

GOLDENDALE ENERGY STORAGE HYDROELECTRIC PROJECT

Federal Energy Regulatory Commission Project No. 14861

Klickitat County, Washington

DRAFT LICENSE APPLICATION Appendix F: Correspondence

For:

FFP Project 101, LLC



December 2019

SUMMARY OF AGENCY AND STAKEHOLDER WRITTEN CORRESPONDENCE SENT AND RECEIVED TO DATE FOR FERC P-14861

- October 2017 Preliminary Permit Application (PPA)
- November 2018 Request for Information Letter (RFI)
- January 2019 Pre-Application Document (PAD)

No	Agency	Name	Date Received	Type of Response	Subject
2017-2018					
00	Rye Development	Erik Steimle			PPA Submittal
01	FERC	David Turner	11/02/2017	FERC eLibrary	AIR Request
02	Rye Development	Erik Steimle	12/01/2017	FERC eLibrary	AIR Response
03	FERC	Kim Nguyen	12/15/2017	FERC eLibrary	PPA Acceptance
04	FERC	Nathaniel J. Davis	12/15/2017	FERC Library	PPA Notice
05	Washington Department Fish & Wildlife	Robert Ferguson	01/25/2018	FERC eLibrary	MTI
06	Klickitat County	David R. Quesnel	01/29/2018	FERC eLibrary	MTI
07	Confederated Tribes of the Umatilla	Kristen Tiede	01/31/2018	FERC eLibrary	PPA
08	U.S. Department of the Interior	Allison O'Brian	02/05/2018	FERC eLibrary	PPA
09	Columbia Riverkeeper	Simone Anter	02/09/2018	FERC eLibrary	MTI
10	American Rivers, Center for Environmental Lay & Policy, and Friends of the White Salmon River	Wendy McDermott, Trish Rolfe, Patricia Arnold	02/13/2018	FERC eLibrary	MTI
11	Oregon Department Fish & Wildlife	Elizabeth Moats	02/13/2018	FERC eLibrary	MTI
12	Confederated Tribes of the Yakima Indians	Lonnie Selam	02/14/2018	FERC eLibrary	PPA
12	FERC Issuance	David Turner	03/08/2018	FERC eLibrary	Preliminary Permit Grant
14	Rye Development	Erik Steimle	08/16/2018	FERC eLibrary	6 Mo status
15	Sherman County	Jenine McDermid	11/26/2018	Email	RFI
16	Confederated Tribes of the Umatilla	Shawn Steinmetz	11/27/2018	Email	RFI
17	Bureau of Land Management	Lenore Heppler	11/28/2018	Email	RFI
18	Washington Department of Ecology	Garin Schrieve	11/29/2018	Email	RFI
19	National Oceanic and Atmospheric Administration Marine Branch Division	Diane Melancon	11/30/2018	Email	RFI
20	Oregon Department of Justice	Patrick Rowe	11/30/2018	Email	RFI
21	Washington Department Fish & Wildlife	Patrick Verhey	12/04/2018	Email	RFI
22	Oregon Public Utility Condition	Diane Davis	12/13/2018	Email	RFI
23	U.S. Hang Gliding & Paragliding	Kelly Kellar	12/19/2018	Email	RFI
24	Oregon State Historic Preservation	Jamie French	12/20/2018	Email	RFI
25	Oregon Department of Fish & Wildlife	Elizabeth AO Moats	12/20/2018	Email	RFI
26	U.S. Geological Survey Washington Water Science Center	Rick Dinicola	12/21/2018	Email	RFI
2019					
27	Washington Department Fish & Wildlife	Patrick Verhey	01/14/2019	Email	RFI
28	Rye Development	Erik Steimle	02/04/2019	FERC eLibrary	NOI & PAD Submittal
29	Rye Development	Erik Steimle	02/26/2019	FERC eLibrary	6 Mo Status Report
30	Columbia Riverkeeper	Simone Anter	02/28/2019	FERC eLibrary	TLP Process
31	Confederated Tribes and Bands of the Yakima Nation	JoDe Goudy	02/29/2019	FERC eLibrary	PAD
32	American Rivers, Center for Environmental Lay & Policy, & Friends of the White Salmon River	Wendy D. McDermott, Trish Rolfe, Patricia L. Arnold	03/01/2019	FERC eLibrary	TLP Process
33	FERC	David Turner	03/01/2019	FERC eLibrary	Consultation Request
34	Washington Department Fish & Wildlife	Patrick Verhey	02/28/2019	Email	PAD

No	Agency	Name	Date Received	Type of Response	Subject
35	USDA Forest Service	Lynn Burditt	03/01/2019	FERC eLibrary	TLP Process
36	Goldendale Chamber of Commerce	Dana Peck	03/04/2019	FERC eLibrary	Support for Project
37	Klickitat County Commissioners	Unsigned	03/05/2019	FERC eLibrary	Support for Project
38	U.S. Geological Survey	Jill Rolland	03/08/2019	Email	PAD
39	City of Goldendale	Michael Canon	03/21/2019	FERC eLibrary	Support for Project
40	FERC	Kimberly Bose	03/21/2019	FERC eLibrary	TLP Approval
41	Rye Development	Erik Steimle	03/21/2019	FERC eLibrary	Notice to File License Application
42	Turlock Irrigation District	Kenneth Holmboe	04/08/2019	FERC eLibrary	MTI
43	Rye Development	Erik Steimle	04/11/2019	FERC eLibrary	Notice of Joint Agency Meeting
44	FERC	Kimberly Bose	04/30/2019	FERC eLibrary	Denial of Late MTI
45	U.S. Fish & Wildlife Service	Brad Thompson	05/2019	FERC eLibrary	PAD
46	Columbia Gorge Audubon Society	David Thies	05/04/2019	FERC eLibrary	PAD
47	Washington Department Fish & Wildlife	Patrick Verhey	05/29/2019	FERC eLibrary	PAD
48	FERC	Suzanne Novak	06/19/2019	FERC eLibrary	Memo RE Tribal Contact Attempts
49	Rye Development	Erik Steimle	06/27/2019	FERC eLibrary	Response to USFWS
50	Rye Development	Erik Steimle	06/27/2019	FERC eLibrary	Response to WDFW
51	U.S. Army Corps of Engineers	Kevin Brice	07/27/2019	FERC eLibrary	PAD
52	Rye Development	Erik Steimle	08/27/2019	FERC eLibrary	6 Mo Status
53	Rye Development	Erik Steimle	11/07/2019	Letter	Request to Meet

AIR = Additional Information Request; FERC = Federal Energy Regulatory Commission; MTI = Motion to Intervene; NOI = Notice of Intent; TLP = Traditional Licensing Process; USDA = United States Department of Agriculture; USFWS = United State Fish and Wildlife Service; WDFW = Washington Department of Fish & Wildlife

FEDERAL ENERGY REGULATORY COMMISSION

Washington, D. C. 20426

November 2, 2017

OFFICE OF ENERGY PROJECTS

Project No. 14861-000—Oregon
Goldendale Energy Storage Project
FFP Project 101, LLC

Erik Steimle
Rye Development
745 Atlantic Ave. 8th Floor
Boston, MA 02111

Reference: Request for Additional Information

Dear Mr. Steimle:

On October 20, 2017, you filed an application for a preliminary permit to study the feasibility of the proposed Goldendale Energy Storage Project, located on the Columbia River in Klickitat County, Washington and Sherman County, Oregon, on lands owned by NSC Smelter, LLC at the former Columbia Gorge Aluminum smelter. These lands have been designated a Resource Conservation and Recovery Act contaminated site and are currently the subject of a clean-up effort being overseen by the Washington Department of Ecology. We need additional information in order to further assess your preliminary permit application. Within 30 days, please file the information requested in attachment A.

The Commission strongly encourages electronic filing. Please file the requested information using the Commission's eFiling system at <http://ferc.gov/docs-filing/efiling.asp>. For assistance, contact FERC Online Support at FERCOnlineSupport@ferc.gov, (886) 208-3676 (toll free), or (202) 502-8659 (TTY). In lieu of electronic filing, please send a paper copy to: Secretary, Federal Energy Regulatory Commission, 888 First Street NE, Washington, D.C. 20426. The first page of any filing should include docket number P-14861-000.

P-14861-000

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Failure to provide this information may result in the rejection of your application. If you have any questions concerning this letter, please call Kim Nguyen at (202) 502-6105.

Sincerely,

David Turner, Chief
Northwest Branch
Division of Hydropower Licensing

Enclosure: Attachment A

ATTACHMENT A

ADDITIONAL INFORMATION

On December 31, 2015, Commission staff dismissed two preliminary permit applications for proposed hydropower projects at this site because of the speculative nature of the cleanup timeline and the uncertainty regarding the site's future suitability for development, due to decades of contamination from the former operation of the Columbia Gorge Aluminum smelter. On rehearing, the Commission stated that it would only consider applications for such a site once the relevant agency certifies the cleanup as complete.¹

Your application states that “unlike previous permit applications filed for the site, the present application involves no cleanup or investigation of the lands selected for the Goldendale Energy Project's primary project features.” The application also includes a letter from the Washington Department of Ecology (Washington Ecology) that generally supports the proposed project and states that Washington Ecology does not believe that the project, as described in the application, will hinder the cleanup process.

Based on the information provided in your application, we need further details to understand how your project is consistent with the Commission's current policy on hazardous materials sites. It is unclear whether there is overlap between land that would be affected by project construction and land that is subject to cleanup. Please provide detailed maps or figures showing cleanup areas relative to *all* the project features (the upper reservoir, water conveyance systems, powerhouse, transmission line, and access roads, as well as staging areas) and a project boundary, highlighting any differences between these features and prior project proposals. Specifically, please provide information to show that construction of the proposed hydropower project would not be affected by the timelines and activities that have or will be required for the overall site's cleanup. Your response should indicate how your proposal is consistent with the Commission's current policy on hazardous materials sites.

In addition, Attachment B of your application indicates that Washington Ecology expects that there are likely two paths forward with redevelopment of the portion of the site you propose for hydropower development, prior to the end of active remediation of the entire site. Please explain how, and at what point, the cleanup process with Washington Ecology would or could be coordinated with the FERC licensing process. Your response should address the detailed information Washington Ecology will need to evaluate the next steps for the hydropower project to move forward, as noted in its letter.

¹ *Public Utility District No.1 of Klickitat County, Washington, et al.*, 155 FERC ¶ 61,056 (2016).

Document Content(s)

P-14861-000.PDF.....1-3



745 Atlantic Ave. 8th Floor, Boston, MA 02111

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, DC 20426

December 1, 2017

Re: Goldendale Energy Storage Project, FERC No. P-14861 – RESPONSE TO THE
NOVEMBER 2, 2017 ADDITIONAL INFORMATION REQUEST FOR THE GOLDENDALE
ENERGY STORAGE PROJECT PRELIMINARY PERMIT APPLICATION

Dear Secretary Bose:

On November 2, 2017, the Commission issued an Additional Information Request (AIR) in response to the Preliminary Permit Application for the proposed Goldendale Energy Storage Project. Comments and questions in Attachment A of the AIR are addressed below in the order they were presented.

Please contact me with any questions you may have.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erik Steimle", with a long horizontal flourish extending to the right.

Erik Steimle
Vice President
erik@ryedevelopment.com

FERC Request for Additional Information

On December 31, 2015, Commission staff dismissed two preliminary permit applications for proposed hydropower projects at this site because of the speculative nature of the cleanup timeline and the uncertainty regarding the site's future suitability for development, due to decades of contamination from the former operation of the Columbia Gorge Aluminum smelter. On rehearing, the Commission stated that it would only consider applications for such a site once the relevant agency certifies the cleanup as complete. Your application states that "unlike previous permit applications filed for the site, the present application involves no cleanup or investigation of the lands selected for the Goldendale Energy Project's primary project features." The application also includes a letter from the Washington Department of Ecology (Washington Ecology) that generally supports the proposed project and states that Washington Ecology does not believe that the project, as described in the application, will hinder the cleanup process.

Based on the information provided in your application, we need further details to understand how your project is consistent with the Commission's current policy on hazardous materials sites. It is unclear whether there is overlap between land that would be affected by project construction and land that is subject to cleanup. Please provide detailed maps or figures showing cleanup areas relative to all the project features (the upper reservoir, water conveyance systems, powerhouse, transmission line, and access roads, as well as staging areas) and a project boundary, highlighting any differences between these features and prior project proposals. Specifically, please provide information to show that construction of the proposed hydropower project would not be affected by the timelines and activities that have or will be required for the overall site's cleanup.

Applicant Response

Applicant is providing FERC with additional details regarding the proposed project that demonstrate there is no overlap between land that would be affected by project construction and land that has been identified by Washington Ecology and the responsible parties for the site as being subject to future cleanup activities as part of the ongoing Remedial Investigation/Feasibility Study (RI/FS). Because there is no overlap, construction of the proposed project would not be affected by the timelines and activities that have been or will be required for the overall site's cleanup. Additional maps have been appended to this response that depict areas subject to future cleanup relative to the proposed project boundary (Appendix A). The maps show that the project boundary for the proposed project is significantly more limited in scope than the project boundary associated with prior permit applications, and does not include areas in which future cleanup is anticipated. The attached figures delineate all project features requested in the AIR, including, but not limited to, the upper reservoir, water conveyance systems, powerhouse, transmission line, access roads, and staging areas. The figures highlight differences between the project as currently proposed and prior project proposals. The applicant wishes to emphasize to the Commission that the proposed Goldendale Energy Storage project area, including the project features listed above, do not include any areas identified as being subject to future cleanup.

While there are no areas within the project boundary that are subject to further cleanup, there is one formerly impacted area within the project boundary that has already been closed in accordance with

applicable regulations under the oversight of Washington Ecology. The West Surface Impoundment (WSI), sometimes referenced as the West Side Landfill (Landfill), is an area associated with the historical aluminum smelter that has been certified as closed by Washington Ecology since 2005 (See Letter of Closure in Appendix B) and is not subject to additional characterization or investigation in the current RI/FS that Washington Ecology is currently working on with NSC Smelter, LLC (NSC) and Lockheed Martin Corporation. As part of the proposed project, the Applicant proposes to work with Washington Ecology to remove all remaining landfilled material from this area within the project boundary. In its September 7, 2017 letter to Rye Development, the agency stated: *“Ecology is supportive of the project proponents plan to remove the West Surface Impoundment, as this would be a higher level of environmental protection than Ecology would likely cover in the cleanup.”* All areas of focus in the current RI/FS study are outside of the proposed project boundary and have been delineated in the maps appended to this filing for the Commission’s review. Finally, the Applicant is providing a detailed development timeline demonstrating that the construction of the proposed Goldendale Energy Storage Project will not be affected by the RI/FS and associated timeline for cleanup in Appendix C.

FERC Request for Information

Your response should indicate how your proposal is consistent with the Commission’s current policy on hazardous materials sites. In addition, Attachment B of your application indicates that Washington Ecology expects that there are likely two paths forward with redevelopment of the portion of the site you propose for hydropower development, prior to the end of active remediation of the entire site. Please explain how, and at what point, the cleanup process with Washington Ecology would or could be coordinated with the FERC licensing process. Your response should address the detailed information Washington Ecology will need to evaluate the next steps for the hydropower project to move forward, as noted in its letter.

Applicant Response

Unlike prior permit applications for this site that were dismissed by FERC, the present permit application involves no overlap between land that would be affected by project construction and land that is subject to cleanup. Because there is no overlap, construction of the proposed project would not be affected by the timelines and activities that have been or will be required for the overall site’s cleanup. Accordingly, the concerns identified by FERC with respect to the prior applications – the speculative nature of the cleanup timeline and the suitability of the project for development based on future cleanup – are not presented by this application.

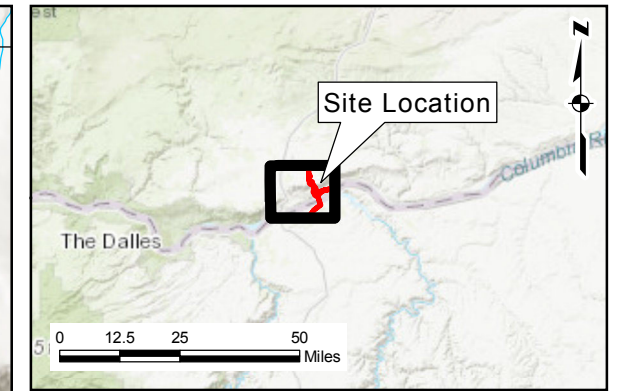
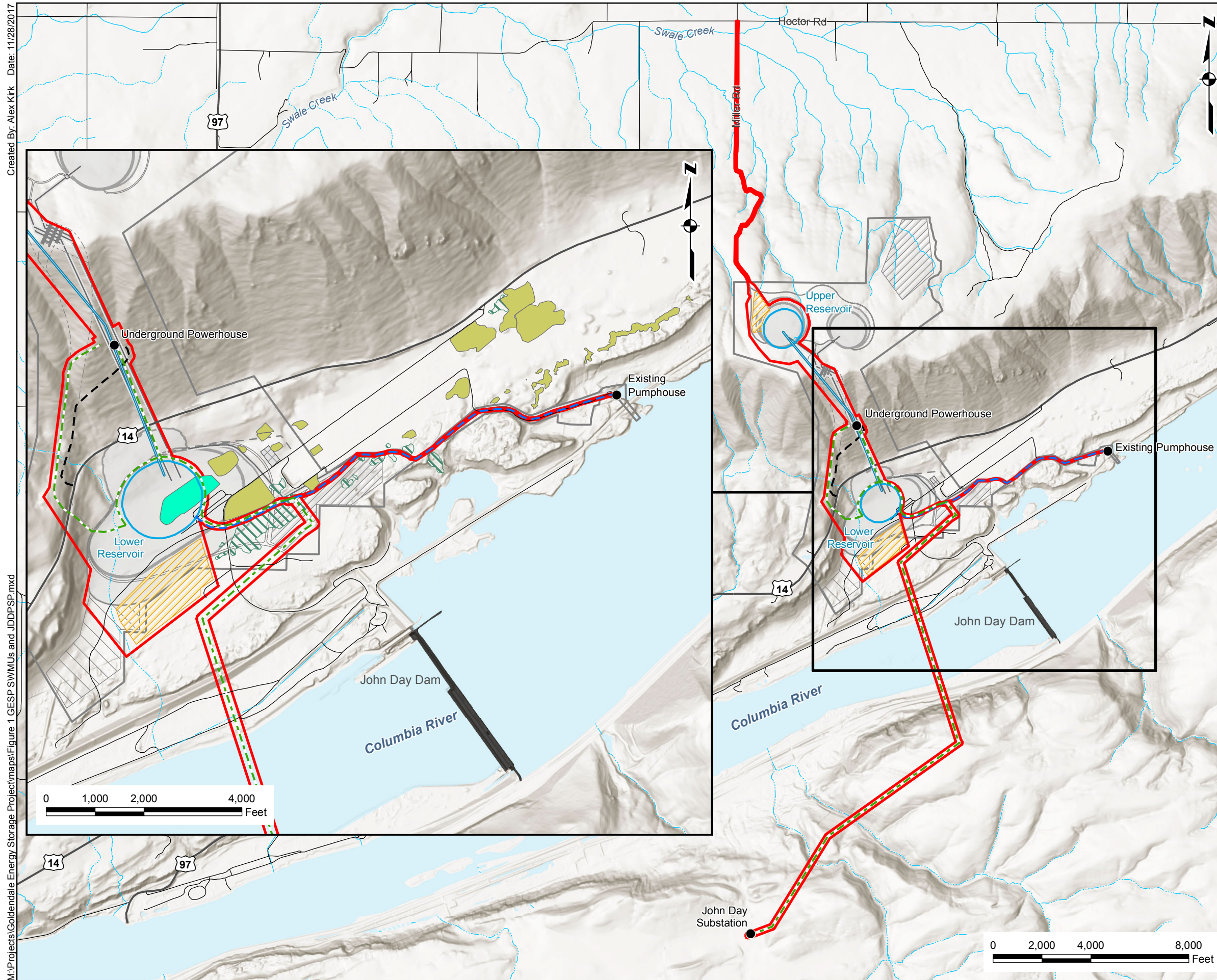
FERC has requested Applicant to explain how, and what point, the cleanup process with Washington Ecology would or could be coordinated with the FERC licensing process. Applicant has already begun coordinating with Washington Ecology prior to submitting this permit application and both parties intend to continue this coordination. As part of its effort in responding to this AIR, Applicant recently reached out to Washington Ecology to confirm its understanding of its future coordination on the development of the Goldendale Energy Storage project. In response, via email on November 16, 2017, Mr. Guy Barrett of Washington Ecology confirmed Applicants’ understanding of the agency’s

coordination on this site and authorized Applicant to provide FERC with the following response to the AIR:

Ecology intends to begin the formal coordination with the applicant and FERC regarding the proposed project and the ongoing cleanup effort shortly after issuance of a FERC Preliminary Permit (in this case coordination began even earlier). After issuance of a preliminary permit, Ecology agrees that the developer would coordinate/consult with Ecology during public/agency meetings, study design, completion of studies, and continue to coordinate with Ecology through preparation of a FERC License Application. This entire process would include Ecology's feedback on active remediation in the broader geographic area. This continual coordination and feedback with Ecology over the 3-year preliminary permit period will be necessary for the developer to prepare and file a complete License Application.

Washington Ecology has indicated that it does not view the cleanup activities and timeline that are projected for the lands outside the project boundary as a barrier to FERC's issuance of a preliminary permit or to Applicant's subsequent ability to begin a formal consultation process with Washington Ecology and other stakeholders as part of the FERC licensing process for a hydropower facility. As part of the consultation process during the term of the preliminary permit, Washington Ecology will have access to all detailed information and studies generated in support of the preparation of a final license application, including the additional information Applicant is currently providing to FERC, which demonstrates that there is no overlap between land affected by project construction and land that is subject to cleanup.

Appendix A



- Legend**
- ▭ Proposed Project Boundary
 - - - Proposed Transmission Line
 - - - Proposed Access Tunnel
 - Proposed Penstock
 - - - Existing Waterline
 - ▭ Proposed Reservoir
 - ▨ Proposed Construction Staging Area
 - ▨ Wetlands
 - Prior Project Infrastructure**
 - ▭ Prior Project Boundary
 - - - Buried High Voltage Cable
 - Access Roads
 - - - Access Tunnels
 - ▭ Buried Powerhouse
 - ▨ Surface Structures
 - Penstock and Intake
 - ▭ Reservoirs
 - ▨ Construction Laydown Area (Temporary)
 - ▨ Spoil Area (Landscaped)
 - Solid Waste Management Areas (SWMU)**
 - ▭ Closed Landfill within Proposed Project Footprint
 - ▭ SWMU Outside Proposed Project Boundary

GOLDENDALE ENERGY STORAGE PROJECT
FFP Project 101, LLC

AREAS OF POTENTIAL CONTAMINATION RELATIVE TO CURRENT & PRIOR PROJECT INFRASTRUCTURE

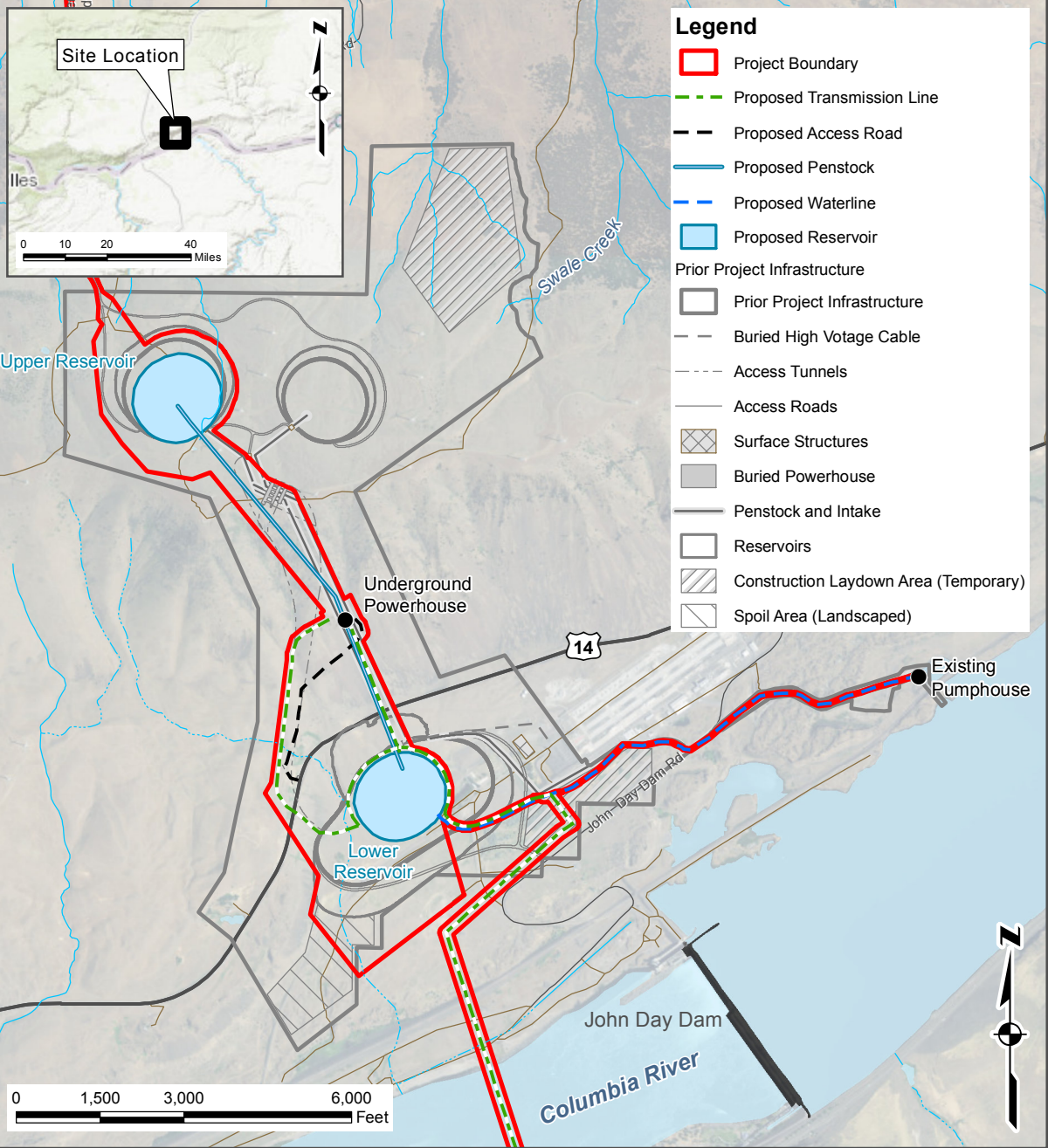
DATE: 11/28/2017 SCALE: AS NOTED FIGURE 1

Environmental Resources Management
1001 SW 5th St, Suite 1010
Portland, Oregon 97204



Created By: Alex Kirk Date: 11/28/2017
M:\Projects\Goldendale Energy Storage\Projects\Maps\Figure 1 GESPP SWMUs and JDDPSP.mxd

Source: National Agricultural Imagery Program, Flown 7/2015 at 1m per pixel.



Source: ESRI Imagery Web Mapping Service NAD 1983 HARN StatePlane Washington South FIPS 4602 Feet

Figure 2
Comparison of Project Boundary for Current & Prior Pumped Hydroelectric Storage Project Goldendale Energy Storage Project Goldendale, Washington

Appendix B

(confidential filing)

APPENDIX C REDACTED

Document Content(s)

GSE AIR Response.PDF.....1-11

FEDERAL ENERGY REGULATORY COMMISSION

Washington, D. C. 20426

December 15, 2017

OFFICE OF ENERGY PROJECTS

Project No. 14861-000–Washington &
Oregon
Goldendale Energy Storage Project
FFP Project 101, LLC

Erik Steimle
Rye Development
745 Atlantic Ave. 8th Floor
Boston, MA 02111

Subject: Acceptance Letter for Preliminary Permit Application

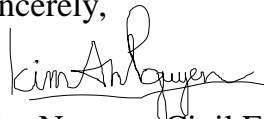
Dear Mr. Steimle:

Your preliminary permit application for the Goldendale Energy Storage Project has been accepted by the Commission for filing as of December 15, 2017. Federal, state, and local agencies will be informed in the Commission's public notice that a copy of the complete application can be viewed or printed on the "eLibrary" link of the Commission's website.

Within 5 days after you receive this letter, please send one copy of the application to the following: the U. S. Bureau of Land Management and the U.S. Army Corps of Engineers. A list of their addresses is enclosed.

If you have any questions, please contact me at (202) 502-6105.

Sincerely,



Kim Nguyen, Civil Engineer
Northwest Branch
Division of Hydropower Licensing

Enclosure: List of Addresses

cc: Public Files

LIST OF ADDRESSES

U. S. Bureau of Land Management
Lands and Minerals Adjudication Section (OR 936.1)
PO BOX 2965
Portland, Oregon 97208-2965

U.S. Army Corps of Engineers, Northwestern Division FERC Hydropower Coordinator
Attention: CENWD-RBT, Brad Bird
P.O. Box 2870
Portland, OR 97208-2870

Document Content(s)

P-14861-000 Acceptance Letter.PDF.....1-2

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

FFP Project 101, LLC

Project No. 14861-000

NOTICE OF PRELIMINARY PERMIT APPLICATION ACCEPTED FOR FILING
AND SOLICITING COMMENTS, MOTIONS TO INTERVENE, AND
COMPETING APPLICATIONS

(December 15, 2017)

On October 20, 2017, FFP Project 101, LLC filed an application for a preliminary permit, pursuant to section 4(f) of the Federal Power Act, proposing to study the feasibility of the Goldendale Energy Storage Project (project) to be located near Goldendale in Klickitat County, Washington and Sherman County, Oregon. The sole purpose of a preliminary permit, if issued, is to grant the permit holder priority to file a license application during the permit term. A preliminary permit does not authorize the permit holder to perform any land-disturbing activities or otherwise enter upon lands or waters owned by others without the owners' express permission.

The proposed project will be closed-loop. Water to initially fill the reservoirs and required make-up water will be pumped from the Columbia River via an existing pumphouse. The proposed project would consist of an upper and lower reservoir, an underground water conveyance system connecting the two reservoirs, an underground powerhouse, and a transmission line. The lower reservoir would be formed by a 7,400-foot-long, 170-foot-high rockfill embankment, with storage capacity of 7,100 acre-feet at maximum water surface elevation of 580 feet and surface area of 62 acres. The upper reservoir would be formed by an 8,000-foot-long, 170-foot-high rockfill embankment, with storage capacity of 7,100 acre-feet at maximum water surface elevation of 2,940 feet and surface area of 59 acres. Water would be conveyed from the upper reservoir to the lower reservoir via a 5,000-foot-long, concrete and steel tunnel with internal diameters ranging from 20 to 29 feet, and a 600-foot-long, 15-foot-diameter steel/concrete penstock. The powerhouse would contain three, 400-megawatt (MW) Francis-type pump-turbine units for a total installed capacity of 1,200 MW. Project power would be transmitted through a new 5-mile-long, 500-kilovolt transmission line from the powerhouse to Bonneville Power Administration's John Day Substation.

The estimated averaged annual generation of the project would be 3,500 gigawatt-hours.

Project No. 14861-000

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Applicant Contact: Erik Steimle, Rye Development, 745 Atlantic Ave. 8th Floor, Boston, MA 02111, phone (503) 998-0230.

FERC Contact: Kim Nguyen, (202) 502-6105.

Deadline for filing comments, motions to intervene, competing applications (without notices of intent), or notices of intent to file competing applications: 60 days from the issuance of this notice. Competing applications and notices of intent must meet the requirements of 18 CFR 4.36.

The Commission strongly encourages electronic filing. Please file comments, motions to intervene, notices of intent, and competing applications using the Commission's eFiling system at <http://www.ferc.gov/docs-filing/efiling.asp>. Commenters can submit brief comments up to 6,000 characters, without prior registration, using the eComment system at <http://www.ferc.gov/docs-filing/ecomment.asp>. You must include your name and contact information at the end of your comments. For assistance, please contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY). In lieu of electronic filing, please send a paper copy to: Secretary, Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426. The first page of any filing should include docket number P-14861-000.

More information about this project, including a copy of the application, can be viewed or printed on the "eLibrary" link of Commission's website at <http://www.ferc.gov/docs-filing/elibrary.asp>. Enter the docket number (P-14861) in the docket number field to access the document. For assistance, contact FERC Online Support.

Nathaniel J. Davis, Sr.,
Deputy Secretary.

