

## Oregon Parks and Recreation Commission

November 15<sup>th</sup>, 2023

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|-------------------------|--------------------------|----------------------|
| Agenda Item:            | 10c                      | <b>Informational</b> |
| Public Comment Allowed: | Yes                      |                      |
| Topic:                  | Letter from OPRD to FERC |                      |
| Presented by:           | Chris Havel              |                      |

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The text below was submitted in writing to the Federal Energy Regulatory Commission on October 3, 2023 in response to a public comment opportunity opened related to a pumped storage project connected to Lake Owyhee. Lake Owyhee State Parks is a 1,000 acre property serving 100,000 day visits and 20,000 camper night annually. The proposed project would withdraw water from the lake to a higher elevation, then release it back into the lake, generating electricity in the process. Agency comments reference a proposal found online at <https://www.ferc.gov/ferc-online/elibrary> by searching for Docket # P-15006-001.

OPRD comments submitted online:

### ***Owyhee Pumped Storage Project (P-15006-001).***

*The Oregon Parks and Recreation Department (OPRD) is charged by statute to operate state parks with “natural, scenic, cultural, historic or recreational value” that “will contribute to the general welfare, enjoyment and pleasure of the public.” (ORS 390.121). We operate the Lake Owyhee State Park, a major service that provides more than 100,000 daytime visits and nearly 20,000 camper nights per year. A vast majority of the recreational and other intrinsic values of the park are dependent on Lake Owyhee itself. We regard protecting natural and cultural resources as fundamentally necessary to provide recreation and heritage services and submit several aspects of the project “Owyhee Pumped Storage Project” need further scrutiny and explanation during the permitting process. Based on the current proposal, areas requiring more thought include:*

### ***Section 6.2 Water Resources (page 177)***

*Surface water effects are described, but the interplay between the project and groundwater resources should be analyzed, and changes to the quality and quantity of water available for human consumption, irrigation, and other uses should be mitigated. In particular, drilling or boring to install infrastructure described in sections 4.3.4 and 4.3.5 on page 60 need to be evaluated for pollution and vibration risks to groundwater systems, and the results mitigated or eliminated.*

### **6.7 Recreation and Land Use (page 180)**

*The project effects on watersports, including diving, SCUBA, motorized and nonmotorized boating, bank and offshore fishing, and related activities need to be evaluated and mitigated at all operational water levels.*

*Traffic studies for both the construction period and ongoing operational use need to establish the extra load that will be placed on public surface roads, including:*

- *Estimates of increased likelihood of slope and surface failures due to high volume and use by heavy vehicles.*
- *Congestion and the estimated the delays and associated extra carbon emissions from idling vehicles.*
- *Location and consequences of blocked vehicle accesses.*
- *Effects on emergency response and evacuations due to flood, fire, and other calamities, especially during construction.*

*These effects should be eliminated or mitigated.*

### **6.8 Aesthetic resources (page 180)**

*Full infrastructure plan should be developed, showing location, strength, color, and directionality of lights for purposes of estimating light pollution, and the effects need to be eliminated through use of light pollution-limiting technologies.*

*Estimates should be developed to derive the average and peak noise output associated both with the construction period and ongoing operations, and noise above a target decibel level should be mitigated with site design and sound-absorbing materials.*

### **6.9 Cultural Resources (Page 180)**

*Consultation between FERC and the SHPO needs to be scheduled with sufficient time for SHPO staff to participate meaningfully. Continued consultation with all federally recognized tribes with an interest in the geographic footprint of the project and the reservoir is vital.*

**Prior Action by the Commission:** None

**Action Requested:** None

**Attachments:** None

**Prepared by:** Chris Havel