State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th St Ridgefield, WA 98642
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February 11, 2021

FILED ELECTRONICALLY

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

Attn: Goldendale Scoping

Dear Ms. Park:

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

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

WDFW Fish and Wildlife Management

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

General Scoping Comments

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

Aquatic Resources

- FLA, Exhibit A, section 3.0
  We recommend evaluating water quality impacts related to lubricants and oil used in the operation of the Francis-type variable speed pump-turbines. The turbines may discharge lubricants into the water during operation.

- FLA, Exhibit E, section 2.2.1
  Evaluate reduced function in stormwater retention, hydrology/water flow through the area, stream reach functions and habitat of the wetland of features S7, S8, and P2.

- Although the West Surface Impoundment contaminated material is to be removed, we recommend evaluating the potential of leaks in the lower reservoir lining that may provide a pathway for toxic material to be release from the West Surface Impoundment into the Columbia River. This information may be used in the development of a monitoring plan.

- The annual loss of water from the reservoir due to evaporation is 420-acre ft. per year. Evaporation over extended periods of time may concentrate any solutes present in the water source, potentially causing the reservoir to become toxic to terrestrial and avian wildlife utilizing the Project waters. We recommend the development of a reservoir water quality monitoring and management plan to ensure the water is safe for wildlife resources. Specific methods to annually monitor levels of dissolved solids, nutrients, and heavy metals should be developed. A schedule for annually reporting the monitoring results and any proposed measure for addressing deteriorating water quality based on monitoring results should be developed.

Terrestrial Resources

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

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

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

- The potential of wildfires related to clearing and grubbing and construction activities should be evaluated. Vegetation clearing to construct the project will create slash that could build up concentrations of combustible material that could fuel wildfires.

- FLA, Exhibit D, Section 2.3.2, 2.3.3
  The licensee states the use of reservoir deterrent such as exclusion fencing and floating plastic shade balls to discourage migratory bird use of the reservoirs will be assessed. Since it has not been determined that plastic shade balls will be utilized at either reservoir, an evaluation of how bats and migratory birds use the reservoirs with and without the application of plastic shade balls should occur. The Project is located adjacent to a wind farm. Increased attraction of birds and bats by the reservoirs could increase bird and bat mortality at the wind farm. Bats and insects may be attracted to the water.

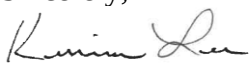
- In addition, the cliffs and talus slopes within the Project area are potential roost and hibernacula sites for bats. There is no available survey information for bats in the project area. Since the use of the Project area by bats is unknown, we recommend evaluating Project impacts on bats. We recommend using year-round acoustic monitoring to determine if bats are attracted to the reservoirs, the species of bats and when they are using the area. If the monitoring shows that bats are attracted to the reservoir, we recommend implementing deterrent measures specifically for bats. Acoustic deterrents that have been used at wind project may be effective.

- We recommend evaluating the use of fencing to deter wildlife and birds from using the reservoirs.

- We recommend installing flight diverters on the transmission lines where these lines are not feasible to be buried; and include quantifiable thresholds for determining when additional measures would be needed to address high-mortality areas based on proposed transmission line monitoring.

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

Sincerely,



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