Document Content(s)

P-14861-000 Notice.DOCX.....1-2

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

FFP Project 101, LLC

Project No. 14861-000

**STATE OF WASHINGTON
DEPARTMENT OF FISH & WILDLIFE'S
NOTICE OF INTERVENTION**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission's (FERC or Commission) Rules of Practice and Procedure, 18 C.F.R. § 385.214, Washington Department of Fish and Wildlife (Department) hereby files its notice of intervention in the above-captioned proceeding. The grounds for this intervention are:

I.

The names and addresses of the legal counsel for the Department and the Department's main staff contact are below. Copies of all orders, notices, pleadings, and correspondence related to this proceeding should be directed to:

William C. Frymire, Senior Counsel
Attorney General of Washington
Fish, Wildlife & Parks Division
1125 Washington Street S.E.
Post Office Box 40100
Olympia, Washington 98504-0100

Email: BillF@atg.wa.gov

Patrick Verhey
Renewable Energy Biologist
WDFW Habitat Program
Renewable Energy Section
1550 Alder Street N.W.
Ephrata, Washington 98823

Email: Patrick.Verhey@dfw.wa.gov

II.

The Department is an agency of the State of Washington with jurisdiction over fish, shellfish, and wildlife resources and charged with the duty of protecting, conserving, managing, and enhancing those resources. Wash. Rev. Code, Title 77. Pursuant to these statutory obligations, the Department brings this intervention on behalf of the citizens of the State of Washington, who, by the laws of that state, own the fish and wildlife resources.

III.

The Department is a state fish and wildlife agency which is required to be consulted in determining losses to the fish, shellfish, and wildlife resources caused by construction and operation of hydroelectric projects licensed by the federal government and to be consulted in identifying the appropriate measures to preserve and enhance those resources. Fish and Wildlife Coordination Act, 16 U.S.C. § 662(a), (b). The Department is authorized to provide recommended terms and conditions to the Commission that shall be included in any new license unless the Commission finds, in writing, that the Department's recommendations are inconsistent with applicable law. Federal Power Act, 16 U.S.C. § 803(j); 18 C.F.R. § 4.34.

IV.

FFP Project 101, LLC filed an application for a preliminary permit, pursuant to section 4(f) of the Federal Power Act, proposing to study the feasibility of the

Goldendale Energy Storage Project to be located near Goldendale in Klickitat County, Washington and Sherman County Oregon.

V.

The FERC Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications identifies that the proposed pumped storage project would consist of an upper and lower reservoir, an underground water conveyance system connecting the two reservoirs, an underground powerhouse, and a transmission line. The lower reservoir would be formed by a 7,400-foot-long, 170-foot-high rockfill embankment, with storage capacity of 7,100 acre-feet at maximum water surface elevation of 580 feet and surface area of 62 acres. The upper reservoir would be formed by an 8,000-foot-long, 170-foot-high rockfill embankment, with storage capacity of 7,100 acre-feet at maximum water surface elevation of 2,940 feet and surface area of 59 acres. Water would be conveyed from the upper reservoir to the lower reservoir via a 5,000-foot-long, concrete and steel tunnel with internal diameters ranging from 20 to 29 feet, and a 600-foot-long, 15-foot-diameter steel/concrete penstock. The powerhouse would contain three, 400-megawatt (MW) Francis-type pump-turbine units for a total installed capacity of 1,200 MW. Project power would be transmitted through a new 5-mile-long, 500-kilovolt transmission line from the powerhouse to Bonneville Power Administration's John Day Substation.

This request may affect fish or wildlife under the jurisdiction of the Department.

VI.

For the above reasons, the Department has a significant interest which may be directly affected by the outcome of this proceeding, and this interest is not adequately represented by existing parties. The Department's participation in this proceeding is in the public interest.

VII.

THEREFORE, in order that this proceeding be fully developed in accordance with the applicable law, and that the Commission have before it all the material facts relating to this project, the Commission should recognize the Department as an intervener.

As a party in the above-entitled proceedings, the Department requests the right to have notice of and appear at any and all hearings or proceedings, to produce evidence and cross-examine witnesses, to be heard through counsel in written and oral argument, to be served with copies of all pleadings, applications, and notices, and for any other such participation and relief as may be appropriate.

DATED this 25th day of January, 2018.

Respectfully submitted:

ROBERT W. FERGUSON
Attorney General



WILLIAM C. FRYMIRE, WSBA 16551
Senior Counsel


PROOF OF SERVICE

I certify that I served a copy of this document on all parties or their counsel of record on the date below as follows:

US Mail Postage Prepaid via Consolidated Mail Service, E-mail, or State Campus Delivery

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 25th day of January, 2018, at Olympia, Washington.



JEANNE ROTH
Legal Assistant

Document Content(s)

14861-000.PDF.....1-5

January 29, 2018

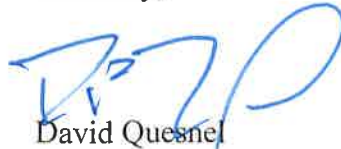
Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First St. NE
Washington, DC 20426

Re: P-14861-000
Klickitat County's Motion to Intervene in the matter of FFP Project 101
LLC's Permit Applications for Preliminary Permit for Goldendale Energy
Storage Project

Dear Secretary Bose:

Attached is Klickitat County's Motion to Intervene for the above referenced proceeding.

Sincerely,



David Quesnel
Prosecuting Attorney, Klickitat County

1
2
3 UNITED STATES OF AMERICA
4 BEFORE THE
5 FEDERAL ENERGY REGULATORY COMMISSION

6 FFP Project 101,

PROJECT NO. P-14861-000

7 Application for Preliminary Permit For
8 Proposed Goldendale Energy Pump Storage
Project

KLICKITAT COUNTY'S
MOTION TO INTERVENE

9 **I. INTRODUCTION**

10 Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission
11 (“Commission”) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, .214, Klickitat
12 County, Washington (“County”) hereby moves to intervene in the above-captioned proceeding.
13 The County is filing this motion for intervention in response to the Commission’s December
14 15, 2017, Notice of Preliminary Permit Application Accepted for Filing and Soliciting
15 Comments, Motions to Intervene and Competing Applications, Project No. 14861-000. In
16 support of its motion, the County respectfully states the following:

17 **II. COMMUNICATIONS**

18 All correspondence, communications, pleadings and other documents related to this
19 proceeding should be addressed to:

20 David Quesnel, Prosecuting Attorney
21 Klickitat County Prosecuting Attorney’s Office
22 205 S. Columbus Ave., Room 106
23 Goldendale, Washington 98620-9289
Telephone: (509) 773-5838
Facsimile: (509) 773-6696
E-mail: davidq@klickitatcounty.org

24 KLICKITAT COUNTY’S
MOTION TO INTERVENE, PROJECT NO. 14861-000

Klickitat County Prosecutor
205 S. Columbus Avenue, Rm 106
Goldendale, WA 98620
(509) 773-5838
Fax: (509) 773-6696

1 The County requests that each of the individuals identified above be placed on the
2 Commission's official service list in this proceeding and hereby consents to receiving such
3 service electronically.

4 **III. BACKGROUND OF THIS PROCEEDING**

5 The proposed project would consist of: (1) an upper earthen reservoir with a height of
6 170 feet and a length of 8,000 feet; (2) an upper reservoir with a surface area of 59, a storage
7 capacity of 7,100 acre-feet and a normal surface elevation of 2,940 feet MSL; (3) a lower
8 earthen reservoir with a height of 170 feet and a length of 7,400 feet; (4) a lower reservoir with
9 a surface area of 62 acres, a storage capacity of 7,100 acre-feet and a normal surface elevation
10 of 580 feet MSL; (5) a 5,000 foot long, 15 foot diameter steel/concrete penstock; (6) a
11 powerhouse containing three 400-megawatt Francis-type pump-turbine units with a total
12 installed capacity of 1,200 MW; (7) a 500 kV, 5 mile long transmission line and; (8)
13 appurtenant facilities. The estimated average annual production would be 3,500 GWh.

14 **IV. INTERESTS OF THE INTERVENOR JUSTIFYING INTERVENTION**

15 Rye Development, on behalf of FFP Project 101, LLC, is proposing to study the
16 feasibility of the Goldendale Energy Storage Project to be located in Klickitat County,
17 Washington. As a host jurisdiction, the County has significant public and regulatory interests
18 in the issues before the Commission.

19 The Project will have both direct and indirect effects on the County's citizens and on
20 County services. The County is extensively involved in a variety of natural resource
21 management issues on the Columbia River, including watershed management and the recovery
22 of salmon and steelhead species listed as threatened under the Federal Endangered Species Act.
23

1 The County is also charged with implementing and enforcing local water quality, water
2 resources and fish and wildlife resources regulations and policies. The project may affect fish
3 or wildlife resources in the County. The County is also charged with providing for the safety,
4 health and welfare of its citizens and is not adequately represented by any other party in this
5 proceeding. It is in the public interest that the host county government maintaining these
6 interests and charged with compliance with these various laws be heard before the Commission
7 on matters that affect those interests.

8 **V. MOTION TO INTERVENE**

9 Therefore, good cause having been shown, the County respectfully requests pursuant to
10 Commission rules that it be permitted to intervene in the above-entitled proceedings and be
11 made a party thereto. It requests the right to have notice of and appear at any and all hearings
12 or proceedings, to produce evidence and cross-examine witnesses, to be heard through counsel
13 through written and oral argument, to be served henceforth with copies of all pleadings,
14 applications, and notices, and for such other participation and relief as may be appropriate
15 under Commission rules.

16 RESPECTFULLY SUBMITTED this 29th day of January 2018.

17 KLUICKITAT COUNTY PROSECUTING ATTORNEY

18 

19 _____
David R. Quesnel, WSBA #38579

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing document on all parties or their counsel of record on the date below via first class mail.

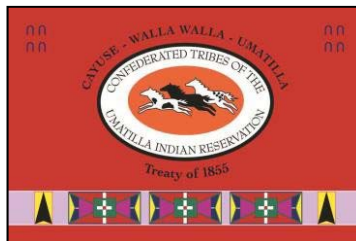
I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 29th day of January, 2018 at Goldendale, Washington.



Rebecca Sells, WSBA #48192
Klickitat County Deputy Prosecuting Attorney

Confederated Tribes *of the*
Umatilla Indian Reservation
Department of Natural Resources
Cultural Resources Protection Program



46411 Timine Way
Pendleton, OR 97801
www.ctuir.org Phone 541-276-3447

January 31, 2018

Kim Nguyen
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Preliminary Permit Application for Project No. 14861-000, Goldendale Energy Storage Project

Dear Ms. Nguyen:

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Cultural Resources Protection Program (CRPP) has reviewed Rye Development's Preliminary Project Application for the proposed Goldendale Energy Storage Project. We have submitted our comments under the Privileged Security Level on FERC's eFiling system.

Respectfully,

Kristen Tiede, M.A.
Archaeologist

Document Content(s)

Public_FERC_Goldendale Energy Storage Project_CTUIR.PDF.....1-2



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
620 SW Main Street, Suite 201
Portland, Oregon 97205-3026

IN REPLY REFER TO:
9043.1
ER17/0575

Electronically Filed

February 5, 2018

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

Subject: **COMMENTS** – Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications for the Goldendale Energy Storage Project, FERC Project No. 14861 - Klickitat County, Washington and Sherman County, Oregon

Dear Ms. Bose:

The Department of the Interior (Department) has reviewed Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications for the Goldendale Energy Storage Project - Klickitat County, Washington and Sherman County, Oregon. If a preliminary permit is issued for this Project, the Department recommends that the applicant consult with the U.S. Fish and Wildlife Service (Service), the Washington Department of Fish and Wildlife, and any Native American Tribe or Nation whose treaty rights may be affected by the Project. These entities can provide guidance in developing the Project in a manner that seeks to preserve, protect, and enhance fish and wildlife resources and other environmental values in the project area. It is especially important for the applicant to initiate consultation early, so studies may begin in a timely fashion and delays may be avoided. This correspondence does not constitute consultation pursuant to the Federal Energy Regulatory Commission's (Commission) regulations. If the requested preliminary permit is issued, we recommend that the applicant devote special attention to the following areas of concern.

Fish and Wildlife Resources

The proposed Project has the potential to impact fish and wildlife resources and habitats of special interest to the Service. Because the Service's overall goal is to restore and protect Federal trust resources supported by the conditions present within the proposed project area, the

Service reviews the Project from an ecosystem perspective and considers whether the Project can be successfully integrated into ongoing operations and address ecosystem needs. Based on this ecosystem needs approach, the Service will be seeking information about the chemical, physical, and biological relationships, processes, and linkages necessary to enhance and maintain a healthy, biologically diverse ecosystem in concert with the proposed construction, operation, and maintenance of this Project.

In general, while performing project feasibility studies during the term of the permit, the applicant should ensure that damage to habitat and resources, particularly aquatic habitat, wetlands, and riparian vegetation, is avoided or minimized. We recommend that the applicant be directed to coordinate with the Service prior to undertaking any scientific study, investigation, or other work required by the preliminary permit. This communication with the Service would be for the purposes of developing measures to avoid, minimize, and mitigate study impacts on federally-listed, threatened, or endangered species, or critical habitat. Further, the applicant should be directed to request and secure from the Service such permits and authorizations that may be necessary to avoid violating the take provisions of Section 9 of the Endangered Species Act (ESA), during the performance of the required studies.

Threatened and Endangered Species Consultation

Section 7 of the ESA and its implementing regulations (at 50 CFR Part 402) require Federal agencies to review their actions at the earliest possible time to determine whether any action may affect listed species or critical habitat. If so, formal consultation with the Service is required unless the exceptions at 50 CFR 402.14(b) apply.

Under 50 CFR 402.08, the Commission may designate Public Utility District No. 1 of Klickitat County as its non-Federal representative to conduct informal consultation or prepare a Biological Assessment (BA) to determine if the proposed Project may affect listed species.

Because listed species, but no critical habitat, are likely to occur in the Project area, we recommend the Commission (or its designated non-Federal representative) enter into informal consultation with the Service to determine if ongoing and future effects of the Project to listed species warrant formal consultation. At this stage, the purpose of informal consultation is to ensure that the applicant understands any potential impacts of the Project on listed species and what studies may be necessary to inform that determination if they decide to file for a license. We also recommend that you request a conference on the effects of the Project on the sage-grouse, which currently has no status under the ESA.

Once the NEPA scoping process has been completed, the Department recommends that the Commission obtain a current list of ESA species in the project area. If formal consultation is warranted and a BA is prepared by the designated non-Federal representative, the Commission must furnish guidance and supervision, and must independently review and evaluate the scope and contents of the BA. The ultimate responsibility for compliance with ESA section 7 remains with the Commission.

Licenses must remain flexible and open to adaptive management to ensure that measures to protect fish and wildlife, including listed species, remain adequate and effective. Although we work collaboratively to resolve issues and concerns regarding changing status and/or new information on listed and proposed species, re-initiation of consultation under Section 7 of the ESA may be necessary at some time during the term of the new license if one or more of the re-initiation criteria at 50 CFR 402.16 apply.

In closing, the Department has no objection to issuance of the requested permit and recommends the above concerns be addressed during the term of the preliminary permit to prevent unnecessary delays and to assist in the creation of an environmentally sustainable project. After issuance of the preliminary permit, the applicant should contact the Service to discuss these concerns in more detail. Consultation and technical assistance requests, questions, comments, documents, and required progress reports should be directed to Mr. Steve Lewis of the Central Washington Field Office in Wenatchee, Washington, at (509) 665-3508 ext. 2002 or via e-mail (Stephen_Lewis@fws.gov). If you have any other questions or concerns, please feel free to contact me at 503-326-2489.

We appreciate the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Allison O'Brien". The signature is written in a cursive, flowing style.

Allison O'Brien
Regional Environmental Officer

Document Content(s)

20180205_ER17_0575_GoldendaleHydroelectric_FERC_14861.PDF.....1-3

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

FFP PROJECT 101, LLC)	FERC Project No. 14861-000
)	
)	MOTION TO INTERVENE OF
Application for Preliminary Permit For Proposed Goldendale Energy Storage Project)	COLUMBIA RIVERKEEPER
)	

INTRODUCTION

On December 15, 2017, the Federal Energy Regulatory Commission (FERC) issued a notice regarding a preliminary permit application for the Goldendale Energy Storage Project (Project), FERC Project No. 14861-000. In accordance with Rule 214 of FERC’s Rules of Practice and Procedure, 18 C.F.R. §385.214, Columbia Riverkeeper (Riverkeeper) moves to intervene in FFP Project 101’s application for preliminary permit. By this motion, Riverkeeper seeks to protect the non-developmental values of the Columbia River and to ensure that FERC’s decision with respect to this project is in the public interest.

CONTACT INFORMATION

Riverkeeper wishes to be informed regarding the progress reports or any other filings by the preliminary permit applicant. This includes being added to all official service and mailing lists regarding the aforementioned preliminary permit application.

Please send such information to the following contact:

Simone Anter
Columbia Riverkeeper, Associate Attorney
111 3rd Street
Hood River, OR 97031
541-387-3030
simone@columbiariverkeeper.org

STATEMENT OF INTEREST

Riverkeeper is a 501(c)(3) non-profit, tax exempt, public interest conservation organization incorporated in Washington with headquarters in Hood River, Oregon. Riverkeeper's mission is to restore and protect the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Riverkeeper represents over 12,000 members and supporters in the Columbia River basin and is a member of the international Waterkeeper Alliance, a group of 300 organizations and affiliates working on behalf of their local waterways.

Riverkeeper works to accomplish its mission through diverse activities including monitoring and commenting on the activities of federal, state, and local agencies charged with responsibility over the Columbia River basin. Additionally, Riverkeeper coordinates education research projects and presentations from the Columbia's headwaters to the Pacific Ocean. Riverkeeper and its members actively participate in governmental decision-making processes that impact the Columbia River and species that depend on the river for survival. Riverkeeper also engages in litigation under the Clean Water Act, acting as a representative of the public interest as authorized by 33 U.S.C. §1365 and as applied to state permitting programs under 40 C.F.R. §123.30

Riverkeeper and its members are directly affected by the outcome of these proceedings. Riverkeeper has members, supporters, and staff that use and enjoy the Columbia River. For example, Riverkeeper members live, work, and/or recreate near the proposed Project. Many of Riverkeeper's members live and/or work in communities on the banks of the Columbia River. The staff, members, and volunteers of Riverkeeper are directly affected by the outcome of these proceedings because the Project application

includes activities that are detrimental and adverse to the members' interest by harming their aesthetic, recreational, and professional interests in the ecological integrity and natural resources of the Columbia River.

Riverkeeper's staff, members, and volunteers participate in fishing, swimming, boating, wildlife viewing, and aesthetic and scientific pursuits on and along the Columbia River. Riverkeeper's staff and members also use the Lewis and Clark National Historic Trail. Riverkeeper's interests in these uses are directly affected by the proposed Project, which has the potential to degrade water quality, fish and wildlife habitat, aesthetics, and recreation. Riverkeeper's staff, members, and volunteers also have an interest in protecting salmonids, including salmonid rearing, migration, and spawning, and other aquatic and terrestrial life that could be harmed by the proposed Project.

Additionally, Riverkeeper is organized for the purpose of protecting water quality and beneficial uses within the water affected by the outcome of these proceedings. A major component of achieving this goal is ensuring compliance with state and federal laws aimed to protect water quality and designated use species. Riverkeeper has spent significant time, resources, and effort to protect and restore the Columbia River and its tributaries, and these efforts may be impinged by the proposed Project.

GROUND FOR INTERVENTION

FERC Rules of Practice and Procedure 214 permits intervention by a party that can establish (1) the position taken by the movant, to the extent known, together with the basis in fact and law for the position, and (2) the movant's interest in the proceeding. 18 C.F.R. §§ 385.214(a)(3), (b)(1), (2). The movant's interest must be stated in sufficient factual detail to demonstrate that the movant has a right to participate for one of the

following reasons: (1) the movant has a right to participate, which is expressly conferred by statute or FERC rule, order, or other action; (2) the movant has or represents an interest which may be directly affected by the outcome of the proceedings; or (3) the movant's participation is in the public interest. *Id.* at § 385.214(b)(2). Riverkeeper has and represents interests that may be directly affected by the outcome of the proceedings and the participation of Riverkeeper is also in the public interest. Additionally, this motion to intervene is timely.

Through intervention, Riverkeeper seeks to obtain equal consideration of non-energy values, adequate and equitable protection, mitigation, and enhancement measures for fish and wildlife, and the protection of recreation, water quality, and other non-energy related values of the Columbia River. Riverkeeper and Riverkeeper members are concerned about threats posed by the Project including, but not limited to: toxic pollution, thermal pollution, impacts on dissolved oxygen levels, increased turbidity, water quantity impacts, fish and wildlife habitat degradation, and aesthetic and cultural impacts. In short, Riverkeeper and Riverkeeper members have a strong public interest in the authorization of the Project and its impacts on Columbia River water quality, salmon spawning and rearing habitat, and the ecological and economic health of the Columbia River.

PROPOSED PROJECT

FFP Project 101, LLC (applicant) is proposing to study the feasibility of the Goldendale Energy Storage Project (Project) to be located near Goldendale in Klickitat County, Washington, and Sherman County, Oregon. On October 29, 2017, applicant filed an application for a preliminary permit, pursuant to section 4(f) of the Federal Power Act (FPA). According to the Federal Register Notice, the proposed Project would consist of:

- A lower reservoir with a surface area of 62 acres, a capacity of 7,100 acre-feet, and a maximum water surface elevation of 580 feet;
- An upper reservoir with a surface area of 59 acres, a capacity of 7,100 acre-feet, and a maximum water surface elevation of 2,940 feet;
- A 5,000-foot-long, 20-29 feet diameter, concrete and steel tunnel water conveyance;
- A 600-foot-long, 15-foot-diameter steel/concrete penstock;
- A powerhouse containing 3 pump/turbine units with a total installed capacity of 1,200 MW;
- A 5 mile long, 500 kV transmission line and;
- Appurtenant facilities.

The proposed Project is located along the Columbia River approximately 8 miles southeast of the City of Goldendale in Klickitat County, Washington, within several miles of the John Day Dam on the Columbia River and near the John Day River.

According to the application, “the Project would be a “closed-loop” system and would use the Columbia River for initial fill and periodic make-up water.” Application for Preliminary Permit, Goldendale Energy Storage Project, FERC Project No. 14861 (Oct. 20, 2017). Portions of the Project will be located on the Historic Columbia Gorge Aluminum Smelter Site.

STATEMENT OF POSITION

Riverkeeper seeks to participate in these proceedings in order to ensure that the public resource values of the Columbia River and the surrounding environment, as well

as the lands and waterbodies impacted by this project, are protected and enhanced and that the authorization complies with all state and federal environmental laws.

Riverkeeper reserves the right to take any position on this proceeding consistent with the goal of protecting the public interest, the native fish and water quality of the Columbia River basin, recreational values of the Columbia River, and the health and safety of its residents. In this application proceeding, Riverkeeper will advocate positions consistent with public safety and other environmental natural resource, recreational, and economic concerns.

Specific issues of concern for Riverkeeper, known at this time, include, but are not limited to the following:

Public Interest: It is not clear from the application that the proposed transmission lines, reservoirs, and water diversions are in the public interest or required for public convenience and necessity. The application fails to provide a solid factual basis for the contention that the Project would develop, conserve, and utilize, in the public interest, the water resources of the region. Additionally, the application fails to provide any factual basis for the contention that the Project will further increase domestic renewable energy generation. The applicant has failed to demonstrate that the public benefit of the Project, if any, outweighs the significant social, economic, and environmental harm. It is not clear from the Project application that the public interest will be served by issuing the preliminary permit.

Aquatic and Fisheries Resources: The Project would have serious direct, indirect, and cumulative impacts on aquatic species and fisheries resources and these impacts are not adequately described or acknowledged in the application. The application does not

describe, for example, how the project could kill, impinge or injure Endangered Species Act-protected juvenile salmonids, steelhead, and other fish species. The application does not discuss potential impacts to sturgeon or lamprey.

Water Quality and Quantity: The Project could result in a number of significant impacts to water quality from the construction, operation, and maintenance of the proposed reservoirs and transmission lines. It is unclear what dredge and fill activities would be associated with construction. Such activities could increase in-river turbidity, mobilize toxics in river sediment, and remove riparian vegetation. The discharge of large volumes of water warmed in reservoirs will result in increased temperature in the Columbia River. The Columbia River is already water quality limited for temperature. In addition, the Clean Water Act prohibits new discharges of heat because there is no TMDL for temperature and the river is on the CWA 303(d) list. Water withdrawals for the project construction and operation would exacerbate existing temperature problems on the Columbia River by decreasing flow. Construction in riparian areas and along steep slopes also increases the risk of erosion and sedimentation to the Columbia River. Finally, the application does not adequately describe how feasibility studies will impact riparian areas, wetlands/lagoons, and the Columbia River. In addition, the discharge may contain toxic pollutants; either added by the project or concentrated pollutants from the Columbia River.

Air quality: The increase in emissions from construction and operation of the proposed project would degrade local and regional air quality.

Economic impacts: The proposed project would result in significant adverse economic impacts as a result of potential impacts to fishing, recreation on the Lewis and

Clark National Historic Trail, and water withdrawals. The project could impact tourism and recreation related jobs.

Wildlife Impacts: The proposed project would degrade or destroy hundreds of acres of riparian, scrub/steppe, grasslands, and rock/cliff habitat. The Project would inundate quality habitat at the reservoir sites and degrade habitat by construction and operation of the facility. This habitat is utilized by a wide variety of plants, reptiles, amphibians, birds, and mammals, including threatened and endangered species. The construction of new transmission lines and reservoirs would significantly alter the landscape. Potential wildlife impacts include, but are not limited to, impacts to: deer, elk, coyotes, osprey, hawks, eagles, herons, and grouse.

Recreational impacts: The Project would adversely affect and degrade recreational opportunities in and around the Columbia River by industrializing the project area, increasing traffic and interfering with recreational boating, fishing, and other recreational activities. The project would also impact the Lewis and Clark National Historic Trail and state designated Lewis and Clark auto tour routes.

Historic and Cultural Impacts: The Columbia Hills are known Native American archeological sites. The Project site may contain cultural and historic resources. Furthermore, the project site is upstream of the Maryhill Museum and Maryhill State Park. The Lewis and Clark National Historical Trail, administered by the National Park Service, is also within the vicinity of the proposed project. State designated Lewis and Clark auto tour routes are also within the vicinity of the site.

Aesthetic Impacts: The project proposes significantly altering the landscape with a series of reservoirs, associated infrastructure, and new transmission lines. In turn the Project poses significant aesthetic impacts to the surrounding area.

Energy Efficiency and Global Warming: The proposed project would produce electricity using an inefficient pump and turbine system. The application materials do not adequately describe how much energy will be wasted in order to produce a smaller amount of energy. The application materials are also unclear on the source of the energy used to pump the water uphill. The inefficient use of energy degrades the value of renewable energy projects, particularly if the energy wasted is from renewable sources, such as wind. This project may reduce the incentive to construct more efficient energy transmission systems. Energy produced by burning fossil fuels may have to replace the energy potentially wasted by this project. Also, it is unclear how this project fits into the states of Washington and Oregon's renewable energy policies and legislation.

Contamination from Columbia Gorge Aluminum Smelter Site: Portions of the Projects infrastructure are located on the former Columbia Gorge Aluminum Smelter Site (Site), now a Resource Conservation and Recovery Act (RCRA) contaminated site. According to a FERC order denying a request for a rehearing on the denial of a preliminary permit in the same area, "Smelter operations contaminated the soil and groundwater at the site with fluoride, polycyclic aromatic hydrocarbons, cyanide, and polychlorinated biphenyls." 155 FERC ¶ 61,056 Project Nos. 13333-005, 14729-001. Further, the denial states that, "as a matter of policy, it is not prudent to issue a preliminary permit for a contaminated site that is still undergoing a cleanup process, regardless of whether that site is a RCRA site or a Superfund site." *Id.* Despite attaching a

letter from the Department of Ecology stating that applicant may either purchase the property, thus become severally and jointly liable for contamination, or clean up the portion of the site needed for the Project, it is unclear how applicant's Project will interact with cleanup efforts and now the Project will disturb contamination located at the site.

Inadequate and Insufficient Information: The application fails to provide adequate information about all of the above project impacts.

CONCLUSION

Because Riverkeeper has a substantial interest in the outcome of the Goldendale Energy Storage Project and no party adequately represents Riverkeeper's interests, Riverkeeper respectfully requests that FERC grant this motion to intervene in the Goldendale Energy Storage Project, FERC Project No. 14861-000.

Dated: February 9, 2018.

Respectfully submitted,

/s/Simone Anter

Simone Anter
Columbia Riverkeeper, Associate Attorney

CERTIFICATE OF SERVICE

I certify that on the 9th day of February, 2018, I electronically filed the original document, Motion to Intervene on behalf of Columbia Riverkeeper with:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

DATED: February 9, 2018

 /s/Simone Anter

Simone Anter
Columbia Riverkeeper, Staff Attorney

SERVICE LIST

**Douglas MacCourt
Ater Wynne LLP

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Colleen.e.fagan@state.or.us

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huntermah@dfw.wa.gov

** : To be served by First-Class U.S. Mail.

Document Content(s)

Motion to Intervene of Columbia Riverkeeper P-14861.PDF.....1-10

Certificate of Service Under P-14861.PDF.....11-12

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

**Klickitat County, WA
Sherman County, OR**

**Goldendale Energy Storage Project
Rye Development**

FERC Project No. 14861-000

Preliminary Permit Application

AMERICAN RIVERS, CENTER FOR ENVIRONMENTAL LAW AND POLICY, AND
FRIENDS OF THE WHITE SALMON RIVER
MOTION TO INTERVENE

I. INTRODUCTION

Pursuant to Rule 214 of the Commission's Rule of Practice and Procedure, 18 C.F.R. § 385.210 and § 385.214, and in response to FERC's December 15, 2017, *Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications*, American Rivers, Center for Environmental Law and Policy, and Friends of the White Salmon River hereby move to intervene as parties in the proceeding for Rye Development's proposed Goldendale Energy Storage Project (FERC Project No. 14861-000) located in Klickitat County, Washington and Sherman County, Oregon.

II. IDENTITY OF INTERVENORS AND STATEMENT OF POSITION

American Rivers is a national non-profit 501(c)(3) river conservation organization. American Rivers protects wild rivers, restores damaged rivers, and conserves clean water for people and nature. Since 1973, American Rivers has protected and restored more than 150,000 miles of rivers through advocacy efforts, on-the-ground projects, and an annual America's Most Endangered Rivers® campaign.

Center for Environmental Law and Policy (CELP) is a non-profit organization dedicated to protecting the public's interest in the rivers and aquifers of Washington State. CELP has extensive experience with Washington's water rights, water supply, and instream flow protection processes, and has participated in much of the key litigation relating to streamflow protection. We have members throughout the Columbia River watershed, and have a long-standing interest in protection of the Columbia's streamflows in particular. CELP's interest in this project stems from its potential to increase consumptive water use from the Columbia, as well as our long-standing work to protect Columbia River instream flows and the salmon and other wildlife that depend on them.

Friends of the White Salmon River is a non-profit 501(c)(3) organization that has worked since 1976 to protect and restore naturally-reproducing anadromous fish populations, and to protect the

shorelines, water resources, and habitat areas that affect wild salmonid populations within Klickitat County. Friends of the White Salmon River has an interest in protecting and conserving water resources affecting wild salmonid populations.

Service of process and other communications should be made via electronic communications to:

Wendy McDermott
Associate Director, Rivers of Puget Sound and Columbia Basin
PO Box 1234
Bellingham, WA 98227
wmcdermott@americanrivers.org

Trish Rolfe
Executive Director
Center For Environmental Law and Policy
85 S. Washington Street, Suite 301
Seattle, WA 98104
trolfe@celp.org

Patricia Arnold
President
Friends of the White Salmon River
P.O. Box 805
White Salmon, WA 98650
pat.arnold@friendsofthewhitesalmon.org

III. GROUNDS FOR INTERVENTION

Intervention by American Rivers, CELP, and Friends of the White Salmon is in the public interest as required by 18 C.F.R. §385.214(b)(2)(iii). Each organization has significant undeniable interests in preserving the natural resources of the Columbia River, and seek to intervene in these proceedings to ensure that the non-power values are protected. No other parties to the proceeding will be able to adequately represent these interests, and therefore, American Rivers, CELP, and Friends of the White Salmon each have a direct and substantial interest in the outcome of this process.

IV. CONCLUSION

Granting intervenor status to American Rivers, CELP and Friends of the White Salmon will not delay this proceeding. No other party represents our organization's interests in this proceeding. For these reasons, we respectfully request that FERC grant intervention in the above referenced proceeding.

