessary, slow the transition to entirely renewable fuels rather than destroy the cultural heritage of the Yakama and the Columbia River.

Darrell Roberts

While the Goldendale Energy Storage Project seems like a beneficial and worthwhile project on the surface there is one overriding factor that should make it a no go and nothing else about the project really matters. That factor is the tribal interests, especially the fact that as quoted from the Draft EIS impacts to tribal culture include "disturbance or destruction of several archaeological sites and sacred cultural areas". Because we have already done an enormous amount of disturbance and destruction to sacred cultural areas by destroying Cellilo Falls to build a dam in the same area we should never again consider any project that does not have the full support of the effected tribes in that area.

Erinne Goodell

I find it incredibly disappointing that, with all the lip service given to matters of equity and supporting Tribal rights, that Ecology would pursue another energy project that affects Tribal resources and sacred sites. How is this any different than the series of dams that obstruct the Columbia River and have decimated salmon stocks in the river?

I do not support the Goldendale Energy Storage Project. We must find other solutions for clean energy that do not affect the sacred cultural areas of Tribes.

Tracie Hornung

RE: Goldendale Pumped Storage Project

1 | I fully support the points made about Sovereign Nations' rights in the MULTI TRIBAL LETTER TO GOVERNOR INSLEE written by 17 Tribes in support of the Yakama Nation's opposition to the project. It brought tears to my eyes to see that the Tribes found it necessary to state the obvious -- that they have had their rights trampled upon too many times.

2 | In the Tribal Resources Analysis Report of the draft EIS, it states that both during construction and operation of the project Significant Adverse Impacts and Significant Unavoidable Adverse Impacts will occur to plants and wildlife used by Tribes, or there will be restrictions of Tribal access to plants and wildlife. The same findings were made regarding archaeological sites, historic sites and Traditional Cultural Properties associated with Tribal use.

1 cont. | I agree with the Tribes' opposition to this project, and it should be shelved.

RECEIVED

AUG 08 2022

**Dept. of Ecology
Central Regional Office**

Jacqueline Moreau
21 Catherine Creek Road
White Salmon, WA 98672
509.493.3808 bluebird@gorge.net

August 4, 2022

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

Dear Ms. Park,

Please enter my comments into the public record stating my objection to the proposed construction of the Goldendale pump storage facility along the Columbia River, in Klickitat County.

1 Key findings in the Draft Environmental Impact State show that no mitigation has been identified for the impact on Yakama Nation tribal members that have used the Columbia Hills since time immemorial for root gathering and ceremonies. The land itself and all that it supports in wildlife and plants faces obliteration and hardship if the two-billion dollar project by Rye Development company is allowed to go through.

2 There are additional threats that must be considered, such as harm caused to Columbia River water from silt runoff during construction, to the detriment of salmon and tribal fishers near John Day Dam below the construction site. The river already has long standing pollution from radioactive waste leakage from nearby Hanford Nuclear Reservation and it can stand no more. Then, there are the many dams on the Columbia that have obliterated villages and salmon species. Atrocity following atrocity, moral wrongs, the proposed project is but one example in decades of systemic racism.

3 Construction using heavy machinery will introduce invasive plant species which will prevent native plants from propagating, including roots harvested by tribal members.

4 Adverse impacts on land and water is tantamount to desecration of these sources and threats the enjoyment of lawful treaty rights by tribal members who harvest fish and roots and follow their religious practices. The enjoyment of treaty rights means the unobstructed practice of culture; the Treaty of 1855 guarantees reserved rights to fish for salmon.

5 Additional reasons to deny development of the pump storage facility: lawsuits are sure to follow if is approved, costly to Klickitat County taxpayers and detrimental to various beneficial programs that may suffer; for the greater community, promises of jobs and energy most likely won't materialize as local benefits.

6 The issue of water rights has not been fully explored for possibilities. In telephone phone conversations between myself and Public Utility General Manager Jim Smith about the proposed pump storage project, alarming details arose. The project involves construction of two sixty acre ponds—basically, one pond on top of another carved into steep hillsides above the John Day Dam—for the holding of water. This detail in itself is disturbing for the egregious advancement of a costly and destructive project over advancement of environmental and cultural integrity.

7 cont.

I find it disturbing that apparently the idea for development of the project stemmed from a need to find a use for water rights owned by the PUD that supplied the nearby defunct aluminum plant, according to Smith. I think this detail should be explored for alternative use of the water right which is worth trying to negotiate.

I propose that the players involved negotiate retirement of the PUD's water right and that water be returned to the Columbia River in light of climate change and drought.

I propose that a moratorium cease advancement of the project.

8

I support the Yakama Nation in opposing the costly and destructive pump storage project. Such a project imperils the mental, spiritual, and physical health of tribal members. My son is a tribal member of the Confederated Tribes of Warm Springs, one of the four treaty tribes that rely on salmon and the health of the Columbia River. Through my personal activism, in which for several years I was the official photographer for the Confederated Tribes and Bands of the Yakama Indian Nation Museum, I produced and presented in public places words and photographs of tribal members, an educational project now in preparation for a book about Indian fishing families of the mid-Columbia River. I believe that I understand what is at stake for the tribes and the Columbia River.

Sincerely,



Jacqueline Moreau

Matt Perrott

This energy storage project is a step in the right direction. I am sure there will be difficulties associated with the project but the underlying idea is sound. Storing energy in this manner should help reduce the need for peak hour energy production using environmentally impactful alternatives such as coal.

Yvonne Colfax

I am a member of the Yakama Nation. My blood quantum is 1/2 Yakama and 1/2 Warm Springs. I was born near and raised in Celilo village, OR. I gill net fish near the Goodnoe area on the Columbia River. This area also provides ample game and roots/berries and other cultural medicinal plants on both sides of the Columbia river and tributaries. The area has many ancient burials near and beside the waters other have been flooded by dam building. Since the building of the John Day Dam, the water flows have drastically changed and impacted fish migration as well as the water health for important aquatic species. Gathering of traditional foods are very confined and losing ground due to massive development along the Columbia River. Any new use of the Columbia River waters needs to be reviewed with my tribe. Thank you for the opportunity to comment. Yvonne Colfax

Andrea Tulee

Dear Washington Department of Ecology:

1 I oppose the proposed Goldendale Pumped Storage Hydroelectric Project because of the damaging impacts that it will have on tribal cultural and religious resources, as expressly stated by members of the Yakama Nation Tribal Council. This Project threatens to destroy numerous archeological, ceremonial, and ancestral use sites sacred to the Yakama Nation. Construction and operation of the pumped storage

2 facility would interfere with the exercise of gathering and fishing practices. I agree with the Draft EIS finding that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. Any proposed mitigation for these impacts is insufficient and none are supported by Tribal Nations. I have a one year old son and a 2 year old daughter that comes from the Kamilthpa Band. Their family and ancestors have always harvested in this area. If this project goes goes

3 forward then the food and medicine provided there at Juniper Point will not be available for my children or future generations. "Clean energy" must not be licensed at the expense of tribal natural resources. Thank you for consideration of my comments.

Sincerely,
Andrea Tulee

Emma Olney

Dear Washington Department of Ecology,

I oppose the proposed Goldendale Pumped Storage Hydroelectric Project "Project" because of the damaging impacts that it will have on tribal cultural and religious resources, as expressly stated by members of the Yakama Nation Tribal Council. This Project threatens to destroy numerous archeological, ceremonial, and ancestral use sites sacred to the Yakama Nation. Construction and operation of the pumped storage facility would interfere with the exercise of my gathering and fishing practices. I agree with the Draft EIS finding that there will be "significant and unavoidable adverse impacts" to my cultural and tribal resources. Any proposed mitigation for these impacts is insufficient and none are supported by Tribal Nations. I am also concerned about the environmental impacts such as ground water quality, invasive species introduction and soil disturbances. The plants and roots gathered at Juniper Point for food and medicine will not be available for future traditional practices if this project moves forward. Tackling the climate crisis needs to also achieve environmental justice and prevent further burdens on Indigenous communities. "Clean energy" must not be licensed to flood tribal cultural sites. This project is tone deaf and ignores the parallels between the flooding of Celiolo, a project built for others' benefit with the burdens and heartache placed on our Native Peoples to bear for generations. Thank you for considering my comments.

Sincerely,

Emma Olney

Lindsay Schuelke

Renewable energy is important, but NOT at the cost of continued harm to tribal lands and people. To move forward with the proposed Goldendale pumped storage project would be to disregard the Yakama Nation's land, practices, culture, and voice. Renewable energy based on this dismissal of the land and those to whom it rightfully belongs will only perpetuate colonial and industrial harm in the guise of the green movement. These permits should be denied.

Lach Litwer

To Whom It May Concern,

1 | I am writing to express my support for the proposed Goldendale pumped hydro project. As a parent of young children, resident of the Columbia River Gorge, and small business owner I can think of no single challenge with greater existential importance to my community than the transition to clean renewable energy.

2 | Large scale energy storage such as is enabled by the proposed project would transform locally abundant and clean but intermittent renewable wind and solar energy to base load power capable of displacing much of the coal power currently imported by Pacificorps to our market.

At sufficient scale, storage projects such as this may even become key enabling technologies for the removal of dams necessary to save our fisheries and restore important features such as Celilo Falls.

3 | I understand and am sensitive to the valid objections expressed by tribal stakeholders. Every avenue for addressing their concerns should be pursued where doing so is compatible with our sustainable energy transition. No single community's parochial objection, however well founded, is more important than our duty to address climate change for future generations of all communities.

The opportunity to transform a former industrial site where an energy hungry aluminum smelt sat before to half of a project with such climate saving potential is too important to miss. For the sake of our children, our environment, and our community, please move forward with all necessary steps towards building the Goldendale pumped hydro energy storage facility.

Thank you for your consideration,

Lach Litwer

Mary Repar

08 August 2022

To: Goldendale Energy Storage Draft EIS
Sage Park, Washington Department of Ecology
Central Regional Office
1250 W. Alder Street
Union Gap, WA 98903-0009

From: Mary Repar
P.O. Box 103
Stevenson, WA 98648
cell: (360) 726-7052
email: repar@saw.net

Subj: State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (DEIS) for the Proposed Goldendale Storage Project (hereafter called the "Project")

Dear Department of Ecology,

1 I have great respect for the professional DoE staff that strives to keep the people of WA state safe and secure in their environment. For the most part, together we mostly succeed. That being said, after reading most of the document, especially the executive summary and cumulative impacts sections, I will say that this document is the most egregious SEPA that it has been my displeasure to read. The applicant, Free Flow Power Project 101 LLC (hereafter known as "FFPP") has not done enough research, data gathering, analyses, and synthesis to make this proposed Project in any way, manner, or form feasible. The location of the project is itself extremely suspect. The data gaps are mind boggling and the citizens of Klickitat County should be up in arms about this proposal.

Just because a project styles itself as "green" or "renewable" does not make it so. We should be very careful as we work to address climate change and our energy needs, that we do not replace old, environmentally unsafe technologies with new, environmentally unsafe technologies.

First, do not harm should be the predicate for future energy replacement projects. The Precautionary Principle exists for a reason: it exists to protect us from our own worst human tendencies to miscalculate present and future harms, cumulative impacts and effects, and our own quality of Life in favor of quick, easy fixes, monetary recompense, and those things that will not inconvenience us or make us change our ways of doing things. Quick and easy means that most, if not all, of the time we end screwing our environment and, in the end, ourselves.

2 The lack of a full sweep of hydrologic data, seismic and seismic mapping data, deep coring throughout and outside the project area (since no project exists within its own boundaries!), test drilling (specifically to see if and where there is bedrock to anchor the project tunnels), stratigraphic data and analyses, etc.

3

Page ii is a show stopper and as far as I am concerned makes this entire project totally unfeasible and a danger to the Columbia River Gorge National Scenic Area, the Columbia River and its environs, and to the humans and wildlife that inhabits this area. "In some cases, implementation of mitigation measures would reduce but not completely eliminate the significant adverse impacts (my bold) and, in some cases, mitigation has not yet been identified. There are identified in the Draft EIS as significant and unavoidable adverse environmental impacts to Traditional Cultural Properties, archaeological sites, culturally important plants, and other Tribal resources (my bold)...However, to date, there is no information available about mitigation proposed by or supported by the Tribes that would reduce the level of impact to less than significant..."

When I read this I didn't know whether to laugh or cry. That paragraph on its own tells us why this project is totally unfeasible. Enough cultural and environmental damage has been done to the NSA (and other lands) through development and expansion in the last seven centuries. We should be doing better not worse in the 22nd century!

4

The old aluminum smelter, a cleanup site, has already made the project area dangerous, i.e., existing toxins, etc., and the environmental damage done by smelter operations is not totally known. Adding another environmentally dangerous project on top of an existing environmentally dangerous project is extremely dangerous, short-sighted, and illogical and unreasonable.

