

**HEADQUARTERS**

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WESTERN ENVIRONMENTAL LAW CENTER

June 8, 2022

Via electronic mail sage.park@ecy.wa.gov and meg.bommarito@ecy.wa.gov.

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

Re: Request for Extension of the Public Comment Period for the Free Flow Power Project (FFP) 101, LLC Goldendale Storage Project Draft Environmental Impact Statement.

Dear Ms. Park and Ms. Bommarito:

The Western Environmental Law Center, Columbia Riverkeeper, Washington Environmental Council, Washington Chapter of the Sierra Club, and American Rivers request that the Washington Department of Ecology extend the public comment period on the Goldendale Energy Storage Project (Project) draft Environmental Impact Statement for an additional 15 days.

The purpose of the commenting period is to engage the public in the review process. According to Washington regulation, “[r]eview, comment, and responsiveness to comments on a draft EIS are the focal point of the act’s commenting process....” Wash. Admin. Code 197-11-500. Without meaningful public review and participation, the purpose of the commenting process is unavailing and to no effect. As it stands, the current timeframe set for the commenting period is inadequate.

First, forty-nine days is not enough time for public review of a draft EIS during a pandemic. Currently, Washington has 2,613 daily cases of COVID. This ongoing and worsening public health crisis has limited the public’s ability to engage in this process. More specifically, the COVID pandemic continues to impact the communities with a direct stake near the proposed project. The Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) have consistently opposed this project since its inception due to the irreparable destruction it would cause to their natural and cultural resources located in the project footprint. The pandemic hit the Yakama Nation Reservation and surrounding ceded lands particularly hard, with tribal resources and attention directed to relief response. As a result, it is unreasonable to expect that the

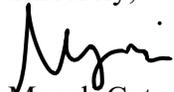
public, and even professionals who often engage in these agency processes, can operate under the time limitations that were considered normal before the pandemic. Furthermore, summer schedules may prevent much of the public from participating in a meaningful review of the draft EIS.

Second, to comment effectively on this decision requires reviewing and considering a significant amount of information that may not be readily available. The unprecedented size of this project, as the largest proposed pumped-storage project in the Pacific Northwest, requires more time to review the Goldendale Energy Storage Project Draft Environmental Impact Statement, the other project documents, and any additional research the public will have to seek out to understand the Project and its implications independently. With thousands of pages of material to review and understand, forty-nine days is not enough time for a public continuing to face a pandemic to review. Moreover, because the website has changed, it may confuse some, making it difficult to access the information.

For these reasons, we request that you extend the public comment period on the draft Environmental Impact Statement for an additional 15 days.

Thank you for your prompt attention to this request. If you have any questions or if we can provide additional information, please contact Andrew Hawley via email at hawley@westernlaw.org or phone at 206.487.7250.

Sincerely,



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