Respectfully submitted this 13th day of February, 2018.

Wendy McDermott
Associate Director, Rivers of Puget Sound and Columbia Basin
American Rivers

Trish Rolf
Executive Director
Center for Environmental Law and Policy

Patricia Arnold
President
Friends of the White Salmon River

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Klickitat County, WA
Sherman County, OR

Goldendale Energy Storage Project
Rye Development**

**FERC Project No. 14861-000

Preliminary Permit Application**

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused the foregoing **American Rivers, Center for Environmental Law and Policy, and Friends of the White Salmon's Motion to Intervene on Rye Development's Preliminary Permit Application for the Goldendale Energy Storage Project Application (P-14861)** to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 13th day of February, 2018.

Patricia Arnold
Friends of the White Salmon River

Document Content(s)

20180213 FOTWS MOI Goldendale.PDF.....1-4



Oregon

Kate Brown, Governor

Department of Fish and Wildlife

East Region
107 20th Street
La Grande, OR 97850
(541) 963-2138
FAX (541) 963-6670

February 13, 2018



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

ELECTRONIC FILING

Subject: Goldendale Energy Storage Project (FERC Project No. P-14861)
Application for Preliminary Permit – Notice of Intervention

Dear Secretary Bose:

On December 15, 2017, the Federal Energy Regulatory Commission issued a *Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications* for FFP Project 101, LLC's Goldendale Energy Storage Project (FERC No. P-14861). The proposed project is located adjacent to the Columbia River near Goldendale in Klickitat County, Washington, and Rufus in Sherman County, Oregon. Attached for filing is the Oregon Department of Fish and Wildlife's Notice of Intervention.

Sincerely,

Elizabeth Moats
NE Region Hydropower Coordinator

C (electronic):
Mary Grainey – OWRD
Marilyn Fonseca - ODEQ
Ken Homolka – ODFW
Service List

Attachment

Attachment

**BEFORE THE
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

FFP Project 101, LLC)	FERC Project P-14861
)	
Goldendale Energy Storage Project)	Application for Preliminary Permit
_____)	

**OREGON DEPARTMENT OF FISH AND WILDLIFE
NOTICE OF INTERVENTION**

(February 13, 2018)

The Oregon Department of Fish and Wildlife (Department) hereby provides notice pursuant to 18 C.F.R. §385.214(a)(2) (Rule 214) that it is intervening in this proceeding. The Department is the state fish and wildlife agency with authority over the fish and wildlife resources in the state of Oregon that may be affected by this proceeding. The Department intervenes for the purposes of becoming a party, and to ensure its interests and the public's are represented in this proceeding.

On October 20, 2017, FFP Project 101, LLC filed an application for preliminary permit pursuant to section 4(f) of the Federal Power Act (FPA), proposing to study the feasibility of the Goldendale Energy Storage Project (Project). The Project would be located adjacent to the Columbia River near Goldendale in Klickitat County, Washington, and Rufus in Sherman County, Oregon.

I. COMMUNICATIONS

The following persons are designated for service of process and placement on the official service list in this proceeding.

Ken Homolka
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive, SE
Salem, OR 97303-4924
503-947-6090
ken.homolka@state.or.us

Elizabeth Moats
Oregon Department of Fish and Wildlife
107 20th Street
La Grande, OR 97850
541-962-1832
Elizabeth.A.OsierMoats@state.or.us

Attachment

II. STATEMENT OF INTEREST

The Department is the state agency with jurisdiction over fish and wildlife in Oregon. See ORS 496.012; the Fish and Wildlife Coordination Act (FWCA) at 16 U.S.C. § 661 and 662; the Federal Power Act (FPA) at 16 U.S.C. § 803 and §823a. The proposed Project would utilize water from the Columbia River for initial fill and make up water. At the proposed project location, the Columbia River is the state boundary between Oregon and Washington and both states are deemed to have concurrent jurisdiction for regulating, protecting and preserving fish therein (ORS 507.101 and ORS 507.020). The Department possesses expertise regarding the management and protection of fish and aquatic resources in the Columbia River that may be affected by the project. Through this intervention, the Department seeks to protect and preserve fisheries resources in the Columbia River.

The proposed transmission lines will connect to Bonneville Power Administration's existing John Day Substation, located in Sherman County, Oregon. The Department possesses expertise regarding the natural resources in the Project vicinity and manages Oregon's wildlife resources that may be affected by the project. Pursuant to Oregon statutes and rules, the Department would seek to avoid, minimize or mitigate Project impacts to habitat and any potential impact to state sensitive, threatened or endangered species (OAR 635-415; ORS 496.171 through 496.182).

By carrying out its statutory responsibilities under the FPA, FWCA, and Oregon law, the Department acts in the public interest.

III. CONCLUSION

The Department respectfully files this notice of intervention to participate in further proceedings.

Attachment

Respectfully submitted,

A handwritten signature in green ink that reads "Elizabeth A. O. Moats". The signature is written in a cursive style with a large initial "E".

Elizabeth A. O. Moats
East Region Hydropower Coordinator

**BEFORE THE
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

FFP Project 101, LLC)	FERC Project P-14861
)	
Goldendale Energy Storage Project)	Application for Preliminary Permit
_____)	

CERTIFICATE OF SERVICE

I certify that I have served the foregoing OREGON DEPARTMENT OF FISH AND WILDLIFE'S NOTICE OF INTERVENTION for the Goldendale Energy Storage Project by electronic mail or first-class mail upon each person designated on the official service list compiled by the Secretary in this proceeding and by electronic filing to FERC.

DATED: February 13, 2018



Elizabeth A.O. Moats
East Region Hydropower Coordinator

SERVICE LIST

David Quesnel
Klickitat, County of
205 S. Columbus Ave.
Room 106
Goldendale, Washington 98620
United States
davidq@klickitatcounty.org

Rebecca Sells
Klickitat, County of
205 S. Columbus Ave.
Room 106
Goldendale, Washington 98620
rebeccas@klickitatcounty.org

William C. Frymire, Senior Counsel
Washington Office of Attorney General
Fish, Wildlife & Parks Division
Post Office Box 40100
Olympia, Washington 98504-0100
billf@atg.wa.gov

Erik Steimle, Vice President
Rye Development
745 Atlantic Avenue
Boston, Massachusetts 02111
United States
erik@ryedevelopment.com

Document Content(s)

Goldendale-P-14861-ODFW Intervention-02132018.PDF.....1-6



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

Erik Steimle,
Rye Development,
745 Atlantic Ave. 8th Floor
Boston, MA 02111,
(503) 998-0230.

February 14, 2018

RE: FERC Docket 14861-000, Goldendale Energy Storage Project

Erik Steimle,

The Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) received a notice of application from the Federal Energy Regulatory Commission in regards to the proposed Goldendale Energy Storage Project. The proposed project is within the Ceded Area of the Yakama Nation as set forth in the Treaty of 1855 (12 stat., 951) signed with the United States of America, The Treaty is considered the Supreme Law of the Land according to Article 6 of the U.S. Constitution. It is the policy of the Yakama Nation to preserve, protect, and perpetuate all significant natural and cultural resources. Only the Yakama Nation can determine what is significant to the Tribe.

Upon review of the proposed project and based upon extensive working knowledge of the proposed project area, the Yakama Nation is opposed to this undertaking as it would cause detrimental impacts to significant cultural resources near the John Day Dam and the Columbia Hills. These cultural resources are sacred to the Yakama Nation and include archaeological, ceremonial, burial, petroglyph, monumental, and ancestral use sites. These sites are commonly called Traditional Cultural Properties (TCPs). The TCPs present within the proposed project area are but a remnant of what once was along the Columbia River. It is the responsibility of the Yakama Nation to protect those resources now and in the future for the benefit of those not yet born.

If you have any questions or comments please contact Gregg Kiona at (509) 865-5121 x4603 or Nick Finley at (509) 790-8958.

Sincerely,

Lonnie Selam
Deputy Director
Yakama Nation Cultural Resources

Document Content(s)

john day pool pump letter signed.PDF.....1-2

162 FERC ¶ 62,144
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

FFP Project 101, LLC

Project No. 14861-000

ORDER ISSUING PRELIMINARY PERMIT
AND GRANTING PRIORITY TO FILE LICENSE APPLICATION

(Issued March 8, 2018)

1. On October 20, 2017, FFP Project 101, LLC (FFP) filed an application for a preliminary permit, pursuant to section 4(f) of the Federal Power Act (FPA),¹ to study the feasibility of the proposed Goldendale Energy Storage Project No. 14861 (project) to be located near Goldendale in Klickitat County, Washington and Sherman County, Oregon.

I. Project Proposal

2. The proposed project would be a closed-loop pumped storage project. Initial fill and make-up water would be pumped from the Columbia River via an existing pump house. The proposed project would consist of an upper and lower reservoir, an underground water conveyance system connecting the two reservoirs, an underground powerhouse, and a transmission line. The upper reservoir would be formed by an 8,000-foot-long, 170-foot-high rockfill embankment, with a storage capacity of 7,100 acre-feet at maximum water surface elevation of 2,940 feet and a surface area of 59 acres. The lower reservoir would be formed by a 7,400-foot-long, 170-foot-high rockfill embankment, with a storage capacity of 7,100 acre-feet at maximum water surface elevation of 580 feet and a surface area of 62 acres. Water would be conveyed from the upper reservoir to the lower reservoir via a 5,000-foot-long, concrete and steel tunnel with internal diameters ranging from 20 to 29 feet, and a 600-foot-long, 15-foot-diameter steel/concrete penstock. The powerhouse would contain three, 400-megawatt (MW) Francis-type pump-turbine units for a total installed capacity of 1,200 MW. Project power would be transmitted through a new 5-mile-long, 500-kilovolt transmission line from the powerhouse to Bonneville Power Administration's John Day Substation.

II. Background

3. The Commission issued public notice of FFP's permit application on December 15, 2017. Timely notices of intervention were filed by Washington

¹ 16 U.S.C. § 797(f) (2012).

Department of Fish and Wildlife and Oregon Department of Fish and Wildlife.² Timely motions to intervene were filed by Klickitat County, Washington; Columbia Riverkeeper; and, collectively, American Rivers, Center for Environmental Law and Policy, and Friends of the White Salmon River (Friends of the River).³ Comments were filed by the U.S. Department of the Interior (Interior); Confederated Tribes and Bands of the Yakama Nation (Yakama Nation); and the Confederated Tribes of the Umatilla Indian Reservation (Umatilla).

III. Discussion

A. Public Interest

4. Columbia Riverkeeper states that it is not clear from FFP's preliminary permit application that the proposed transmission lines, reservoirs, and water diversions are in the public interest or required for public convenience and necessity. The FPA does not condition issuance of a preliminary permit upon a finding that it is in the public interest because to make such a finding would require the information and conclusions that are to be developed during the permit phase.⁴

B. Site Development

5. Portions of the project's proposed infrastructure would be located on the site of the former Columbia Gorge Aluminum Smelter, which is now a Resource Conservation and Recovery Act (RCRA)⁵ contaminated site. Columbia Riverkeeper notes that the Commission has previously stated that "as a matter of policy, it is not prudent to issue a preliminary permit for a contaminated site that is still undergoing a cleanup process, regardless of whether that site is a RCRA site or a Superfund site."⁶ Columbia Riverkeeper states that it is unclear how the proposed project will interact with cleanup efforts or disturb contamination located at the site.

² Timely notices of intervention are granted by operation of Rule 214(a)(2) of the Commission's Regulations. 18 C.F.R. § 385.214(a)(2) (2017).

³ Timely, unopposed motions to intervene are granted by operation of Rule 214(c) of the Commission's regulations. 18 C.F.R. § 385.214(c) (2017).

⁴ See, e.g., *Wind River Hydro, LLC*, 115 FERC ¶ 61,009, at P 10 (2006).

⁵ 42 U.S.C. §§ 6091 *et seq.* (2012).

⁶ *Public Utility District No. 1 of Klickitat County, Washington*, 155 FERC ¶ 61,056, at P 8 (2016).

6. The Commission has previously stated that it will only consider development applications for sites undergoing a RCRA or Superfund cleanup process once the relevant state or federal agency certifies that cleanup is complete. As part of its permit application, FFP includes a letter from Washington Department of Ecology (Washington DOE), the state agency that oversees cleanup of the site, in which Washington DOE states that it is “supportive of the proposed project and believes that [the project] will not hinder the cleanup process.”⁷ Moreover, FFP has sufficiently demonstrated that its project boundary, which includes all lands that would be necessary for construction and operation of the project, does not include any land subject to further cleanup activities by Washington DOE.⁸ FFP must pursue progress during the permit term and in any future licensing process without adversely impacting ongoing cleanup activities, and will have to demonstrate that licensing will not result in any issues arising from contamination in the project area.

C. Issues Related to Project Construction and Operation

7. The Umatilla recommend that the applicant’s review of previously conducted cultural resource studies should include all cultural resource work conducted within one mile of the project’s area of potential effect (APE). The Confederated Tribes ask that the Commission consider the potential effects of the proposed project on any historic properties that may be within the APE. The Yakama Nation states that it is opposed to the project because of the potential impacts to significant natural and cultural resources.

8. Interior notes that it will request information about the chemical, physical, and biological relationships, processes, and linkages necessary to enhance and maintain a healthy, biologically diverse ecosystem in concert with the proposed construction, operation, and maintenance of the project. Columbia Riverkeeper is concerned that aquatic and fisheries resources, water quality and quantity, wildlife, recreation, cultural resources, air quality, aesthetics, and other resources could be adversely affected by project construction and operation.

⁷ FFP’s Application for Preliminary Permit, at Attachment B. Washington DOE has informed Commission staff that it cannot formally certify that cleanup of only a portion of a RCRA site is complete; however, as stated above, Washington DOE has indicated it is supportive of the proposal and FFP has demonstrated that its proposed project does not overlap any areas identified by Washington DOE as being subject to future cleanup activities.

⁸ FFP’s December 1, 2017 Response to Commission Staff’s November 2, 2017 Additional Information Request.

9. A preliminary permit does not authorize a permittee to undertake construction of the proposed project. The purpose of a preliminary permit is to study the feasibility of the project, including studying potential impacts. The concerns raised in the comments are premature at the preliminary permit stage, in that they address the potential effects of constructing and operating the proposed project. Should the permittee file a license application, these issues will be addressed in the licensing process.

D. Consultation and Study Requirements under the Permit

10. Interior recommends that while performing project feasibility studies during the term of the permit, the applicant should ensure that damage to habitat and resources, particularly aquatic habitat, wetlands, and riparian vegetation, is avoided or minimized. Interior also recommends that the applicant coordinate with the U.S. Fish and Wildlife Service (FWS) prior to undertaking any scientific study, investigation, or other work required by the preliminary permit. Because listed species are likely to occur in the project area, Interior recommends that the Commission (or its designated non-Federal representative) enter into informal consultation with FWS to determine if ongoing and future effects of the project to listed species warrant formal consultation.

11. The Commission has not sought to place all relevant study requirements in preliminary permits.⁹ Rather, the studies to be undertaken by a permittee are shaped by the Commission's filing requirements for development applications. Potential development applicants are required to consult with appropriate state and federal resource agencies and affected Indian tribes, conduct all reasonable studies requested by the agencies, and solicit comments on the application before it is filed.¹⁰ As noted above, the permit does not authorize construction: the permittee must satisfy any applicable legal requirements before conducting studies that may affect the environment. Any necessary Endangered Species Act consultation would occur during the licensing process.

IV. Permit Information

12. Section 4(f) of the FPA authorizes the Commission to issue preliminary permits for the purpose of enabling prospective applicants for a hydropower license to secure the data and perform the acts required by section 9 of the FPA,¹¹ which in turn sets forth the material that must accompany an application for license. The purpose of a preliminary permit is to preserve the right of the permit holder to have the first priority in applying for

⁹ See, e.g., *Continental Lands, Inc.*, 90 FERC ¶ 61,355, at 62,177 (2000).

¹⁰ See 18 C.F.R. § 4.38 (2017).

¹¹ 16 U.S.C. § 802 (2012).

a license for the project that is being studied.¹² Because a permit is issued only to allow the permit holder to investigate the feasibility of a project while the permittee conducts investigations and secures necessary data to determine the feasibility of the proposed project and to prepare a license application, it grants no land-disturbing or other property rights.¹³

13. Article 4 of this permit requires the permittee to submit a progress report no later than the last day of each six-month period from the effective date of this permit. The late filing of a report or the supplementation of an earlier report in response to a notice of probable cancellation will not necessarily excuse the failure to comply with the requirements of this article.

14. During the course of the permit, the Commission expects that the permittee will carry out pre-filing consultation and study development leading to the possible development of a license application. The pre-filing process begins with preparation of a Notice of Intent (NOI) and Pre-Application Document (PAD) pursuant to sections 5.5 and 5.6 of the Commission's regulations.¹⁴ The permittee must use the Integrated Licensing Process unless the Commission grants a request to use an alternative process (Alternative or Traditional Licensing Process). Such a request must accompany the NOI and PAD and set forth specific information justifying the request.¹⁵ Should the permittee file a development application, notice of the application will be published, and interested persons and agencies will have an opportunity to intervene and to present their views concerning the project and the effects of its construction and operation.

¹² See, e.g., *Mt. Hope Waterpower Project LLP*, 116 FERC ¶ 61,232, at P 4 (2006) (“The purpose of a preliminary permit is to encourage hydroelectric development by affording its holder priority of application (i.e., guaranteed first-to-file status) with respect to the filing of development applications for the affected site.”).

¹³ Issuance of this preliminary permit is thus not a major federal action significantly affecting the quality of the human environment. A permit holder can only enter lands it does not own with the permission of the landholder, and is required to obtain whatever environmental permits federal, state, and local authorities may require before conducting any studies. See, e.g., *Three Mile Falls Hydro, LLC*, 102 FERC ¶ 61,301, at P 6 (2003); see also *Town of Summersville, W.Va. v. FERC*, 780 F.2d 1034 (D.C. Cir. 1986) (discussing the nature of preliminary permits).

¹⁴ 18 C.F.R. §§ 5.5 and 5.6 (2017).

¹⁵ See 18 C.F.R. § 5.3 (2017).

15. A preliminary permit is not transferable. The named permittee is the only party entitled to the priority of the application for license afforded by this preliminary permit. In order to invoke permit-based priority in any subsequent licensing competition, the named permittee must file an application for license as the sole applicant, thereby evidencing its intent to be the sole licensee and to hold all proprietary rights necessary to construct, operate, and maintain the proposed project. Should any other parties intend to hold during the term of any license issued any of these proprietary rights necessary for project purposes, they must be included as joint applicants in any application for license filed. In such an instance, where parties other than the permittee are added as joint applicants for license, the joint application will not be eligible for any permit-based priority.¹⁶

The Director orders:

(A) A preliminary permit is issued for the Goldendale Energy Storage Project No. 14861 to FFP Project 101, LLC, for a period effective the first day of the month in which this permit is issued, and ending either 36 months from the effective date or on the date that a development application submitted by the permittee has been accepted for filing, whichever occurs first.

(B) This preliminary permit is subject to the terms and conditions of Part I of the Federal Power Act and related regulations. The permit is also subject to Articles 1 through 4, set forth in the attached standard form P-1.

(C) This order constitutes final agency action. Any party may file a request for rehearing of this order within 30 days of the date of its issuance, as provided in section 313(a) of the Federal Power Act, 16 U.S.C. § 825l (2012), and section 385.713 of the Commission's regulations, 18 C.F.R. § 385.713 (2017).

David Turner, Chief
Northwest Branch
Division of Hydropower Licensing

¹⁶ See *City of Fayetteville Public Works Commission*, 16 FERC ¶ 61,209 (1981).

Form P-1 (Revised April 2011)**FEDERAL ENERGY REGULATORY COMMISSION****TERMS AND CONDITIONS OF
PRELIMINARY PERMIT**

Article 1. The purpose of the permit is to maintain priority of application for a license during the term of the permit while the permittee conducts investigations and secures data necessary to determine the feasibility of the proposed project and, if the project is found to be feasible, prepares an acceptable application for license. In the course of whatever field studies the permittee undertakes, the permittee shall at all times exercise appropriate measures to prevent irreparable damage to the environment of the proposed project. This permit does not authorize the permittee to conduct any ground-disturbing activities or grant a right of entry onto any lands. The permittee must obtain any necessary authorizations and comply with any applicable laws and regulations to conduct any field studies.

Article 2. The permit is not transferable and may, after notice and opportunity for hearing, be canceled by order of the Commission upon failure of the permittee to prosecute diligently the activities for which a permit is issued, or for any other good cause shown.

Article 3. The priority granted under the permit shall be lost if the permit is canceled pursuant to Article 2 of this permit, or if the permittee fails, on or before the expiration date of the permit, to file with the Commission an application for license for the proposed project in conformity with the Commission's rules and regulations then in effect.

Article 4. No later than the last day of each six-month period from the effective date of this permit, the permittee shall file a progress report. Each progress report must describe, for that reporting period, the nature and timing of what the permittee has done under the pre-filing requirements of 18 C.F.R. sections 4.38 and 5.1-5.31 and other applicable regulations; and, where studies require access to and use of land not owned by the permittee, the status of the permittee's efforts to obtain permission to access and use the land. Progress reports may be filed electronically via the Internet, and the Commission strongly encourages e-filing. Instructions for e-filing are on the Commission's website at <http://www.ferc.gov/docs-filing/efiling.asp>. To paper-file instead, mail four copies of the progress report to the Secretary, Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

Document Content(s)

P-14861 Goldendale permit order.DOCX.....1-7

August 15, 2018

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, DC 20426

Re: Goldendale Energy Storage Project (FERC No. 14861)-**FIRST SIXTH MONTH PROGRESS REPORT**

Dear Secretary Bose,

On March 8, 2018, the Goldendale Energy Storage Project in Klicitat County, Washington (the "Project") was issued a preliminary permit by the Federal Energy Regulatory Commission (the "Commission"):

Project Number	Project Name	Permittee
P-14861	Goldendale Energy Storage Project	FFP Project 101, LLC

As a condition of permit issuance, the Commission requires the permittee file progress reports every six months. Rye Development, LLC, on behalf of the permittee (collectively, "Rye Development" or "Rye"), is submitting the following Six-Month Progress Report.

Project Activities

- On March 8, 2018 the Commission issued a preliminary permit for the Goldendale Energy Storage Project
- On May 15, 2018 Rye Development hosted an introductory project meeting and site visit for elected officials, the Washington Department of Ecology, Klickitat Public Utility District, and other stakeholders.

Engineering and Cost Analysis

- Over the last six months Rye has continued to refine the preliminary design of the proposed facility and update project costs. Over the next six months, the permittee intends to further refine the design of the project features to support the preparation of a preliminary application document (PAD).

Consultation

- Rye Development is continuing to consult with stakeholders and intends to prepare a PAD in the fall of 2018. An initial meeting discussing the proposed project with the Yakama Nation Tribal Council is scheduled for September 6, 2018.

Please do not hesitate to contact me if you require any additional information about this proposed Project.

Sincerely,



Erik Steimle

Document Content(s)

FERC Progress Report No 1.PDF.....1-1

Sherman County Response to Nov 19 RFI

From: Jenine McDermid <countyclerk@shermancounty.net>

Sent: Monday, November 26, 2018 11:43 AM

To: Erik Steimle <erik@ryedevelopment.com>

Subject: Sherman County: Proposed Goldendale Energy Storage Project (FERC Project No. 14861)

Erik,

Today we received your request for information for the proposed Goldendale Energy Storage Project.

I found nothing in our filed records pertaining to this project. County Judge Gary Thompson suggested I refer you to the Klickitat County planning office in Goldendale for further information.

Thank you.

Jenine McDermid, c.c.c.

Sherman County Clerk

500 Court Street

PO Box 365

Moro, OR 97039

Phone: 541-565-3606

Fax: 541-565-3771

countyclerk@shermancounty.net

<http://www.co.sherman.or.us>

Register to vote or check your registration status online at: <http://sos.oregon.gov/voting-elections/Pages/default.aspx>

Visit Sherman County's website! <https://www.co.sherman.or.us>

DISCLOSURE NOTICE: Messages to and from this e-mail address may be subject to Oregon Public Records Law. The information contained herein does not constitute legal advice. Information provided herein should be verified with receiver's own legal counsel.

Confederated Tribes of the Umatilla Indian Reservation Response to Nov 19 FRI

From: Shawn Steinmetz <ShawnSteinmetz@ctuir.org>

Sent: Tuesday, November 27, 2018 2:26 PM

To: Erik Steimle <erik@ryedevelopment.com>

Cc: Audie Huber <AudieHuber@ctuir.org>; Tera Farrow Ferman <TeraFarrowFerman@ctuir.org>; Kristen Tiede <KristenTiede@ctuir.org>

Subject: Rye Development - Golden Energy Storage Project

Erik:

Thanks for the emailed letter dated November 19, 2018 concerning Rye Development's Golden Energy Storage Project. This appears to be essentially the same project that was called the John Day Pumped Storage Hydro project that the Confederated Tribes of the Umatilla Indian Reservation received notice of in a letter from dated September 29, 2014 from Klickitat County PUD. It has also been presented to us by Environmental Resources Management as the John Day Pumped Storage Project (FERC No. 13333) on March 31, 2015. As the Confederated Tribes of the Umatilla Indian Reservation's Cultural Resources Protection Program stated in the past, the proposed undertaking is within a historic property of religious and cultural significance to the Confederated Tribes of the Umatilla Indian Reservation that has been recommended as eligible for inclusion in the National Register of Historic Places. This project would adversely affect this historic property. The Cultural Resources Protection Program would like to work with you and the appropriate representative from FERC, the lead federal agency for the undertaking, to consider resolution of the adverse effects to the historic property.

Please let me know if you have any questions, my contact information is attached below.

Respectfully,
Shawn

Shawn Steinmetz
Archaeologist
Confederated Tribes of the Umatilla Indian Reservation
Cultural Resources Protection Program
46411 Timine Way
Pendleton, Oregon 97801
(541) 429-7963
shawnsteinmetz@ctuir.org

BLM Response to Nov 19 RFI

From: Heppler, Lenore <lheppler@blm.gov>
Sent: Wednesday, November 28, 2018 10:45 AM
To: Erik Steimle <erik@ryedevelopment.com>
Subject: Re: [EXTERNAL] RE: Proposed project

Erik: Thank you. It appears we have no role in this project.

Good luck!

Lenore

On Tue, Nov 27, 2018 at 3:42 PM Erik Steimle <erik@ryedevelopment.com> wrote:

Lenore,

I have attached the files you requested. The project is not in the vicinity of any BLM lands and I am happy to clarify any additional project questions you may have.

Sincerely,

Erik Steimle

From: Heppler, Lenore <lheppler@blm.gov>
Sent: Monday, November 26, 2018 2:23 PM
To: Erik Steimle <erik@ryedevelopment.com>
Cc: Marcus Tobey <mtobey@blm.gov>
Subject: Proposed project

Erik: I received your letter today requesting information to support preliminary application for the Goldendale Energy Storage Project. The first thing for us is to figure out if this proposed project is on any BLM- managed lands. Do you have a shape file of the project area you can send? With that, we could easily determine if BLM is even involved in this project

Lenore

Lenore Heppler

Branch Chief, Land, Mineral and Energy Resources

Oregon-Washington State Office

Bureau of Land Management

lheppler@blm.gov

503-808-6154

--

Lenore Heppler
Branch Chief, Land, Mineral and Energy Resources
Oregon-Washington State Office
Bureau of Land Management

lheppler@blm.gov

503-808-6154

WA Dept of Ecology Response to Nov 19 RFI

From: Schriever, Garin D (ECY) <gasc461@ECY.WA.GOV>

Sent: Thursday, November 29, 2018 11:16 AM

To: Erik Steimle <erik@ryedevelopment.com>

Subject: Your letter dated November 19, 2018

Mr. Steimle:

I'm the Department of Ecology's project manager for the cleanup of the Columbia Gorge Aluminum Site near Goldendale. This email is in regard to your letter dated November 19th to James DeMay of the Department of Ecology's Industrial Section concerning the proposed Goldendale Energy Storage Project. It appears that this is a request to provide information regarding environmental resources in the project area.

Ecology's Industrial Section is the regulatory authority for the cleanup, water discharge permit, and hazardous waste management for the Columbia Gorge Aluminum Smelter. As such, we are in possession of extensive files concerning the site, many of which include information on environmental resources.

What I'm trying to understand about your letter is whether you are:

1. intending to make a public disclosure request for all our records concerning environmental resources at the site; or
2. offering us the opportunity to provide information we think you should consider for your project.

If your intent is to make a public disclosure request it will be extensive and likely take longer than 30 days to fulfill unless you choose to narrow it. There will also be fees associated with fulfilling the request.

Please give me a call at your convenience to discuss. We want to be of assistance, but are looking to better understand your intent so we can respond appropriately.

Thanks,

Garin Schriever, P.E.
Cleanup Project Manager
Washington State Dept. of Ecology
PO Box 47600
Olympia, WA 98504-7600
(360) 407-6999

NOAA Response to Nov 19 RFI

From: Diane Melancon - NOAA Federal <diane.melancon@noaa.gov>
Sent: Friday, November 30, 2018 10:23 AM
To: Erik Steimle <erik@ryedevelopment.com>
Cc: NDB Communications - NOAA Service Account <ndb.communications@noaa.gov>; Lance Roddy <Lance.Roddy@noaa.gov>; OCS NDB <OCS.NDB@noaa.gov>; Tara Wallace <Tara.Wallace@noaa.gov>
Subject: Proposed Goldendale Energy Storage Project (FERC Project No. 14861)

Mr. Steimle,

Yesterday I received your November 19, 2018 letter via USPS Certified Mail. Perhaps another section of NOAA would have information regarding the environmental resources in the project area, but the Marine Chart Division does not. The Marine Chart Division mainly produces nautical charts whose features focus on those important for navigation. For your reference, I am attaching a PDF with our largest-scaled nautical charts that cover the project area, charts 18533 and 18535.

Although we don't have the information you currently seek, the proposed high voltage transmission line is of interest to us because it crosses the navigable waters of the Columbia River. For that reason, should the project be constructed, please send the Marine Chart Division - Nautical Data Branch the project's as-builts - most importantly, the high voltage transmission line's U.S. Army Corps of Engineers permit and as-built information. Although we accept hard copy documents at the address to which you sent the letter, digital communication and documents are preferred via the Nautical Data Branch's email address: ocs.ndb@noaa.gov.

Many thanks for contacting us and all the best for the project,
Diane

Diane Melançon, Cartographer
Nautical Data Branch
NOAA's Marine Chart Division



Charts_18533_18535
.pdf

Oregon Department of Justice response to Nov 20 RFI

From: Rowe Patrick G <Patrick.G.Rowe@doj.state.or.us>
Sent: Friday, November 30, 2018 12:06 PM
To: Erik Steimle <erik@ryedevelopment.com>
Subject: FW: Rye Development 11.19.18 letter to AG Rosenblum re: Request for Information re: Proposed Goldendale Energy Storage Project

Mr. Steimle,

The Oregon Department of Justice recently received your letter re: the Rye Development energy storage project (attached). The letter was forwarded to me, as I am the contact attorney (general counsel) for the Oregon Department of Energy. I have shared your letter with the Director of the Department of Energy and the head of its Siting Division. In the letter, you request any information regarding environmental resources in the project area. I'd appreciate it if you could further describe what type of information you are seeking.

Thank you.

Patrick G. Rowe

Senior Assistant Attorney General | General Counsel | Natural Resources Section
Oregon Department of Justice
503.947.4583

From: Seeley Jeffery
Sent: Friday, November 30, 2018 11:50 AM
To: Rowe Patrick G
Subject: Rye Development 11.19.18 letter to AG Rosenblum re: Request for Information re: Proposed Goldendale Energy Storage Project

Attached.

Jeffery R. Seeley

Legal Secretary
General Counsel Division | Natural Resources Section
Oregon Department of Justice
1162 Court Street NE, Salem, OR 97301-4096
503-947-4520 (Main line) | 503-947-4590 (Direct) | FAX: 503-378-3784

*****CONFIDENTIALITY NOTICE*****

This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

WDFW Response to Nov 19 RFI and RYE Response

From: Erik Steimle

Sent: Tuesday, December 4, 2018 5:02 PM

To: 'Verhey, Patrick M (DFW)' <Patrick.Verhey@dfw.wa.gov>

Cc: Steve Lewis <Stephen_Lewis@fws.gov>

Subject: RE: Your request for Existing Information to Support Preliminary Application Document for the Proposed Goldendale Energy Storage Project (FERC Project No. 14861)

Patrick,

Thank you for your prompt response and providing us with the information. Rye is taking a different approach to the project design, than the previous proposal. We are proposing a facility with a smaller project footprint and will be incorporating a number of protective measures for wildlife in the application. We too look forward to working with you on this project.