5

Page v, Potentially required permits, licenses, and approvals. There is NO POTENTIALLY REQUIRED. These would ALL be required before the first shovel hits any dirt. And, all these permits require data to be gathered, assessed, and cumulative impacts to be analyzed. Let's see—explosives, endangered species, historic preservation, clean air and water, possible killing of eagles, stormwater, earth movement, etc., and other impacts that are not well defined because data that would impact this environment has not even been gathered! This is not right. Data comes first, analysis second, and then maybe we can talk about proceeding to the next step.

6

Page S2. The CGA smelter that operated from 1969 to 2003 is on the WA DoE's Hazardous Sites List, added in 1990. Why it was not closed in 1990 is an open question since it's hazardous! According to the DEIS, investigation of contamination on the site and development of cleanup actions are proceeding through a separate process. No, this separate process is critical to the decision making process because the data gathered during this separate process is what will determine if the Project goes forward at all. If the investigation shows that the contamination is dangerous and ongoing then the Project is dead in the water and it should be stopped.

7

"Need" in this case is more a want and not all wants make sense. Definitely, this project on this contaminated site does not make sense because it includes extreme adverse effects to the environment and to all the inhabitants of the NSA.

8

State SEPA rules and regulations should be as strong or stronger than National Environmental Policy Act (NEPA). Why there are separate tracks for these two acts for this project is questionable.

9

page S4. Cumulative impacts to Tribal first foods and spirit foods, tribal lands, treaty resources, tribal cultural resources, to geology, air and water quality, fish, wildlife, cultural resources, transportation, tribal religious resources and the waters of the United States (which belong to all Americans), impacts to tribal cultural and other resources that won't be possible to mitigate, and

9 cont.

whether off site mitigation will be sufficient to replace lost or adversely impacted habitats, habitat and terrestrial species impacts, additional water demands on fish and other aquatic resources (and the waters that support them and the overall habitat conditions necessary for their health and well-being, impacts and reduced function of stormwater retention, impacts on hydrology/water flows, stream reach functions, and impacts on wetland habitats, etc. My head hurt when I read the list of impacts. Any one of these if adversely affected would bring into question the feasibility of the Project. All of them together make the Project unfeasible in its entirety.

10

Page S5, Shaft and tunnels. The elevation difference between 2950 feet at the upper reservoir and the lower reservoir elevation of 590 feet, is 2360 feet. It appears that the vertical shaft from the upper reservoir to the power and water conveyance tunnel is somewhere in the 2000 foot range. In reading the DEIS, and granted I had to do a swift read through because the comments are due August 9th, it appears that most of the geology cores were down to only 40 feet. Since the area is a unconsolidated alluvial fill, probably from the Missoula floods, I think that a more in-depth and full geological examination of all the faults and strata in the area must be done.

Page S6, water replacement. The 360 acre-feet of water each year to replace water lost through evaporation (and possibly leakage) is at best a guesstimate. Our summers are getting hotter and more humid and the water loss could be higher. Are the residents of Klickitat county and the rest of us in the NSA willing to lose more water out of the Columbia and other sources so a LLC can make money selling energy to California or Oregon or other states? I'm voting NO.

Pages S7, S8, S9, S10, and S-11, Summary of Impacts and Proposed Mitigation. The number of adverse and significant impacts on these pages is jaw dropping. These pages were very difficult to read because the summary descriptions are horrible and dangerous and should not be allowed, but it is the Impact Findings that are so egregious as to warrant lawsuits before the first shovel of dirt is dug. Seriously. The Summary of Proposed Mitigations make all the adverse and significant effects all better because, you know, we can mitigate anything because we really want to build this dangerous and environmentally unsound project, because, well, we can't think of better and safer and more environmentally sound projects and, heaven forbid, that we are inconvenienced in our daily lives by bothersome pesky environmental issues.

11

Mitigation is a myth with which we humans delude ourselves so we can do things that, although they would cause adverse and significant impacts and have severe effects on our environment, we still want to do them and will do anything to get them done. Mitigation is a myth. Off-site mitigation is a balm to our consciences (maybe!) and has, to my knowledge, never been shown to be scientifically equal to the no action alternative. Off-site mitigation should not exist as an alternative.

Cumulative impacts, direct and indirect, matter. If habitat functions and quality for some species would be affected during Project operation then we need to know what functions, quantify the quality, and specify species.

I'm not sure if we citizens are viewed as being stupid or that we don't know how to read and cogitate, but when I read the following item, it made me quite angry: "Plants, mammals, reptiles, and invertebrates could experience mortality and birds could experience disturbance during the 5-year construction period, but species viability would not be adversely affected." First, there has to be data collected over any period in order to assess whether species would or would not be adversely affected. Second, there is no data to back up the not adversely affected comment. And

11 cont.

third, birds and invertebrates and other species are part of our environment and what we do impacts them and their survival. We should not be killing other species because we want our lights to shine longer at night or because we want air conditioning in the Summer. Every living thing on this planet has a niche and no one niche is any more important than the other. Just because we humans don't understand all the processes of the Earth doesn't mean that we should disregard them or their effects and impacts.

All of the impacts and effects can be avoided if the NO ACTION alternative is chosen.

12

Page 1. This SEPA does not provide a comprehensive evaluation of significant adverse environment impacts since some of the most critical element of the Project has not yet been gathered; that is, data, and evaluated. Subsurface conditions, geological data (stratigraphy, composition, faults, cores, drilling, etc.), the groundwater divide between the northern and southern aquifers, mass wasting ("Mass wasting is the movement of rock and soil down slope under the influence of gravity. Rock falls, slumps, and debris flows are all examples of mass wasting. Often lubricated by rainfall or agitated by seismic activity, these events may occur very rapidly and move as a flow.") The fault map of this area needs much more data and study. There are also mines in the area.

13

Page 4. If DoE determined in June 2021 that the information submitted by the applicant for Clean Water Act Section 401 Water Quality Certification was "insufficient to determine if the activities and impacts associated with construction and operation of the project could be conducted in a manner that would not violate applicable water quality laws" then why is a SEPA being done at this time? If there is no data, there can be no evaluation. The information necessary to get a permit should be done early in the process not after a project has approval to proceed.

14

Also, Mt. Hood in Hood River, OR is seismically active. We have Mt. Adams west of the project area whose glaciers are melting at a very fast rate and water will be an issue sooner rather than later in the NSA.

Page 6. First, I don't freaking care about market conditions so the applicant can make more money using the resources of the NSA while significantly and adversely affecting those resources!! The environment comes first. If the project would significantly and adversely affect the environment then the project should not be approved. First, do no harm.

15

Water rights are a sensitive issue but will have to be addressed in this era of climate change. Water rights granted in the past may not be supported by the hard reality of climate change today and will probably have to be updated.

16

Page 7, Tunnels. The proposed tunnels are very problematic in unconsolidated alluvial fill sediments in this geologic landscape. The Missoula floods came through here and that geology is unstable.

17

The proposed transmission lines are also very problematic in the National Scenic Area and would affect the scenic part of the NSA Act. The Gorge Commission should certainly put in comments opposing any more transmission lines across the Columbia River which affect the scenic and aesthetic value of the Gorge.

This brings into the discussion the fact that in the race to change our energy production from one technology which uses coal and oil and into other technologies using natural gas and solar and wind, we are not being mindful of where we will go in the future. Natural gas, solar, and wind are not free of environmental effects and impacts. There is no free lunch in energy production. We should be looking to minimize future environmental effects and impacts and not produce more of them. People will be inconvenienced. There will be less energy. We humans will have to learn more about conservation of energy so that less energy has to be produced.

18

Building codes will have to change so that we need less air conditioning and heating. Not every street and highway and parking lot has to be lighted up like the Fourth of July in order to be safe and secure. There are actions that we can take to decrease energy use while we make the transition to less environmentally impactful technologies.

At some point, transmission lines may become a moot point as residential housing becomes independent of the the electrical grid. Energy producers need to change their business model so they can prosper in the future. Fuel cells, better storage batteries are are and improving. If they don't have customers, they will not survive as businesses.

Page 9. Any project that further impacts fish in our waters is a non-starter and requires the NO ACTION ALTERNATIVE. Mitigation is not an option.

19

Page 10, proposed project facilities. 2.3.1 states that "The final arrangement of proposed project features would be based on required studies of topography, geology, hydrology, seismic hazard consideration, and functional requirements." This made my head hurt. Seriously, These "required studies" should have already been done and should be part of this DEIS so that all the facts and data could be taken into consideration. The public, which owns the natural resources that the Applicant wants to use to make money, needs to know all the facts in order to make a reasoned decision.p\

20

7100 acre-feet is 309,915,000 cubic feet, which is the volume needed for the reservoir fill. This does not include the top off waters that would be needed over time as evaporation and leakage occur. This is a lot of water. Frankly, 2,318,325,194.81 gallons of water is a BILLION GALLONS too much. Water is a precious commodity. More precious than oil or gold. Water is Life and this proposed Project sucks up way too much Life.

P. 13, tunnels and powerhouse. Once again we see a term that implies that there will be more construction and activity once the project has initial approval. "The location, number of circuits, voltage, and configuration of the proposed project's interconnection with the regional electric utility network would be finalized by the Applicant during the final design stage in conjunction with the BPA planning group." Transmission lines are not aesthetic (this is the NSA, after all!), they take up a large part of the environment, and we should be questioning why we are putting in more transmission lines when we should be going for less transmission lines that affect our environment.

21

Page 15. What does 70,000 tons of concrete produced by the upper reservoir plant per year translate to in terms of CO2 emissions? Same for the 130,000 tons produced by the lower reservoir concrete batch plant.

22

Page 16. Can the waters provided by KPUD be used by the citizens of Klickitat county if their water issues become dire?? There are already water issues in Hood River, Mosier, White

Salmon-Bingen, Skamania County wells and streams, etc., and, as climate change persists there will be more water issues in the Gorge. Klickitat should think about the future water needs of its citizens.

22 cont. Page 17, FERC hydropower license. I'm sorry, but for Klickitat PUD to be obligated for 50 years to this project is not reasonable. As climate change increases and water needs become more crucial to communities, there should, at the very minimum, be a contract clause that says communities come first if the water situation for the Gorge becomes a survival problem. Though KPUD would make money from any deal, we can't drink money or water our food plants with money. Water is Life.

23 Page 18. I was struck by the following statement: "Other renewable/decarbonized energy storage technologies were suggested in scoping comments, such as the following: Stacked blocks, liquid air, underground compressed air, flow batter storage, and solar and lithium-ion batter storage. None of these alternative energies meet the criteria to attain the proposal's objectives." So what if they don't meet the criteria to attain the proposal's objective? This just means that this entire proposal should get the NO ACTION alternative.

24 Page 20, ESA (FERC). "FERC, in consultation with US Fish and Wildlife Service (USFS) and National Oceanic and Atmospheric Administration Fisheries, would evaluate the effects on listed and proposed species and critical habitats and require compensatory mitigation for unavoidable impacts." There is NO COMPENSATORY mitigation for destroying fish habitat and the environment just because somebody wants to build a energy project!! If fish and the habitats would be affected by this Project then this project should get the NO ACTION alternative.

25 Any blasting with dynamite is not a good idea in this unconsolidated alluvial geology area! As WADOT and ODOT have found when blasting along our roadsides, one gets more than one expects when unforeseen consequences of blasting rocks and unconsolidated materials occur.

Page 21. Eagles should not be killed or their habitat affected just to make this project happen. That philosophy, that it's okay to kill a few species along the way to energy production is so 18th and 19th century thinking.

26 "Construction and operation of the proposed project would affect wetlands and streams, which are waters of the United States." There are many streams, wetlands, and groundwaters in this area and they would be adversely and significantly affected by the Project. A section 404 Clean Water Act Permit should NOT be granted for this project and the NO ACTION alternative should be chosen.

27 Page 22. "The proposed project would result in both the temporary and permanent placement of fill material into wetlands and streams (waters of the state) that may not be regulated as waters of the United States under Section 404 of the Clean Water Act." Not just NO, but HELL, NO!! Seriously. We need our wetlands and waters more than ever in the face of increasing climate change manifestations and this proposal would result in both temporary and permanent destruction of streams and wetlands?!?! The NO ACTION alternative should be chosen for this project.

28 Page 24. "Significant and unavoidable adverse impact" is totally avoidable under the NO ACTION ALTERNATIVE!

29 Page 26, Soils and Geology. The geology of this area is unconsolidated alluvial material with underground faults, surface waters, and ground water which makes this area susceptible to

landslides and earth movement (mass wasting). Blasting with dynamite and ground disturbance would increase the dangers of earth movement. The key findings of the geology and soils analysis says it all: removing vegetation would increase the potential for erosion; could moderately increase geologic and seismic hazards, including the potential for landslides; during project operations a local or regional earthquake could cause liquefaction in the victim of the lower reservoir due to the project being within the moderate shaking zone for the Cascade Zone earthquake." Why anyone would think that this Project was a good idea after reading this, is a mystery.

