

# Alyssa Poletti

Date: July 13, 2022

Subject: 22-06-006 Goldendale Energy Storage Project - Draft Environmental Impact Statement

To: Sage Park

Department of Ecology

Central Region Office

Attn: Goldendale Energy DEIS

1250 W. Alder Street

Union Gap, WA 98903-0009

Dear Regional Director Park,

Thank you for the open comment period on the draft environmental impact statement (EIS) for the proposed Goldendale Energy Storage Project. As a University of Washington (UW) climate scientist, UW Future Rivers Fellow, and Aspen Tech Policy Climate Cohort Fellow, I recommend that the Goldendale Energy Storage Project draft EIS be amended to include:

1. Emphasis on the immense and adverse impact on the Yakama Nation from a cultural, aesthetic, ecological, and environmental justice perspective.
2. Further assessment of present and future water stress concerns.

While the EIS would be incomplete without a further assessment of water stress concerns, the significant and unmitigated impact of the Goldendale Energy Storage Project on the Yakama Nation should immediately disqualify this project from further consideration.

1. Explicitly focus on the immense and adverse impact on the Yakama Nation, from an aesthetic, ecological and environmental justice perspective in accordance with the Biden administration's Justice 40 mandate.

- i. The Goldendale Energy Storage Project should amend the EIS Executive Summary Table S-1 (and subsequent documents) to state that there are "significant adverse impacts" to (a) Aesthetics/Visual Quality, (b) Terrestrial Species and Habitats, and (c) Environmental Justice.

The EIS states that there will be significant and unavoidable adverse impacts to the Yakama Nation in the section on Cultural and Tribal Resources. However, there are also significant adverse impacts to aesthetics/visual quality, the terrestrial species and habitats, and environmental justice. Thus, the EIS draft, the Executive Summary, Appendix G, and Appendix J should all be amended to reflect the cultural, aesthetics/visual quality, ecological, and environmental justice impacts.

- a. Aesthetics

The EIS Executive Summary should include the significant adverse impact to Aesthetics/Visual Quality for both visitors and indigenous residents. For example, Rattlesnake Mountain is a popular

hiking location and a tribal sacred site near the proposed project. The Yakama Nation's Deputy Director for Culture describes the lake as a pristine location with both religious and aesthetic significance, which will be disrupted by the Goldendale Energy Storage Project [1].

#### b. Ecological

The EIS Appendix G: Terrestrial Species & Habitats Report should be amended to include considerations regarding the unavoidable impact of the proposed Goldendale Energy Storage Project on tribal food gathering. Not only is the location of the proposed Goldendale Energy Storage Project on sacred land, but the land is a site for traditional food and medicine collection [2].

#### c. Environmental Justice

Finally, the EIS Appendix J: Environmental Justice Report should include the significant adverse impact to the local tribal community. The EIS draft states that this project has no disproportionate impact on a minority community, while simultaneously acknowledging the significant and unavoidable adverse impact on the tribal community. This contradiction should be corrected.

ii. The Goldendale Energy Storage Project should draft a new EIS collaboratively with the local tribes.

Currently, the EIS draft overlooks aspects of the ecology, aesthetics, and environmental justice important to the Yakama Nation because the Yakama Nation was given little voice in the creation of this EIS. The impacted tribes were notified of the Goldendale Project only by a letter or email. To amend this grave injustice, the Goldendale Energy Storage Project should consider a new EIS with tribal input. The Goldendale Energy Storage Project could consider a smaller reservoir or alternative location.

### 2. Further assessment of present and future water stress concerns

i. For more informed comments, the Department of Ecology should make the Cliffs Water Right readily available to the public.

On February 11, 2021, you stated that the Goldendale Energy Storage Project will not use water from the Columbia River. However, the EIS does not clearly state the source of water beyond the "Cliffs Water Right." I recommend clearly stating that the water will not come from the Columbia River on page S-1 of the draft EIS. Additionally, the Cliffs Water Right document is not readily available to the public. This reduces the public's ability to comment on the impact of the Goldendale Energy Storage Project on Klickitat municipal water.

ii. The EIS Appendix B: Surface and Groundwater Hydrology Resource Analysis Report needs to clearly state (a) the project's water source, (b) whether the Goldendale Energy Storage reservoirs count as consumptive use, and (c) why this project necessitates more than half of Klickitat's total yearly water allotment.

Without access to the Cliffs Water Right text, I infer from the EIS that the Goldendale Energy Storage Project does not use Columbia River water because it is using Klickitat municipal water which has already been allocated away from the Columbia River. Public Utility District #1 of Klickitat County has been allocated 13,911 acre-feet per year, with 4,861 acre-feet available for

consumptive use annually. Yet, the Goldendale Energy Storage Project requires an initial 7,640 acre-feet over the first 6.5 months, far exceeding the annual allocation from the Cliffs Water Right. Therefore, the EIS needs to clarify the source and classification of the Goldendale project water use.

iii. The EIS Surface and Groundwater Hydrology Resource Analysis Report should include projections of the future decline in the Columbia River basin streamflow.

While the Goldendale Energy Storage Project is using already allocated water, this water still originates from the Columbia River, which is an essential source of water and food across Washington state. Understanding that the Columbia River streamflow has declined by 15% from 1951 to 2008 - and will continue to decrease - the EIS does not consider how use of municipal water from the Columbia River will increase future water stress[3].

In summary, the Goldendale Energy Storage Project poses known and unavoidable damage to tribal culture, resources, food gathering, recreation and aesthetics, as well as potential damage to future water resources. The draft EIS should be amended to reflect this. Please, do not hesitate to contact me for further information.

Thank you,  
Alyssa Poletti, MS  
(856) 651 8566  
apolet@uw.edu

1. Courtney Flatt, NWPD (2021) 'It's Irreversible': Goldendale Green Energy Project Highlights A History Of Native Dispossession
2. Confederated Tribes and Bands of the Yakama Nation (2021) Yakama Nation Advocates for Protection of Cultural Sites; Opposes Proposed Goldendale Pump Storage Project
3. Whitney L. Forbes, GRL (2019) Streamflow in the Columbia River Basin: Quantifying Changes Over the Period 1951-2008 and Determining the Drivers of Those Changes

Date: June 17, 2022

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