Sincerely,

Erik Steimle

**Rye
Development**

Erik Steimle

Vice President

220 NW 8th Ave

Portland, OR 97209

(503) 998-0230

erik@ryedevelopment.com

www.ryedevelopment.com

From: Verhey, Patrick M (DFW)

Sent: Tuesday, December 04, 2018 4:44 PM

To: 'Eric@ryedevelopment.com' <Eric@ryedevelopment.com>

Cc: Steve Lewis <Stephen_Lewis@fws.gov>

Subject: Your request for Existing Information to Support Preliminary Application Document for the Proposed Goldendale Energy Storage Project (FERC Project No. 14861)

Hi Eric.

Once again I am excited to work with you on this Project. In October of 2014 the WDFW provided information on the Klickitat PUD Pumped Storage Project (FERC # P-13333), which was remarkably similar to the current proposal for the Goldendale Energy Storage Project (FERC # P-14861). I have attached that correspondence to this e-mail. I certainly can go through my files and resend all of the information I provided previously and information that identified WDFW's concerns with the Klickitat PUD Pumped Storage Project. But, it seems it would be a duplication of efforts and waste time that

could be spend discovering any new available information that may be helpful to you. Let me know if you would like me to duplicate my previous efforts. My preference is to spend this time working on potentially updating information that was provided on the Klickitat Project, which you were the primary contact. Let me know.

Also, after reviewing the November 19, 2018 correspondence from you the thought occurred to me as to why the project is being activated, with no modification from previous designs to address wildlife conservation issues. The WDFW and to my knowledge USFWS had significant concerns in regards to increasing the potential of raptor blade strikes at the Windy Ridge/Windy Point Wind Project, portions of which are located within the Klickitat PUD Pumped Storage Project and now within or at least immediately adjacent to the Goldendale Energy Storage Project. If you recall the WDFW provided information on the location of a Golden Eagle nest located immediately adjacent to the Project and provided comment on the attractive nature of the open reservoirs to waterfowl, which would in turn attract raptors to the wind turbines in the vicinity of the reservoirs to prey upon the waterfowl. Has Rye Development engineered a solution to this issue?

Please direct any future correspondence in regards the Goldendale Energy Project to me. Per the WDFW intervention notice, I am the WDFW lead on the Project. I look forward to a continued good working relationship with you and Rye Development.





Patrick Verhey

WDFW Habitat Program

Energy and Major Projects Division Biologist

1550 Alder St N.W.

Ephrata, WA 98823

Office (509) 754-4624 ex. 213

Cell (509) 431-8296

Patrick.Verhey@dfw.wa.gov

Work schedule is M-Th



STATE OF WASHINGTON

DEPARTMENT OF FISH AND WILDLIFE

1550 Alder St. N.W. • Ephrata, Washington 98823 • (509) 754-4624 FAX (509) 754-5257

October 28, 2014

Mr. Brian Skeahan
Project Consultant
Klickitat PUD
1313 South Columbus Ave.
Goldendale, WA 98620

RE: Request for Information Relevant to Proposed John Day Pumped Storage Hydroelectric Project, FERC No. 13333.

Dear Mr. Skeahan:

The Washington Department of Fish and Wildlife (DFW) have reviewed your preliminary permit for the John Day Pump Storage Project (Project), FERC Project No. 13333. The DFW is particularly interested in the Project's effect on fish and wildlife. On September 29, 2014 Klickitat County PUD requested any information the DFW may have regarding environmental resources in the Project area. We have included information available to DFW regarding environmental resources that may be impacted by the Project in this correspondence in addition to outlining our initial concerns. In addition we recommend reviewing the February 2006 Windy Point Wind Farm Environmental Report, which contains a great deal of environmental information that may pertain to your Project. Notably, in section 2.5.1 of the report the Project area is included as part of the regional IBA (important bird area) as designated by Audubon Washington.

Project Description

The Project would operate as a closed loop pumped storage project, where water is recycled between two man-made reservoirs in an off-channel and closed system. Water for the initial fill of the lower reservoir and periodic make-up water to account for seasonal evaporative losses would be provided through an existing water intake in the John Day pool through use of an existing water right owned by Klickitat PUD. The Project would require the construction of an underground powerhouse and waterway, an overhead transmission line spanning across the Columbia River into Oregon, and two reservoirs of just over 100 surface acres each, one in the

vicinity of John Day Dam on lands of the former Columbia Gorge Aluminum plant and the second located in the Columbia Hills north of John Day Dam.

WDFW environmental resources in the Project area

WDFW Priority Habitat Species list can be found at <http://wdfw.wa.gov/conservation/phs/list/>. A search of the PHS list of species that reside within or immediately adjacent to the project resulted in the following list of species:

- Bald Eagle-State sensitive species/Federal species of concern
- Golden Eagle-State candidate species
- Prairie Falcon-state monitored
- Little Brown Myotis Bat
- Canyon Bat-state monitored
- Night Snake-state monitored
- Common Garter Snake
- Western Fence Lizard

WDFW Environmental Concerns

Habitat

Environmental impacts due to construction of the upper and lower reservoirs and transmission line should be limited to the extent possible and mitigation should be developed to address unavoidable impacts to Oregon white oak habitat, oak/pine woodlands, grassland habitat, lithosol habitat, juniper woodlands and shrub steppe habitat.

Avian

The DFW recommend following the Suggested Practices for Avian Protection On Power Lines, The State of the Art in 2006 to protect avian species from electrocution as a result of landing or perching on transmission lines and distribution lines.

As of August 9, 2007, the bald eagle is no longer included on the list of federal threatened and endangered species. However, the golden eagle is a resident in the project area and a state candidate species. Bald eagles are potential residents. Both are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.

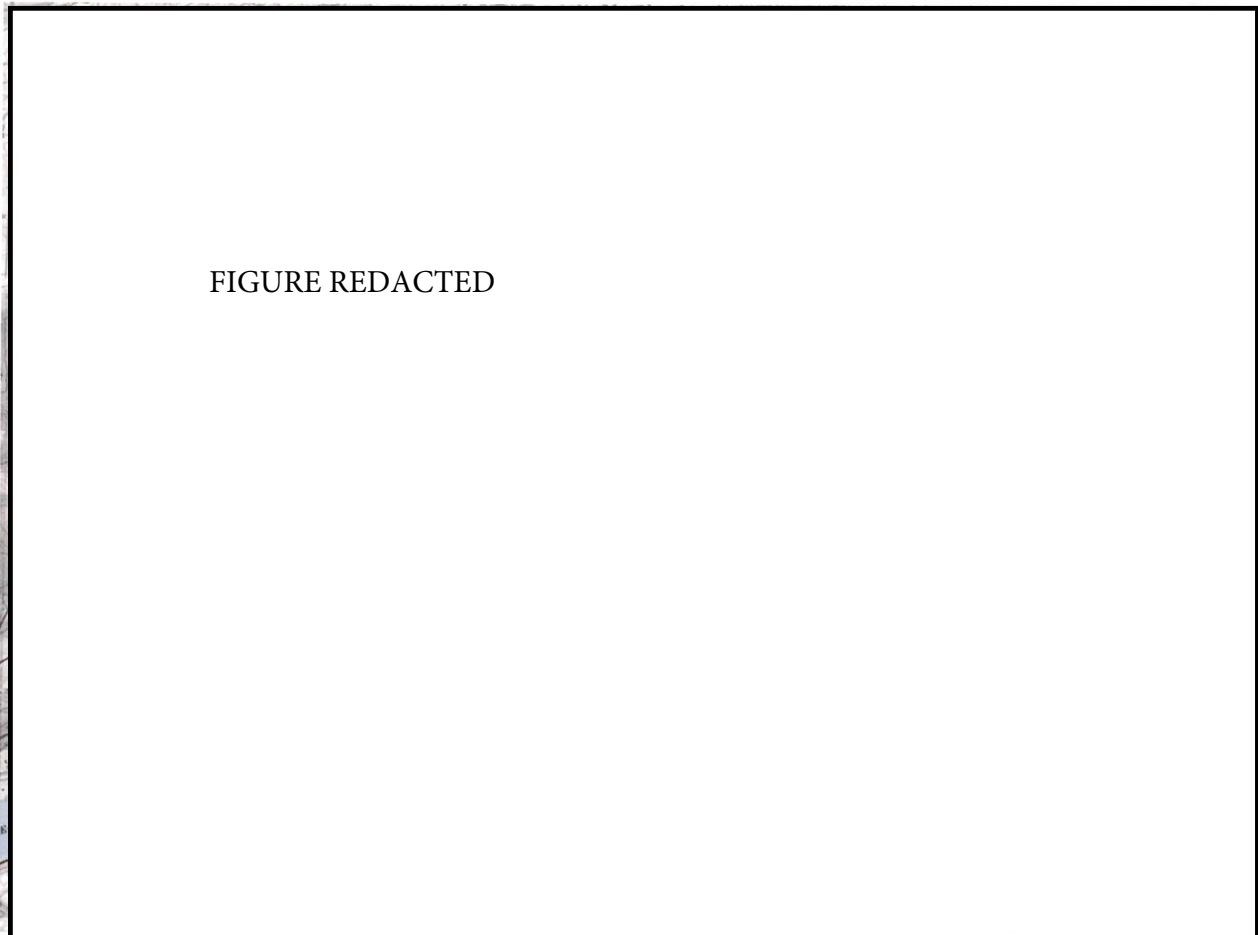
The DFW has conducted extensive studies of associated golden eagle territory, as well as bald eagle and other raptor use of the Project area. To date, it is unknown if any nesting bald eagles are in close proximity to the Project. The bald eagles we see wintering (i.e., primarily migrants) are associated with the John Day Hydroelectric Project on the Columbia River, located immediately adjacent to the Project area, and along Rock Creek. We anticipate these birds will be attracted to the proposed reservoirs to forage for waterfowl and fish. Ospreys and waterfowl have a high likelihood to be drawn to the Project area as well. Increase in numbers of these birds would increase their presence at the adjacent wind projects and potential for mortality events.

The proposed project is the third major project or activity in the area. Cumulative impacts of the Windy Point II Wind Energy Project, Tuolumne Wind Project, and the proposed Project may result in mortality, nest abandonment, and a loss of eagle habitat. Since the wind power projects were developed at least 3 adults eagles have died or disappeared on this territory. Although younger birds have been seen on the territory, none have re-established as a nesting pair. No young have been produced since the wind projects were developed. The attached map (Fig. 1) illustrates the home range of the adult male golden eagle DFW radio tagged in 2007 with respect to turbines and approximate locations of the proposed reservoir. Because it is only based on an 8-month time period it is not representative of the entire use area of eagles likely to nest on this territory in the future.

Specific eagle concerns:

1) Loss of prime foraging habitat - much of the foraging habitat for these eagles to the west of the nest has already been compromised by wind turbines. If the proposed Project is built, foraging for the golden eagle pair would be limited along the entirety of the slope and lower terrace down to the aluminum plant.

2) Human disturbance resulting from reservoir construction and activities associated with maintenance may stress the birds and cause them to abandon the nest. The west nest, figure 1, is essentially located on the cliff face above the lower reservoir.



3) Construction and maintenance of the Project can potentially increase bald eagle and osprey activity near both reservoirs due to the reservoirs potentially providing a food source (fish and waterfowl) that did not previously exist. The potential increase in presence of bald eagles may increase the need for nest/territory defense by the golden eagles during nesting, which would contribute to increase energy demands of the birds and increased stress.

4) Potentially increased bald eagle activity in the wind project turbine zones (upper reservoir especially) due to the attraction of eagles to the reservoirs to forage.

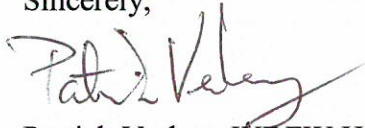
Fish

The pumping of large volumes of water between the Columbia River and the proposed lower and upper reservoir has the potential to entrain and kill adult and juvenile fish resulting from the passage of fish through the project's turbines and pumps. WDFW recommends the installation of a fish screen or juvenile bypass system to prevent entrainment of fish. In addition, DFW is concerned in regards to toxic wastes accumulated in the vicinity of the Columbia Gorge Aluminum Plant and the potential impacts these materials may have on fish life.

According to WDFW's SalmonScape, <http://apps.wdfw.wa.gov/salmonscape/map.html>, the following fish may be present in the Project area: Upper Columbia River Summer Chinook, Upper Columbia River Spring Chinook, Fall Chinook, Coho, summer steelhead, sockeye, and bull trout, mountain whitefish, lamprey, smelt, and resident fish.

Thank you for this opportunity to provide WDFW initial concerns and available information for the proposed John Day Pump Storage Project. Please contact me at (509) 754-4624 ex. 13 or by e-mail at Patrick.Verhey@dfw.wa.gov if you have any questions.

Sincerely,



Patrick Verhey, WDFW Hydroelectric Mitigation Biologist

Cc:

Pat Irle, Ecology, Yakima, WA
Stephen Lewis, USFWS, Wenatchee, WA
Bob Rose, Yakama Nation, Toppenish, WA

Oregon PUC Response to Nov 19 RFI

From: DAVIS Diane <diane.davis@state.or.us>
Sent: Thursday, December 13, 2018 9:13 AM
To: Erik Steimle <erik@ryedevelopment.com>
Subject: RE: Request for Existing Information - FERC Project No. 14861

Dear Erik Steimle,

I've contacted the Oregon PUC Staff, and we do not have any information regarding the environmental resources in the Goldendale Energy Storage Project.

If I can be of further assistance, please contact me.

Thank you.

Diane Davis

PUC Administrative Hearings Division

From: DAVIS Diane
Sent: Tuesday, November 27, 2018 11:43 AM
To: 'erik@ryedevelopment.com' <erik@ryedevelopment.com>
Subject: Request for Existing Information - FERC Project No. 14861

Hello,

I received your request today and forwarded it on to the PUC Staff. I'll keep you posted as to whether or not we have responsive information, and if we do, whether or not there will be a cost to provide.

Thank you.

Diane Davis

Oregon PUC Administrative Hearings Division

US Hang Gliding & Paragliding Response to Nov 19 RFI and Applicant's Response

-----Original Message-----

From: Kelly Kellar <wordpress@ryedevelopment.com>

Sent: Wednesday, December 19, 2018 2:37 PM

To: Rye Development <info@ryedevelopment.com>

Subject: "Goldendale Hydropowered energy storage prodject ?" - Rye Contact Form

From: Kelly Kellar <Info@maxroc.com>

Subject: Goldendale Hydropowered energy storage prodject ?

Message Body:

Hello,

I'm wondering how this Goldendale Hydropowered energy storage project will impact the paraglidng and hang gliding community that have been flying this site sense 1995 ? It is the only east wind flying site we have in the pacific northwest.

We always had a good relationship with the golden aluminum plant.

It is our highest hopes that we will continue to be able to fly here.

From Reed Gleason's property that he had purchased from the goldendale aluminum plant. Solely for the purpose of preserving it as a flying site .

Please let us know what we can expect or who we can talk to so we can get a clear picture of how we can all have a great future together complimenting your power project and our passion for paragliding and hang gliding.

Thanks

United States Hang Gliding & Paragliding instructor.

Kelly Kellar

1(503)464-6140

info@maxroc.com

-----Original Message-----

From: Erik Steimle <erik@ryedevelopment.com>

Sent: Thursday, December 20, 2018 1:45 PM

To: info@maxroc.com

Cc: Sandy Slayton <sandy.slayton@erm.com>; Suzanne Adkins <Suzanne.Adkins@erm.com>

Subject: RE: "Goldendale Hydropowered energy storage prodject ?" - Rye Contact Form

Kelly,

Thank you for taking the time to meet with me and discuss the proposed Goldendale Energy Storage Project. It was good to get a detailed understanding of where you and fellow paragliders takeoff and land in this area of the county, as well as understand that the project as we are proposing will not interfere with flights in the area. As requested I have attached a number of high quality renderings of the project including the ones we looked at today. Please let me know if you have any trouble downloading them. I will keep you posted on the timing of our upcoming public meeting in Goldendale.

Sincerely,

Erik Steimle
Vice President
220 NW 8th Ave
Portland, OR 97209
(503) 998-0230
erik@ryedevelopment.com
www.ryedevelopment.com

Oregon SHPO Response to Nov 19 RFI

-----Original Message-----

From: FRENCH Jamie * OPRD <Jamie.French@oregon.gov>

Sent: Thursday, December 20, 2018 8:47 AM

To: Erik Steimle <erik@ryedevelopment.com>

Subject: SHPO Case Nbr SHPO Case No.: 18-1856, FERC 14861, Rye Development, Goldendale Energy Storage Project

Please find the SHPO's response to your request for comment on cultural resources at the above-identified project. This attachment serves as your file copy. If you have any questions, please feel free to contact me.



Oregon
Kate Brown, Governor

Parks and Recreation Department
State Historic Preservation Office
725 Summer St NE Ste C
Salem, OR 97301-1266
Phone (503) 986-0690
Fax (503) 986-0793
www.oregonheritage.org



December 20, 2018

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

RE: SHPO Case No. 18-1856
FERC 14861, Rye Development, Goldendale Energy Storage Project
5 mile transmission line to BPA John Day Substation

Dear Mr. Steimle:

A search through the SHPO archaeological database has revealed that there are several cultural resources in the area of the project referenced above. It is important that a cultural resource survey be conducted to identify the location, boundaries and significance of any cultural remains within the project area prior to any ground disturbing activities.

We recommend that the area be examined by a professional archaeologist, prior to development, to determine if cultural materials are present. A list of archaeological consultants can be found at our website (www.oregonheritage.org) by clicking on the Archaeological Services web page and highlighting the section marked Archaeological Consultants Directory.

The recommendations above are intended to help the applicant avoid damaging any archaeological sites in the project area. If you have not already done so, be sure to consult with all appropriate Indian tribes regarding your proposed project. If you have any questions regarding the applicant's need to hire an archaeologist, or wish any additional information about the above comments, feel free to contact the SHPO office. In order to help us track your project accurately, please be sure to reference the SHPO case number above in all correspondence.

Sincerely,

Jamie French, M.A.
SHPO Archaeologist
(503) 986-0729
Jamie.French@oregon.gov



ODFW Response to Nov 19 RFI

From: Elizabeth A OsierMoats <Elizabeth.A.OsierMoats@state.or.us>
Sent: Thursday, December 20, 2018 12:26 PM
To: Erik Steimle <erik@ryedevelopment.com>
Cc: Elizabeth A OsierMoats <Elizabeth.A.OsierMoats@state.or.us>; Ken Homolka <Ken.Homolka@state.or.us>
Subject: Goldendale Energy Storage Project (P-14861)

Erik Steimle,

Oregon Department of Fish and Wildlife (ODFW) received your letter, dated November 19, 2018, requesting existing information related to the proposed Goldendale Energy Storage Project (P-14861).

ODFW's concerns remain unchanged since we provided comments on the John Day Pumped Storage Hydroelectric Project (P-13333), which was proposed at the same site, with a similar footprint, and would have similar impacts.

Attached are those comments, dated October 30, 2014, and comments from the National Marine Fisheries Service, which we referenced in our comments.

Please feel free to contact me if you have any further questions.

Thank you,

Elizabeth A.O. Moats
East Region Hydropower Coordinator
Oregon Department of Fish and Wildlife
East Region Office
107 20th Street
La Grande, OR 97850
Office: 541-962-1832
Cell: 541-805-4559



Oregon

John A. Kitzhaber, MD, Governor

Department of Fish and Wildlife

Northeast Region
107 20th Street
La Grande, OR 97850
(541) 963-2138
FAX (541) 963-6670

October 30, 2014

Brian Skeahan
Project Consultant
Klickitat PUD
1313 South Columbus Ave
Goldendale, WA 98620



RE: Request for information relevant to proposed John Day Pumped Storage Hydroelectric Project, FERC No P-13333

Dear Mr. Skeahan:

The Oregon Department of Fish and Wildlife (ODFW) received your letter, dated September 29, 2014, in which you request information relevant to the Proposed John Day Pumped Storage Hydroelectric Project (P-13333). According to the letter, the project water intake is located in the Columbia River upstream of the John Day Dam on the Washington shore. In addition, an overhead transmission line will be constructed across the Columbia River and into Oregon to deliver electricity to Bonneville Power Administration's John Day Substation.

ODFW is the state agency with jurisdiction over fish and wildlife in Oregon. The Project would obtain water from the Columbia River. The Columbia River at the proposed intake location is the state boundary to Oregon and Washington and both states are deemed to have concurrent jurisdiction for regulating, protecting, or preserving fish (Oregon Revised Statute (ORS) 507.101 and ORS 507.020). Further, the proposed transmission lines will connect to Bonneville Power Administration's existing John Day Substation, located in Sherman County, Oregon. ODFW possesses management expertise regarding the natural resources in the Columbia River and manages Oregon's fish and wildlife resources that may be affected by the Project.

Wildlife Resources

A portion of the proposed transmission line will be located in Oregon approximately 5 miles south of the project. Attached is a map of the project vicinity showing ODFW's general areas of concern for terrestrial species. This data is publicly available on Compass, the Centralized Oregon Mapping Products and Analysis Support System (<http://www.dfw.state.or.us/maps/compass/index.asp>). Additionally, ODFW is aware of a peregrine falcon nesting site in the vicinity of the proposed transmission line.

Fish and Aquatic Resources

ODFW supports the National Marine Fisheries Service (NMFS) comments, dated October 29, 2014, regarding screening required on the project intake and the design criteria thereof and the potential for impacts to Columbia River water quantity and quality during project operation.

ODFW shares management responsibility for fisheries resources in the Columbia River with Washington. ODFW's policy is to require screening on any diversion where fish are present (ORS 498.306) and to require mitigation for any fish and wildlife habitat losses resulting from development actions (Oregon Administrative Rule 635-415-0010). While the intake will be under the jurisdiction of the State of Washington, ODFW's responsibility to protect and preserve fisheries resources in the Columbia River remains. Risks to fish and aquatic resources in the Columbia River should be investigated and site specific mitigation should be developed to minimize any potential impacts.

ODFW appreciates the opportunity to provide information and comments in the development of the proposed John Day Pumped Storage Hydroelectric Project. Please feel free to contact me if you have any questions (541-962-1832 or elizabeth.a.osiermoats@state.or.us).

Sincerely,

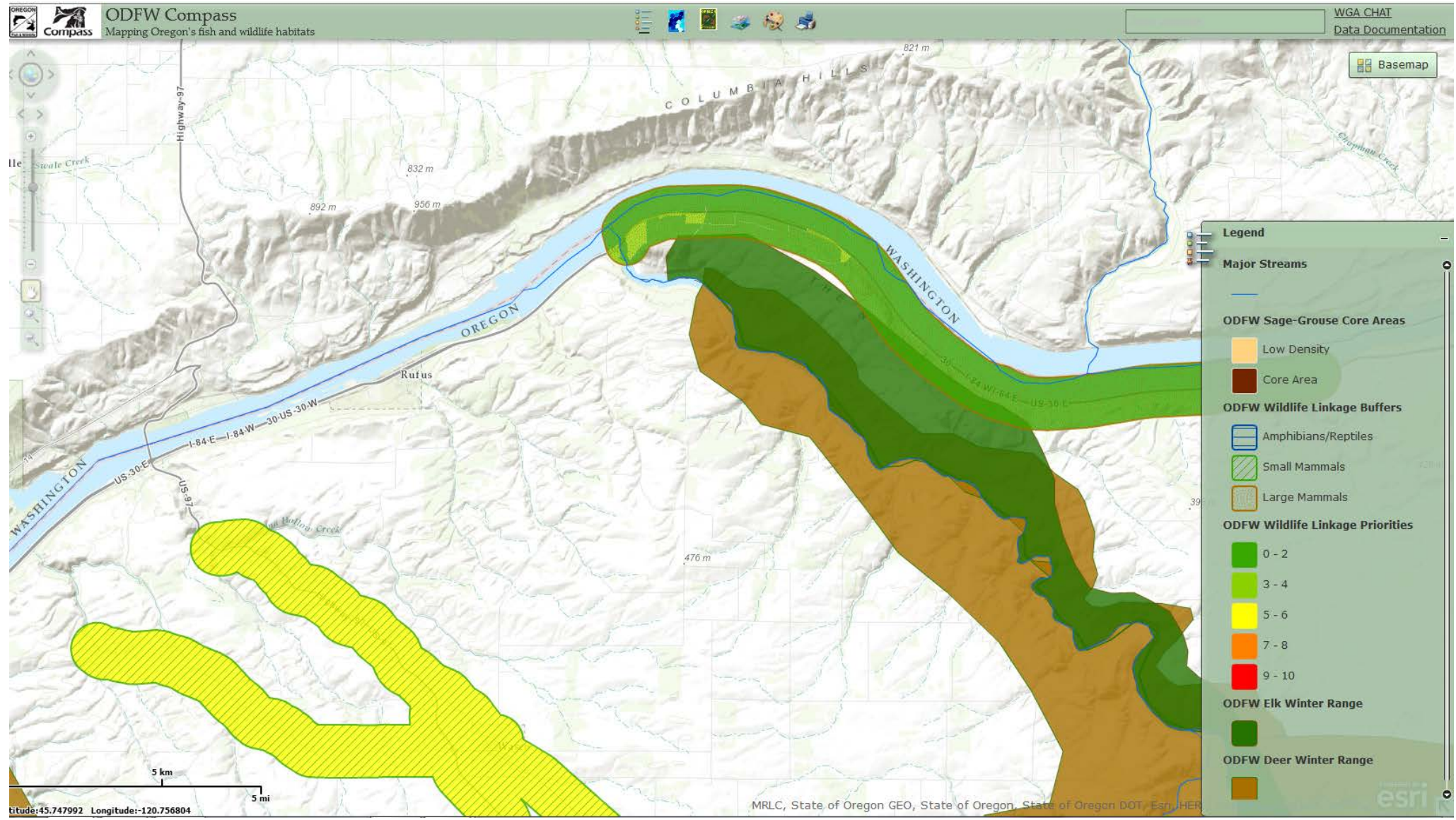
Elizabeth A. O. Moats
East Region Hydropower Coordinator

C:

Ken Homolka – ODFW
Rebecca O'Neil – ODOE
Mary Grainey – OWRD
Marilyn Fonseca - ODEQ

Attachment: John Day Pool Pumped Storage Hydroelectric Project (P-13333) Vicinity Terrestrial Habitat – Areas of Concern

John Day Pool Pumped Storage Hydroelectric Project (P-13333) Vicinity Terrestrial Habitat – Areas of Concern



USGS Washington Science Center Response to Nov 19 RFI

From: Dinicola, Richard <dinicola@usgs.gov>

Sent: Friday, December 21, 2018 9:50 AM

To: Erik Steimle <erik@ryedevelopment.com>

Cc: Joseph Jones <jjones@usgs.gov>; Cynthia Barton <cbarton@usgs.gov>; Marijke Van Heeswijk <heeswijk@usgs.gov>

Subject: Re: REQUEST FOR EXISTING INFORMATION...FERC Project No. 14861

Mr. Steimle,

My Center (The USGS Washington Water Science Center) was asked to respond to your letter to the USGS Regional Director in Menlo Park, CA dated Nov. 19, 2018:

Re: REQUEST FOR EXISTING INFORMATION TO SUPPORT PRELIMINARY APPLICATION DOCUMENT FOR THE PROPOSED GOLDENDALE ENERGY STORAGE PROJECT (FERC Project No. 14861)

In that regard, we assembled our available information on the Water Resources of the Klickitat River near Goldendale (attached).

Best Regards

Rick Dinicola, Associate Director

U.S. Geological Survey, Washington Water Science Center

934 Broadway, Suite 300, Tacoma, WA 98402

Office 253 552 1603 | Mobile 253 355 6337 | <http://wa.water.usgs.gov>

WDFW Email January 14, 2019

NOTE: GOLDEN EAGLE SURVEY INFORMATION NOT INCLUDED

From: Erik Steimle
Sent: Monday, January 14, 2019 2:43 PM
To: 'Verhey, Patrick M (DFW)' <Patrick.Verhey@dfw.wa.gov>
Subject: RE: raptor survey information for Goldendale Energy Storage Project P-14861

Thank you Patrick,

This is helpful.

Erik

From: Verhey, Patrick M (DFW) <Patrick.Verhey@dfw.wa.gov>
Sent: Monday, January 14, 2019 2:41 PM
To: Erik Steimle <erik@ryedevelopment.com>
Subject: raptor survey information for Goldendale Energy Storage Project P-14861

Erik,

unfortunately we don't have updated information on the John Day GOEA territory (it was last surveyed in 2014, also see attached), but it's on the list for surveying in 2019. The attached information may be useful to you during the Project development phase.



Patrick Verhey
WDFW Habitat Program
Energy and Major Projects Division Biologist
1550 Alder St N.W.
Ephrata, WA 98823
Office (509) 754-4624 ex. 213
Cell (509) 431-8296
Patrick.Verhey@dfw.wa.gov
Work schedule is M-Th

**Rye
Development**

ORIGINAL

745 Atlantic Ave. 8th Floor, Boston, MA 02111

FILED
SECRETARY OF THE
COMMISSION

January 28, 2018

2019 FEB -4 P 3 15

Honorable Kimberly D. Bose
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

FEDERAL ENERGY
REGULATORY COMMISSION

**Re: NOTIFICATION OF INTENT AND PRE-APPLICATION DOCUMENT FOR THE
GOLDENDALE ENERGY STORAGE PROJECT, FERC NO. 14861**

Honorable Kimberly D. Bose,

This notice is provided to inform you that FFP Project 101, LLC (Applicant) intends to file for an original license for the proposed Goldendale Energy Storage Project FERC No. 14861 (Project).

The Notification of Intent (NOI) and the Pre-Application Document (PAD) filed with the Federal Energy Regulatory Commission (FERC) are available for download at the following web address:

<http://www.ryedevelopment.com/projectstor/goldendale-washington/>

The Applicant has petitioned the FERC to license the Project using the Traditional Licensing Process (TLP).

FERC issued a Preliminary Permit on March 8, 2018 for the purpose of allowing the Applicant to investigate the feasibility of the Project, conduct investigations, consult with appropriate state and federal resource agencies and secure the necessary data to determine the feasibility of the Project, and to prepare a license application. Since filing for the permit, the Applicant has maintained steady progress on the Project by conducting outreach to local stakeholders, entering into agreements for site access with the majority landowner and water rights holder, continuing dialog with Bonneville Power Administration regarding interconnection initiating discussions interested parties regarding the purchase of energy output, and evaluating the feasibility and economic potential for the Project.

The initial stage for seeking a license was the preparation of the PAD, which is included with this submittal to the FERC and is also being supplied to stakeholders. The applicant has continued to make a good faith effort to reach out to numerous state agencies and interested stakeholders to obtain existing resource information, as well as understand potential impacts associated with the project. Based on these efforts, as well as other facts and circumstances, the Applicant believes that the default Integrated Licensing Process (ILP) would not serve the stakeholders' best interests and that the TLP would instead be a more appropriate, cost-effective, and efficient method for proceeding.

Pursuant to Section 5.3(c)(1)(i) and (ii), the following considerations are being addressed:

(A) Likelihood of timely issuance;

The ILP is an intensive, front-loaded process that involves scoping under the National Environmental Policy Act (NEPA), study plan development, dispute resolution, study plan implementation, and application development. The ILP imposes a stringent timeline on the licensing process, thereby placing

Rye Development

745 Atlantic Ave. 8th Floor, Boston, MA 02111

significant demands on all parties involved—including already strained resource agencies—to meet rigid deadlines. Any one failure in this regard could set the project back months to years and even jeopardize the project completely; because of this, the Applicant believes the TLP would allow both the applicant and resource agencies to complete all requirements necessary for issuance of a license in a more timely manner.

(B) Complexity of the resource issues;

The Applicant believes that, while significant and obviously important, the resource issues of the Project are both simple and minimal compared to other projects of this scale. Concomitantly, the likelihood of significant dispute over studies is also minimal. Given the Applicant's willingness to adequately address these issues, the Applicant believes that the TLP would better facilitate moving the licensing process forward. It would allow the Applicant and agencies to focus immediately on the issue resolution without being burdened with additional pre-resolution requirements under the ILP.

(C) Level of anticipated controversy;

Based on communications with stakeholders and their responses, the applicant expects that licensing of the Project will elicit a low level of controversy. While the licensing participants will thoroughly study and examine issues identified in the PAD, the Applicant believes requirements can be met in a timely manner and meet the requirements of the FPA.