29 cont.

This next statement is mind boggling: "Mitigation is not required to reduce any significant impacts, but additional geotechnical studies, sediment and erosion control plans, implementation of BMPs, and design updates are proposed to reduce potential impacts." I'm almost speechless. This paragraph is so egregiously dangerous and unethical as to be almost incomprehensible to thinking and reasoning humans. Who would ever want to cause significant impacts to our environment on purpose just to build a money making project? THE NO ACTION ALTERNATIVE IS LOOKING BETTER AND BETTER.

Page 30. The geology of this area—unconsolidated sediments, volcanic rocks and deposits, landslide deposits, unconsolidated silt and fine sand deposits, an alluvial fan deposit within the proposed footprint of the lower reservoir, basaltic talus, silt, sand, gravel—makes this area wholly unsuited for this proposed Project. Slope stability is questionable. Erosion and accretion are related to slope instability and mass movement—two things that would definitely significantly impact any operation. The known geology alone makes the NO ACTION alternative the only possible option.

30

Page 31, faulting. Thrust faults, strike-slip faults, and dip slip faults. Oh, my. If the "age of the folding and faulting in this region is not well understood" why are we doing a SEPA now instead of waiting until geotechnical data has been gathered why are even talking about this project?? Even IF, and that's a big if, these faults "are not considered to be capable of producing earthquakes", that does not mean that fault movement cannot happen. Faults don't necessarily produce earthquakes. The faulting in the project area alone should make this project a no go. The NO ACTION alternative should be chosen.

Page 37. Wind erosion in the Gorge is a real thing. "Due to the relative windy conditions of this region, there is likely a high potential for wind erosion in the study area. The soils types in the study area have a low to high range of wind erodibility factors. Soils with the highest wind erodibility factors are in the southern portion of the study area in the area of the proposed lower reservoir." The winds in the Gorge are getting more powerful and more frequent and will most likely increase in strength as climate change persists. Erosion, both wind and water, dangerous. The NO ACTION alternative is looking better and better.

31

Page 39 and 40, geologic and seismic hazards. Geologic hazards "are large-scale, complex natural events that occur on land and are capable of causing immense damage, loss of property, and sometime loss of life." Seismic hazards "are a specific type of geologic hazard that result from ground shaking caused by earthquakes." WDNR identified two situations when're landslides commonly occur in the general vicinity of the proposed project: weak sedimentary layers cause overlying basalt to slide along the weak, tilted sedimentary interbeds, and weathered, tilted, and clay-rich volcanoclastic rocks fail either on their own or beneath overlying younger lava flows, transporting both downslope. This geology needs to be investigated further and coring and drilling should be done. "Large areas of bedrock instability are present in association with areas of faulting,

32

32 cont. ...and sedimentary interbeds have caused extensive mass wasting and slope instability along sections of the Washington shore of the Columbia River...In addition to past landslides and areas of potential deep bed instability, others areas of instability in the study area include the extensive talus deposits that form an apron at the base of the basalt cliffs and the consolidated debris flow deposits in the area proposed for the lower reservoir."

33 "Earthquakes are associated with hazards of liquefaction and landslides." Six earthquakes were reported within 5 miles of the proposed project between 1969 and 2021. There are fault zones within 12 and 16 miles east of the project area. "The U.S. Geologic Survey Shakeup indicates that the proposed project would be within the zone of moderate shaking intensity from the Cascade Subduction Zone-generated earthquake."

Page 40. Liquefaction is a real threat in the project area. "The 2002 geotechnical investigation indicated that primary specific seismic risks in the lower portion of the proposed project area are associated with soil liquefaction and lateral spreading. Sediments present within the saturated zone beneath some portions of the study area exhibit conditions that are conducive to liquefaction during earthquakes. This liquefaction potential also may contribute to increased chance of lateral spreading of soils during a seismic event."

34 I'm going to say this again: the NO ACTION ALTERNATIVE is the only option for this proposed project.

I am stupefied that anyone in their right mind would think that using explosives, drilling tunnels, and removing vegetation that will cause erosion and mass wasting is a good idea in order to build a operation that is environmentally unstable and dangerous. Slope instability, increased water and wind erosion or accretion potential, and increased potential for landslides after construction disturbance are not minor issues.

35 Page 41. "Excavation of rock for the construction of underground project features would not affect the overall geology and have only negligible effects on geologic formations of the area." Of course the "overall" geology might not be affected but the localized geology and landscape would be significantly and adversely affected. On page S-5 the sketch shows that the vertical shaft from the upper reservoir (which is at 2950 feet of elevation) seems to be drilled down to below the 590 feet of elevation of the the lower reservoir, and the elevation of the powerhouse that is in the conveyance tunnel is at 115 feet of elevation. I must have missed the widths of the tunnels in the DEIS but am assuming that the widths have to be significant since there would have to a lot of supporting, stabilizing material around the tunnel walls so they do not collapse. This would entail a lot of stress on the unconsolidated alluvial geologic sedimentary layers in the project area.

To use the word "negligible" in this context is misleading, and, frankly, offensive to anyone who understands geology and geologic hazards.

Page 42. There is a lot of destruction of the habitat, vegetations, and soils by the proposed project.

"Based on the Applicant's Preliminary Supporting Design Report (HDR 2020a), construction of the proposed project could encounter multiple areas of instability in both the above and below ground portions of the study area. Most of those instances are associated with uncertain conditions in the underlying basalt formation layers, especially those locations where faults cross the study area in

locations where unconsolidated deposits occur...However, because of the uncertainty related to the geologic conditions, there would be some impacts on slope stability from construction. Additional geotechnical studies and design updates proposed by the Applicant could further reduce these impacts, which are not expected to be significant."

35 cont.

I'm not sure if the perpetrators of this DEIS think we are stupid or that we will not read the DEIS. "Additional geotechnical studies and design updates" will NOT reduce the impacts of construction and explosives and earth movement and tunneling!! The NO ACTION ALTERNATIVE, however, will most definitely reduce the impacts. Besides, all these geotechnical studies and designs should already be in the DEIS and NEPA documents so that a thorough evaluation can be done by the public and interested entities.

36

Any effects on SR 14 are unacceptable, specifically stormwater and sediments. SR 14 is the only highway through the area on the WA side of the Columbia River. We have all experienced the closures on this highway and I-84 on the OR side of the river. We are constrained by the available infrastructure. Public safety and welfare are considerations and should not be impacted by any project.

Page 43. "The proposed project is not expected to result in any significant adverse impacts on geology and soil resources within the study area. Many of the potential impacts have the potential to be reduced with the implementation of standard BMPs and design considerations proposed by the Applicant."

37

Unless the Applicant plans on rolling back the Missoula Floods and all the unconsolidated materials resulting from said flood and defaulting the area and draining all the streams and waters, there will be significant and adverse impacts and cumulative effects on the geology and soils and habitats and waters within the study area!!! Words matter and trying to downplay the reality of the significant and severe cumulative impacts of this project on the environment and all the environs in the proposed project area is very offensive and does not serve the public, nor the Applicant, well. The Applicant should know sooner, rather than later, that their Project is not going to happen so that they don't spend more money, time, and effort on a project that will not be built.

Page 42. Finally, "No mitigation measures would be required because there would be no significant adverse impacts. Specific permit conditions and mitigation actions would be confirmed by regulatory agencies during permitting for the proposed project."

38

Well, let us just shunt off the important stuff to the "regulatory agencies" why don't we. The WA State Environmental Policy Act should require complete and comprehensive data and analyses so that the environmental checklist will provide the best, most timely, complete and comprehensive data so that the citizens of WA state and relevant agencies can make informed decisions on how the natural resources of their state will be used, or not, if the NO ACTION alternative is chosen. In this case, the NO ACTION ALTERNATIVE is the only option. No data, no construction.

39

Page 48. Water is Life. For fish and humans. WRIA 30, Swale Creek Watershed: salmonid spawning, rearing, and migration, domestic and agricultural water supply, stock watering, wildlife habitat, harvesting, commerce and navigation, boating, and in NSA values, aesthetics. Why would we risk this watershed so the Applicant can do significant and adverse impacts to the environment to build a project that nobody needs in the Gorge?

39 cont. | Question: Where will the electricity produced by this proposed project be sold?

40 | Page 51. The old aluminum CGA smelter clean up is still in play and nothing should be done until that site is totally cleaned up and rehabbed. We do not need to add more new environmental problems on top of old environmental problems.

41 | Page 53, note 7. "Surface waters in the proposed aerial transmission line right-of-way were assessed using desktop methods and were not verified or delineated in the field." This is inadequate and does not give us the best available information upon which to make informed decisions.

42 | Page 57. Transmission lines are environmentally significant and do cause adverse impacts. Until we see a BPA proposal of how they would add transmission lines to the existing overhead transmission line, they really don't know whether any work on the ground or in the waters would be involved.

43 | Protective buffers around our waters and wetlands are critically important and "Many of the surface waterbodies and wetlands present in the study area are considered critical areas under the Growth Management Act." (RCW 36.70) There is a significant footage of wetlands, 540,798 square feet, within the study area.

Page 58, groundwater. More information and data is needed on this topic before statements such as "groundwater conditions in the northern portion of the study area are separate and distinct from those of the southern portions" are made. "A conceptual model" is not real data obtained with drilling and coring and chemical analyses of the waters in the area.

44 | Page 59. "Generally interpreted" is not a technical term when dealing with groundwater and its environs. "Inferred" is also not a technical term and has no data value.

"The sparse existing subsurface information in the area of the proposed upper reservoir indicates that no substantial groundwater is present to a depth of 40 feet." Well, I'm not sure which dictionary is being used here, but to me sparse means very little information!!

Water can migrate up, down, sideways and in any directions it wants to!! So saying that something is "relatively impermeable" is not meaningful when talking about water migration.

45 | Page 60, Wells. It is very important to know if the wells in the area would be affected by any activity done by the Applicant. Nobody wants wells to go dry or to be polluted by unknown toxins. "Groundwater at depths of less than 150 feet in the Swale Valley has been documented to contain concentrations of nitrates exceeding the state drinking water standard of 10 milligrams per liter. There is also a strong correlation of elevated nitrate concentrations with chloride concentrations that suggest an association to septic systems."

46 | If explosives are used it is guaranteed that there will be earth movement and we don't know whether the groundwaters flows will also be affected. The NO ACTION ALTERNATIVE is looking better and better.

47 | Further, "The unconsolidated deposits, consisting of naturally deposited sands, gravel, and silts and

47 cont.

manmade fill, appear to be 30 to 50 feet thick in the area surrounding the proposed lower reservoir location..." Sands, gravel and silts are not stable bedrock.

In conclusion, the Precautionary Principle: First, do no harm, definitely applies to this project. The SEPA makes very clear that this project, if allowed to proceed, would endanger the waters of both WA state and the United States, it would significantly and adversely impact the environment—the wildlife, the habitat, the waters, etc.—in the proposed site area. This project might work in a mine or a quarry but it is totally unfeasible in the proposed area. This is the National Scenic Area and aesthetics and natural resources are protected by the federal NSA Act. The fact that there would be severe and unique significant adverse impacts to Tribal cultural resources, Tribal communities, and tribal members, and their First Foods and Spirit Foods and way of Life is not acceptable.

48

The NO ACTION ALTERNATIVE IS THE ONLY OPTION for this proposal due to the excessive nature of the cumulative significant adverse impacts as delineated in this SEPA. No further data gathering will make this project acceptable in the face of the dangerous and significant impacts and effects on the environment that would occur if this project was allowed to proceed.

We humans should not be creating more environmental problems as we try to work our way through climate change and its many impacts and effects. We should strive to do better. We should also start thinking about conserving more energy so that we do not have to be creating more energy projects, especially projects that do not benefit us or our environment. Our convenience is not a reason to destroy our environment. This is our only home. There is no Planet B!

I recommend that the Department of Ecology issue the NO ACTION ALTERNATIVE option for this proposal.

Sincerely,

e-signature/Mary Repar

08 August 2022

To: Goldendale Energy Storage Draft EIS
Sage Park, Washington Department of Ecology
Central Regional Office
1250 W. Alder Street
Union Gap, WA 98903-0009

From: Mary Repar
P.O. Box 103
Stevenson, WA 98648
cell: (360) 726-7052
email: repar@saw.net

Subj: State Environmental Policy Act (SEPA) Draft Environmental Impact Statement
(DEIS) for the Proposed Goldendale Storage Project (hereafter called the
“Project”)

Dear Department of Ecology,

I have great respect for the professional DoE staff that strives to keep the people of WA state safe and secure in their environment. For the most part, together we mostly succeed. That being said, after reading most of the document, especially the executive summary and cumulative impacts sections, I will say that this document is the most egregious SEPA that it has been my displeasure to read. The applicant, Free Flow Power Project 101 LLC (hereafter known as “FFPP”) has not done enough research, data gathering, analyses, and synthesis to make this proposed Project in any way, manner, or form feasible. The location of the project is itself extremely suspect. The data gaps are mind boggling and the citizens of Klickitat County should be up in arms about this proposal.

