

Derek Benedict

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Dear Breean Zimmerman,

Rye Development's plan to build the Pacific Northwest's largest pumped-storage hydroelectric development along the Columbia River threatens water quality, wildlife, and ignores the objections of tribal nations.

I am writing to ask Ecology to deny Rye's 401 certification based on the following reasons: ? The Columbia River: Rye's proposal will harm Columbia River water quality. Initial fill for the reservoirs would use 2.93 million gallons of Columbia River water. Rye would also use roughly 1.2 million gallons of water per year from the Columbia for "periodic makeup" to offset losses from evaporation and leakage. Ecology's analysis must account for the project's impacts in a changing environment. The Columbia River Basin has experienced a general decline in spring snowpack since the mid-20th century due to more precipitation occurring as rain (rather than snow) and earlier snowmelt runoff. Ecology's 401 review must consider the development's significant impact on limited Columbia River water resources. ? Fish and Wildlife: State and federal agencies have raised substantial concerns about the project's impacts to golden eagles, bald eagles, prairie falcons, and other fish and wildlife species. Fish and wildlife are designated uses under the Clean Water Act. Ecology should deny the 401 certification based on the project's direct, indirect, and cumulative impacts on fish and wildlife. ? Streams and Wetlands: Construction of the upper reservoir will permanently destroy two ephemeral streams and an ephemeral pond. Rye's development will further scar a landscape already significantly impacted by wind energy. Rye fails to demonstrate that permanent destruction of unique aquatic habitats meets the Clean Water Act's standards.

Thank you for your consideration.

Sincerely,

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