(D) Relative costs of the TLP compared to the ILP;

The Applicant believes that the TLP would be more economical for this project than the ILP. In bypassing labor-intensive scoping and study plan development, the licensing process would proceed at significantly reduced costs and alleviate undue burden on resource agencies.

(E) The amount of available information and potential for significant disputes over studies;

The Applicant plans to collaboratively work with the agencies and stakeholders to develop appropriate study scopes to analyze identified issues. The Applicant is committed to conducting necessary studies in order to effectively evaluate the issues and anticipates no significant disputes over studies.

(F) Other factors believed by the applicant to be pertinent:

- i. The Applicant has made a good faith effort to reach out to numerous state agencies and interested stakeholders to ascertain potential impacts associated with the project. Based on these efforts as well as other facts and circumstances, the Applicant believes that the default ILP would not serve the stakeholders best interests and that the TLP would instead be more appropriate, cost-effective and efficient method for proceeding.
- ii. The Applicant has reached out to many agencies and tribes and is continuing to work collaboratively with all interested parties in defining the Project features in a manner most compatible with the management plans and priorities for the area.
- iii. As required by FERC regulation, the Applicant is providing a copy of this request to all affected resource agencies, Indian tribes and other stakeholders likely to be interested in the proceeding, as set forth in Section 8 of the attached NOI.

Rye Development

745 Atlantic Ave. 8th Floor, Boston, MA 02111

The applicant respectfully submits that these considerations, as mentioned above, weigh in favor the FERC granting its request to utilize the TLP. For these reasons, the Applicant respectfully requests that the FERC authorize it to utilize the TLP in the licensing of this Project.

As provided in Section 5.3(d)(1) of the FERC's regulations, all comments on this request must be filed with the FERC within 30 days of the filing date (February 28, 2018) and must reference FERC Project No. 14861. Respondents may submit comments electronically (www.ferc.gov) or by sending an original and eight copies to the following address:

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St NE
Washington, DC 20426

Finally, as required under Section 5.3(d)(2) of the FERC's regulations, the applicant will publish the notice of this request in the appropriate newspaper and file a copy of this notice with the FERC upon publication.

Washington State has aggressive greenhouse gas reduction and clean energy goals. Oregon and California have recently passed 50 percent RPS legislation, each of which also includes targets for reducing greenhouse gas emissions that limit the types of resources that can be used to provide flexibility services. Additionally, California is considering a 100% RPS and the City of Los Angeles recently passed a 100% renewable energy resolution. Load growth and increasing RPSs will require approximately double the number of renewable energy projects that are currently on the Pacific Northwest system by the year 2035. With the California 50% RPS, it is expected that nearly 40GW of solar will be built, creating massive over-generation and negatively priced mid-day solar dump energy that can be exported and stored in the Pacific Northwest.

Integrating California in-state solar at this scale will require net load ramping flexible capacity during peak hours of use when solar falls off to ensure grid reliability and economic use of this oversupply. Intermittent renewables on the grid already have the potential to create gigawatts of overgeneration and are being curtailed due to the existing system's limited flexibility and storage. Without utility-scale storage to solve the operational challenges of integration, Washington, Oregon, and California cannot achieve carbon reduction and environmental policy goals reliably and cost-effectively. Based on economic modeling of the Project by Energy and Environmental Economics Inc. (E3), the Goldendale Energy Storage Project could save regional ratepayers hundreds of millions of dollars annually in cost savings and revenue.

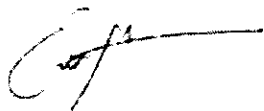
Of the viable, least-cost energy storage options available, pumped storage is the best proven, least-cost energy storage technology at scale. We are studying the idea of constructing two new sealed or "closed" reservoirs near the former Columbia Gorge Aluminum Smelter. The reservoirs would not be connected to the Columbia River and would not impact any existing aquatic environments. The project would store energy by letting water leased from Klickitat Public Utility District flow downhill through turbines during the day, producing electricity at peak times, and then being pumped back uphill at night, renewing the energy source during low use times. The project would be effectively "recharged" and the same water is reused to generate and store new energy. The process does not use consume water to recharge and has no carbon emissions, making it an environmentally responsible source of energy storage.

Rye Development

745 Atlantic Ave. 8th Floor, Boston, MA 02111

A dedicated off-river or "closed loop" pumped storage project such as the proposed Goldendale Energy Storage Project does not have the operational and environmental restrictions imposed on the conventional hydropower projects located on the Columbia River where there are often non-generation uses of the river system that are prioritized over the production of electricity. Therefore, the project can freely start, stop, reverse, and fluctuate as needed by the power system without impacting non-generation objectives such as aquatic species protection, flood control, navigation, irrigation, and recreation. In addition, the potential energy project being studied by Rye Development and National Grid would assist with the cleanup of a portion of the former Goldendale Aluminum Smelter site and create more than 3,000 jobs during construction of the facility and 100 local jobs during operation.

Sincerely,



Erik Steimle
Vice President
Portland, Oregon
erik@ryedevelopment.com

Document Content(s)

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February 26, 2019

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, DC 20426

Re: Goldendale Energy Storage Project (FERC No. 14861)- **SECOND SIXTH MONTH
PROGRESS REPORT**

Dear Secretary Bose,

On March 8, 2018, the Goldendale Energy Storage Project in Klicitat County, Washington (the "Project") was issued a preliminary permit by the Federal Energy Regulatory Commission (the "Commission"):

Project Number	Project Name	Permittee
P-14861	Goldendale Energy Storage Project	FFP Project 101, LLC

As a condition of permit issuance, the Commission requires the permittee file progress reports every six months. Rye Development, LLC, on behalf of the permittee (collectively, "Rye Development" or "Rye"), is submitting the following Six-Month Progress Report.

Project Activities

- On January 25, 2019 Rye Development filed a notice of intent (NOI), preliminary application document (PAD), and a request to use FERC's traditional licensing process (TLP) for the Goldendale Energy Storage Project

Engineering and Cost Analysis

- Over the last six months Rye has continued to refine the preliminary design of the proposed facility and updated project costs to support the filing of a PAD. Over the next six months, the permittee intends to further refine the design of the project features.

Consultation

- Rye Development is continuing to consult with stakeholders including resource agencies, the Yakama Tribe, residents, and others about the PAD and project activities moving forward.

Please do not hesitate to contact me if you require any additional information about this proposed Project.

Sincerely,



Erik Steimle



Columbia Riverkeeper
407 Portway Ave, Suite 301
Hood River, OR 97031

phone 541.387.3030
www.columbiariverkeeper.org

February 28, 2019

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

RE: Rye Development's request to use the Traditional Licensing Process for the Goldendale Energy Storage Project, FERC No. P-14861

Dear Ms. Bose,

Columbia 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. We have been actively engaged in Rye Development's proposed Goldendale Energy Storage Project (Project) since 2017.

We ask that FERC reject the request by Rye Development to use the Traditional Licensing Process (TLP) for its proposed Project and require Rye Development to follow the preferred Integrated Licensing Process (ILP). FERC regulations state that the ILP is to be used as the default process unless good cause is shown for use of the TLP using the following criteria:

- A. Likelihood of timely license issuance;
- B. Complexity of the resource issues;
- C. Level of anticipated controversy;
- D. Relative cost of the traditional process compared to the integrated process;
- E. The amount of available information and potential for significant disputes over studies; and
- F. Other factors believed by the applicant to be pertinent. 18 CFR §5.3(c)-(d).

We do not believe that Rye Development has clearly demonstrated good cause.

The likelihood of timely license issuance remains minimal based on the level of controversy that exists around this Project. In its Notification of Intent and Pre-Application Document (NOI/PAD) for the Project, Rye Development failed to provide any tangible reassurance of the likelihood of timely license issuance. Instead, Rye Development noted only that the ILP is an "intensive front-loaded process," meaning that a failure to meet any step could set the project back. The nature of the ILP does not constitute good cause for not using it for this Project. Rye Development failed to provide any other evidence of the likelihood of timely license issuance. The history of opposition to pump storage at this particular location--taken together with comments and motions to intervene in this iteration of the Project from various organizations and governmental entities, including tribes--indicates the strong level of

controversy that exists around this Project. The high level of controversy indicates the unreasonable likelihood of timely license issuance.

The Project's resource issues are complex, and an expedited licensing process will not facilitate their resolution. The Confederated Tribes and Bands of the Yakama Nation (Yakama) and the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) intervened and commented, respectively, in this matter citing the Project's potential detrimental effects to significant cultural resources. Rye Development's NOI/PAD indicates that it contracted with Yakama's cultural resources management group to perform cultural resource studies in the Project area. The need for cultural resource studies indicates the complexity of the resources at issue. Expediting the licensing project will not allow these studies the proper time to be fully conducted and the harm alleviated and avoided. Further, Rye Development has not indicated that it has met with or is working with CTUIR. One tribe's participation does not negate the need to engage with the other, as cultural resources may and most likely differ. Rye Development has not demonstrated good cause supporting its contention that "the resource issues of the Project are both simple and minimal."

Rye Development's bold assertion that "licensing of the Project will elicit a low level of controversy" is wrong and either uninformed or disingenuous. The Project's proposed location has already been identified as potentially affecting and disturbing both cultural and environmental resources and as such should be subject to the integrated requirements of the ILP, including scoping under the National Environmental Policy Act (NEPA). Rye Development has offered nothing, except its assertions, to suggest that there is good cause to not conduct the ILP. The NOI/PAD lists Yakama Nation (spelled incorrectly) as the only affected tribe and fails to include CTUIR, despite CTUIR's concern for cultural resources in the area. Furthermore, several agencies and organizations have already expressed concerns via comments and/or motions to intervene over this Project.

Rye Development has also failed to indicate why it anticipates "no significant disputes over studies." For example, in letters and comments, the Washington Department of Fish and Wildlife (WDFW) flagged the Project's potential to disturb golden and bald eagles, protected under Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act, through the loss of foraging habitat and construction disturbances. Golden eagles nest in the vicinity of the proposed Project, and bald eagles also frequent the area. While Rye Development offered information on how they plan to mitigate effects to these protected species, it is not clear that WDFW will agree with Rye Development's mitigation strategy and studies. The NOI/PAD also uses several studies conducted on other, similar projects to bolster Rye Development's preferred eagle mitigation strategy, yet fails to use studies on this area specifically. The limited studies conducted, and the use of other projects' studies, are inadequate to support any serious analysis of the Project and its proposed mitigation. Rye Development's assertions that the Project is an "environmentally responsible source of energy storage" do not negate the need for detailed studies of the impacts of this Project.

Rye Development's letter requesting permission for the TLP is grossly misleading. The ILP process was created so that controversial issues could be dealt with and addressed at the beginning of the project, prior to submittal of the Final License Application. Rye Development's simple prognosis of the impacts of this Project overlooks real and unanswered concerns. This is not the first time a pump storage project has been proposed for development at this site, and the potential environmental upsides from pump storage

generally should not outweigh the need for adequate analysis through the ILP and proper consideration of whether this particular site is suitable for a pump storage project.

Given the continuing high level of controversy, the complexity of the resource issues, and significant disputes over studies, FERC should deny the TLP request.

Thank you for the opportunity to comment,

Sincerely,

Simone Anter, Staff Attorney
Columbia Riverkeeper
407 Portway Ave. Suit 301,
Hood River, OR 97031
simone@columbiariverkeeper



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

February 21, 2019

Kimberly Bose
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Notification of Intent and Pre-Application Document for the Goldendale Energy Storage Project,
FERC No. 14861

Ms. Bose,

The Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) have reviewed a letter and Pre-Application Document sent to the Federal Energy Regulatory Commission from Rye Development under FERC No. 14861. The proposed project Area of Potential Effect (APE) is within the Ceded Area of the Yakama Nation pursuant to the Treaty of 1855 (12 stat., 951) and is the Supreme Law of the Land pursuant to Article 6 of the U.S. Constitution (i.e. Supremacy Clause). The FERC has a Federal Trust Responsibility to preserve and protect resources significant to the Yakama Nation. Only the Yakama Nation can determine what is significant to the Tribe. Based on review of the letter and pre-application, the Yakama Nation has several concerns with this project.

The Yakama Nation Cultural Resources Program filed a letter of opposition to this project on February 14, 2018. This letter of opposition was regarding the detrimental impact this project will have on a previously recorded Traditional Cultural Property (TCP). Based on review of the pre-application packet, there is mention of a cultural resources survey conducted by the Yakama Nation within the APE in 2013, however neither the results of this investigation nor the Traditional Cultural Property recorded were mentioned in the packet. Rye Development visited the Yakama Nation Tribal Council on September 4, 2018. Concerns were raised regarding the letter of opposition from the Yakama Nation Cultural Resources Program, however no resolution was provided aside from stating the desire to contract with the Program. Hiring a Yakama Nation program to provide technical expertise is not a resolution to the concerns brought forth by the Tribe to date. While it will provide the Program's expertise to further elaborate on the significance of the TCP, it has not resolved the issue that there will be detrimental impacts to this resource.

After reading the letter, it appears that Rye Development finds that pursuant to Section 5.3(c)(1)(i) and (ii) under item (B) it reads:

The Applicant believes that, while significant and obviously important, the resource issues of the Project are both simple and minimal compared to other projects of this scale. Concomitantly, the likelihood of significant dispute over studies is also minimal.



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

The Yakama Nation strongly disagrees with that statement. The resource issues involving this project are not minimal and are not simple, they are all encompassing and unavoidable. Furthermore, the likelihood of a significant dispute over studies is expected due to the significance of the sacred site and associated resources.

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 the document. Had the Yakama Nation been afforded the opportunity to review and comment on these documents, further information could have been brought forth to inform the application process. The Yakama Nation has informed the applicant and previous applicants under Docket P-1333, that this project is within a TCP that was recorded in 2013. Therefore, the Yakama Nations questions the accuracy of the letter and corresponding application document.

The method of how this application process continues to progress is going in a direction where the Yakama Nation will inevitably be required to mitigate a sacred site. At no time has FERC provided a stop-gap measure that would allow for consideration of its Federal Trust Responsibility to protect this TCP. Rye Development's execution of the National Environmental Policy Act and 18 CFR Subchapter B, Part B has not been a process in concert with our Nation's concerns and documented facts, but rather has been moving forward despite them.

For these reasons, the Yakama Nation is formally opposed to this project as it will damage a sacred TCP and will cause significant impacts to the Yakama way of life.

Sincerely,

JoDe Goudy

Yakama Nation Tribal Chairman

Cc: YN Cultural Committee

Jerry Meninick, YN Culture Division Deputy Director

Rob Whitlam, State Archaeologist, DAHP

Dennis Griffin, State Archaeologist, Oregon SHPO



February 28, 2019

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

RE: Rye Development's request to use the Traditional Licensing Process for the Goldendale Energy Storage Project, FERC No. P-14861

Dear Ms. Bose:

American Rivers is a 501(c)(3) non-profit organization whose mission is to protect wild rivers, restored damaged rivers and conserve water for people and nature. Headquartered in Washington, DC, American Rivers has offices across the country and more than 275,000 members, supporters, and volunteers, including many of whom live in the Columbia River Basin states of Washington, Oregon, Idaho and Montana. We have been working in the Pacific Northwest for over 25 years and we have a strong interest in protecting and restoring the Columbia River and its tributaries for the benefit of healthy fish and wildlife populations and human communities.

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

Center for Environmental Law and Policy (CELP) is a non-profit organization dedicated to protecting the public's interest in the rivers and aquifers of Washington State. CELP has extensive experience with Washington's water rights, water supply, and instream flow protection processes, and has participated in much of the key litigation relating to streamflow protection. We have members throughout the Columbia River watershed, and have a long-standing interest in protection of the Columbia's streamflows in particular. CELP's interest in this project stems from its potential to increase consumptive water use from the Columbia, as well as our longstanding work to protect Columbia River instream flows and the salmon and other wildlife that depend on them.

Our organizations have been engaged in Rye Development's proposed Goldendale Energy Storage Project (Project) since 2018.

We ask that the Federal Energy Regulatory Commission (Commission) reject the request by Rye Development to use the Traditional Licensing Process (TLP) for its proposed Project and require Rye Development to follow the preferred Integrated Licensing Process (ILP). As stated on the Commission website, the “Integrated Licensing Process is intended to streamline the Commission’s licensing process by providing a predictable, efficient, and timely licensing process that continues to ensure adequate resource protections.”¹ This process provides an improved mechanism and framework for early identification of issues and resolution of study needs and avoids the costly and cumbersome process of post-filing studies, integrates Commission review with other stakeholder permitting needs, and establishes clear time frames providing a level of certainty for project management that benefits all stakeholders.

The Project’s natural and cultural resource issues are complex, and an expedited licensing process will not facilitate their resolution. In its Notification of Intent and Pre-Application Document (NOI/PAD) for the Project, Rye Development claims that “licensing of the Project will elicit a low level of controversy.” However, the proposed location for the Project has already been identified as potentially affecting and disturbing both cultural and environmental resources and has already elicited a high level of controversy. We believe that the ILP is much better suited to situations such as the current one where significant resource issues need to be addressed and the process ultimately leads to overall cost and time efficiencies that reduce the expense of licensing for all stakeholders.

As such, the Project should be subject to the integrated requirements of the ILP, and we respectfully request that FERC deny Rye Development’s TLP request.

Sincerely,

Wendy D. McDermott
Director, Rivers of Puget Sound and the Columbia Basin
American Rivers
P.O. Box 1234
Bellingham, WA 98225
wmcdermott@americanrivers.org

Trish Rolfe
Executive Director
Center For Environmental Law and Policy
85 S. Washington Street, Suite 301
Seattle, WA 98104
trolfe@celp.org

Patricia L. Arnold
President
Friends of the White Salmon River
P.O. Box 802
White Salmon, WA 98672
pat.arnold@friendsofthewhitesalmon.org

¹ <<https://www.ferc.gov/industries/hydropower/gen-info/licensing/ilp.asp>>

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON D.C. 20426
(March 1, 2019)

OFFICE OF ENERGY PROJECTS

Project No. P-14861-001 – WA/OR
Goldendale Energy Storage
Hydroelectric Project
FFP Project 101, LLC

**Reference: Consultation with Tribes for the Goldendale Energy Storage
Hydroelectric Project No. 14861-000**

To the Tribal Leaders Addressed:

The Federal Energy Regulatory Commission (Commission) invites your participation in the licensing process for the proposed Goldendale Energy Storage Hydroelectric Project No. 14861 (Goldendale Project). The Commission's licensing process is an opportunity for both the applicant and interested agencies, tribes, and other stakeholders to consider the project's proposed operation, and the need for protection, mitigation, and enhancement measures that may be implemented over the term of any license issued for the project. The 1,200-megawatt (MW) Goldendale Project would be located off-stream of the Columbia River in Klickitat County, Washington and Sherman County, Oregon. FFP Project 101, LLC (FFP) has requested to use the Commission's Traditional Licensing Process to license the project. A Notice of Intent and Pre-Application Document were filed with the Commission on January 28, 2019.

The project facilities would include: (1) a 50-acre upper reservoir formed by a 170-foot high, 8,000 foot-long rockfill embankment dam at an elevation of 2,940 feet mean sea level (MSL); (2) a 62-acre lower reservoir formed by a 170-foot high, 7,400-foot long embankment at an elevation of 580 feet MSL; (3) an underground conveyance tunnel (4) an underground powerhouse located between the upper and lower reservoir; (5) 230-kilovolt transmission line(s); and (6) appurtenant facilities.

The water used to initially fill the lower reservoir as well as make-up water would be purchased from Klickitat Public Utility District and would come from an existing intake pond on the Columbia River. The initial volume of water necessary to fill the lower reservoir is estimated to be 9,000 acre-feet and would be filled over about 6.5 months. It is estimated that the project would need 270 acre-feet of water each year to replenish water lost through evaporation. The estimated annual generation for 8 hours a day, 7 days a week is 3,400 gigawatt-hours per year.

It is very important that a tribe whose interests could be affected by the proposed

Goldendale Project participate early in the process so that tribal issues are addressed. For this reason, please inform us if you have an interest in participating in the licensing process for the project.

In addition, please indicate if you would like to meet with Commission staff to discuss the Commission's licensing process, how your Tribe can participate to the fullest extent possible, your interests and concerns in the affected area, and how to establish procedures to ensure appropriate communication between Commission and tribal staffs. The meeting can be limited to Commission and your Tribal staff, or can be open to other tribes or FFP.

If at all possible, we would appreciate your response by (April 1, 2019). Our regulations require that we hold a meeting with your tribe no later than thirty days from the filing of FFP's Notice of Intent if a meeting is desired;¹ however, we are waiving that timeframe to ensure that, if your tribe desires a meeting, we will be able to conduct it at a mutually agreeable time.

The Commission strongly encourages electronic filing. Please file your response using the Commission's eFiling system at <http://www.ferc.gov/docs-filing/efiling.asp>. Commenters can submit brief comments up to 6,000 characters, without prior registration, using the eComment system at <http://www.ferc.gov/docs-filing/ecomment.asp>. You must include your name and contact information at the end of your comments. For assistance, please contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY). In lieu of electronic filing, please send a paper copy to: Secretary, Federal Energy Regulatory Commission, 888 First Street NE, Washington, D.C. 20426. The first page of any filing should include docket number P-14861-001.

¹ 18 C.F.R. § 5.7.

If you have any questions or comments, please contact Suzanne Novak at (202) 502-6665 or Suzanne.novak@ferc.gov. Suzanne Novak will contact you shortly to follow-up on this letter.

Sincerely,

David Turner, Chief
Northwest Branch
Division of Hydropower Licensing

Addressees:

William Sigo IV, Chairman
Confederated Tribes of the
Umatilla Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801-0638

Austin Greene, Jr., Chairman
Confederated Tribes of the
Warm Springs
1233 Veterans Street
Warm Springs, Oregon 97761

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

cc:

Erik Steimle
Vice President, Development
Rye Development
220 NW 8th Ave.,
Portland, Oregon 97209

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, DC 20426

February 28, 2019

Re: Washington Department of Fish and Wildlife Comments (WDFW) comments on the Preliminary Application Document (PAD) for the Goldendale Energy Storage Project (FERC No. 14861)

Dear Secretary Bose:

Included with this cover letter are comments we received from the Washington Department of Fish and Wildlife (WDFW) in response to Preliminary Application Document (PAD) for the Goldendale Energy Storage Project (FERC NO. 14861).

Please contact me with any questions you may have.

Sincerely,



Erik Steimle
Vice President
erik@ryedevelopment.com

From: Verhey, Patrick M (DFW) <Patrick.Verhey@dfw.wa.gov>
Sent: Tuesday, February 26, 2019 9:17 AM
To: Erik Steimle <erik@ryedevelopment.com>
Subject: Goldendale Energy Storage PAD P-14861

Erik,

I noticed there are no mention of addressing permanent habitat impacts of the Goldendale Energy Storage Project within the PAD. As a starting point for the discussion I recommend we take a look at the 2009 Wind Power Guidelines as a reference to develop mitigation ratios (see section 5.2) for property acquisition or the development of a mitigation by fee to address permanent and temporary impacts of the Project on existing habitat. Table 4.5-6 in the Goldendale Energy Storage PAD indicates approximately 81+- acres of permanently impacted habitat on the Washington State side of the Columbia River will occur if the Project is constructed. The WDFW recommends no loss of habitat function or value, or populations. Mitigation should provide equal or better biological function and values. We appreciate the prevention, mitigation, and enhancement measure proposed in the PAD; however, there is a need for mitigating permanent impacts of the Project on habitat.

Consistent with the October 28, 2014 WDFW letter in which the WDFW provided comments on the John Day Pumped Storage Hydroelectric Project (FERC No. 13333). The WDFW continues to have concerns in regards to loss of prime foraging habitat for the eagles. The Goldendale Energy Storage Project is the third major project or activity developed in the area. Cumulative impacts of the Windy Point II Wind Energy Project, Tuolumne Wind Project, and the proposed Project may result in mortality , nest abandonment, and loss of eagle habitat. Since the wind power projects were developed at least three adult eagles have died or disappeared from the territory.

Also, my contact information in Appendix A of the PAD should be updated to 1550 Alder St. N.W. Ephrata, WA 98823. Thank you for providing me with this opportunity to comment on the Goldendale Energy Storage PAD, FERC Project P-14861.



Patrick Verhey

WDFW Habitat Program

Energy and Major Projects Division Biologist

1550 Alder St N.W.

Ephrata, WA 98823

Office (509) 754-4624 ex. 213

Cell (509) 431-8296

Patrick.Verhey@dfw.wa.gov

Work schedule is M-Th

From: Erik Steimle <erik@ryedevelopment.com>
Sent: Thursday, February 28, 2019 11:19 AM
To: Verhey, Patrick M (DFW) <Patrick.Verhey@dfw.wa.gov>
Subject: RE: Goldendale Energy Storage PAD P-14861

Patrick,

Thank you for providing comments on the PAD for the Goldendale Energy Storage Project. I have reviewed the attached mitigation guidance and suggest that we meet after our environmental consultants have completed spring/early summer vegetation/habitat surveys in the project area. This will allow us to more accurately describe habitat that would be temporarily or permanently impacted by the project.

Sincerely,

**Rye
Development**

Erik Steimle

Vice President

220 NW 8th Ave

Portland, OR 97209

(503) 998-0230

erik@ryedevelopment.com

www.ryedevelopment.com

From: Verhey, Patrick M (DFW) <Patrick.Verhey@dfw.wa.gov>
Sent: Thursday, February 28, 2019 11:31 AM
To: Erik Steimle <erik@ryedevelopment.com>
Subject: RE: Goldendale Energy Storage PAD P-14861

Erik,

I look forward to meeting with you to discuss mitigation for permanent and temporary impact of the Goldendale Energy Storage Project once the environmental consultants have completed spring/early summer vegetation/habitat surveys in the project area.



Patrick Verhey

WDFW Habitat Program

Energy and Major Projects Division Biologist

1550 Alder St N.W.

Ephrata, WA 98823

Office (509) 754-4624 ex. 213

Cell (509) 431-8296

Patrick.Verhey@dfw.wa.gov

Work schedule is M-Th



File Code: 1900; 2170
Date: February 28, 2019

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

Re: USDA FOREST SERVICE RESPONSE TO “Notification of Intent and Pre-application Document for the Goldendale Energy Storage Project, FERC No. 14861.”

Dear Secretary Bose,

Thank you for the opportunity to respond to Rye Development’s “Notification of Intent and Pre-application Document for the Goldendale Energy Storage Project, FERC No. 14861” filed on January 28, 2019, with the Federal Energy Regulatory Commission (Commission).

The eastern boundary of the Congressionally-designated Columbia River Gorge National Scenic Area is located approximately 9.5 miles west (downriver) of the proposed project site. The USDA Forest Service, in coordination with the Columbia River Gorge Commission, manages the National Scenic Area to provide for the protection and enhancement of scenic, natural, cultural and recreational resources, and to protect and support the economy of the Columbia River Gorge area.

The USDA Forest Service supports development of sustainable alternative energy sources where mitigation commensurate with Project impacts is provided. While the proposed Goldendale Energy Storage Project is located outside of the National Scenic Area boundary, the USDA Forest Service has an interest in assuring that the resources and communities of the Gorge area, including tribal communities, are represented during the planning and development phases of projects that have the potential to effect natural resources and the local economy.

Based on the complexity of the resource issues and the potential economic effects of the project, the USDA Forest Service’s interest in collaborative processes, and the positive experiences the USDA Forest Service has had with the ILP process, the USDA Forest Service believes that Rye Development would benefit from following the Integrated Licensing Process (ILP), rather than the Traditional Licensing Process (TLP), as requested by Rye Development.

In our experience, the ILP provides for frequent and early stakeholder involvement and enhanced interaction between project applicants, the Commission, and stakeholders. In contrast, the TLP relies almost exclusively on written communications. Our experience with other projects of similar complexity has been that early and open discussions with partners, agencies, and other stakeholders with regard to project design has invariably led to more successful and more



environmentally appropriate projects. It is our desire that this Project have the same opportunity to benefit from the collaborative interaction afforded by the ILP approach.

According to 18 CFR 5.3(d)(2)(v)(A), USDA Forest Service comments on PGP's request to follow the TLP process must address the following issues:

- (A) likelihood of timely license issuance;
- (B) complexity of the resource issues;
- (C) level of anticipated controversy;
- (D) relative cost of the traditional process compared to the integrated process;
- (E) the amount of available information and potential for significant disputes over studies; and
- (F) other factors believed by the commenter to be pertinent

In response, the USDA Forest Service offers the following response to those issues:

(A) Likelihood of timely license issuance: The coordination required by the ILP promotes stakeholder participation that encourages early identification and resolution of issues, builds relationships necessary to resolve concerns, develops study information more upfront in the process and creates efficiencies in the process which leads to a greater likelihood of a timely license issuance.

Specially, the USDA Forest Service believes that early involvement of all interested stakeholders in the ILP will result in a more coordinated and timely completion of licensing documents such as Section 106 consultation and biological opinions from National Marine Fisheries Service and US Fish and Wildlife Service that could otherwise delay license issuance.

(B) Complexity of the resource issues: The USDA Forest Service believes that the environmental issues associated with the Project may be more complex than Rye Development has indicated. Presence of federally listed endangered species and habitat for these species alone significantly increase the complexity of the resource issues and ensure that consultation regarding potential Project impacts to anadromous fish habitat will be required with the respective federal agencies.

(C) Level of anticipated controversy: It is our belief that the level of anticipated controversy may be higher than Rye Development has indicated. Stakeholders in the Pacific Northwest are generally very experienced in the licensing of hydroelectric and other energy projects, and have significant resources to participate in these processes. Given that this Project is proposed to be built immediately adjacent to the Columbia River, which is already heavily impacted by energy infrastructure and other land uses, a certain amount of controversy is to be expected in this proceeding.

This expected controversy can be effectively managed through open, extensive and ongoing communication with all stakeholders, which is built into the ILP process. The ILP process typically creates long lasting relationships between the stakeholders that promote local solutions

and positive outcomes in these types of projects. The ILP better promotes the kind of communication that causes these projects to be successful than the TLP.

(D) Relative cost of the traditional process compared to the integrated process: According to the Commission's final ILP rule making (July 23, 2003), annualized cost is less for the ILP process (\$350,000) for a typical application than the TLP (\$550,000), page 136. Furthermore, while the ILP requires more meetings, this upfront coordination will in fact be more efficient in providing for timely and effective communication, early identification of issues which leads to less process delays and efficient use of limited resources by all involved stakeholders.

(E) The amount of available information and potential for significant disputes over studies: Any significant disputes over studies can be minimized or avoided altogether through the ILP process which provides for early engagement and ongoing conversations with the stakeholders about necessary studies. Multiple federal, state, and tribal agencies in the area have natural and cultural resource information that would be extremely useful to inform the project.

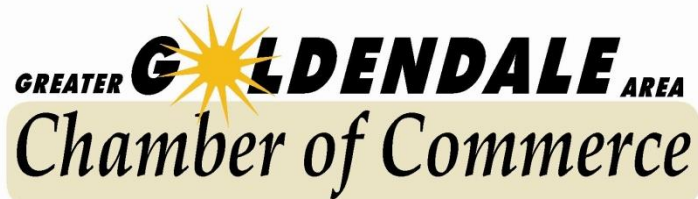
(F) Other factors believed by the commenter to be pertinent: The USDA Forest Service supports the ILP process because of the early and frequent stakeholder involvement in the identification of interests, the day-lighting of issues surrounding those interests, and the development of studies to address, and facilitate resolution of those issues.

Thank you for the opportunity to provide these comments. Please contact Robin Shoal, Planning and Natural Resources Staff Officer, at 541-308-1716, if you have any questions or need any additional information.

Sincerely,



LYNN BURDITT
Area Manager



903 East Broadway, Goldendale, WA 98620 • (509) 773-3400 •
www.goldendalechamber.org

March 4, 2019

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE
Washington, DC 20426

Dear Ms. Bose,

On behalf of the Goldendale Chamber of Commerce, I am writing to express my support for Rye Development and National Grid's efforts to obtain a FERC License using the Traditional Licensing Process for the proposed Goldendale Energy Storage Project located in Klickitat County, WA.

Our Chamber covers approximately 80% of Klickitat County, including the City of Goldendale and the proposed Goldendale Energy Storage Project site. The Chamber, on behalf of its membership, has a long history of supporting energy projects in the area, including Klickitat County's energy overlay zone and related comprehensive plan sections which actively promote clean energy project development and related facilities.