Just because a project styles itself as “green” or “renewable” does not make it so. We should be very careful as we work to address climate change and our energy needs, that we do not replace old, environmentally unsafe technologies with new, environmentally unsafe technologies.

First, do not harm should be the predicate for future energy replacement projects. **The Precautionary Principle exists for a reason: it exists to protect us from our own worst human tendencies to miscalculate present and future harms, cumulative impacts and effects, and our own quality of Life in favor of quick, easy fixes, monetary recompense, and those things that will not inconvenience us or make us change our ways of doing things.** Quick and easy means that most, if not all, of the time we end screwing our environment and, in the end, ourselves.

The lack of a full sweep of hydrologic data, seismic and seismic mapping data, deep coring throughout and outside the project area (since no project exists within its own boundaries!), test

duplicate

drilling (specifically to see if and where there is bedrock to anchor the project tunnels), stratigraphic data and analyses, etc.

Page ii is a show stopper and as far as I am concerned makes this entire project totally unfeasible and a danger to the Columbia River Gorge National Scenic Area, the Columbia River and its environs, and to the humans and wildlife that inhabits this area. “In some cases, implementation of mitigation measures would reduce but not completely eliminate the **significant adverse impacts (my bold)** and, in some cases, mitigation has not yet been identified. **There are identified in the Draft EIS as significant and unavoidable adverse environmental impacts to Traditional Cultural Properties, archaeological sites, culturally important plants, and other Tribal resources (my bold)**...However, to date, there is no information available about mitigation proposed by or supported by the Tribes that would reduce the level of impact to less than significant...”

When I read this I didn't know whether to laugh or cry. That paragraph on its own tells us why this project is totally unfeasible. Enough cultural and environmental damage has been done to the NSA (and other lands) through development and expansion in the last seven centuries. We should be doing better not worse in the 22nd century!

The old aluminum smelter, a cleanup site, has already made the project area dangerous, i.e., existing toxins, etc., and the environmental damage done by smelter operations is not totally known. Adding another environmentally dangerous project on top of an existing environmentally dangerous project is extremely dangerous, short-sighted, and illogical and unreasonable.

Page v, Potentially required permits, licenses, and approvals. There is NO POTENTIALLY REQUIRED. These would ALL be required before the first shovel hits any dirt. And, all these permits require data to be gathered, assessed, and cumulative impacts to be analyzed. Let's see—explosives, endangered species, historic preservation, clean air and water, possible killing of eagles, stormwater, earth movement, etc., and other impacts that are not well defined because data that would impact this environment has not even been gathered! This is not right. Data comes first, analysis second, and then maybe we can talk about proceeding to the next step.

Page S2. The CGA smelter that operated from 1969 to 2003 is on the WA DoE's Hazardous Sites List, added in 1990. Why it was not closed in 1990 is an open question since it's hazardous! According to the DEIS, investigation of contamination on the site and development of cleanup actions are proceeding through a separate process. No, this separate process is critical to the decision making process because the data gathered during this separate process is what will determine if the Project goes forward at all. If the investigation shows that the contamination is dangerous and ongoing then the Project is dead in the water and it should be stopped.

“Need” in this case is more a want and not all wants make sense. Definitely, this project on this contaminated site does not make sense because it includes extreme adverse effects to the environment and to all the inhabitants of the NSA.

State SEPA rules and regulations should be as strong or stronger than National Environmental Policy Act (NEPA). Why there are separate tracks for these two acts for this project is questionable.

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Page S5, Shaft and tunnels. The elevation difference between 2950 feet at the upper reservoir and the lower reservoir elevation of 590 feet, is 2360 feet. It appears that the vertical shaft from the upper reservoir to the power and water conveyance tunnel is somewhere in the 2000 foot range. In reading the DEIS, and granted I had to do a swift read through because the comments are due August 9th, it appears that most of the geology cores were down to only 40 feet. Since the area is a unconsolidated alluvial fill, probably from the Missoula floods, I think that a more in-depth and full geological examination of all the faults and strata in the area must be done.

Page S6, water replacement. The 360 acre-feet of water each year to replace water lost through evaporation (and possibly leakage) is at best a guesstimate. Our summers are getting hotter and more humid and the water loss could be higher. Are the residents of Klickitat county and the rest of us in the NSA willing to lose more water out of the Columbia and other sources so a LLC can make money selling energy to California or Oregon or other states? I'm voting NO.

Pages S7, S8, S9, S10, and S-11, Summary of Impacts and Proposed Mitigation. The number of adverse and significant impacts on these pages is jaw dropping. These pages were very difficult to read because the summary descriptions are horrible and dangerous and should not be allowed, but it is the Impact Findings that are so egregious as to warrant lawsuits before the first shovel of dirt is dug. Seriously. The Summary of Proposed Mitigations make all the adverse and significant effects all better because, you know, we can mitigate anything because we really want to build this dangerous and environmentally unsound project, because, well, we can't think of better and safer and more environmentally sound projects and, heaven forbid, that we are inconvenienced in our daily lives by bothersome pesky environmental issues.

Mitigation is a myth with which we humans delude ourselves so we can do things that, although they would cause adverse and significant impacts and have severe effects on our environment, we still want to do them and will do anything to get them done. Mitigation is a myth. Off-site mitigation is a balm to our consciences (maybe!) and has, to my knowledge, never been shown to

be scientifically equal to the no action alternative. Off-site mitigation should not exist as an alternative.

Cumulative impacts, direct and indirect, matter. If habitat functions and quality for some species would be affected during Project operation then we need to know what functions, quantify the quality, and specify species.

I'm not sure if we citizens are viewed as being stupid or that we don't know how to read and cogitate, but when I read the following item, it made me quite angry: "Plants, mammals, reptiles, and invertebrates could experience mortality and birds could experience disturbance during the 5-year construction period, but species viability would not be adversely affected." First, there has to be data collected over any period in order to assess whether species would or would not be adversely affected. Second, there is no data to back up the not adversely affected comment. And third, birds and invertebrates and other species are part of our environment and what we do impacts them and their survival. We should not be killing other species because we want our lights to shine longer at night or because we want air conditioning in the Summer. Every living thing on this planet has a niche and no one niche is any more important than the other. Just because we humans don't understand all the processes of the Earth doesn't mean that we should disregard them or their effects and impacts.

All of the impacts and effects can be avoided if the NO ACTION alternative is chosen.

49 cont.

Page 1. This SEPA does not provide a comprehensive evaluation of significant adverse environment impacts since some of the most critical element of the Project has not yet been gathered; that is, data, and evaluated. Subsurface conditions, geological data (stratigraphy, composition, faults, cores, drilling, etc.), the groundwater divide between the northern and southern aquifers, mass wasting ("**Mass wasting is the movement of rock and soil down slope under the influence of gravity. Rock falls, slumps, and debris flows are all examples of mass wasting. Often lubricated by rainfall or agitated by seismic activity, these events may occur very rapidly and move as a flow.**") The fault map of this area needs much more data and study. There are also mines in the area.

Page 4. If DoE determined in June 2021 that the information submitted by the applicant for Clean Water Act Section 401 Water Quality Certification was "insufficient to determine if the activities and impacts associated with construction and operation of the project could be conducted in a manner that would not violate applicable water quality laws" then why is a SEPA being done at this time? If there is no data, there can be no evaluation. The information necessary to get a permit should be done early in the process not after a project has approval to proceed.

Also, Mt. Hood in Hood River, OR is seismically active. We have Mt. Adams west of the project area whose glaciers are melting at a very fast rate and water will be an issue sooner rather than later in the NSA.

Page 6. First, I don't freaking care about market conditions so the applicant can make more money using the resources of the NSA while significantly and adversely affecting those

resources!! The environment comes first. If the project would significantly and adversely affect the environment then the project should not be approved. First, do no harm.

Water rights are a sensitive issue but will have to be addressed in this era of climate change. Water rights granted in the past may not be supported by the hard reality of climate change today and will probably have to be updated.

Page 7, Tunnels. The proposed tunnels are very problematic in unconsolidated alluvial fill sediments in this geologic landscape. The Missoula floods came through here and that geology is unstable.

The proposed transmission lines are also very problematic in the National Scenic Area and would affect the scenic part of the NSA Act. The Gorge Commission should certainly put in comments opposing any more transmission lines across the Columbia River which affect the scenic and aesthetic value of the Gorge.

This brings into the discussion the fact that in the race to change our energy production from one technology which uses coal and oil and into other technologies using natural gas and solar and wind, we are not being mindful of where we will go in the future. Natural gas, solar, and wind are not free of environmental effects and impacts. There is no free lunch in energy production. We should be looking to minimize future environmental effects and impacts and not produce more of them. People will be inconvenienced. There will be less energy. We humans will have to learn more about conservation of energy so that less energy has to be produced.

Building codes will have to change so that we need less air conditioning and heating. Not every street and highway and parking lot has to be lighted up like the Fourth of July in order to be safe and secure. There are actions that we can take to decrease energy use while we make the transition to less environmentally impactful technologies.

At some point, transmission lines may become a moot point as residential housing becomes independent of the the electrical grid. Energy producers need to change their business model so they can prosper in the future. Fuel cells, better storage batteries are are and improving. If they don't have customers, they will not survive as businesses.

Page 9. Any project that further impacts fish in our waters is a non-starter and requires the NO ACTION ALTERNATIVE. Mitigation is not an option.

Page 10, proposed project facilities. 2.3.1 states that "The final arrangement of proposed project features would be based on required studies of topography, geology, hydrology, seismic hazard consideration, and functional requirements." This made my head hurt. Seriously, These "required studies" should have already been done and should be part of this DEIS so that all the facts and data could be taken into consideration. The public, which owns the natural resources that the Applicant wants to use to make money, needs to know all the facts in order to make a reasoned decision.p\

7100 acre-feet is 309,915,000 cubic feet, which is the volume needed for the reservoir fill. This does not include the top off waters that would be needed over time as evaporation and leakage occur. This is a lot of water. Frankly, 2,318,325,194.81 gallons of water is a BILLION GALLONS too much. Water is a precious commodity. More precious than oil or gold. Water is Life and this proposed Project sucks up way too much Life.

P. 13, tunnels and powerhouse. Once again we see a term that implies that there will be more construction and activity once the project has initial approval. “The location, number of circuits, voltage, and configuration of the proposed project’s interconnection with the regional electric utility network would be finalized by the Applicant during the final design stage in conjunction with the BPA planning group.” Transmission lines are not aesthetic (this is the NSA, after all!), they take up a large part of the environment, and we should be questioning why we are putting in more transmission lines when we should be going for less transmission lines that affect our environment.

Page 15. What does 70,000 tons of concrete produced by the upper reservoir plant per year translate to in terms of CO2 emissions? Same for the 130,000 tons produced by the lower reservoir concrete batch plant.

Page 16. Can the waters provided by KPUD be used by the citizens of Klickitat county if their water issues become dire?? There are already water issues in Hood River, Mosier, White Salmon-Bingen, Skamania County wells and streams, etc., and, as climate change persists there will be more water issues in the Gorge. Klickitat should think about the future water needs of its citizens.

Page 17, FERC hydropower license. I’m sorry, but for Klickitat PUD to be obligated for 50 years to this project is not reasonable. As climate change increases and water needs become more crucial to communities, there should, at the very minimum, be a contract clause that says communities come first if the water situation for the Gorge becomes a survival problem. Though KPUD would make money from any deal, we can’t drink money or water our food plants with money. Water is Life.

Page 18. I was struck by the following statement: “Other renewable/decarbonized energy storage technologies were suggested in scoping comments, such as the following: Stacked blocks, liquid air, underground compressed air, flow batter storage, and solar and lithium-ion batter storage. None of these alternative energies meet the criteria to attain the proposal’s objectives.” So what if they don’t meet the criteria to attain the proposal’s objective? **This just means that this entire proposal should get the NO ACTION alternative.**

Page 20, ESA (FERC). “FERC, in consultation with US Fish and Wildlife Service (USFS) and National Oceanic and Atmospheric Administration Fisheries, would evaluate the effects on listed and proposed species and critical habitats and require compensatory mitigation for unavoidable impacts.” **There is NO COMPENSATORY mitigation for destroying fish habitat and the environment just because somebody wants to build a energy project!! If fish and the habitats would be affected by this Project then this project should get the NO ACTION alternative.**

Any blasting with dynamite is not a good idea in this unconsolidated alluvial geology area! As WADOT and ODOT have found when blasting along our roadsides, one gets more than one expects when unforeseen consequences of blasting rocks and unconsolidated materials occur.

Page 21. Eagles should not be killed or their habitat affected just to make this project happen. That philosophy, that it's okay to kill a few species along the way to energy production is so 18th and 19th century thinking.

“Construction and operation of the proposed project would affect wetlands and streams, which are waters of the United States.” There are many streams, wetlands, and groundwaters in this area and they would be adversely and significantly affected by the Project. A section 404 Clean Water Act Permit should NOT be granted for this project and the **NO ACTION alternative should be chosen.**

Page 22. “The proposed project would result in both the temporary and permanent placement of fill material into wetlands and streams (waters of the state) that may not be regulated as waters of the United States under Section 404 of the Clean Water Act.” Not just NO, but HELL, NO!! Seriously. We need our wetlands and waters more than ever in the face of increasing climate change manifestations and this proposal would result in both temporary and permanent destruction of streams and wetlands?!?! **The NO ACTION alternative should be chosen for this project.**

Page 24. “Significant and unavoidable adverse impact” is totally avoidable under the **NO ACTION ALTERNATIVE!**

Page 26, Soils and Geology. The geology of this area is unconsolidated alluvial material with underground faults, surface waters, and ground water which makes this area susceptible to landslides and earth movement (mass wasting). Blasting with dynamite and ground disturbance would increase the dangers of earth movement. The key findings of the geology and soils analysis says it all: removing vegetation would increase the potential for erosion; could moderately increase geologic and seismic hazards, including the potential for landslides; during project operations a local or regional earthquake could cause liquefaction in the victim of the lower reservoir due to the project being within the moderate shaking zone for the Cascade Zone earthquake.” Why anyone would think that this Project was a good idea after reading this, is a mystery.

This next statement is mind boggling: “Mitigation is not required to reduce any significant impacts, but additional geotechnical studies, sediment and erosion control plans, implementation of BMPs, and design updates are proposed to reduce potential impacts.” I'm almost speechless. This paragraph is so egregiously dangerous and unethical as to be almost incomprehensible to thinking and reasoning humans. Who would ever want to cause significant impacts to our environment on purpose just to build a money making project? **THE NO ACTION ALTERNATIVE IS LOOKING BETTER AND BETTER.**

Page 30. The geology of this area—unconsolidated sediments, volcanic rocks and deposits, landslide deposits, unconsolidated silt and fine sand deposits, an alluvial fan deposit within the proposed footprint of the lower reservoir, basaltic talus, silt, sand, gravel—makes this area wholly unsuited for this proposed Project. Slope stability is questionable. Erosion and accretion are related to slope instability and mass movement—two things that would definitely significantly impact any operation. **The known geology alone makes the NO ACTION alternative the only possible option.**

Page 31, faulting. Thrust faults, strike-slip faults, and dip slip faults. Oh, my. If the “age of the folding and faulting in this region is not well understood” why are we doing a SEPA now instead of waiting until geotechnical data has been gathered why are even talking about this project?? Even IF, and that’s a big if, these faults “are not considered to be capable of producing earthquakes”, that does not mean that fault movement cannot happen. Faults don’t necessarily produce earthquakes. The faulting in the project area alone should make this project a no go. **The NO ACTION alternative should be chosen.**

Page 37. Wind erosion in the Gorge is a real thing. “Due to the relative windy conditions of this region, there is likely a **high potential for wind erosion in the study area. The soils types in the study area have a low to high range of wind erodibility factors. Soils with the highest wind erodibility factors are in the southern portion of the study area in the area of the proposed lower reservoir.**” The winds in the Gorge are getting more powerful and more frequent and will most likely increase in strength as climate change persists. Erosion, both wind and water, dangerous. **The NO ACTION alternative is looking better and better.**

Page 39 and 40, geologic and seismic hazards. Geologic hazards “are large-scale, complex natural events that occur on land and are capable of causing immense damage, loss of property, and sometime loss of life.” Seismic hazards “are a specific type of geologic hazard that result from ground shaking caused by earthquakes.” WDNR identified two situations when’re landslides commonly occur in the general vicinity of the proposed project: weak sedimentary layers cause overlying basalt to slide along the weak, tilted sedimentary interbeds, and weathered, tilted, and clay-rich volcanoclastic rocks fail either on their own or beneath overlying younger lava flows, transporting both downslope. This geology needs to be investigated further and coring and drilling should be done. “Large areas of bedrock instability are present in association with areas of faulting, ...and sedimentary interbeds have caused extensive mass wasting and slope instability along sections of the Washington shore of the Columbia River...In addition to past landslides and areas of potential deep bed instability, others areas of instability in the study area include the extensive talus deposits that form an apron at the base of the basalt cliffs and the consolidated debris flow deposits in the area proposed for the lower reservoir.”

“Earthquakes are associated with hazards of liquefaction and landslides.” Six earthquakes were reported within 5 miles of the proposed project between 1969 and 2021. There are fault zones within 12 and 16 miles east of the project area. **“The U.S. Geologic Survey Shakeup indicates that the proposed project would be within the zone of moderate shaking intensity from the Cascade Subduction Zone-generated earthquake.”**

Page 40. Liquefaction is a real threat in the project area. **“The 2002 geotechnical investigation indicated that primary specific seismic risks in the lower portion of the proposed project area are associated with soil liquefaction and lateral spreading. Sediments present within the saturated zone beneath some portions of the study area exhibit conditions that are conducive to liquefaction during earthquakes. This liquefaction potential also may contribute to increased chance of lateral spreading of soils during a seismic event.”**

I’m going to say this again: **the NO ACTION ALTERNATIVE is the only option for this proposed project.**

I am stupefied that anyone in their right mind would think that using explosives, drilling tunnels, and removing vegetation that will cause erosion and mass wasting is a good idea in order to build a operation that is environmentally unstable and dangerous. Slope instability, increased water and wind erosion or accretion potential, and increased potential for landslides after construction disturbance are not minor issues.

Page 41. “Excavation of rock for the construction of underground project features would not affect the overall geology and have only negligible effects on geologic formations of the area.” **Of course the “overall” geology might not be affected but the localized geology and landscape would be significantly and adversely affected.** On page S-5 the sketch shows that the vertical shaft from the upper reservoir (which is at 2950 feet of elevation) seems to be drilled down to below the 590 feet of elevation of the the lower reservoir, and the elevation of the powerhouse that is in the conveyance tunnel is at 115 feet of elevation. I must have missed the widths of the tunnels in the DEIS but am assuming that the widths have to be significant since there would have to a lot of supporting, stabilizing material around the tunnel walls so they do not collapse. This would entail a lot of stress on the unconsolidated alluvial geologic sedimentary layers in the project area.

To use the word “negligible” in this context is misleading, and, frankly, offensive to anyone who understands geology and geologic hazards.

Page 42. There is a lot of destruction of the habitat, vegetations, and soils by the proposed project.

“Based on the Applicant’s Preliminary Supporting Design Report (HDR 2020a), construction of the proposed project could encounter multiple areas of instability in both the above and below ground portions of the study area. Most of those instances are associated with uncertain conditions in the underlying basalt formation layers, especially those locations where faults cross the study area in locations where unconsolidated deposits occur...However, because of the uncertainty related to the geologic conditions, there would be some impacts on slope stability from construction. Additional geotechnical studies and design updates proposed by the Applicant could further reduce these impacts, which are not expected to be significant.”

I’m not sure if the perpetrators of this DEIS think we are stupid or that we will not read the DEIS. **“Additional geotechnical studies and design updates” will NOT reduce the impacts of construction and explosives and earth movement and tunneling!! The NO ACTION**

ALTERNATIVE, however, will most definitely reduce the impacts. Besides, all these geotechnical studies and designs should already be in the DEIS and NEPA documents so that a thorough evaluation can be done by the public and interested entities.

Any effects on SR 14 are unacceptable, specifically stormwater and sediments. SR 14 is the only highway through the area on the WA side of the Columbia River. We have all experienced the closures on this highway and I-84 on the OR side of the river. We are constrained by the available infrastructure. Public safety and welfare are considerations and should not be impacted by any project.

Page 43. “The proposed project is not expected to result in any significant adverse impacts on geology and soil resources within the study area. Many of the potential impacts have the potential to be reduced with the implementation of standard BMPs and design considerations proposed by the Applicant.”

Unless the Applicant plans on rolling back the Missoula Floods and all the unconsolidated materials resulting from said flood and defaulting the area and draining all the streams and waters, there will be significant and adverse impacts and cumulative effects on the geology and soils and habitats and waters within the study area!!! Words matter and trying to downplay the reality of the significant and severe cumulative impacts of this project on the environment and all the environs in the proposed project area is very offensive and does not serve the public, nor the Applicant, well. The Applicant should know sooner, rather than later, that their Project is not going to happen so that they don't spend more money, time, and effort on a project that will not be built.

Page 42. Finally, “No mitigation measures would be required because there would be no significant adverse impacts. Specific permit conditions and mitigation actions would be confirmed by regulatory agencies during permitting for the proposed project.”

Well, let us just shunt off the important stuff to the “regulatory agencies” why don't we. The WA State Environmental Policy Act should require complete and comprehensive data and analyses so that the environmental checklist will provide the best, most timely, complete and comprehensive data so that the citizens of WA state and relevant agencies can make informed decisions on how the natural resources of their state will be used, or not, if the NO ACTION alternative is chosen. In this case, the **NO ACTION ALTERNATIVE is the only option.** No data, no construction.

Page 48. Water is Life. For fish and humans. WRIA 30, Swale Creek Watershed: salmonid spawning, rearing, and migration, domestic and agricultural water supply, stock watering, wildlife habitat, harvesting, commerce and navigation, boating, and in NSA values, aesthetics. Why would we risk this watershed so the Applicant can do significant and adverse impacts to the environment to build a project that nobody needs in the Gorge?

Question: Where will the electricity produced by this proposed project be sold?

Page 51. The old aluminum CGA smelter clean up is still in play and nothing should be done until that site is totally cleaned up and rehabbed. We do not need to add more new environmental problems on top of old environmental problems.

Page 53, note 7. “Surface waters in the proposed aerial transmission line right-of-way were assessed using desktop methods and were not verified or delineated in the field.” This is inadequate and does not give us the best available information upon which to make informed decisions.

Page 57. **Transmission lines are environmentally significant and do cause adverse impacts. Until we see a BPA proposal of how they would add transmission lines to the existing overhead transmission line, they really don’t know whether any work on the ground or in the waters would be involved.**

Protective buffers around our waters and wetlands are critically important and “Many of the surface waterbodies and wetlands present in the study area are considered critical areas under the Growth Management Act.” (RCW 36.70) There is a significant footage of wetlands, 540,798 square feet, within the study area.

Page 58, groundwater. More information and data is needed on this topic before statements such as “groundwater conditions in the northern portion of the study area are separate and distinct from those of the southern portions” are made. “A conceptual model” is not real data obtained with drilling and coring and chemical analyses of the waters in the area.

Page 59. “Generally interpreted” is not a technical term when dealing with groundwater and its environs. “Inferred” is also not a technical term and has no data value.

“The sparse existing subsurface information in the area of the proposed upper reservoir indicates that no substantial groundwater is present to a depth of 40 feet.” Well, I’m not sure which dictionary is being used here, but to me sparse means very little information!!

Water can migrate up, down, sideways and in any directions it wants to!! So saying that something is “relatively impermeable” is not meaningful when talking about water migration.

Page 60, Wells. It is very important to know if the wells in the area would be affected by any activity done by the Applicant. Nobody wants wells to go dry or to be polluted by unknown toxins. “Groundwater at depths of less than 150 feet in the Swale Valley has been documented to contain concentrations of nitrates exceeding the state drinking water standard of 10 milligrams per liter. There is also a strong correlation of elevated nitrate concentrations with chloride concentrations that suggest an association to septic systems.”

If explosives are used it is guaranteed that there will be earth movement and we don’t know whether the groundwaters flows will also be affected. **The NO ACTION ALTERNATIVE is looking better and better.**

Further, “The unconsolidated deposits, consisting of naturally deposited sands, gravel, and silts and manmade fill, appear to be 30 to 50 feet thick in the area surrounding the proposed lower reservoir location...” Sands, gravel and silts are not stable bedrock.

In conclusion, the Precautionary Principle: First, do no harm, definitely applies to this project. The SEPA makes very clear that this project, if allowed to proceed, would endanger the waters of both WA state and the United States, it would significantly and adversely impact the environment—the wildlife, the habitat, the waters, etc.—in the proposed site area. This project might work in a mine or a quarry but it is totally unfeasible in the proposed area. This is the National Scenic Area and aesthetics and natural resources are protected by the federal NSA Act. **The fact that there would be severe and unique significant adverse impacts to Tribal cultural resources, Tribal communities, and tribal members, and their First Foods and Spirit Foods and way of Life is not acceptable.**

The NO ACTION ALTERNATIVE IS THE ONLY OPTION for this proposal due to the excessive nature of the cumulative significant adverse impacts as delineated in this SEPA. No further data gathering will make this project acceptable in the face of the dangerous and significant impacts and effects on the environment that would occur if this project was allowed to proceed.