As the third-largest wind producing area in the US, the Goldendale Chamber membership is familiar with and supportive of large-scale energy project construction and operation. Integration of the area's existing and proposed renewable energy generation is a key limiting factor to expansion of clean energy resources in achieving carbon reduction goals and enhancing electric system reliability, issues the proposed project resolves.

The Goldendale Chamber's support for the Traditional Licensing Process is also based on the closed-loop, off-channel, limited nature of the Goldendale Energy Storage Project, which is on private land that has seen an aluminum smelter, grazing, and wind project development.

Taken together, these characteristics support the utilization of the Traditional Licensing Process in pursuing the necessary license for the project as the most appropriate, cost effective, and efficient means of licensing the Goldendale Energy Storage Project.

Thank you for your consideration of the Goldendale Chamber of Commerce position on this matter.

Sincerely,

Dana Peck

Dana Peck
Executive Director

Board of County Commissioners, Goldendale, WA.
March 5, 2019

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE
Washington, DC 20426

RE: Comments on the Notification of Intent and Pre-Application Document
for the Goldendale Energy Storage Project, FERC No 14861

Dear Secretary Bose,

Thank you for the opportunity to comment on the Notification of Intent and Pre-Application Document for the Goldendale Energy Storage Project, FERC No. 14861. The Goldendale Energy Project (Project) is located in Klickitat County. Klickitat County filed a timely motion to intervene in March 2018.

We, the Board of County Commissioners of Klickitat County, write in support of FERC granting the Project applicant's request to use the Traditional Licensing Process. We appreciate the applicant's desire for an expeditious licensing process and share the applicant's sense of urgency, in part, because we fully expect Senate Bill 5116 (companion House Bill 1211) will be passed by Washington State Legislature and signed by Governor Inslee this session. The bill, which has already passed in the Senate, requires all electric utilities to eliminate use of coal-fired resources by December 2025 and make all retail sales of electricity greenhouse neutral by January 2030, and requires all utilities to meet 100% of their retail electric load using non-emitting and renewable resources by January 2045. Utility-scale storage will be needed to meet these aggressive standards without sacrificing reliability. We submit that it is important for the Project to be on an expeditious path towards licensing so that utilities can plan their resource needs.

We are familiar with the Project. The lower portion of the Project site is zoned Industrial Park and has over a 30-year history of heavy industrial use. The Project's upper reservoir is located among several operating wind energy projects and in an area used for livestock grazing. The Project is within Klickitat County's Energy Overlay Zone, an area that has been subject to extensive environmental review under Washington State's State Environmental Policy Act (SEPA) in association with promulgation of Klickitat County's Energy Overlay Zone Ordinance and in association with the permitting processes for several wind energy projects in the immediate vicinity of the Project. The Environmental Impact Statement (EIS) that was prepared for the Energy Overlay Zone Ordinance and the EIS's and other environmental studies prepared for individual wind energy projects comprise a significant body of available information regarding the resources and potential mitigation options.

Much of this information was incorporated into the applicant's Pre-Application Document.

Thank you for considering our letter of support.

Sincerely,

BOARD OF COUNTY COMMISSIONERS
Klickitat County, Washington

Document Content(s)

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USGS Comments to PAD Filing

From: Rolland, Jill <jrolland@usgs.gov>
Sent: Friday, March 8, 2019 8:38 AM
To: Erik Steimle <erik@ryedevelopment.com>
Cc: Curtis Hoelsing <choelsing@usgs.gov>
Subject: Re:Goldendale energy storage project

Dear Erik,

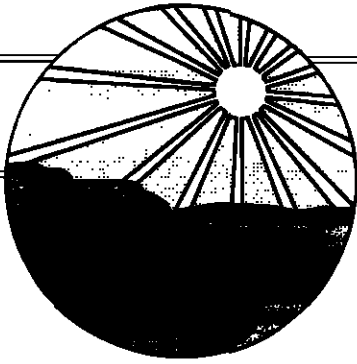
Please be advised that the U.S. Geological Survey does not need to be included as a stakeholder in regards to the Broadwater hydroelectric project FERC relicensing process.

Thank you for your attention to this matter.

Best Regards,

Jill

Jill Rolland, Sc.D.
Deputy Regional Director (Acting)
Center Director, Western Fisheries Research Center
USGS Northwest Regional Office
909 First Avenue, Suite 800
Seattle, WA 98104
206.526.6291 (WFRC office)
206.225.6643 (mobile)



CITY OF GOLDENDALE

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

March 8, 2019

ORIGINAL

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

FILED
SECRETARY OF THE
COMMISSION
2019 MAR 22 A 9 18
REGULATION COMMISSION

Dear Ms. Bose, *D-14861-001*

On behalf of the City of Goldendale, WA, I am writing to express this city's support of the Rye Development and National Grid's efforts to obtain a FERC License for the proposed Goldendale Energy Storage Project located in Klickitat County, WA. We further support the utilization of the Traditional Licensing Process in pursuing the necessary license for the project as the most appropriate cost effective and efficient means of licensing the Goldendale Energy Storage Project. The proposed project is for a closed loop, off-channel, pumped storage project on private land that has seen an aluminum smelter, cattle grazing and wind project development. The site has limited geographic scope.

Our community recognizes the substantial economic benefit of having this project near our city, County Seat of Klickitat County. Construction of the Goldendale Energy Storage Project will enable the Pacific Northwest to integrate more renewable energy thus advancing Klickitat County's renewable energy development goals. Klickitat County has long supported large scale energy projects through its energy overlay zone. As a result of this innovative and supportive approach to clean energy, Klickitat County is the third largest wind producing area in the United States. Integration of the area's existing and proposed renewable clean energy generation is a key limiting factor to expansion of clean energy resources.

We appreciate your consideration of our expression of support for the Rye Development and National Grid's application for a FERC License using the Traditional Licensing Process.

Sincerely,

Michael Canon, Mayor

City of Goldendale

Document Content(s)

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

FFP Project 101, LLC

Project No. 14861-001

NOTICE OF INTENT TO FILE LICENSE APPLICATION, FILING OF PRE-APPLICATION DOCUMENT, AND APPROVING USE OF THE TRADITIONAL LICENSING PROCESS

(March 21, 2019)

- a. Type of Filing: Notice of Intent to File License Application and Request to Use the Traditional Licensing Process.
- b. Project No.: 14861-001
- c. Date Filed: January 28, 2019
- d. Submitted By: Rye Development on behalf of FFP Project 101, LLC
- e. Name of Project: Goldendale Pumped Storage Project
- f. Location: Off-stream (north side) of the Columbia River at River Mile 215.6 in Klickitat County, Washington and Sherman County, Oregon, approximately 8 miles southeast of the City of Goldendale. The project would occupy 16.1 acres of lands administered by the Bonneville Power Administration.
- g. Filed Pursuant to: 18 CFR 5.3 of the Commission's regulations
- h. Potential Applicant Contact: Erik Steimle, Rye Development, 220 NW 8th Avenue Portland, Oregon 97209; (503) 998-0230; e-mail – erik@ryedevelopment.com.
- i. FERC Contact: Michael Tust at (202) 502-6522; or e-mail at michael.tust@ferc.gov.
- j. FFP Project 101, LLC (FFP) filed its request to use the Traditional Licensing Process on January 28, 2019. FFP provided public notice of its request on January 30, 2019 and January 31, 2019. In a letter dated March 21, 2019, the Director of the Division of Hydropower Licensing approved FFP's request to use the Traditional Licensing Process.

- k. With this notice, we are initiating informal consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries under section 7 of the Endangered Species Act and the joint agency regulations thereunder at 50 CFR Part 402; and NOAA Fisheries under section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act and implementing regulations at 50 CFR 600.920. We are also initiating consultation with the Washington State Historic Preservation Officer and the Oregon State Historic Preservation Officer, as required by section 106, National Historic Preservation Act, and the implementing regulations of the Advisory Council on Historic Preservation at 36 CFR 800.2.
- l. With this notice, we are designating FFP as the Commission's non-federal representative for carrying out informal consultation pursuant to section 7 of the Endangered Species Act and section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act; and consultation pursuant to section 106 of the National Historic Preservation Act.
- m. FFP filed a Pre-Application Document (PAD; including a proposed process plan and schedule) with the Commission, pursuant to 18 CFR 5.6 of the Commission's regulations.
- n. A copy of the PAD is available for review at the Commission in the Public Reference Room or may be viewed on the Commission's website (<http://www.ferc.gov>), using the "eLibrary" link. Enter the docket number, excluding the last three digits in the docket number field to access the document. For assistance, contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY). A copy is also available for inspection and reproduction at the address in paragraph h.
- o. Register online at <http://www.ferc.gov/docs-filing/esubscription.asp> to be notified via e-mail of new filing and issuances related to this or other pending projects. For assistance, contact FERC Online Support.

Kimberly D. Bose,
Secretary.

Document Content(s)

P-14861-001 Notice.DOCX.....1-2

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

FFP Project 101, LLC

Project No. 14861-001

NOTICE OF INTENT TO FILE LICENSE APPLICATION, FILING OF PRE-APPLICATION DOCUMENT, AND APPROVING USE OF THE TRADITIONAL LICENSING PROCESS

(March 21, 2019)

- a. Type of Filing: Notice of Intent to File License Application and Request to Use the Traditional Licensing Process.
- b. Project No.: 14861-001
- c. Date Filed: January 28, 2019
- d. Submitted By: Rye Development on behalf of FFP Project 101, LLC
- e. Name of Project: Goldendale Pumped Storage Project
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- g. Filed Pursuant to: 18 CFR 5.3 of the Commission's regulations
- h. Potential Applicant Contact: Erik Steimle, Rye Development, 220 NW 8th Avenue Portland, Oregon 97209; (503) 998-0230; e-mail – erik@ryedevelopment.com.
- i. FERC Contact: Michael Tust at (202) 502-6522; or e-mail at michael.tust@ferc.gov.
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- k. With this notice, we are initiating informal consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries under section 7 of the Endangered Species Act and the joint agency regulations thereunder at 50 CFR Part 402; and NOAA Fisheries under section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act and implementing regulations at 50 CFR 600.920. We are also initiating consultation with the Washington State Historic Preservation Officer and the Oregon State Historic Preservation Officer, as required by section 106, National Historic Preservation Act, and the implementing regulations of the Advisory Council on Historic Preservation at 36 CFR 800.2.
- l. With this notice, we are designating FFP as the Commission's non-federal representative for carrying out informal consultation pursuant to section 7 of the Endangered Species Act and section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act; and consultation pursuant to section 106 of the National Historic Preservation Act.
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- n. A copy of the PAD is available for review at the Commission in the Public Reference Room or may be viewed on the Commission's website (<http://www.ferc.gov>), using the "eLibrary" link. Enter the docket number, excluding the last three digits in the docket number field to access the document. For assistance, contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY). A copy is also available for inspection and reproduction at the address in paragraph h.
- o. Register online at <http://www.ferc.gov/docs-filing/esubscription.asp> to be notified via e-mail of new filing and issuances related to this or other pending projects. For assistance, contact FERC Online Support.

Kimberly D. Bose,
Secretary.

Document Content(s)

P-14861-001 Notice.DOCX.....1-2

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

FFP Project 101, LLC)	
)	Project No. 14861-000
)	

**MOTION TO INTERVENE OUT-OF-TIME AND COMMENT
OF THE TURLOCK IRRIGATION DISTRICT**

The Turlock Irrigation District (“TID”) moves, pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure (18 C.F.R. §§ 385.212 and 385.214) and the Commission’s “Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications,” issued December 15, 2017, for leave to intervene out-of-time in this proceeding. TID is requesting leave to intervene in the proceeding because it has learned the FFP Project 101, LLC (“FFP”) is proposing to build the Goldendale Energy Storage Project (“GES Project”) on land that is leased by the Tuolumne Wind Project (“TWP”) and contains TWPA’s wind turbines, which TWPA uses to supply energy and capacity to TID. TID relies on this generation to meet its load and its California State mandated Renewable Portfolio Standard (“RPS”) obligations. TID is concerned the GES Project could interfere with the operations of, and the energy output from, TWPA’s turbines.

I. COMMUNICATIONS

Pleadings and other communications concerning this proceeding should be addressed to the following persons on behalf of TID:

Brad A. Koehn
Assistant General Manager
Power Supply
Turlock Irrigation District
P.O. Box 949
333 East Canal Drive
Turlock, CA 95381-0949
Telephone: (209) 883-8203
Facsimile: (209) 656-2148
E-mail: bakoehn@tid.org

Jon R. Stickman
Kenneth Holmboe
Duncan & Allen
1730 Rhode Island Avenue, NW
Suite 700
Washington, D.C. 20036
Telephone: (202) 289-8400
Facsimile: (202) 289-8450
E-mail: jrs@duncanallen.com
kh@duncanallen.com

Dan B. Severson
Analyst
Turlock Irrigation District
P.O. Box 949
333 East Canal Drive
Turlock, CA 95381-0949
Telephone: (209) 883-8603
Facsimile: (209) 656-2148
E-mail: dbseverson@tid.org

TID requests waiver of Rule 203(b)(3) of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.203(b)(3)) to permit inclusion of all the foregoing persons on the Official Service List, and further requests that these persons be included as representatives of TID on any restricted service list that may be established in these proceedings.

I. MOTION FOR LEAVE TO INTERVENE

A. TID's Interest in the Proceeding

TID is an 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. It serves approximately 100,000 electric retail customers and has annual electric sales of approximately 2 million MWhs. TID operates its own NERC- and WECC-approved Balancing Authority (“BA”), which is interconnected to the California Independent System Operator (“CAISO”) BA and the Balancing Authority of Northern California (“BANC”). TID’s BA incorporates 668 MW of generation and served a 2013 peak load of 621 MW. TID is also a member of the Transmission Agency of Northern California (“TANC”), through which it owns capacity on the California-Oregon Transmission Project (“COTP”), which it uses for delivery of resources owned and located in the Pacific Northwest. These resources are a vital component of TID’s ability to meet its electric load in the TID BA reliably and economically.

Among the resources that TID uses to meet its electric load is a 62 turbine, 136.6 MW wind farm, owned by TWPA and located in Klickitat County, Washington. TWPA is a California Joint Powers Agency formed in 2008 by TID and the Walnut Energy Center Authority. TID purchases all the capacity and energy from the wind farm and pays all its costs. The TWPA wind farm represents a \$400 million investment by TID.¹ TWPA leases the land upon which the 62 turbines have been constructed (“Leased Premises”) from several landowners. Under each of these land lease agreements, the landlords have agreed, among other things, not to currently or prospectively, unreasonably interfere with the construction, installation,

^{1/} In addition to the TWP, TID’s renewable resource portfolio currently includes wind, hydro, solar and biomass. These renewable resources cumulatively account for approximately 25% of TID’s generation.

maintenance, operation or removal of Turbines located on the Leased Premises; access over the Leased Premises to such turbines; or the undertaking of any other activities permitted under the leases. The landlords expressly agree not to lease or grant easements/licenses over the Leased Premises that in any way would unreasonably interfere with the wind speed or wind direction over the Leased Premises, by placing Wind Turbines, planting trees or constructing buildings or other structures, or by engaging in any other activity on the Leased Premises that might cause a decrease in the output or efficiency of the turbines.

TID has recently learned that FFP has proposed to construct the GES Project on land leased by TWPA and located immediately adjacent to at least 16 of TWPA's 62 wind turbines. The remaining 46 turbines will be between 2.5 and 7.5 miles from the GES Project. TID learned of the close proximity of the GES Project site to TWPA's wind turbines, when FFP requested that TWPA agree to FFP getting access over the roads TWPA uses to maintain the its turbines. Specifically, TID learned that FFP has proposed "Agreement #G18032 Between Tuolumne Wind Project Authority And FFP Project 101, LLC," ("Access Agreement"), which if finalized, would grant FFP the ability to use certain roads on land leased by TWPA "for purposes of investigating, stakeholder outreach and surveying activities related to the feasibility studies for possible construction of a dam and reservoir on adjacent property." *See Access Agreement at Art. 1.*

Because FFP's GES Project related activities could have significant impacts on TWPA's operations that interfere with or reduce the output of TWPA's turbines,

which TID purchases, TID has an interest in these proceedings that cannot be adequately represented by any other party or potential party to this proceeding and therefore, satisfies the requirements of Rule 214 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.214). Accordingly, TID should be granted intervenor status.

B. Good Cause for Intervention Out-of-Time

Rule 214(b)(3) of the Commission's Rules of Practice and Procedure (18 C.F.R. §385.214(b)(3)) requires that TID demonstrate, in addition to the interests that would be affected by the outcome of this proceeding, "good cause why the time limitation [for filing a motion to intervene] should be waived." Rule 214(d) of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.214(d)) identifies specific factors that the decisional authority "may consider" in deciding whether to grant leave to intervene out of time. These factors are whether (*id.*):

- (i) The movant had good cause for failing to file the motion within the time prescribed;
- (ii) Any disruption of the proceeding might result from permitting intervention;
- (iii) The movant's interest is not adequately represented by other parties in the proceeding;
- (iv) Any prejudice to, or additional burdens upon, the existing parties might result from permitting the intervention;
- (v) The motion conforms to the requirements of paragraph (b) of this section [establishing requirements for contents of all motions to intervene].

The Commission “has generally adopted a liberal approach to late intervention ..., if doing so will not delay the proceeding or result in prejudice to other parties.... In doing so, the Commission has not found that the movants are entitled to intervene late, or that they have demonstrated compliance with all the discretionary factors mentioned in the rule. Rather, the Commission has simply exercised its discretion to allow the late intervention.”² The Commission’s practice with respect to requests for late intervention differentiates between cases such as this one, in which no dispositive action has yet occurred, and those in which either a dispositive order has been issued or a settlement reached. In the former class of situations, the Commission liberally grants intervention out of time; in the latter types of cases, the Commission takes a far more restrictive approach.³

TID’s motion satisfies the requirements of Rules 214(b) and 214(d)(v). TID was never provided notice of FFP’s FERC filings in this proceeding. In addition, TID was not aware of the exact location of the proposed GES Project or its potential impacts on TWPA’s operations until TID received the Access Agreement and asked for more detail on the project’s location, which was only recently provided.

The remaining Rule 214(d) factors also favor granting intervention out-of-time. TID’s participation in this proceeding cannot be represented by anyone else because

² *Alaska Power & Telephone Co.*, 98 FERC ¶ 61,092 at p. 61,276 (2002). *Accord: Liberty Energy (Midstates) Corp.*, 138 FERC ¶ 61,249 at P 17 (2012).

³ *See, e.g., Southern Co. Servs., Inc.*, 92 FERC ¶ 61,167 at p. 61,565 (2000) (“To permit Calpine's late intervention after the issuance of the Commission's order in Southern Company, in order to challenge that order, would result in unjustified delay and disruption of the proceeding and undue burden on other parties”); *Black Marlin Pipeline Co.*, 67 FERC ¶ 61,205 at p. 61,638 (1994).

without TID's consent the GES Project cannot go forward on any land leased by TWPA. There is no undue delay here. TID has acted as expeditiously as possible to pursue intervention. In any event, the mere lapse of time from the issuance of a notice of filing is not an obstacle to granting late intervention.⁴ There is no claim of prejudice resulting from TID's request for late intervention. To the contrary, TID understands that FFP does not oppose TID's motion. Moreover, the GES Project is only in the preliminary permit stage. The licensing process has not even begun. Accordingly, the Commission should make and enter an order granting TID intervenor status with full rights of participation as a party to this proceeding, and such other and further relief as may be necessary, just and appropriate in the circumstances.

II. COMMENTS

Because FFP proposes to construct the GES Project in close proximity to TWPA's turbines, TID is concerned the GES Project could interfere with TWPA's operations or the energy output of its turbines. Specifically, TID is concerned the GES Project could: (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;

⁴ *Tennessee Gas Pipeline Co.*, 47 FERC ¶ 61,227 at p. 61,795 (1989) ("While these motions were filed more than one year beyond the due date for filing motions to intervene, we find that granting the late motions will not prejudice the interests of any other party and good cause exists to permit the late interventions").

and (5) interfere with the operations of the turbines' underground power lines when constructing the GES Project's underground components. The following is a detailed discussion of each of these issues.

A. TID is concerned the GES Project could cause wind redirection that reduces the output of the turbines

TID is concerned the operation of the GES Project could redirect the wind used by TWPA's turbines, which would disrupt the winds laminar flow⁵ through the turbines' blades, prevent the turbines from fully exploiting the available wind energy, reduce their output and reduce the turbines' value to TID. When the rotor spins, the power is transferred via the drive shaft and gearbox. Then, the generator converts the kinetic energy from the turbine into electrical energy. Most of the time the wind turbines are not generating at 100%. During the times the wind speed is less than full production levels it is critically important that the wind not be diverted up and over or in a direction that reduces the turbines ability to generate. Here, the concern is that when the GES Project is spilling water and generating power it will act much like a dam and generate lateral air flows that will emanate from the inside of the upper and lower reservoirs and interfere with the horizontal air flows (*i.e.*, the wind) used by the turbines. If these vertical air flows are significant, and wind speeds are low, the vertical air flows could block the wind entirely, redirecting it up and over the turbines, thereby reducing their output to zero. FFP must locate and design the GES

⁵ Laminar flows occur when a wind flows in parallel layers, with no disruption between those layers

Project so that it does not cause redirect wind flows or cause any other interruption in the operations or output of TWPA's turbines.

B. TID is concerned the GES Project could cause increased wind turbidity that damages the turbines and reduces their output

Similarly, when wind speeds are higher, the aforementioned vertical air flows emanating from the GES Project's upper reservoir could cause increased wind turbulence,⁶ by disrupting the winds laminar flow through the turbine blades, which would also prevent TWPA's turbines from fully exploiting the available wind energy.⁷ In addition, when the wind becomes more turbulent, it causes the turbine blades to be have unequal wind energy on each blade, which causes increased wear and tear on the blades and ultimately will cause the turbine to fail. The turbines are spaced apart to have a minimum of initial wind turbulence so that the wind that goes through one turbine blade stabilizes before the wind gets to the next turbine. Avoiding such wind turbulence is so important that there is a feature on each turbine that shuts the turbine off when turbulence causes the turbine blades to vibrate excessively. FFP must locate and design the GES Project so that it does not cause this wind turbulence or any other impacts that damage the turbines or interrupt their operations or output.

⁶ In fluid dynamics turbulence or turbulent flow is any pattern of fluid motion characterized by chaotic changes in pressure and flow velocity.

⁷ The turbulent flow causes uneven blade pressures which can result in less efficient wind generation reducing the value of the turbine.

C. TID is concerned the GES Project could cause the foundations of TWPA's turbines to be saturated and unstable

TID is concerned that the GES Project's reservoir(s) or underground water shaft(s) could cause water to seep into the ground around the foundations of the turbines or alters these foundations' drainage systems (both constructed and natural). The foundations in TWPA's turbines are filled with backfill and may be susceptible to seepage resulting from the increased water in the area. If a turbine's foundation is compromised, it could become unstable causing the turbine to be derated or removed from production. FFP must design the GES Project so that water does not seep from the reservoirs or any other part of the project into the turbines' foundations.

D. TID is concerned the GES Project could cause an increase in wildlife near the turbines, which could increase the number of animals that fly into and damage turbines

Currently, TWPA has a very low animal strike rate because there is no water ponds or reservoirs immediately adjacent to the TWPA's turbines. TID is concerned that the addition of the proposed two new large reservoirs could increase the wildlife population near the turbines causing an increase in animal strikes. Each strike could damage the turbine blades causing potential loss in generation efficiency and repairs to the blades. Moreover, if the damage is significant enough, it could cause the turbine to be taken out of service for an extended period of time, which would reduce its output to zero, significantly reducing TID's ability to use the unit to meet its energy needs. The environmental impact and public concern could be an even greater cost to the site. FFP must explain how it will design the project so that it will not

increase the number animal strikes and the associated damages to the turbines and the turbines' operations.

E. TID is concerned the underground drilling in the construction of the GES Project could disrupt TWPA's operations and output

The proposed GES Project will require a significant amount of underground drilling. There will be a large diameter, underground water shaft that connects the two reservoirs and underground cables between the reservoirs. TID is concerned that this drilling could damage, or interrupt TWPA's use of, its underground 34.5 KV distribution system that interconnects each of the turbines to the grid. Depending on how the drilling is accomplished, one or more of the turbines may have to shut down while this drilling occurs, for safety reasons. Drilling vibration or drilling too close to the underground conductors could pose a serious safety hazard to the personnel drilling, on the site and the equipment. In order to prevent such a hazard from occurring, it is likely TWPA will have to de-electrify these underground lines during the drilling process. If this occurs, it would dramatically reduce the energy output from TWPA's turbines they would no longer be interconnected to the grid. FFP must explain how it will ensure that the operations and output of TWPA's turbines are not impacted when it is constructing the underground components of the GES Project.

F. FFP must take certain actions to ensure that TWPA is held harmless from are not adversely impacted by the construction of the GES Project

Because the proposed GES Project is supposed to be constructed immediately adjacent to TWPA's turbines, this project could adversely impact TWPA's operations and the output of its generators. The only way to ensure that FFP's construction of

the GES Project will not adversely impact TWPA's operations or output is for: (1) FFP to conduct one or more GES Studies to analyze any potential adverse impacts that the GES Project may have on TWPA's operations and output; (2) FFP to provide TWPA and TID the ability to participate in and review the results of the aforementioned studies; and (3) FFP to resolve any disputes with TWPA and TID regarding any adverse impacts that result from the construction of the GES Project before FFP being construction of the GES Project.

If FFP fails to address any adverse impacts caused by the construction of the GES Project, to TID's and TWPA's satisfaction, TWPA will block the construction of the GES Project on any land TWPA has under lease, as these land leases expressly prohibit the landlord from allowing the construction of any structure or facility that interferes in anyway with the operations or out output of TWPA's turbines.

III. CONCLUSION

For the foregoing reasons, TID requests that the Commission issue an order:

(1) Granting TID's motion to intervene, and making TID a party to this proceeding with full rights of participation;

(2) Ordering: (a) FFP to conduct one or more GES Studies to analyze any potential adverse impacts that the GES Project may have on TWPA's operations and output; (b) FFP to provide TWPA and TID the ability to participate in and review the results of the aforementioned studies; (c) FFP to resolve any disputes with TWPA and TID regarding any adverse impacts that result from the construction of the GES Project; and (d) that the Commission approval of the construction of the GES Project

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is contingent on FFP mitigating or agreeing to mitigate any and all material, adverse impacts that are determined to result from the construction of the GES Project; and

(3) Granting TID such other relief as may be necessary, just and appropriate in the circumstances.

Respectfully submitted,

/s/ Jon R. Stickman

Jon Stickman
Kenneth Holmboe
Duncan & Allen
1730 Rhode Island Avenue, NW
Suite 700
Washington, D.C. 20036

Counsel to the Turlock Irrigation District

Dated: April 8, 2019

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Kenneth Holmboe
Kenneth Holmboe
Duncan & Allen
1730 Rhode Island Avenue, NW
Suite 700
Washington, D.C. 20036

Counsel to the Turlock Irrigation District

Dated: April 8, 2019

Document Content(s)

MTI and Comment TID - FFP Project Pumped Storage (final).PDF.....1-14

Rye Development

745 Atlantic Ave. 8th Floor Boston, MA

April 5, 2019

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
2019 APR 11 A 10 43
REGULATORY COMMISSION

Honorable Kimberly D. Bose
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: DATE AND LOCATION OF PUBLIC MEETINGS FOR THE GOLDENDALE ENERGY STORAGE PROJECT, FERC NO. 14861

Honorable Kimberly D. Bose,

On behalf of FFP Project 101, LLC (Applicant), Rye Development and National Grid will be hosting meetings to discuss the Goldendale Energy Storage Project, as required by 18 CFR 4.38(b)(3). The meetings will be held on May 1, 2019 and are open to resource agencies, tribes, local residents, and other stakeholders.

The schedule is as follows:

1:00 pm - 2:30 pm	Initial meeting at the Goldendale Grange Hall
3:00 pm - 4:00 pm	Site Visit, meet at the Goldendale Grange Hall
7:00 pm - 9:00 pm	Second meeting at the Goldendale Grange Hall

Meeting Location Details

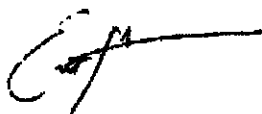
Both meetings are open to resource agencies, tribes, local residents, and other stakeholders. The same project information will be presented by the developers and their consultants at both meetings. The meetings will be held at the Goldendale Grange Hall, which is located at 228 East Darland Street in Goldendale, Washington.

Site Visit Details

Individuals will need to provide their own transportation from the Goldendale Grange Hall to the project area, and carpooling is encouraged.

Notice of the public meetings will run in The Goldendale Sentinel newspaper in Goldendale, Washington, and in the Enterprise newspaper in White Salmon, Washington, during the week of April 15th. Copies of this public meetings notice are being mailed to entities listed in Attachment 1 of the NOI with point of contact (POC) adjustments made based on comments received in response to the NOI/PAD. A copy of this list has been appended to this letter.