We humans should not be creating more environmental problems as we try to work our way through climate change and its many impacts and effects. We should strive to do better. We should also start thinking about conserving more energy so that we do not have to be creating more energy projects, especially projects that do not benefit us or our environment. Our convenience is not a reason to destroy our environment. This is our only home. There is no Planet B!

I recommend that the Department of Ecology issue the **NO ACTION ALTERNATIVE** option for this proposal.

Sincerely,

e-signature/Mary Repar

Tim Johnson

Completion of the pump storage project would allow wind and solar to be a constant source of energy and allow removal of dams. Removal of dams would be good for Salmon and hence the Tribes. This project would further have a significant positive environmental impact by replacing carbon producing energy with clean energy to limit global warming. Project has a huge positive impact for a very small footprint.

August 9, 2022

Goldendale Energy Storage Project Draft EIS
Sage Park, Washington Department of Ecology, Central Regional Office
1250 W. Alder Street
Union Gap, WA. 98903-0009

RE: GOLDENDALE PUMPED STORAGE PROJECT

Dear Sir:

1

I am writing a letter to oppose the proposed Goldendale Pumped Storage Hydroelectric Project because of the damaging impacts that it will have on the resources of the Yakama Nation.

2

The Yakama Nation has Ceded Land and Trust & Non-Trust land in the on/off the Yakama Reservation. On the Ceded Land we are allowed to continue practicing our Cultural and Traditional Food & Medicinal Gatherings: Fishing, Hunting, Gathering Roots, Berries, Sage, etc. We have practiced first food gatherings for many many years, even before our Treaty of 1885 was signed and initiated. The proposed Going Green-Sources of Energy will destroy the natural habitat areas of our natural foods that were gifted to us by the Creator/God. Our people traveled and harvested along the ceded areas that once all belonged to us. Initiated harvesting foods/medicines beginning in February to late September: Hunting, Fishing, Celery, Roots and Berries.

3

The surrounding areas, you have large companies, coming into the areas wanting to change the land base for this and that: Dams, HydroElectric Pumps, Wind Mills, Solar Panels. Who will this benefit the rural or the dominant cities? Does it benefit the Yakama Nation People? Destroying our land to construct Sources of Energy is taking away from the original peoples. We have farmers, companies already putting up fence lines with signs "No Trespassing" where we once gathered. There are also signs erected "No Fishing" "No Hunting", "Violaters will be Prosecuted" in these areas.

2 cont.

Along these harvesting trails we have different Indian names for each area. We have lost people along these trails buried in the grounds with many artifacts. Some of these areas are considered Archeological Sites to be preserved under state and federal written laws.

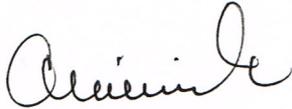
3 cont.

The government took away our people, water, and land when the Celilo Falls was erected for the Dalles and John Day dams. Many of our people were displaced. This was a tragic event to our people considered Historical Trauma. What else will you

3 cont. | destroy to become monetarily rich? Please do not destroy our natural lands for a few rich people. I heard some of these people are coming in from California and Utah looking for land base resources to start these projects. Like I asked before, who does it benefit?

1 cont. | Please leave our natural based properties as is, just because no one lives in the area
4 | does not mean it serves anyone purpose. Will there be any public meetings for this proposed Goldendate Pumped Storage Project?

If you have any questions, please respond to my post office box.



Arlea M. Meninick, YN#6993
PO Box 303
Harrah, WA. 98933-0303

Debra Byrd

I oppose the Goldendale Energy Storage Project. We need to think about the future, not just another avenue to create jobs at the cost of the damage these projects do to the land. You have an important decision to make on behalf of the environment, but the environment cannot advocate for itself. We all have to sit back and hope/pray that decisions are made for the long term, unfortunately we may see the beauty of the land's sacrificed for a few jobs.

Stacy Sowder

I think its a great project. Good for the environment. It lets us use the wind and solar power that we have. I've reviewed the EIS and it appears it would have a minimal impact to the environment. Reduces carbon emissions and a great way to utilize our natural resources.

Dorothy Jordan

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM

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Dear Central Region Director Park I strongly oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Thank you for your time and consideration of these comments. Sincerely, Dorothy Jordan
1407 Abbott Rd Lynden, WA 98264-9401
dorrie.jordan@gmail.com

Adina Parsley

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,
Adina Parsley
20420 Marine Dr
APT P2
Stanwood, WA 98292
7843dickandpat3@gmail.com

Allison Ostrer

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Allison Ostrer
2721 SW Trenton St
Seattle, WA 98146
aostrer@hotmail.com

Amanda Dickinson

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Amanda Dickinson
1322 S 18th Ave APT 135
Yakima, WA 98902-5264
bettyyakima@aol.com

Angela Kelly

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Angela Kelly
1817 Adams St
SE Olympia, WA 98501
angiesfemail@yahoo.com

Angie Dixon

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Angie Dixon
6949 Humphrey Rd
Clinton, WA 98236
9622angied@whidbey.com

Anita Scheunemann

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Anita Scheunemann
6316 199th Loop SW
Rochester, WA 98579
8693arscheu@comcast.net

Ann Stockdale

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Ann Stockdale
1714 20th st Ct
NW
Gig Harbor, WA 98335
annstockdale@comcast.net

Anna Costello

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Dear Central Region Director Park
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Anna Costello
15630 58th Pl
WEdmonds, WA98026-4608
amcostello3@frontier.com

Anna McNaught

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Anna McNaught
5939 N 26th St
Apt F61
Tacoma, WA 98407
annamcnaught@icloud.com

Art Bogie

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Dear Central Region Director Park
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Arthur Bogie
5915 Sunset AVE
Unit 503
Anacortes, WA 98221
fidalgo1.art@gmail.com

Art Greenlee

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Art Greenlee
193 maxview driveport ludlow, WA 98365
artgreenlee@gmail.com

Barbara Blackwood

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Dear Washington Department of Ecology and Governor Jay Inslee,
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Barbara Blackwood
11916 E 25th Ave
Spokane Valley, WA 99206
5728barbara.bb@comcast.net

Barbara Lamb

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Barbara Lamb
5017 Cedar Acres
Ln
Langley, WA 98260-9208
btlamb@whidbey.com

Ben Rall

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Ben Rall
2217 W Crown Avenue
Spokane, WA 99205
intolerantleft@protonmail.com

Brandie Deal

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Brandie Deal
301 225th St
SW Bothell, WA 98021
8353 laughsalot0579@yahoo.com

Brenda Michaels

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Brenda Michaels
353 S Edwards Rd
Port Townsend, WA 98368
9269brenda@conscioustalk.net

Brian Hollander

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Brian Hollander
2112 Delphi Rd
SW Olympia, WA 98512
93051hotse_h@msn.com

Brian Venable

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Brian Venable
14300 Greenwood Ave N Apt 214
Seattle, WA 98133
6869brainscience2003@yahoo.com

Bronwen Evans

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Sincerely,
Bronwen Evans
219 James St
Seattle, WA 98104
2211 bronwynnevents@hotmail.com

Buz Fletcher

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Buz Fletcher
336 Snowden Rd
White Salmon, WA 98672
buzman522@gmail.com

carlos westergaard

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the linkDear Dear Central Region Director ParkDear Washington Department of Ecology and Governor Jay Inslee,I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation).This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions.The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,carlos westergaard14104 Dogwood Ct. KpnGig Harbor, WA98329carlos_westergaard@hotmail.com

Carol Affleck

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Carol Affleck
9144 45th Ave
SW
Seattle, WA 98136
2675cjaffleck@aol.com

Carol Ann Roan Dennis

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Dear Central Region Director Park
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Carol Ann Roan Dennis
1501 SW Victory Oak Harbor, WA 98277
caeliann@comcast.net

Carol Else

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Carol Else
9702 Veterans Dr SW
9702 Lakewood, WA 98498
11511.else@comcast.net

Catherine Ross

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Catherine Ross
19508 88th Ave
WEdmonds, WA980266115
ross.catherine05@gmail.com

Carole H

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Carole H
4807 Willamette St
Port Townsend, WA 98368
1044photosandbooks@msn.com

Carole Henry

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Sincerely,
Carole Henry
6345 Seabeck Holly Rd
NW Seabeck, WA 98380
xmas_carole@hotmail.com

Carolyn Treadway

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Carolyn Treadway
1951 Circle Lane
SE Lacey, WA 98503-2561
cwt2014@planetcare.us

Cathy Brandt

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Cathy Brandt
11526 208th Pl
SE Issaquah, WA 98027
5400brandtonsquak@aol.com

Charles Landau

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Sincerely,
Charles Landau
3303 Sherman St
Port Townsend, WA 98368
4841charlesl@olympus.net

CHRIS BATTIS

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Dear Central Region Director Park
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Sincerely,
CHRIS BATTIS
2811 COWGILL AVE
BELLINGHAM, WA 98225
cdbattis@gmail.com

Chris Guillory

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Chris Guillory
420 S Laurel St
APT 5
Port Angeles, WA 98362
2803chris_no51@yahoo.com

Chris Nolasco

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Sincerely,
Chris Nolasco
3119 151st St
SW Lynnwood, WA 98087
2401cln5@hotmail.com

CINDY COFFIN-GREENIG

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM

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Dear Central Region Director Park
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Sincerely,
CINDY COFFIN-GREENIG
618 N 65th St
Seattle, WA 98103
5304ccgre63@gmail.com

Claude Krampe

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Claude Krampe
24901 NE Chilcote Dr
Yacolt, WA 98675
3340ckandut@yahoo.com

Clayton Jones

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Clayton Jones
4246 S 148th St
Tukwila, WA 98168
4451seajay21649@gmail.com

Colin Wiseman

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Dear Washington Department of Ecology and Governor Jay Inslee,
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Colin Wiseman
3523 Riley St
Bellingham, WA 98229
colinwiseman@gmail.com

Cornelia Teed

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Cornelia Teed
1201 13th St
UNIT 201
Bellingham, WA 98225
7154joteed2000@yahoo.com

D Calahan

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D Calahan
18554 W Lake Desire Dr
SE Renton, WA 98058-9556
callie7588@hotmail.com

David Carrothers

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Sincerely,
David Carrothers
3570 Brondt Rd
Ellensburg, WA 98926
9684davidc@mccarlcreekoutfitters.com

David Grelock-Yusem

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Sincerely,
David Grelock-Yusem
5574 Welfare Ave NE
Bainbridge Island, WA 98110
3181 dyusem@gmail.com

Desiree Nagyfy

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Dear Central Region Director Park
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Desiree Nagyfy
1120 E Westmoreland Rd
Deer Park, WA 99006
8352
dnagyfy@msn.com

Dean Webb

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Dean Webb
4522 36th Ave
WSeattle, WA98199
dm_webb@live.com

Deborah Baird

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Deborah Baird
3535 Smugglers Cove Rd. Greenbank, WA 98253
debcrutzen@hotmail.com

Deborah Fredericks

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because there are already too many dams and diversions on the Columbia River. Irreplaceable cultural resources have already been taken from our Native neighbors. We shouldn't add any more to their historic suffering. While it is true that our energy needs must be met without turning to fossil fuels, this specific project places an unfair burden on the Yakama Nation. I call on you to halt this proposal and collaborate with the tribes in designing an effective project that won't further harm the Columbia and people who depend on it.
Regards,
Deborah Fredericks
1217 East Empire Avenue
Spokane, WA 99207-3021
cat09tales@hotmail.com

Deborah J Cruz

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Deborah J Cruz
1454 Willeys Lake Rd
Ferndale, WA 98248
9774dwacruz@comcast.net

Debra Morrison

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Sincerely,
Debra Morrison
2021 NE 75th St
Seattle, WA 98115
morrisondeb6452@gmail.com

Denise Day

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Denise Day
506 E 64th St
Tacoma, WA 98404
1907denisedays65@outlook.com

Dennis Bahr

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Sincerely,
Dennis Bahr
7425 152nd St
SESnohomish, WA 98296
8436dennisbahr@yahoo.com

Dennis Ledden

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the linkDear Dear Central Region Director ParkDear Washington Department of Ecology and Governor Jay Inslee,I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation).This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions.The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,Dennis Ledden183 Webb RdSequim, WA983829267lcs5779@gmail.com

Dennis Pennell

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Dennis Pennell
402 NE 136th Way
Vancouver, WA 98685-2823
dennisnpennell@yahoo.com

Diane Falk

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Diane Falk
PO BOX 151
Marysville, WA 98270
151falkdb@frontier.com

Diane Sullivan

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,
Diane Sullivan
1231 SW Kalama Loop
Oak Harbor, WA 98277
4556dianealida@mac.com

dolores darst

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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dolores darst
343 Cedar Park Dr
Port Angeles, WA 98362
8429 bddarst@gmail.com