Sincerely,



Erik Steimle
Vice President
Portland, Oregon
erik@ryedevelopment.com

Attachment 1: Goldendale Distribution List, April 2019

		Agency	
Ellen Rosenblum		Office of the Attorney General, Justice Building	1162 Court Street NE Salem, OR 97301
Jay Insee		Office of the Governor	P.O. Box 40002 Olympia, WA 98504-0002
Kate Brown		Office of the Governor	900 Court Street NE, Room 254 Salem, OR 97301-4047
Bruce Pokarney		Oregon Department of Agriculture	635 Capitol Street NE Salem, OR 97301-2532
Janine Benner	Director	Oregon Department of Energy	550 Capitol St. NE, 1st Floor Salem, OR 97301
Director		Oregon Department of Environmental Quality	700 NE Multnomah Street, Ste 600 Portland, OR 97232
Elizabeth Moats	Northeast Regional Hydropower	Oregon Department of Fish and Wildlife	107 20th Street La Grande, OR 97850
Director		Oregon Department of Forestry	2600 State Street Salem, OR 97310
Director		Oregon Dept. of Land Conservation and Development	635 Capitol Street NE, Suite 150 Salem, OR 97310-2540
Administrator		Oregon Natural Resources Council	5825 N. Greely Avenue Portland, OR 97217
Assistant Director	Heritage	Oregon Parks & Recreation Department State Historic Preservation Office	725 Summer Street NE, Suite C Salem, OR 97301
Diane Davis		Oregon Public Utility Commission, Administrative Hearings Division	550 Capitol St NE, #215 Salem, OR 97310
		Oregon State Chamber of Commerce	6075 Ulali Dr, Suite 102 Keizer, OR 97303
Director		Oregon State Marine Board	PO Box 14145 Salem, OR 97309-5065
Director		Oregon State Parks and Recreation Department, Office of the Director	725 Summer Street NE, Suite C Salem, OR 97301
Mary Grainey		Oregon Water Resources Department, Hydroelectric Section	725 Summer Street NE, Suite A Salem, OR 97301
Conservation Director		Oregon Wild	5825 North Greeley Portland, OR 97217-4145
Northwest Regional Director		Pacific Coast Federation of Fishermen's Associations	P.O. Box 11170 Eugene, OR 97440
Scott Corwin		Public Power Council	825 NE Multnomah Street Portland, OR 97232
		SEPA Center, Washington Department of Natural Resources	P.O. Box 47015 Olympia, WA 98504-7015
Jenine McDermid		Sherman County Clerk's Office	PO Box 365, 500 Court Street Moro, OR 97039
Program Director		The Institute for Fisheries Resources	PO Box 11170 Eugene, OR 97440-3370
		The Nature Conservancy, Washington Program	74 Wall Street Seattle, WA 98121
Sverre Bakke	Editor	The White Salmon Enterprise	220 Jewett Blvd, White Salmon, WA 98672
		Trout Unlimited - Oregon	PO Box 740 Gladstone, OR 97027
Kevin Brice		U.S. Army Corps of Engineers, Deputy District Engineer for Project	P.O. Box 2946 Portland, OR 97208
Colonel Aguilar		U.S. Army Corps of Engineers, Portland District	P.O. Box 2946 Portland, OR 97208-2946

Attachment 1: Goldendale Distribution List, April 2019

District Engineer		U.S. Army Corps of Engineers, Wetlands Regulatory Program	P.O. Box 2946 Portland, OR 97208
State Director		U.S. Bureau of Land Management, Lands and Minerals Adjudication	P.O. Box 2965 Portland, OR 97208
Director		U.S. Bureau of Land Management, U.S. Department of the Interior	1849 C Street NW, MIB 5655 Washington, DC 20240
Commissioner		U.S. Bureau of Land Management, U.S. Department of the Interior	1849 C Street NW Washington, DC 20240
Regional Director		U.S. Bureau of Reclamation, U.S. Department of the Interior	2800 Cottage Way Sacramento, CA 95825
Commandant	(CG-5533)	U.S. Coast Guard, Navigation Standards Division	2703 Martin Luther King Jr Ave, Stop 7418 Washington, DC 20593-7418
Chief		U.S. Department of Agriculture - Forest Service	1400 Independence Ave SW Washington, DC 20228
Lynn Burditt		U.S. Department of Agriculture - Forest Service, Columbia River Gorge	P.O. Box 3623 Portland, OR 97208-3623
Secretary		U.S. Department of Commerce, Office of the Secretary	1401 Constitution Avenue NW Washington, DC 20230
Administrator		U.S. Environmental Protection Agency, Ariel Rios Building	1200 Pennsylvania Ave NW Washington, DC 20460
Regional Administrator		U.S. Environmental Protection Agency, Region 10	1200 Sixth Avenue, Suite 155 Seattle, WA 98101
Environmental Protection Specialist		U.S. Environmental Protection Agency, Region 10	1200 Sixth Avenue, Suite 155 Seattle, WA 98101
Regional Director		U.S. Fish and Wildlife Service	911 NE 11th Avenue Portland, OR 97232-4181
Regional Director		U.S. Fish and Wildlife Service	2800 Cottage Way Sacramento, CA 95825
Jessica Gonzales		U.S. Fish and Wildlife Service, Central Washington Field Office	215 Melody Lane, Suite 119 Wenatchee, WA 98801
Field Supervisor		U.S. Fish and Wildlife Service, Oregon Field Office	2600 Southeast 98th Avenue, Suite 100 Portland, OR 97266
Director		U.S. Fish and Wildlife Service, U.S. Department of the Interior	1849 C Street NW, Room 3238 Washington, DC 20240
Field Supervisor		U.S. Fish and Wildlife Service, Upper Columbia River Field Office	11103 East Montgomery Drive Spokane, WA 99206-4779
Field Supervisor		U.S. Fish and Wildlife Service, Western Washington Field Office	510 Desmond Drive SE, Suite 102 Lacey, WA 98503
Regional Forester		U.S. Forest Service, Pacific Northwest Region	P.O. Box 3623 Portland, OR
Army Secretary		United States Army	101 Army Pentagon Washington, DC 20310
Regional Director		United States Geological Survey	345 Middlefield Road Menlo Park, CA 94025
Director		United States Geological Survey, U.S. Department of the Interior	12201 Sunrise Valley Dr. Reston, VA 20192
		US Army Corps of Engineers Portland District	PO Box 2946 Portland, OR 97208
Brigadier General Kem	Commander	USACE, Northwest Division	PO Box 2870 Portland, OR 97208-2870
Evan G. Carnes	Senior Project Manager	USACE, Northwest Division, Regulatory Branch, SW WA Field Office	P.O. Box 3755 Seattle, WA 98124-3755
Glen Smith	Operations Project	USACE, The Dalles-John Day-Willow Creek Projects	PO Box 564 The Dalles, OR 97058-9998

Attachment 1: Goldendale Distribution List, April 2019

Tom Tebb		Washington Department of Ecology, Central Region Office	1250 West Alder Street Union Gap, WA 98903
Sage Park	Regional Director	Washington Department of Ecology, Headquarters	1250 W. Alder Street Union Gap, WA 98903-0009
James Demay		Washington Department of Ecology, Water 2 Resources Program	PO Box 47706 Olympia, WA 98504
Peter Goldmark		Washington Department of Natural Resources	PO Box 47000 Olympia, WA 98504
		Washington Office of Archeology and Historic Preservation State Historic Preservation Office	PO Box 48343 Olympia, WA 98504-8343
Bill Frymire	Senior Counsel	Washington Office of Attorney General	PO Box 40100 Olympia, WA 98504-0100
		Washington State Department of Agriculture	1111 Washington St SE, PO Box 4256 Olympia, WA 98504-2560
Tony Usibelli		Washington State Department of Commerce, State Energy Office	Plum St. SE Olympia, WA 98501
Patrick Verhey		Washington State Department of Fish & Wildlife, Renewable Energy Section	600 Capitol Way N. Olympia, WA 98501
Kessina Lee	Regional Director	Washington State Department of Fish & Wildlife, Southwest - Region 5	5525 South 11th Street Ridgefield, WA 98642
James Robb		Western Electricity Coordinating Council	155 North 400 West, Suite 200 Salt Lake City, UT 94103
Denny Granstrand		Yakima Valley Audubon Society	PO Box 2832 Yakima, WA 98903
Executive Director		Advisory Council on Historic Preservation, Old Post Office Building	401 F Street NW, Suite 308 Washington, DC 20001
Executive Director		American Canoe Association	503 Sophia Street, Suite 100 Fredericksburg, VA 22401
Tom Weirich		American Council On Renewable Energy	1600 K Street NW, Suite 650 Washington, DC 20006
Wendy McDermott		American Rivers	PO Box 1234 Bellingham, WA 98227
Executive Director		American Whitewater	P.O. Box 1540 Cullowhee, NC 28723
Vladimir Koritarov		Argonne National Laboratory	9700 S Cass Ave., B109 Lemont, IL 60439
		Association of WA Business	1414 Cherry St SE Olympia, WA 98501
Diane Henkels		Attorney and Consultant	621 SW Morrison St, Ste 1025 Portland, OR 97205
Conservation Director		Audubon Society	1200 18th Street NW, Suite 500 Washington, DC 20036
Dick Wanderscheid		Bonneville Environmental Foundation	240 SW 1st Avenue Portland, OR 97204
Elliot Mainzer	Administrator	Bonneville Power Administration	PO Box 3621 Portland, OR 97208-3621
Regional Director		Bureau of Indian Affairs, U.S. Department of the Interior	911 NE 11th Avenue Portland, OR 97132
Director		Bureau of Indian Affairs, U.S. Department of the Interior	1849 C Street NW, MS 2624 MTB Washington, DC 20240
Dan Von Seggern	Staff Attorney	Center for Environmental Law & Policy	85 S Washington St. Suite 301 Seattle, WA 98104
Jeff Bissonette		Citizens' Utility Board of Oregon	610 SW Broadway Portland, OR 97205

Attachment 1: Goldendale Distribution List, April 2019

Larry Bellamy		City of Goldendale	1103 S. Columbus Ave Goldendale, WA 98620
Terry Cullen		Columbia River Gorge Commission	NE Wauna Ave, P.O. Box 730 White Salmon, WA 98672-0730
Executive Director		Columbia River Gorge Commission	NE Wauna Ave, P.O. Box 730 White Salmon, WA 98672-0730
Paul Lumley		Columbia River Inter-Tribal Fish Commission	700 NE Multnomah Street, #1200 Portland, OR 97232
Simone Anter		Columbia Riverkeeper	111 3rd St. Hood River, OR 97031
Ed Sienkiewicz		ColumbiaGrid	8338 NE Alderwood Road, Suite 140 Portland, OR 97220
Brady Kent		Confederated Tribes and Bands of the Yakima Nation	P.O. Box 151 Toppenish, WA 98948-0151
Chairman		Confederated Tribes of the Umatilla Indian Reservation	P.O. Box 638 Pendleton, OR 97801-0638
		Confederated Tribes of the Umatilla Indian Reservation	46411 Timine Way Pendleton, OR 97801
Chairman		Confederated Tribes of Warm Springs	1233 Veterans Street Warm Springs, OR 97761
Congressman		Congressman Greg Walden	14 N. Central Ave. #112 Medford, OR 97501
Congresswoman		Congresswoman Jaime Herrera Beutler	750 Anderson Street, Suite B Vancouver, WA 98661
Theo Mbabaliye	Ph.D.	Environmental Protection Agency (EPA), Region 10	1200 6th Ave, Suite 900, ETPA-202-3 Seattle, WA 98101-3140
Director		Federal Emergency Management Agency	500 C Street SW Washington, DC 20472
Honorable Kimberly D. Bose		Federal Energy Regulatory Commission	888 First Street NE Washington, DC 20426
Douglas Johnson		Federal Energy Regulatory Commission, Division of Dam Safety and Inspections	805 SW Broadway Portland, OR 97205
Andy Dunau		Foundation for Water and Energy Education	2206 S. Sherman Spokane, WA 99203
		Friends of the Columbia Gorge, Portland Office	522 SW Fifth Avenue, Suite 720 Portland, OR 97204
Patricia Arnold		Friends of the White Salmon River	472 Sunnyside Road Trout Lake, WA 98650
Lou Marzeles	Editor	Goldendale Sentinel	117 W Main St. Goldendale, WA 98620
		Greater Goldendale Area Chamber of Commerce	903 E Broadway St. Goldendale, WA 98620
National Coordinator		Hydropower Reform Coalition	1101 14th St. NW, Suite 1400 Washington, DC 20005
Northwest Coordinator		Hydropower Reform Coalition	428 NW Sisemore St. #2 Bend, Oregon 97703
Nancy Johnson		Kiwanis Club of Goldendale	PO BOX 993 Goldendale, WA 98620
Chairman		Klamath General Council	P.O. Box 436 Chiloquin, OR 97624-0436
Renea Campbell		Klickitat County Clerk's Office	205 S. Columbus Ave, Room 204, MS-CH-3 Goldendale, WA 98620
Dave McLure		Klickitat County Economic Development Association, Annex 5	127 West Court Street, MS-CH-26 Goldendale, WA 98620

Attachment 1: Goldendale Distribution List, April 2019

David Quesnel		Klickitat County, Prosecuting Attorney's Office	205 S. Columbus Ave., Room 106 Goldendale, WA 98620
Rebecca Sells		Klickitat County, Prosecuting Attorney's Office	205 S. Columbus Ave., Room 106 Goldendale, WA 98620
Administrator		National Oceanic and Atmospheric Administration	1401 Constitution Ave NW, Room 6217 Washington, DC 20230
		National Oceanic and Atmospheric Administration National Marine Fisheries Service	1201 NE Lloyd Blvd, Ste 1100 Portland, OR 97232-1274
Diane Melancon		National Oceanic and Atmospheric Administration, Marine Chart Division - Nautical Data Branch	N/CS26 Station 7331, 1315 E-W Highway Silver Spring, MD 20910
Director		National Oceanic and Atmospheric Administration, Northwest Fisheries Science Center	2725 Montlake Boulevard East Seattle, WA 98112
Regional Administrator		National Oceanic and Atmospheric Administration, Regional Fisheries Office	7600 Sand Point Way NE Seattle, WA 98115
Stan Austin	Regional Director	National Park Service, Pacific West Region	333 Bush Street, Suite 500 San Francisco, CA 94104-2828
Director		National Park Service, U.S. Department of the Interior	1849 C Street NW Washington, DC 20240
Washington, D.C. Office		National Renewable Energy Laboratory	901 D. Street, S.W., Suite 930 Washington, DC 20024-2157
NAVFAC-OPF/C		Naval Seafloor Cable Protection Office, Naval Facilities Engineering	1322 Patterson Ave SE, Suite 1000 Washington, DC 20374-5065
Robert Kahn		Northwest & Intermountain Power Producers Coalition	P.O. BOX 504 Mercer Island, WA 98040
Robert Grott		Northwest Environmental Business Council	620 SW 5th Ave., #1008 Portland, OR 97204
Council Member		Northwest Power and Conservation Council	851 S.W. Sixth Avenue, Suite 1020 Portland, OR 97204
Terry Flores		Northwest River Partners	101 SW Main St. Portland, OR 97204
Jeff Bissonnette		NW Energy Coalition	811 1st Ave., Suite 305 Seattle, WA 98104
	SHPO	Office of Archeology & Historic Preservation	P.O. Box 48343 Olympia, WA 98504-8343
		Office of Environmental Affairs, U.S. Department of the Interior	1849 C Street NW, Room 2340 M1B Washington, DC 20240
		Office of Environmental Policy, U.S. Department of the Interior	911 NE 11th Avenue Portland, OR 97232
Senator Cantwell		Office of Senator Cantwell	511 Dirksen Senate Office Building Washington, DC 20510
Senator Merkley		Office of Senator Merkley	313 Hart Senate Office Building Washington, DC 20510
Senator Murray		Office of Senator Murray	173 Russell Senate Office Building Washington, DC 20510
Senator Wyden		Office of Senator Wyden	221 Dirksen Senate Office Building Washington, DC 20510
Bob Ferguson		Office of the Attorney General	1125 Washington Street SE, P.O. Box 40100 Olympia, WA 98504-0100

Document Content(s)

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

FFP Project 101, LLC

Project No. 14861-000

NOTICE DENYING LATE INTERVENTION

(April 30, 2019)

On March 8, 2018, Commission staff issued a preliminary permit to FFP Project 101, LLC (FFP) to study the feasibility of its proposed Goldendale Energy Storage Project No. 14861, to be located near Goldendale in Klickitat County, Washington and Sherman County, Oregon.¹ On April 8, 2019, the Turlock Irrigation District (TID) filed a late motion to intervene.

FFP's permit was issued and became administratively final 13 months before TID filed its motion to intervene. FFP has not filed a development application for its proposed Goldendale Energy Storage Project. Therefore, there is no proceeding open for intervention, and TID's motion to intervene must be dismissed.²

This notice constitutes final agency action. Requests for rehearing of this notice must be filed within 30 days of the date of its issuance, as provided in section 313(a) of the Federal Power Act, 16 U.S.C. 825l(a) (2012), and section 385.713 of the Commission's regulations, 18 CFR 385.713 (2018).

Kimberly D. Bose,
Secretary.

¹ *FFP Project 101, LLC*, 162 FERC ¶ 62,144 (2018). The permit was issued for a term of 36 months. Therefore, the permit will expire on February 29, 2020, or on the date FFP files an acceptable development application, whichever occurs first.

² Should FFP file a development application for its proposed project, notice of the application will be published, and interested entities, including TID, will have an opportunity to intervene and present their views concerning the proposed project. If TID seeks information of any activities during the issued preliminary permit term, it may register and eSubscribe at <https://ferconline.ferc.gov/eSubscription.aspx>.

Document Content(s)

P-14861-000 Notice4-30-19.doc.DOCX.....1-1



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Washington Fish and Wildlife Office
Central Washington Field Office
215 Melody Lane, Suite 119
Wenatchee, WA 98801

In Reply Refer To:

01EWF00-2019-CPA-0014

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

Dear Ms. Bose:

Re: U.S. Fish and Wildlife Service Comments on the Goldendale Pumped Storage Hydroelectric Project (FERC Project No. 14861).

On January 25, 2019, the FFP Project 101, LLC (Applicant) filed its *Notification of Intent and Pre-Application Document (PAD) for the Goldendale Energy Storage Project, FERC No. 14861* (Goldendale Project), a closed-loop pumped storage hydroelectric system in Washington State off the Columbia River near the John Day Dam on the Columbia River. In accordance with Federal Energy Regulatory Commission (Commission) regulations under the Traditional Licensing Process (TLP), Rye Development and National Grid hosted joint agency/public meetings on behalf of the Applicant on May 1, 2019 for resource agencies, tribes, and other interested parties to discuss the proposed Goldendale Project (18 CFR 4.38(b)(3)). Rye Development and National Grid requested comments on additional studies and the PAD by May 30, 2019

As background, the U.S. Fish and Wildlife Service (Service) filed its response to a *Request for Additional Studies for the Proposed John Day Pumped Storage Hydroelectric Project, FERC Project No. 13333-000* (JD Project) with Public Utility District No. 1 of Klickitat County (Klickitat PUD) and the Commission on April 7, 2015. The Goldendale Project is similar to the JD Project since it is being proposed at the same location and has many of the same infrastructure components. In our April 7, 2015 letter, the Service provided numerous recommendations for aquatic and terrestrial studies, and highlighted the potential for project impacts on migratory birds. On June 26, 2015, Klickitat PUD ceased work on the JD Project licensing effort due to the scope of the required studies and financial considerations.

Since both projects have numerous similarities, we believe that many of our comments regarding the JD Project are applicable to the Goldendale Project and request that our April 7, 2015 comments (Attachment A) be included in the record as an official statement of the Service's position regarding the matters addressed herein for the proceeding at hand. We base this filing on several reasons. Our review of the PAD has discovered no relevant studies to assess the impacts of the Goldendale Project on water use in the Columbia River near the project location. Initial fill water and periodic make-up water would be purchased from Klickitat PUD using a

KPUD-owned conveyance system and municipal water right; however, the PAD does not specify how and when the reservoirs would be filled and drained for operation and maintenance purposes and any resulting water quality effects due to the adjacent Columbia Gorge Aluminum Smelter. It is also our understanding that the information the Applicant relies upon in the PAD is outdated and many of the proposed wildlife studies in the PAD entail a single year of study and may not result in an accurate depiction of project effects on wildlife resources. These types of effects and concerns are outlined in the Service's April 7, 2015 comments. We would like to work with the Applicant as study plans and project designs reach their final stages to ensure a proper assessment and characterization of any relevant effects associated with the Goldendale Project.

In the event that the Applicant or Rye Development and National Grid has technical questions or concerns regarding these comments, please contact Steve Lewis at (509) 665-3508 extension 2002.

Sincerely,



For Brad Thompson, Acting State Supervisor
Washington Fish and Wildlife Office

cc:

- USFWS, Leavenworth (J. Craig)
- USFWS, Portland (K. Freund)
- NOAA-Fisheries, Ellensburg (R. Pittman)
- WDFW, Ephrata (P. Verhey)
- Rye Development, Portland (E. Steimle)

Attachment

Attachment A



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish and Wildlife Office
215 Melody Lane, Suite 103
Wenatchee, Washington 98801



In Reply Refer To:

13260-2015-CPA-0002

X Ref. 13260-2012-CPA-0031

April 7, 2015

Klickitat PUD
ATTN: Brian Skeahan
1313 South Columbus Ave.
Goldendale, Washington 98620

Dear Mr. Skeahan:

Subject: FWS Response to the Request for Additional Studies for the Proposed John Day Pumped Storage Hydroelectric Project FERC Project No. P13333-000

The U.S. Fish and Wildlife Service (Service) has reviewed Public Utility District No. 1 of Klickitat County's (Klickitat PUD) request for additional studies for the proposed John Day Pumped Storage Hydroelectric Project (Project), in accordance with the Federal Energy Regulatory Commission (Commission) guidelines for the Traditional Licensing Process (TLP). Each resource agency and Indian tribe must provide a potential applicant, in this instance Klickitat PUD, with written comments explaining the need for additional studies within 60 days of Klickitat PUD's joint meeting that occurred in January 2015. The purpose of this joint meeting was to have an opportunity for a site visit, with all pertinent agencies, Indian tribes, and members of the public to explain Klickitat PUD's proposal and its potential environmental impacts.

As you are aware the Project would entail a closed-loop pumped storage project, where water is recycled between two man-made reservoirs in an off-channel and closed system. Water for the initial fill of the lower reservoir and periodic make-up water to account for seasonal evaporative losses during operation would be provided through an existing water intake in the John Day pool (Lake Umatilla), through use of an existing water right owned by Klickitat PUD. We directed you to many sources of existing information to assist Klickitat PUD in assessing how the proposed Project would impact aquatic and terrestrial resources, in our November 24, 2014 correspondence letter filed with you and the Commission.

Prior to filing this correspondence, we met with you via conference call on January 26, 2015, to discuss our agency's concerns pertaining to the proposed Project. We highlighted numerous concerns about the Project; however, we would like to highlight the importance of protecting migratory birds in the proposed project area, specifically golden eagles and bald eagles, and recommend conducting fish and wildlife studies, if the proposed Project proceeds onto the development of a license application.

Migratory Birds

While we believe additional fish and wildlife studies may be needed to assess the potential impact of the proposed Project, it is premature to make those recommendations at this stage of project development. In your *Notification of Intent and Pre-application Document for the J.D. Pool Pumped Storage Hydroelectric Project, FERC No. 13333* dated October 31, 2014; you state the follow as part of your rationale to use the TLP for the proposed Project:

"The applicant believes that, while significant and obviously important, the resource issues of the Project are both simple and minimal compared to other projects of this scale. Concomitantly, the likelihood of significant dispute over studies is also minimal. Given the Applicant's willingness to adequately address these issues, the Applicant believes the TLP would better facilitate moving the licensing process forward. It would allow the Applicant and agencies to focus immediately on the issue resolution without being burdened with additional pre-resolution requirements under the ILP."

We understand the simplistic approach of this statement and do not oppose the use of the TLP in this instance; however, it appears that Klickitat PUD does not truly understand the scope and nature of existing hydroelectric and wind energy development and its associated impacts in the project area. There are numerous Project impacts pertaining to aquatic and terrestrial resources that we emphasized in our November 24, 2014, correspondence. However for the purposes of this correspondence, we would like to provide further detail to Klickitat PUD and the Commission regarding migratory birds (i.e., golden eagle and bald eagle activity) in the proposed project area and surrounding vicinity. This discussion will assist Klickitat PUD and the Commission in assessing whether or not the proposed project area is suitable for this pumped storage proposal and develop a pathway for the development of additional studies, if applicable. At this time, we believe it may be premature to discuss additional studies until a determination is made whether or not other sites may be available to develop and construct the proposed Project. Nevertheless, we do provide fish and wildlife studies for your consideration within the context of this correspondence.

Golden eagle nests occur within close proximity to the proposed project in an area known as Windy Flats/Windy Ridge. This area is known for its expansive wind development and associated impacts to migratory birds (Watson *et al.* 2014). Over the past several years, golden eagle injuries have occurred and conventional thinking appears to link these injuries to wind development. Based on preliminary estimates derived from Washington Department of Fish and Wildlife staff (J. Watson, Washington Department of Fish and Wildlife, pers.

comm., March 2015), golden eagle reproduction has been reduced by nearly 50% in the Wind Flats/Windy Ridge area. Existing effects to migratory birds are not solely limited to golden eagles. Breeding and wintering bald eagles frequently forage in significant numbers along the Columbia River near the proposed project area and their interactions with existing wind power projects have occurred in the past. It is reasonable to assume that the proposed Project will likely have a negative effect on migratory bird resources in the area for several reasons.

The creation of two reservoirs, as specified in the Project description, has numerous cascading effects to migratory birds. These include the loss of habitat where bird species such as golden eagles forage within close proximity to existing nest locations. Secondly, the creation of large bodies of water as contemplated through the proposed reservoirs, will attract migratory birds (i.e., bald eagles) to these resting or loafing areas. Some of these migratory birds will become food resources for large predatory birds such as bald eagles. As a result, bald eagles and golden eagles may become more numerous in this area, thereby increasing the risk of wind turbine eagle strikes.

As of now, there is no evidence presented by Klickitat PUD in its Pre-Application Document that calls for the development of a rigorous Avian Protection Plan (APP) to minimize impacts to migratory birds such as bald eagles and golden eagles. After discussions of reasonable siting of the proposed Project have been concluded, we would like to coordinate with Klickitat PUD in the development of this APP for the proposed Project. We also suggest contacting Washington Department of Fish and Wildlife, to obtain specific raptor monitoring reports associated with the Windy Point/Windy Flats area and associated raptor use, to assess whether or not the proposed Project is compatible with migratory birds in the surrounding landscape. We recommend against further development in this area as contemplated by the proposed Project; however, if Klickitat PUD decides to move forward with subsequent phases of this Project, we recommend obtaining the appropriate eagle permits depending on the level of eagle and other raptor disturbance anticipated with this proposed Project. Information on how to obtain these permits can be found at the following address: <http://www.fws.gov/migratorybirds/mbpermits.html>.

Fish and Wildlife Studies

At this time, the Service is providing general recommendations and protective measures, until more specific information concerning the proposed Project is developed by the Permittee. Should an application for license be filed for this project, the Permittee should include in the application a plan to avoid, minimize, and compensate for adverse impacts to fish and wildlife resources resulting from project construction, operation, and maintenance. To support the preparation of an acceptable application, the Service recommends that the Permittee arrange for and fund the studies described below. These studies should assist the Commission, the Klickitat PUD, and reviewing agencies in evaluating and assessing potential project impacts and alternatives, and to develop measures to protect, mitigate damages to, and enhance fish and wildlife and their habitats.

Aquatic Studies

The Service is concerned about project effects on existing populations of fish, amphibians, and other aquatic fauna and flora and the habitat that supports them. Klickitat PUD should identify the existing aquatic species in the study area and the effects of project construction, operation, and maintenance on the aquatic ecosystem. We are also concerned about potential project effects on geomorphology, substrate, sediment transport, woody debris transport, streamflow regimes, flow release timing, flow fluctuation, water quality, water temperature, nutrients, and fish passage in the study area.

The effects of project construction, operation, and maintenance on streamflow regimes, timing, and flow fluctuation should be evaluated. Klickitat PUD should evaluate the impacts of project operation on streamflow in the Columbia River both upstream and downstream of the project's water intake/discharge structure. Any modified streamflow regime should protect and maintain existing aquatic habitat. The magnitude of flow recommendations should be based on site-specific hydrologic and biological information. Application of the Service's Instream Flow Incremental Methodology should be used to determine an appropriate minimum instream flow regime (<https://fortress.wa.gov/ecy/publications/publications/qwr95104.pdf>).

The effects of project operations on the timing, quantity, quality, and effectiveness of downstream flow releases from John Day Dam should be evaluated. Klickitat PUD should also study and evaluate the impacts of rapidly fluctuating flows, if applicable. If it is determined that aquatic organisms would be significantly affected by changes in flow that are outside the normal range of variability, then appropriate compensation should be provided.

The effects of project construction, operation, and maintenance on water quality and water temperature in the Columbia River should be evaluated. Diverted flows could affect chemical constituents such as dissolved oxygen, pH, salinity, turbidity, and others. A study should be conducted to characterize water quality at different flow levels to detect changes in water chemistry that may be caused by project construction and operation. Altered instream water temperatures can also affect oxygen concentration and availability for fish and aquatic organisms. Any changes in water temperature should also be evaluated to determine effects on aquatic organisms.

Klickitat PUD should identify and evaluate the project's effects on fish movement and the movement of other aquatic organisms at the John Day Dam and project area. Adverse effects could include: (1) entrainment of fish; (2) delay, injury or mortality of upstream moving fish caused by project construction and operation; (3) injury or mortality of downstream moving fish caused by the project turbines or other project works; (4) reduced streamflow and available fish habitat below the project; and (5) blocked or impaired movement of fish populations. The status of existing or proposed fishways and how the project would facilitate the effectiveness of such fishways should be studied. The construction, operation, and maintenance of the proposed John Day Pumped Storage Hydroelectric Project should not in any way interfere with or compromise the U.S. Army Corps of Engineers' efforts to effectively operate and maintain safe and timely fish passage at the John Day Dam.

The cumulative effects of the project should also be addressed. Cumulative effects are defined as the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions (40 CFR 1508.7). Cumulative effects should be analyzed and described for the key interactions between this project and any other projects or factors not considered in this application that could have a cumulative effect on water quantity, water quality, fisheries and aquatic species, and related water resources management issues in the region. Klickitat PUD should identify how actions of this proposed project are related to ongoing or anticipated actions of other projects or activities that could have cumulative effects on the Columbia River ecosystem.

Terrestrial Studies

Klickitat PUD should identify the wildlife that is present and evaluate the effects the Project may have on wildlife and their habitats. Appropriate avoidance and mitigation measures should be proposed. Transmission and distribution lines should be buried, if practical, or otherwise designed according to guidelines provided by the Avian Power Line Interaction Committee and the Service.¹ This would help reduce the loss of wildlife habitat and prevent electrocution of perching birds, particularly hawks and eagles as previously discussed in this letter. Special attention should be given to measures designed to avoid and minimize the impacts of project and transmission line construction, operation, and maintenance on sage grouse in Oregon and Washington, if applicable. The effects of changes in downstream flow releases on riparian vegetation should be evaluated. Erosion control measures should be identified to prevent the loss of or damage to wildlife habitat in and downstream from the project area.

Klickitat PUD should evaluate the impacts, if any, of project construction and operation on migratory birds, including migratory waterfowl, and their habitat. Klickitat PUD should develop and include in any future license application plans to protect, mitigate, and enhance waterfowl resting, feeding, and nesting habitat that may be adversely affected by Project construction, operation, and maintenance.

Summary Comments

We appreciate the opportunity to assist Klickitat PUD in the development of additional studies for the proposed pumped storage hydroelectric project. Klickitat PUD should understand that the Service is interested in seeing this information utilized in the creation of an environmentally acceptable project. After all pertinent existing information is compiled for the proposed hydroelectric project; Klickitat PUD should contact the Service to discuss this information in more detail. Consultation and technical assistance requests, questions,

¹ Avian Power Line Interaction Committee (APLIC) and the U.S. Fish and Wildlife Service. 2005. Avian Protection Plan. Edison Electric Institute and U.S. Fish and Wildlife Service. Washington, D.C. These guidelines are to be used in conjunction with Suggested Practices for Raptors Protection on Power lines: The State of the Art in 1996, Avian Power Line Interaction Committee (APLIC), Edison Electric Institute/Raptors Research Foundation, Washington, DC, and Mitigating Bird Collisions with Power lines: The State of the Art in 1994, Avian Power Line Interaction Committee (APLIC), Edison Electric Institute, Washington, DC.

comments, documents, and required progress reports related to the proposed project should be directed to Stephen Lewis at the Service's Central Washington Field Office, by mail to the address listed on the front page; telephone: (509) 665-3508, extension 2002; or via e-mail: Stephen_Lewis@fws.gov.

Sincerely,



Eric Rickerson, Project Leader
Washington Fish and Wildlife Office

cc:

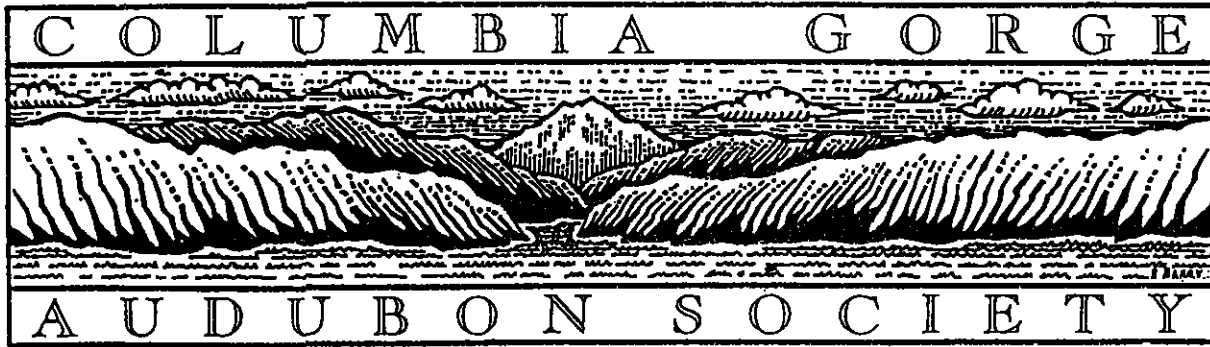
USFWS, Portland, OR (D. Young)
USFWS, Boise, ID (M. Stuber)
WDFW, Ephrata, WA (P. Verhey)
Yakama Nation, Toppenish, WA, (B. Rose)
FERC, Washington, D.C., (K. Bose)

LITERATURE CITED***In Litteris* REFERENCES**

Watson, J.W., Duff, A., and Davies, R. 2014. Home Range and Resource Selection by GPS-Monitored Adult Golden Eagles in the Columbia Plateau Ecoregion: Implications for Wind Power Development. *The Journal of Wildlife Management*. 78(6):1012-1021.

PERSONAL COMMUNICATIONS

Jim Watson, Washington Department of Fish and Wildlife, Lacey, WA, personal communication, March 18, 2015.



To: Ms. Kimberly D. Bose, Secretary
 Federal Energy Regulatory Commission
 888 First St., NE
 Washington, DC 20426

ORIGINAL

FILED
 SECRETARY OF THE
 FEDERAL ENERGY REGULATORY COMMISSION
 2019 MAY 13 P 4:17
 FEDERAL ENERGY REGULATORY COMMISSION

From: Columbia Gorge Audubon Society
 PO Box 1393
 White Salmon, WA 98672

May 4, 2019

Re: FERC P-14861, a proposed Pumped Storage Hydro project in Klickitat County, Washington, locally termed "the damn pump project."

Ms. Kimberly D. Bose:

Our county has had a rather cavalier attitude toward public notices for quite some time now, and we must have missed the most recent notice for this proposal. We trust that it will not be held against us if we do not regularly read the newspaper of record for our county, but we gave up buying that paper after the editor identified our Audubon chapter members as "environmental terrorists," and then, not so subtly, suggested that we be shot. But, I assure you that we are only "birders" and not terrorists; that claim, made in the 1990's, may have been one of the first "alt-facts" generated by the extreme right.