Dorothy Parshall

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Dear Central Region Director ParkDear Washington Department of Ecology and Governor Jay Inslee,I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation).This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions.The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,Dorothy Parshall723 Decker AveLangley, WA982609526dorothyp@whidbey.com

Duane Niatum

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Duane Niatum
2826 NW 62nd St
Seattle, WA 98107
2512niatumd@hotmail.com

Eleanor Dowson

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Eleanor Dowson
2007 Mill Pointe Dr
SE Mill Creek, WA 98012
4817eleanordowson@comcast.net

ELISIA DALLUGE

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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ELISIA DALLUGE
600 Yakima Ave #25
Moses Lake, Washington, WA 98837
lisa.eklund@yahoo.com

Elizabeth Lengel

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Elizabeth Lengel
12901 S Wildwood Ln
Anacortes, WA 98221
8783lengels@mac.com

Elizabeth Robinson

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Elizabeth Robinson
10550 Lake city Way nE
Seattle, WA 98125
kalika4878@hotmail.com

Emily Van Alyne

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Dear Central Region Director Park
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Emily Van Alyne
6749 Whitestone St
West Richland, WA 99353
7405oceanminded09@gmail.com

Erik LaRue

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Erik LaRue
17598 Maiben Rd
Burlington, WA 98233
9670pacific2626@gmail.com

Fritzi Cohen

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Fritzi Cohen
PO BOX 82
Nahcotta, WA 98637
0082nahcotta2@aol.com

George Beasley

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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George Beasley
323922
Highway 2
Newport, WA 99156
9344im2ez2c@yahoo.com

Glen Anderson

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Glen Anderson
5015 15th Ave
SE
Lacey, WA 98503
2723glenanderson@integra.net

Glenn Eklund

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Glenn Eklund
4975 Jones Rd
Oak Harbor, WA 98277
glostuggage@hotmail.com

Gloria Skouge

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Gloria Skouge
326 NW 182nd St
Shoreline, WA 98177
3527mi.glo@frontier.com

Grace Padelford

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
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Grace Padelford
11807 100th Ave NE APT B101
Kirkland, WA 98034
9603gapadelford@gmail.com

Grant Low

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Grant Low
2110 Highland Drive
Prosser, WA 99350-1195
melvingladys@yahoo.com

Greg Hoskins

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
I SUPPORT the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because we need reliable GREEN energy to save our entire SACRED planet. I do NOT agree with American Rivers on this, a group I otherwise usually support.
Sincerely,
Greg Hoskins
PO Box 2248
White Salmon, WA 98672
skinsgreg@yahoo.com

Hilarie Ericson

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
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Dear Central Region Director Park
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Hilarie Ericson
14515 N Creek Dr
UNIT APTA208
Mill Creek, WA 98012
5364
hilariee@hotmail.com

Holger Mathews

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Holger Mathews
3100 Airport Way S UNIT 48
Seattle, WA 98134
2135ginja69@gmail.com

J W Gordon

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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J W Gordon
231 Woodland Ave. Port Townsend, WA 98368-5059
jwg98368@gmail.com

Jan Jasper

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Jan Jasper
811 Anchor Ave NW
APT 5
Ocean Shores, WA 98569
9329kesikesi@gmail.com

Janelle Church

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Janelle Church
13947 Rainier View Ln SE
Yelm, WA 98597
6711 janellechurch8@me.com

Jayne Haygood

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

I write this as I am sitting in my campground (WT1) at Brooks Memorial State Park. The beauty and tranquility of this area is beyond measure. With the deepest sincerity I plead with you to oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,

Jayne Haygood
18112 SE 41st Way
Vancouver, WA 98683
8281jayneehaygood@mac.com

Jean Schwinberg

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Jean Schwinberg
6341 5th Ave
NE Apt 308
Seattle, WA 98115
6564jeanschwinberg@yahoo.com

Jean Thornsby

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Jean Thornsby
36721 6th Ave
SW
Federal Way, WA 98023
7272
jean_thornsby@hotmail.com

Jeff Freels

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,
Jeff Freels
1714 Magnolia St
SE Lacey, WA 98503
6927jeff@jeffwerx.com

Jen Bentzel

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Sincerely,
Jen Bentzel
1249 Lisa Ln SE
APT 101
Lacey, WA 98503
2016lhasangel@yahoo.com

Jennifer Cerulli

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Sincerely,
Jennifer Cerulli
3565 Tacoma Ave S
Tacoma, WA 98418
mamawolf07@gmail.com

Jeremias Thuesen

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Sincerely,
Jeremias Thuesen
1407 Kaiser Rd SW
Olympia, WA 98512
5550thuesenja@gmail.com

Jessica Galbraith

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Jessica Galbraith
PO Box 2806
Bellingham, WA 98227
jessielu@jessielu.com

Jillian Shea

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Sincerely,
Jillian Shea
193 Maxview Dr
Port Ludlow, WA 98365
jsheacpa@hotmail.com

Jo Harvey

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Jo Harvey
204 Eastgate Ave
NPacific, WA98047
1222cailinfil@yahoo.com

Joan Liberty

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Sincerely,
Joan Liberty
11045 8th Ave
NE Seattle, WA 98125
joan_liberty@hotmail.com

Joe Piecuch

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Sincerely,
Joe Piecuch
4894 NE Totten Rd
Poulsbo, WA 98370
7827joepiecuch@gmail.com

John and Judy Knoten

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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John and Judy Knoten
602 NW 85th St
Vancouver, WA 98665
7732jknoten52@msn.com

John Dunn

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Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
John Dunn
PO BOX 1024
Vashon, WA 98070
1024jdunn936@yahoo.com

John Meyer

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Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
John Meyer
2100 Westlake Ave N
Ste 1
Seattle, WA 98109
john@nwoc.com

John Pottle

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
Please deny the permit for the Goldendale Pumped Storage Hydroelectric Project (Project). Moving away from fossil fuels is critical for the long term. However, hydro power causes far too much environmental damage and we should not be building more. Expanded electric generating capacity should come from sources such as solar and/or wind. I also oppose the Project because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,
John Pottle
3433 61st Ave SW
Seattle, WA 98116-3027
mister_fisher1958@outlook.com

Joyce Grajczyk

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Sincerely,
Joyce Grajczyk
12026 SE 216th St
Kent, WA 98031
jag4848@comcast.net

Judith Cohen

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Sincerely,
Judith Cohen
1608 E Republican
StSeattle, WA981124606jctcohen@yahoo.com

June MacArthur

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Sincerely,
June MacArthur
1045 Hillandale Dr E, Port Orchard, WA 98366, USA
portmacarthur@msn.com

Karl Joerger

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Sincerely,
Karl Joerger
415 Beech Street
Vancouver, WA 98661
kjoerger@comcast.net

Katherine Nelson

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Sincerely,
Katherine Nelson
9445 S 232nd St
Kent, WA 98031
3166nicoeli3@yahoo.com

kathryn alexandra

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kathryn alexandra
4311 ginnett rd
Anacortes, WA 98221
kalexandra@comcast.net

Kelley Slack

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Sincerely,
Kelley Slack
1811 34th St
Bellingham, WA 98229
3246kelleycoleman77@gmail.com

Ken Zontek

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Ken Zontek
4701 Modesto Way
Yakima, WA 98908
2580kzontek@hotmail.com

Kevin Schmidt

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Sincerely,
Kevin Schmidt
5186 New Sweden Ave NE
Bainbridge Island, WA 98110
3119 kevin@kevinschmidt.com

Kim Seely

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Kim Seely
583 Battery St. Seattle, WA 98121
kimbrownseely@hotmail.com

Kjersten Gmeiner

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Kjersten Gmeiner
12051 14th Ave Ne
Seattle, WA 98125-5019
gmeiner.k@gmail.com

Kyle Comanor

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I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). There are other places. State leaders need to end unsustainable and subsidized land use. Put this project on that land, not on land with tribal impacts. This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations.

Sincerely,
Kyle Comanor
7348 17th Ave NE
Seattle, WA 98115
5741comanor@yahoo.com

Laura Rainey

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,
Laura Rainey
914 W Indiana St
Bellingham, WA 98225
1836geowmn@verizon.net

Lea Ann Rolla

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,
Lea Ann Rolla
379 Williams Ln
Lopez Island, WA 98261-8638
hemicats@hotmail.com

Lela Perkins

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations.

Sincerely,
Lela Perkins
15109 50th Ave
SE
Everett, WA 98208
8800lelaperkins@comcast.net

Leslie Spurling

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations.

Sincerely,
Leslie Spurling
1210 N 152nd St
Shoreline, WA 98133
6209lesliespurling@yahoo.com

Linda Carroll

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
As an environmentally motivated voter, I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparable damage that it will inflict on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations.
Sincerely,
Linda Carroll
215 W Waverly Pl
Spokane, WA 99205-3178
lindalouise701184951@yahoo.com

Linda Wasserman

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Linda Wasserman
1510 N Steele St
Tacoma, WA 98406
8114coolauthor2@gmail.com

Lisa Winters

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Lisa Winters
24901 Roberts Dr
Black Diamond, WA 98010
9211 ladygreyreiver@comcast.net

Lois Hanson

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Lois Hanson
5529 40th Ave
NE
Seattle, WA 98105
lois1230@hotmail.com

Lori Erbs

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Lori Erbs
PO BOX 50
Acme, WA 98220
0050lorieji@cs.com

Mana Iluna

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Mana Iluna
4415 145th Ave.
NE Bellevue, WA 98007
manailuna1@msn.com

Marc Fryt

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Marc Fryt
403 W Nebraska Ave
Spokane, WA 99205
6312marcfryt@yahoo.com

Marie Weis

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Marie Weis
248 Shorewood Ct
Fox Island, WA 98333
9725marieweis@yahoo.com

Martha Atkinson

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

As a former biologist for the U.S. National Park Service, I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations.

Sincerely,
Martha Atkinson
4161 Deer Creek Rd
Valley, WA 99181
9718marciatkinson@hotmail.com

Mary Levine

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Mary Levine
55 e roanoke st
Seattle, WA 98102
comivez@aol.com

McCree Williams

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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McCree Williams
1800 S 330th St, Apt B203
Federal Way, WA 98003
mccreeiw@hotmail.com

Meryle A. Korn

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Sincerely,
Meryle A. Korn
2821 Huron St
Bellingham, WA 98226-4112
meryle.korn@gmail.com

mia heavyrunner

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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mia heavyrunner
9540 SE Glendale St
Port Orchard, WA 98366
8929 miamoonbeam1313@yahoo.com

Michael and Barbara Hill

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Michael and Barbara Hill
701 Mineral Hill Rd
Mineral, WA 98355
theelbehills@gmail.com

Nadine Wallace

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Nadine Wallace
2709 N Cedar St
Tacoma, WA 98407-6338
mardine1@comcast.net

Nancy Mattson

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Nancy Mattson
4409 California Av SW #602
Seattle, WA 98116
nmattson33@hotmail.com

Nancy White

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Nancy White
13311 East Forrest Avenue
Spokane, WA 99216-0202
nancypendletonwhite@comcast.net

Norman Baker

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Norman Baker
3789 Lost Mountain Rd
Sequim, WA 98382
7924ntbakerphd@gmail.com

p p

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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p 1718 Melrose Ave
Seattle, WA 98122
6805 patriciaperron@hotmail.com

Patrick McKee

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations.

Sincerely,
Patrick McKee
9233 SE 59th
St. Mercer Island, WA 98040
patmckee@sbcglobal.net

Patrick Prescott

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Patrick Prescott
14413 NE Douglas Fir Ct
Vancouver, WA 98684-8037
pprescott36@gmail.com

paul potts

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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paul potts
172 State Route 105
Raymond, WA 98577
9279
paul_potts@email.com

Paula Shafransky

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Paula Shafransky
22461 Prairie Rd
Sedro Woolley, WA 98284-8586
pshafransky@gmail.com

Peter Baird

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Peter Baird
9105 Fortuna Dr.
Apt 8503
Mercer Island, WA 98040
pedro_lynn@msn.com

Phillip Leija

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Phillip Leija
13923 E Main Ave
Spokane Vly, WA 99216-2046
cuabove82nd@gmail.com

priscilla martinez

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Dear Central Region Director Park
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I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). We need to take better care of what is left of our environment, for wildlife, marine life, plant life, and people. This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,
priscilla martinez
35411 SE English St
Snoqualmie, WA 98065
9718priscillamartinez486@yahoo.com

R Weiss

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R Weiss
PO Box 1415
La Conner, WA 98257
reweiss38@gmail.com

Rachael Bigham

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Sincerely,
Rachael Bigham
3031 25th Ave
WSeattle, WA 98199
2813rachael.bigham@yahoo.com

Randi Belcher

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Randi Belcher
165 W Whitman
Leavenworth, WA 98826
randibelcher@yahoo.com

Richard Rutz

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Richard Rutz
6121 NE 175th St
APT A303
Kenmore, WA 98028
4844richardr1066@comcast.net

Ricky Taylor

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Dear Washington Department of Ecology and Governor Jay Inslee,
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Ricky Taylor
4221 114th ST
SE
Everett, WA 98208
taylorrl@outlook.com

Robert Brown

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Robert Brown
1443 Edwards Avenue
Fircrest, WA 98466
larkbrown@comcast.net

Robert Jensen

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Dear Central Region Director Park
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Robert Jensen
4031 21st Avenue
St SE, Apt. 201
Lacey, WA 98503
rvmjensen@hotmail.com

Ron MacArthur

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Ron MacArthur
1045 Hillandale Dr
Port Orchard, WA 98366
3830june_macarthur@hotmail.com

Rowena Donelson

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Sincerely,
Rowena Donelson,
WA98248rowenadonelson@yahoo.com

Roy Treadway

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Roy Treadway
1951 Circle Lane
SELacey, WA98503
royctreadway@comcast.net

Ruth Allen

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Ruth Allen
720 209th Ave ct
eLake Tapps, WA 98391
rwallen83@aol.com

Sally Bartow

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Sammy Low

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Sincerely,
Sammy Low
20420 Marine Dr
APT P2
Stanwood, WA 98292
7843cougarcreek7@gmail.com

Sandra Rodgers

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Sincerely,
Sandra Rodgers
43000 NE Columbia Tie Road
Amboy, WA 98601-4407
rodgersamby@aol.com

Sara Burgess

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Sara Burgess
333 34th Avenue
ESeattle, WA98112-4917
saraburgess1@gmail.com

Sarah Bauman

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Sincerely,
Sarah Bauman
695 Chuckanut Dr
N Bellingham, WA 98229
6920sarahweilbauman@hotmail.com

Sarah Bedtelyon

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Sarah Bedtelyon
6009 53rd Ave
NeSeattle, WA 98115-7715-98115-7715
sshawnthesquare@yahoo.com

Scott Species

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Scott Species
1922 9th Ave Apt 401
Seattle, WA 981011302
sspecies@yahoo.com

Shannon Shannon

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Sincerely,
Shannon Shannon
19107 15th Ave NW
Shoreline, WA 98177
2723 markley.shannon@yahoo.com

Sharon Pederslie

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Sincerely,
Sharon Pederslie
525 14th Ave E
Apt 1004
Seattle, WA 98112
4559sylvanheart@hotmail.com

Shemayim Elohim

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Shemayim Elohim
213 32nd Ave
Seattle, WA 98122
6327the8th_chakra@yahoo.com

Shondra Bingaman

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Shondra Bingaman
2907 140TH St NW
Marysville, WA 98271-7129
shondrabingaman90@gmail.com

Stephanie Trasoff

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Sincerely,
Stephanie Trasoff
2447 Crestline St
Ferndale, WA 98248
9224strasoff@hotmail.com

Stephen Bailey

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Dear Central Region Director ParkDear Washington Department of Ecology and Governor Jay Inslee,I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation).This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions.The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely,Stephen Bailey4778 Edward DrDeming, WA982449415stilltruckinsb@yahoo.com

Steve Green

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Steve Green
12719 Country Club
PI Burlington, WA 98233
824malogatos@yahoo.com

Steve Wilson

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Dear Central Region Director Park
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Steve Wilson
PO BOX 4035
West Richland, WA 99353
4000safe_drvr@yahoo.com

Sue Danver

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Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Sue Danver
7106 Foothill Loop
SW
Olympia, WA 98512
2028sdanver7@aol.com

Susan Harmon

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Susan Harmon
8 Little Palimino Ct
Bellingham, WA 98229-44156
1harmonsg@gmail.com

Suzanne Scollon

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,
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Suzanne Scollon
PO BOX 913
Freeland, WA 98249-0913
suzie@geosemiotics.net

Sybille Vital

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Sybille Vital
13845 148th Ave
SE
Yelm, WA 98597
9173sybillevital@gmail.com

Tawn Kreider

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Dear Central Region Director Park
Dear Washington Department of Ecology and Governor Jay Inslee -This makes my heart hurt. We are in such an environmental crisis, the last thing that needs to happen is more environmental destruction. I agree with the Yakama Nation & American Rivers. Please please please don't let money drive your decision!! Lead with future generations in mind, not just 10-50 years down the road. Choose biomimicry...work with the environment, explore other options. I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations.
Sincerely, Tawn Kreider
7305 Alabama Dr
Vancouver, WA 98664
1501tmakreider@gmail.com

Terry Nightingale

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Dear Washington Department of Ecology and Governor Jay Inslee,

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Sincerely,
Terry Nightingale
3617 23rd Ave W
Seattle, WA 98199-2345
tnight@pobox.com

Terry Rice

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25763 Gold Beach Dr
SW Washon, WA 98070-8529
tidaltery@gmail.com

Therese McRae

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Sincerely,
Therese McRae
15211 SE 39th
St Bellevue, WA 98006
1703theresemcrae@msn.com

Thom Peters

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Thom Peters
7725 Riverview Rd
Snohomish, WA 98290
5884voice4wild@aol.com

Thomas Swoffer

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Sincerely,
Thomas Swoffer
32607 SE 341st
StRavensdale, WA98051
8921swofftr@q.com

thor t

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thor t
1211 aquavistagig harbor,
WA 98335
thort@hotmail.com

Tina Brown

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5526 Sugarloaf St
Anacortes, WA 98221
2962zerobridgewon@aol.com

Tonya Stiffler

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Sincerely,
Tonya Stiffler
18051 Sunnyside Ave N
Shoreline, WA 98133
4625tstiffler@comcast.net

Tracy Ouellette

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Sincerely,
Tracy Ouellette
14078
Mactaggart Ave
Bow, WA 98232
9246tracyjouellette@gmail.com

Victoria Urias

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Sincerely,
Victoria Urias
14001 35th Ave
NE Seattle, WA 98125
3705 vickiurias@comcast.net

William Bartley

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Sincerely,
William Bartley
4517 Crescent Ave
Everett, WA 98203-2121
lebesguex@yahoo.com

William Conger

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Sincerely,
William Conger
4247 Sharpe Rd
Anacortes, WA 98221
congewe@hotmail.com

William Golding

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Dear Washington Department of Ecology and Governor Jay Inslee,
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William Golding
246 S Stadium Way
Tacoma, WA 98402
4802willgolding92@yahoo.com

Joyce Weir

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the linkDear Dear Central Region Director ParkThe Draft EIS finds that there will be “significant and unavoidable adverse impacts” to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. “Clean energy” must not be built on the backs of Tribal Nations. Sincerely, Joyce WeirPO BOX 973Newport, WA991560973jaweir@povn.com

Richard Curtis

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the linkDear Governor Inslee,There are many reason to oppose the proposed Goldendale Pumped Storage Hydroelectric Project including cultural, economic and environmental. There are significant adverse impacts to tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). The Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions.The environmental impacts are almost too many to count and there is the potential the artificial perched water system will fail due to geologic features. Economically the Project does not add more energy but actually requires energy to operate.The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely, Richard CurtisPO Box 451Ethel, WA98542oakotter@gmail.com

Emily Heemstra

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link Dear Washington Department of Ecology and Governor Jay Inslee, I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely, Emily Heemstra Renton, WA 98056 emily.heemstra@gmail.com

Fay Payton

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Dear Washington Department of Ecology and Governor Jay Inslee, I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely, Fay Payton

814 SE 12th St
College Place, WA 99324
1842paytonplace1225@yahoo.com

Virginia Davis

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link Dear Washington Department of Ecology and Governor Jay Inslee, I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely, Virginia Davis 17721 NE 156th St Woodinville, WA 98072-6505 ginny1218@yahoo.com

Marvin Dawson

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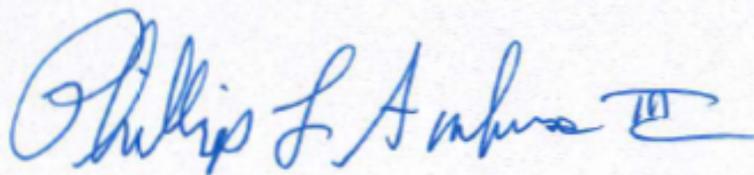
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link I support the American Rivers position and hope you will also. } Dear Washington Department of Ecology and Governor Jay Inslee, I proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations. Sincerely, Marvin Dawson
23319 19TH Pl W Bothell, WA 98021-9248
marvin_dawson@hotmail.com

Public Comment Example/Prepopulated Response

Dear Washington Department of Ecology,

I oppose the proposed Goldendale Pumped Storage Hydroelectric Project "Project" because of the damaging impacts that it will have on tribal cultural and religious resources, as expressly stated by members of the Yakama Nation Tribal Council. This Project threatens to destroy numerous archeological, ceremonial, and ancestral use sites sacred to the Yakama Nation. Construction and operation of the pumped storage facility would interfere with the exercise of my gathering and fishing practices. I agree with the Draft EIS finding that there will be "significant and unavoidable adverse impacts" to my cultural and tribal resources. Any proposed mitigation for these impacts is insufficient and none are supported by Tribal Nations. The plants and roots that I have gathered at Juniper Point for food and medicine will not be available future traditional practices if this project moves forward. Tackling the climate crisis needs to also achieve environmental justice and prevent further burdens on Indigenous communities. "Clean energy" must not be licensed to flood tribal cultural sites. Thank you for consideration of my comments.

Sincerely,



Yakama Elder



RECEIVED

AUG 01 2022

Dept of Ecology
Central Regional Office



July 28, 2022

TO: Goldendale Energy Storage Project Draft EIS
Sage Park Washington Department of Ecology,
Central Regional Office
1250 W. Alder Street
Union Gap, WA 98903-0009

From: Angeline Phillips
Yakama Nation Tribal Member

RE: Oppose the proposal

Dear Washington Department of Ecology,

1 I oppose the proposed Goldendale Pumped Storage Hydroelectric Project "Project" because of the
damaging impacts that it will on tribal cultural and religious resources, as expressly stated by member of
the Yakama Nation Tribal Council. This project threatens to destroy numerous archeological, ceremonial,
and ancestral use sites sacred to the Yakama Nation.

2 Construction and operation of the pumped storage facility would interfere with the exercise of my
gathering and fishing practices. I agree with the Draft EIS finding that there will be "significant and an
unavoidable adverse impacts" to my cultural and tribal resources.

3 Any proposed mitigation for these impacts is insufficient and none are supported by Tribal Nations. The
plants and roots that I have gathered at Juniper Point for food and medicine will not be available for future
traditional practice if this project moves forward. Tracking the climate crisis needs to also achieve
1 cont. environmental justice and prevent further burdens on indigenous communities. "Clean Energy" must not
be licensed to flood cultural sites.

Thank you for consideration of my comments.

Sincerely,



Angeline Phillips
Yakama Nation Tribal Member

RECEIVED

AUG 01 2022

Dept of Ecology
Central Regional Office

Oleh Varanytsya

Dear Central Region Director ParkDear Washington Department of Ecology and Governor Jay Inslee,

I oppose the proposed Goldendale Pumped Storage Hydroelectric Project (Project) because of the irreparably damaging impacts that it will have on tribal cultural and religious resources, as explicitly expressed by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This Project threatens to destroy numerous archeological, ceremonial, burial, petroglyph monumental and ancestral use sites sacred to the Yakama Nation, and would interfere with the exercise of gathering, fishing, ceremony and passing of Yakama Nation's traditions. The Draft EIS finds that there will be "significant and unavoidable adverse impacts" to cultural and tribal resources. It also indicates that there is no proposed mitigation for these impacts that is supported by Tribal Nations. While renewable energy and grid resilience are important considerations as we tackle the climate crisis, so too is the need to achieve environmental justice and to prevent disproportionate impacts of energy development on Indigenous communities. "Clean energy" must not be built on the backs of Tribal Nations.

Sincerely, Oleh Varanytsya 15300 112th Ave NE Bothell, WA 980114170 skorpio2685@gmail.com

Gene Callan

I am a resident, landowner and business owner in Klickitat County...and I strongly support this pumped storage project.

In my opinion, certain renewable energy concepts make sense and others do not. For example, covering our County's and State's valuable agriculture land with acres of industrial solar farms is short-sighted, an environmental disaster and simply wrong. On the other hand, selective projects present significantly less environmental impact and make total sense.

The pumped storage site leverages the topography, proximity to wind energy, the electrical grid and the abandoned aluminum plant. The project provides both construction and operational jobs to Klickitat County and our Columbia Gorge region. Yes, the engineering, entitlement and construction tasks are complex, but the overall concept is straight-forward, strong and worthy of the effort.

I encourage the development team, elected officials, governmental agencies, tribes and all impacted parties to work together to find acceptable solutions to bring this project to fruition.