Since the proponents have probably failed to mention it, we wish to bring to your attention the fact that the National Audubon Society has designated the Columbia Hills (where this project would be located) as the "Columbia Hills Important Bird Area." This designation is not handed out willy-nilly. Nominations are extensively reviewed by expert avian biologists, and only the most significant landscapes are designated as Important Bird Areas. This speaks to the significance of these Hills for birds, especially hawks and eagles.

Of course, recognition by National Audubon Society of the importance of the Hills and its designation as an Important Bird Area was completely ignored by the wind power developers who have covered the Hills with wind turbines. (One wildlife biologist told

us that the only mitigation he was able to get over the entire Columbia Hills was to move one turbine a couple hundred feet from its proposed location.) The consequences of the ruthless decision to develop the Hills are classified as "proprietary information" by the wind power corporations, and are not readily available to the public. We have heard from "for hire" wildlife biologists who worked in the area for the companies involved, and they were disgusted by how the preliminary studies were designed and tweaked to minimize the predicted bird kill rate, and were "sick at heart" when follow-up studies revealed a bird kill rate approximately 17 times what had been predicted. The actual bird kill rate was so high, in fact, that the projects would not legally have been allowed if the truth were known and revealed during the proposal stage. But the project was built, and the blades still spin. We call this "science on a leash."

While the public is unable to access bird kill rates, we believe that you can. You could keep that information confidential so that competitors could not access it, couldn't you? Also, there is a nearby wind power project that the Klickitat Public Utility District partially owns. Since there is public ownership involved, we believe that you could access their bird kill information. We believe that birds are being decimated by wind turbines on and around the Columbia Hills, and we urge you to seek out this information to establish whether or not there is already a bird kill problem there, because, let's face it, a huge holding pond behind an earthen dam will only attract more birds into the turbine kill zone. Among these will be water birds, birds that now have little reason to frequent the area. Water birds would, of course, attract even more raptors to the area, raising their death toll even more.

Early project proposals described several dams, not just one. Since several dams and multiple holding ponds would undoubtedly result in even more bird deaths and perhaps kill the project, we wonder if the developers are now trying to withhold the full extent of their project. Segmenting projects is standard operating procedure in our county, as this often avoids enhanced environmental review, and sometimes results in tax benefits. We urge that you seek out those earlier plans, which include about five dams totaling approximately 7 miles in length, one of which was to be 500 feet high. Those plans may show you the developers' future intentions.

We are told that during a recent public hearing, one citizen told the proponents that their proposed dam would be built on a geological fault. The reaction of the responding proponent was not to deny this fact, but to dismiss it. His facial expression reflected "we sure didn't want this issue brought up," and his response was, "Did you know that the John Day Dam is built on a fault?" As if to suggest that one dam built on a fault justifies building another dam on a fault. The "faulty" logic of this is, of course, that when the John Day Dam was built, the geology of the area was not as well known as it now is, and it probably was not known that there was a fault there. But proponents of this project do know that there is a fault - an active fault - under their proposed dam on the Columbia Hills, and they also likely know that the dirt of the Hills is known to liquefy. You owe it to the public to research this critical safety issue.

Another related issue that you - and the public - needs to know, is where will the water and mud go if there is a dam failure? We asked this question early on, and received no reply. There is also a question of over-flow in the event of sudden run-off from slopes surrounding the proposed dam. Sudden drastic run-off has been known to occur to an astonishing extent in this area.

Speaking of faults and dam failure, it needs to be pointed out that The John Day Dam is mostly concrete, rebar and rock, whereas the proposed Columbia Hills dam would be earthen, a type of structure known to be susceptible to failure.

An electrical engineer has told us that wind power energy is about twice as expensive as hydropower to produce, and that dam pump project energy would cost about four times the cost of hydropower (which is also a renewable resource, it should be noted). Of course, mandates supporting switching to renewable energy production such as wind power will force the public to purchase their power at exorbitant rates. But for how long? When will the rate paying public rebel and reverse those mandates? That time is coming, and when it does, the developers will already be gone with their profits and the investors will be left holding the bag. But perhaps the economic aspects of this project do not fall under your area of purview, but if they do, your eyes should be open when you review the numbers.

Wind power on the Columbia Hill was a terrible mistake to begin with, and it was only allowed through deception. Adding one or more holding ponds on the Hills among all those spinning blades would result in a holocaust for birds, and a threat to public safety. We seldom oppose projects, but when we have, and those projects have been built, our warnings have always proven to be justified. We are tired of being proven right. We request that you reject this proposal.

A handwritten signature in black ink that reads "Dave Thies". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Dave Thies, President
Columbia Gorge Audubon Society

Document Content(s)

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STATE OF WASHINGTON

DEPARTMENT OF FISH AND WILDLIFE

1550 Alder St. N.W. • Ephrata, Washington 98823 • (509) 754-4624 FAX (509) 754-5257

May 28, 2019

FILED ELECTRONICALLY

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

RE: Additional Study Requests and comments on the PAD for the Goldendale Energy Storage Project, FERC Project No. 14861

Dear Secretary Bose:

The Washington Department of Fish and Wildlife (DFW) has reviewed the pre application document (PAD) for the Goldendale Energy Storage Project (Project), FERC Project No. 14861 and is providing the following comments on the PAD and recommendations for additional studies.

The DFW continues to be concerned with the addition of the upper reservoir in close proximity to wind turbines, previously mentioned in the DFW October 28, 2014 letter in reference to the John Day Pumped Storage Hydroelectric Project. This letter was included in the PAD. 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. We appreciate the development of a Draft Wildlife Management Plan (WMP) and the inclusion of studies to determine Project impacts on raptors. These studies will aid in guiding the determination of the need for mitigation. However, we are concerned in regards to the lack of mitigation options. In addition to the installation of plastic shade balls on the open water areas to dissuade water fowl from using it and other waterfowl dissuasion methods to be developed in the WMP. Wind generation curtailment should be included as an option to help prevent avian/bat mortality, especially during the spring and fall migration periods.

Project Description

According to the PAD the Project is a closed-loop pumped storage hydropower facility located off stream of the Columbia River at John Day Dam, located on the Washington side of the Columbia River at River Mile 215.6. The proposed Project will involve no river or stream impoundments. 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.

Project Facilities include: An upper reservoir consisting of a rock fill embankment dam approximately 170 feet high, 8,000 feet long, a surface area of about 59 acres, storage of 7,100 acre-feet, at an elevation of 2,940 feet above mean sea level; 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 average mean sea level. An underground water conveyance tunnel and underground powerhouse; and 23-kilovolt 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.

DFW Fish and Wildlife Management

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

PAD comments

There will be temporary and permanent reduction of habitat as a result of the construction of the Project that should be addressed through compensatory mitigation. Since the impacts of the removal of habitat to construct the two reservoirs and the approximately 18,200 ft. (3.4 miles) of new access roads cannot be addressed through the development of best management practices. We recommend developing mitigation in the form of land acquisition for conservation of wildlife resources to compensate for environmental and natural resource impacts of the Project.

The need for compensatory mitigation is supported by the evidence of the large amount of diversity of wildlife species that potentially reside in the Project described in section 4.7.1.3 of the PAD. Species that have the potential to exist within the Project and are listed as either federally-listed (endangered, threatened, species of concern, or candidate) and or state listed (endangered, threatened, sensitive, or candidate) within Klickitat County, Washington and Sherman County, Oregon include four species of amphibians, seven species of reptiles, 30 species of birds and raptors, 19 mammals (including bats) and four invertebrates. Based on existing golden eagle (*Aquila chrysaetos*) GPS data, which indicates frequent use of the Project area by golden eagles, it is anticipated that there will be significant impacts due to habitat conversion resulting in loss of foraging habitat on this species. In addition, impacts to wintering mule deer (*Odocoileus hemionus hemionus*), and impacts to species that use talus slopes will occur due to direct loss of habitat. Also, according to table 4.7-3 of the PAD there are 14 federal

and state-listed endangered, threatened, and sensitive plant species with the potential to occur in the Project vicinity. Although we appreciate the development of best management practices to protect these species, permanent impact due to construction of the reservoirs and roads will occur.

It is important to consider compensatory mitigation in terms of the temporal scope of the Project, which could be up to fifty-years. Mitigation measures put in place to mitigate for permanent impacts, including habitat losses, need to have the means in place for maintaining these measures, throughout the time frame of the license. The DFW habitat mitigation policy goal is no net loss of habitat function and value.

Raptor Surveys:

We support the development of Pre Construction Raptor Nest Surveys, Monitoring Golden Eagle Use, and Bald Eagle Monitoring surveys included Appendix C: WMP of the PAD. We do however offer the following recommendation:

We recommend conducting pre-construction raptor nest surveys for three consecutive years in order to capture the variability of eagle use of nests. Capturing nesting behavior for birds like golden eagles that may not nest in the same nest every year with a single year or two of survey information can be extremely biased.

Bird carcass are subject to removal by coyotes and other animal, making it difficult to get accurate information on bird mortalities. For this reason we recommend at least two years of pre-construction bald eagle monitoring, including fatality survey to be conducted under wind turbines in the vicinity of the upper reservoir. In addition it may take some time for the upper reservoir to be discovered by waterfowl and for the bald eagles to key in on this new source of food. We recommend at a minimum three years of post-construction survey to provide pre and post construction eagle fatality information. The USFWS (2003; Interim guidelines to avoid and minimize wildlife impacts from wind turbines <http://www.fws.gov/habitatconservation/wind.pdf>) recommends 3 years of surveys to capture seasonal and annual changes in avian abundance.

DFW Recommendations for Additional Environmental Studies

Wildlife

Proposal Title: Update Wildlife Data

Justification and Purpose: Up to date wildlife studies are needed. The PAD relies heavily on data collected by Ecology and Environment Incorporated during the development of the Windy Point Wind Farm, which included land adjacent to the proposed upper reservoir. The data in the PAD table 4.5-2 and 4.5-3 is not specific to the Project. It was collected in 2005 prior to the construction of the Windy Point Wind Farm and is fourteen years old. In addition, information from the DFW Priority Habitat Species (PHS) database was used. The PHS data provides insight to the possible species diversity of the Project area, but the database is incomplete. The absence of wildlife species in the PHS database is not necessarily an indication that they do not occur there, but that survey information for that specific area does not exist.

As a priority, wildlife surveys should be conducted in the Project area that will be permanently and temporarily impacted (reservoir areas and new roads) in order to aid in the determination of the impacts of the removal or temporary removal of the habitat on wildlife. This information will be used to develop impact avoidance and minimization measures, including best management practices that should be incorporated into planning and design; construction; and operational phases of the Project.

Study Plan: Scientifically-based wildlife surveys should be conducted monthly for an entire calendar year in order to detect species that are only present and/or detectable during certain times of the year. Surveys should be conducted by walking transects and recording observations of birds, mammals and reptiles. A written report which includes species observed, location, nest location, den site or burrow location should occur. If species are identifiable via scat or tracks, they should also be noted.

Proposal Title: Literature Review of Similar Project Effects on Migratory Birds

The DFW recommends conducting a literature review to gather information that will provide information on impacts and use of pump storage projects where new reservoirs were constructed adjacent to wind turbines. This information will be useful in determining the potential for new wind turbine impacts to migratory birds as a result of the construction of the Project. The DFW anticipates waterfowl will utilize the new Project reservoirs for resting, loafing and as a safe haven.

Proposal Title: Pre and Post Upper Reservoir Construction Bat Surveys

Justification and Purpose: Table 4.7-4 of the PAD lists federal and state listed species for Klickitat County, Washington, and Sherman County, Oregon in which the hoary bat (*Lasiurus cinereus*), long-legged myotis (*Myotis volans*), Pacific Townsend's big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*), silver-haired bat (*Lasionycteris noctivagans*) and the spotted bat (*Euderma maculatum*) have the potential to occur in the Project boundary. Data is not available to determine if the pallid Townsend's big-eared bat (*Corynorhinus townsendii pallescens*) has the potential to be present in the Project.

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 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.

Study Plan: Pre construction and post construction studies should occur during the spring, summer, and fall. Prior to construction mortality survey should occur for two consecutive years to determine current existing bat mortality rates. Post reservoir construction bat mortality surveys should occur for two consecutive years to determine fatality rates.

The survey protocol should include: estimates of carcass removal and carcass detection bias likely to influence those rates; duration and frequency of monitoring; monitoring of wind turbines immediately adjacent to the reservoir; general transect search protocol; field bias and error assessment; and estimates of fatality. Per the USFWS Land-Based Wind Energy Guidelines (2012) a more detailed description of fatality search protocols can be found in the California (California Energy Commission 2007) and Pennsylvania (Pennsylvania Game Commission 2007) state guidelines and in Kunz et al. (2007), Smallwood (2007), and Strickland et al. (2011).

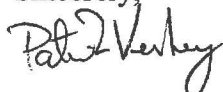
Proposal Title: Upper Reservoir Acoustic Bat Surveys

Justification and Purpose: Conducting acoustic bat surveys will provide current information on the use of the upper reservoir area by bats and aid in the determination of the presence of state and federal endangered bat species. This information will aid in determining whether future bat studies are warranted.

Study Plan: Acoustic bat detectors should be placed on the wind turbine adjacent to the proposed location of the upper reservoir. Detectors should be situated to sample as much of the rotor swept zone as possible, or at least 150 feet above ground surface (NY State Department of Environmental Conservation 2009). Monitoring should cover periods of migration as well as periods of known high activity for resident species (USFWS Guidelines 2012). Sampling should occur April through October to capture potential highly pulsed migration events. Data should correspond with bat foraging activity, daily from ½ hour prior to sunset until ½ hour after sunrise. Climatological data should be collected so weather data can be used in the analysis of bat activity levels. Data should be downloaded weekly and units inspected to ensure they are working properly to prevent data loss.

Thank you for this opportunity to provide the DFW comments on the PAD and additional study recommendations for the proposed Goldendale Energy Storage Project. Please contact me at (509) 754-4624 ex. 13 or by e-mail at Patrick.Verhey@dfw.wa.gov if you have any questions.

Sincerely,



Patrick Verhey, WDFW Biologist

Literature Cited

California Energy Commission and California Department of Fish and Game. 2007. California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development.

Commission Final Report. California Energy Commission, Renewables Committee, and Energy Facilities Siting Division, and California Department of Fish and Game, Resources Management and Policy Division. CEC-700-2007-008-CMF.

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Telephone Memo

To: Public Files
From: Suzanne Novak - OEP
Date: June 19, 2019
Dockets: P-14861-000
Project: Goldendale Hydroelectric Project

Subject: Tribal Consultation Contact with the Confederated Tribes of the Umatilla Indian Reservation Regarding the Proposed licensing of the Goldendale Hydroelectric Project

On April 4, 2019, I called the Chairman's office for the Confederated Tribes of the Umatilla Indian Reservation (Tribes) to follow up on our March 1, 2019, letter we sent to Chairman William Sigo IV inviting to him have government to government consultations with the Commission regarding the Goldendale Project. There was no answer so I left a message on the office's voicemail asking for someone in the office to contact me if the Chairman was interested in having such a meeting. Since I did not hear back, on May 7, 2019, I called the Chairman's office again and left a similar voice message because there was no answer. Since I still had not heard back from the Tribes, I sent a follow-up email with a link to the March 1, 2019 letter and asked for someone to contact me if the Chairman was interested in having a meeting. Since then I have not heard back from any member of the Tribes.

Document Content(s)

P-14861-000 Memo Umatilla Tribes.PDF.....1-1

June 27, 2019

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, DC 20426

Re: Response to May 29, 2019 Comments and Additional Study Requests from United States Fish and Wildlife Service (USFWS) for the Goldendale Energy Storage Project, FERC No 14861

FFP 101 (Applicant) has reviewed comment received on May 29, 2019 from USFWS in response to the pre-application document (PAD) for the Goldendale Energy Storage Project (Goldendale Project) located in Klickitat County, Washington. This letter is a response to comments and requests for additional studies from USFWS based on their review of the PAD submitted to FERC on January 25, 2019.

General Comments

The comments from USFWS reference their letter from April 2015 when a similar project was under development with a different applicant and FERC Number (P-13333). USFWS indicates in the May 2019 letter that because the project is similar, their 2015 comments are relevant.

The Applicant disagrees with this assumption as it oversimplifies the significant project re-design and relationship to the existing water right for the project. Much of the new design evolved specifically to help minimize concerns raised by agencies in 2015. The current project design has a significantly smaller footprint, one less reservoir, and does not extend to the Columbia River, but will purchase water from the Klickitat Public Utility District. Because of these modifications, the applicant does not believe there will be project impacts to aquatic species or water quality.

Avian Impacts

Some of USFWS's comments center on impacts to avian species due to the proximity of the project to nearby wind turbines. The wind projects are not associated with the Goldendale Project and therefore any impacts to avian species due to injury or mortality from wind turbines is the responsibility of the owners and operators of the wind turbines. The Goldendale Project consists of a closed-loop pumped storage hydro project and does not include construction or operation of any wind turbines. The Applicant has no authority, jurisdiction, or operational

influence over those projects, and protection from wind turbines should fall to those owners and the appropriate regulatory agencies, including USFWS.

Aquatic Species and Water Quality

USFWS makes multiple comments in their 2015 letter related to impacts to water quality, riparian habitat, and aquatics species. The Applicant believes that these comments from 2015 are not relevant to the current project design, which does not extend to the Columbia River, and that USFWS comments show lack of clarity and understanding of the current project design regarding water intake. Specific comments and responses are itemized below.

- *USFWS Comment:* the PAD does not specify how and when the reservoirs would be filled and drained for operation and maintenance purposes and any resulting water quality effects due to the adjacent Columbia Gorge Aluminum Smelter.

Applicant Response: Operational details will be presented in the license application. However, because the project is a closed loop system with no outfall to any surface water body, the project would not have any water quality effect. If drainage of the lower reservoir were needed for maintenance, the water would be pumped into the upper reservoir and vice versa. Only one reservoir will be filled to capacity at any given time.

- *USFWS 2015 Comment:* The Service is concerned about project effects on existing populations of fish, amphibians, and other aquatic fauna and flora and the habitat that supports them. We are also concerned about potential project effects on geomorphology, substrate, sediment transport, woody debris transport, streamflow regimes, flow release timing, flow fluctuation, water quality, water temperature, nutrients, and fish passage in the study area. The effects of project construction, operation, and maintenance on streamflow regimes, timing, and flow fluctuation should be evaluated. Applicant should evaluate the impacts of project operation on streamflow in the Columbia River both upstream and downstream of the project's water intake/discharge structure. Any modified streamflow regime should protect and maintain existing aquatic habitat. The magnitude of flow recommendations should be based on site-specific hydrologic and biological information. Application of the Service's Instream Flow Incremental Methodology should be used to determine an appropriate minimum instream flow regime

Applicant Response: Klickitat Public Utility District's (KPUD) water right was historically used by the aluminum smelter and had a withdrawal rate greater than what would be used by the project. There are no new impacts associated with KPUD maintaining the existing right.

- *USFWS 2015 Comment:* The effects of project operations on the timing, quantity, quality, and effectiveness of downstream flow releases from John Day Dam should be evaluated. Klickitat PUD should also study and evaluate the impacts of rapidly fluctuating flows, if applicable. Klickitat PUD should identify and evaluate the project's effects on fish movement and the movement of other aquatic organisms at the John Day Dam and project area. Adverse effects could include: (1) entrainment of

fish; (2) delay, injury or mortality of upstream moving fish caused by project construction and operation; (3) injury or mortality of downstream moving fish caused by the project turbines or other project works; (4) reduced streamflow and available fish habitat below the project; and (5) blocked or impaired movement of fish populations.

Applicant Response: The project design does not extend to the Columbia River. The project will purchase water from KPUD.

- *USFWS 2015 Comment:* The status of existing or proposed fishways and how the project would facilitate the effectiveness of such fishways should be studied. The construction, operation, and maintenance of the proposed John Day Pumped Storage Hydroelectric Project should not in any way interfere with or compromise the U.S. Army Corps of Engineers' efforts to effectively operate and maintain safe and timely fish passage at the John Day Dam.

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- *USFWS 2015 Comment:* The effects of changes in downstream flow releases on riparian vegetation should be evaluated. Erosion control measures should be identified to prevent the loss of or damage to wildlife habitat in and downstream from the project area.

Applicant Response: As stated above, there are no downstream releases.

Attraction to Reservoirs

USFS comments that the proposed Project will likely have a negative effect on migratory bird resources due to loss of habitat where bird species such as golden eagles forage within close proximity to existing nest locations, and that the creation of large bodies will attract migratory birds (i.e., bald eagles) to these resting or loafing areas. As a result, bald eagles and golden eagles may become more numerous in this area, thereby increasing the risk of wind turbine eagle strikes.

The Applicant does believe that the reservoirs will be an attraction to waterfowl and other wildlife species from existing higher quality habitat within and near the Columbia River. The general idea when designing and constructing the reservoirs will be to avoid creating any suitable wildlife habitat. Due to the proximity of the project to the John Day and Columbia Rivers, waterfowl, wildlife and other species will be attracted to that nearby superior habitat.

The Applicant looks forward to collaboration with USFWS as the license application is developed to include measures to avoid creation of habitat and reduce attraction of waterfowl and other species. The Applicant is also continuing to research options and measures to reduce

attraction to the reservoirs including looking to how this issue is addressed at airport storm water detention basins. There are a number of measures included in the Wildlife Management and Avian Protection plans, which have been and will continue to be developed in close collaboration with USFWS and other appropriate agencies. These include:

- Fencing the reservoir to exclude wildlife;
- No construction of riparian habitat or in-water habitat;
- No development of terrestrial habitat conducive to wildlife, including bats and birds;
- Proposing the use of shade balls to deter wildlife presence/use.
- Researching other methods to further deter wildlife, including birds and bats, from using reservoir ponds.
- The operational regime of the project will result in both upper and lower reservoirs being drained approximately once per day, further reducing the potential for riparian or aquatic habitat.

Golden Eagle Foraging & Raptor Monitoring

USFWS suggests contacting Washington Department of Fish and Wildlife (WDFW), to obtain specific raptor monitoring reports associated with the Windy Point/Windy Flats area and associated raptor use. They also recommend obtaining the appropriate eagle permits depending on the level of eagle and other raptor disturbance.

Applicant is in close communication and coordination with WDFW regarding golden eagle and other raptor use in the area and has requested the 2019 survey and monitoring data. We will also obtain any necessary disturbance permits.

The Applicant does not believe that there would be significant impacts on golden eagles (GOEA) because of habitat conversion and loss of foraging habitat. Golden eagle prime habitat in some western states has been defined as having high population densities consisting of a mixture of cliffs and trees and open habitat with an abundance and diversity of prey (WDFW, 2004). Important foraging habitat for golden eagles includes shrub-steppe and native grassland communities (WDFW, 2004).

The Project site does not contain prime foraging or nesting habitat. The Project does not overlap WDFW priority habitat for GOEA, only cliff habitat is priority mapped, and the Project would not be impacting cliff habitat. The existing wind farm and decommissioned aluminum plant makes this area already developed, industrial land. The Project site contains a small percentage of marginal foraging habitat (biologists in 2019 observed several yellow-bellied marmots in smelter area and manicured lawn present there), and the proposed Project would not impact this habitat to the extent of causing significant impacts on GOEAs. Based on agency communication and plans for 2019 aerial raptor surveys, we plan to continue to collaborate with agencies for current research on golden eagle use of habitat in or near the Project.

The Applicant would conduct surveys of bald and golden eagle nests within the buffer distances required by BGEPA prior to initiating construction and would implement avoidance measures as appropriate depending on the results of the surveys.

Wildlife Data

USFWS suggests that the information the Applicant relies upon in the PAD is outdated and many of the proposed wildlife studies in the PAD entail a single year of study and may not result in an accurate depiction of project effects on wildlife resources.

The Applicant does not believe that additional wildlife studies will provide useful data that will further our understanding of project impacts. Our assumptions about the presence of wildlife species are based on the pre-construction studies conducted prior to construction of nearby wind projects and further assume presence of all the species listed in those studies. Project biologists have indicated that habitat for wildlife species has likely degraded since that time, and new studies would only provide less protective data than relying on the pre-wind construction studies.

Transmission

USFWS suggests that Applicant should bury transmission and distribution lines, or otherwise designed according to guidelines provided by the Avian Power Line Interaction Committee (APLIC) and the Service. They also ask that special attention be given to measures designed to avoid and minimize the impacts of project and transmission line construction, operation, and maintenance on sage grouse in Oregon and Washington, if applicable.

The Applicant intends design and construct all transmission or distribution lines according to APLIC criteria.

Summary

The Applicant looks forward to continued collaboration with USFWS and other Agencies during the development of the Avian and Wildlife Management plans to address concerns regarding attraction to the new reservoirs and providing clarification to USFWS regarding the details of the project design and construction. We do reiterate, however, that the study and mitigation of impacts from nearby wind farms are not appropriate to the Goldendale Project beyond reservoir attraction or documented loss of habitat.

Please contact me with any questions you may have.

Sincerely,



Erik Steimle

erik@ryedevelopment.com

June 27, 2019

Kimberly Bose, Secretary
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Please contact me with any questions you may have.

Sincerely,



Erik Steimle

erik@ryedevelopment.com



**DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, PORTLAND DISTRICT
PO BOX 2946
PORTLAND, OR 97208-2946**

ORIGINAL

Subject: FERC P-14861 Rye Development Pump Storage Facility in Goldendale, Washington

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

Dear Ms. Bose:

REC'D
2019 JUL 25 P 3:09
REGISTRATION DIVISION

This letter is Portland District Corps of Engineers (Corps) response to the request for public comments for the above named project.

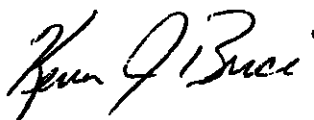
The Corps is responsible for evaluating any projects that may impacted or be injurious to the public interest on Corps lands or on Federally authorized projects per 33 USC 408. The Rye development project, while near Corps lands in Goldendale Washington and under the current proposed plan, will not occupy Corps lands. If the proposed project alignment should change, then we would ask that Rye development inform the Corps of the change to determine if any Corps lands will be impacted.

The proposed project description states that Rye Development is proposing to use an existing Bonneville Power Administration (BPA) electrical line that crosses over the federally authorized Columbia River channel, and an existing water line owned by Klickitat Public Utility District (KPUD) to initially fill and recharge the storage pond. It is the Corps understanding that at this time, Rye Development is requesting that they be allowed to use the existing BPA and KPUD lines, but that no official agreements have been entered into. If those agreements should not be approved and another electric line will need to cross the Columbia River, or if any work will occur on lands of the John Day Lock and Dam Project (administered by the Corps), then we would request that Rye Development inform the Corps so that we may evaluate if the new proposal will impact the federal project.

Finally, the Corps has concerns regarding a failure of the storage pond and if it fails will the material wash into the river. If material does wash into the river, has Rye Development evaluated the impacts of the material to impact or stop navigation in the river or use of the John Day Lock and Dam? We would request that such a failure be analyzed and addressed to ensure no impacts to either the John Day Lock and Dam or federal navigation channel.

The Corps appreciates the opportunity to comment on this project and would request that we continue to be informed of any actions related to the project, or if any changes are made to the proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin J. Brice". The signature is written in a cursive style with a large initial "K".

Kevin J. Brice, P.E., PMP
Deputy District Engineer
for Project Management

Document Content(s)

15315701.tif.....1-2



745 Atlantic Ave. 8th Floor, Boston, MA 02111

August 26, 2019

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, DC 20426

Re: Goldendale Energy Storage Project (FERC No. 14861)- **THIRD SIXTH MONTH PROGRESS REPORT**

Dear Secretary Bose,

On March 8, 2018, the Goldendale Energy Storage Project in Klicitat County, Washington (the “Project”) was issued a preliminary permit by the Federal Energy Regulatory Commission (the “Commission”):

Project Number	Project Name	Permittee
P-14861	Goldendale Energy Storage Project	FFP Project 101, LLC

As a condition of permit issuance, the Commission requires the permittee file progress reports every six months. Rye Development, LLC, on behalf of the permittee (collectively, “Rye Development” or “Rye”), is submitting the following Six-Month Progress Report.

Project Activities

- On January 25, 2019 Rye Development filed a notice of intent (NOI), preliminary application document (PAD), and a request to use FERC’s traditional licensing process (TLP) for the Goldendale Energy Storage Project.
- On March 21, 2019 the Commission approved the applicant’s request to use the Traditional Licensing Process for the Goldendale Energy Storage Project.
- On May 1, 2019 the applicant hosted joint agency/public meetings to discuss the proposed Goldendale Energy Storage Project and requested comments on the proposed resource studies to support a License Application.
- May-September of 2019 Completion of environmental, cultural, socioeconomic, and engineering studies to support a Draft License Application (DLA).

Engineering and Cost Analysis

- Over the last six months Rye has continued to refine the preliminary design of the proposed facility and updated project costs to support the filing of a Draft License Application (DLA). Over the next six months, the permittee intends to further refine the design of the project features.
- Ongoing coordination with the US Department of Energy (USDOE). USDOE has selected the Goldendale Energy Storage Project for 1 of 2 pumped storage projects in the US to complete comprehensive techno-economic studies.

Consultation

- Rye Development is continuing to consult with stakeholders including resource agencies, the Yakama Tribe, residents, and others about the PAD, resource studies, and other project activities moving forward.

Please do not hesitate to contact me if you require any additional information about this proposed Project.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Erik Steimle', with a long horizontal stroke extending to the right.

Erik Steimle

Document Content(s)

FERC Progress Report No. 3.DOCX.....1-2

November 7, 2019

JoDe L. Goudy, Chairman
Yakama Nation Tribal Council
401 Fort Road
PO Box 151
Toppenish, WA 98948

**Re: REQUEST FOR A MEETING WITH YAKAMA NATION TRIBAL COUNCIL TO
DISCUSS THE PROPOSED GOLDENDALE ENERGY STORAGE PROJECT**

Chairman Goudy,

Representatives of Rye Development and National Grid wish to meet with Yakama Nation Tribal Council to provide an update on the energy storage project we are studying near Goldendale, Washington (the Project).

As we described in our meeting with you in 2018, we are exploring the idea of developing a closed-loop pumped storage hydroelectric generating facility at the former Columbia Gorge Aluminum Smelter near Goldendale. The Project would be the cornerstone of a 100% clean, carbon free electrical grid in the Pacific Northwest and a catalyst for thousands of new jobs. Decarbonization of our electrical grid is a critical component of combating climate change. Since our meeting with you last summer, we have completed a number of engineering and resource studies to support the preparation of a project application for review by the Federal Energy Regulatory Commission. We sincerely appreciate the opportunity this past year to retain Yakama Nation archaeologists and botanists to complete some of these studies.

As you are aware, Washington State has aggressive greenhouse gas reduction and clean energy goals. Load growth and increasing renewable energy targets will require approximately double the number of renewable energy projects that are currently on the Pacific Northwest system by the year 2035. Intermittent renewables on the grid such as wind and solar already have the potential to create gigawatts of overgeneration and are being curtailed due to the existing system's limited flexibility and storage. Without utility-scale storage to solve the operational challenges of integration, Washington, Oregon, and California cannot achieve carbon reduction and environmental policy goals reliably and cost-effectively. Based on economic modeling of the Project by Energy and Environmental Economics Inc. (E3), the Project could save regional ratepayers hundreds of millions of dollars annually.

Of the viable energy storage options available, pumped storage is the best proven, least-cost energy storage technology at scale. We are continuing to studying the idea of constructing two new lined or "closed" reservoirs for the Project. The reservoirs would not be connected to the Columbia River and would not impact any existing aquatic environments. The Project would store energy by letting water purchased from Klickitat Public Utility District flow downhill through turbines during the day, producing electricity at peak times, and then being pumped back uphill at night, renewing the energy source during low electricity use times. The same water would be used to recharge the Project and store new energy each day. Once the reservoir is filled, the closed loop process does not consume additional water to recharge and has no carbon emissions, making it an environmentally responsible source of energy storage.

The Project can freely start, stop, reverse, and fluctuate as needed by the power system without impacting aquatic species, flood control, navigation, irrigation, and recreation. In addition, the Project would assist with the cleanup of a portion of the former Goldendale Aluminum Smelter site and create more than 3,000 jobs during construction over a five-year construction period and 100 long term local jobs during operation over several decades.

We kindly request the opportunity to meet with Yakama Nation Tribal Council again to discuss an update on the project.

Sincerely,



Erik Steimle
Vice President
Portland, Oregon
erik@ryedevelopment.com