

**Comments Received on the Record of the Public Hearing**

*The following two pages contain links to the comments received on the record of the public hearing on the Draft Proposed Order on Request for Amendment 1 to the Perennial Wind Chaser Station site certificate. Click on a link to go to the page where that comment appears.*

1. Certificate Holder 2019-08-22
2. Columbia Riverkeeper et al. 2019-08-22
3. Columbia Riverkeeper members\_supporters 2019-08-22
4. CTUIR 2019-08-12
5. Friends of the Columbia Gorge et al. 2019-08-08
6. Power Past Fracked Gas Coalition et al. 2019-08-16
7. Alan Amoth 2019-08-21
8. Alex Prentiss 2019-08-21
9. Alexander Miller 2019-08-21
10. Andreas Kyriacou 2019-08-21
11. Bernadette Rodgers 2019-08-14
12. Bonnie McKinlay 2019-08-22
13. Brock Roberts 2019-08-14
14. Carla Wise 2019-08-14
15. Chris Baker 2019-08-15
16. Chris Baker 2019-08-21
17. Connie Coleman 2019-08-20
18. Crystal Tolmie 2019-08-21
19. Daivati Bharadvaj 2019-08-21
20. Daniel Frye 2019-08-21
21. Daryl Grenz 2019-08-20
22. Dave King 2019-08-21
23. David Westerlund 2019-08-14
24. Donna Steadman 2019-08-21
25. Edward Cleary 2019-08-21
26. Emilie Marlinghaus 2019-08-21
27. Frank Payne 2019-08-22
28. Frederick Tolmie 2019-08-21
29. George Milne 2019-08-21

30. Irene Gilbert 2019-08-08
31. Jackie Nigh 2019-08-21
32. James Lanz 2019-08-20
33. Janet Kavanagh 2019-08-21
34. Janet Trygstad 2019-08-21
35. Jenny Holmes 2019-08-21
36. Julie Chapman 2019-08-22
37. Julie DeSmith 2019-08-21
38. Karen Stark 2019-08-21
39. Kenneth Fine 2019-08-21
40. Lara Gardner 2019-08-22
41. Leigh Hood 2019-08-14
42. Linda Browning 2019-08-14
43. Maija Schaefer 2019-08-21
44. Mary Daily 2019-08-14
45. Maxine Sheets-Johnstone 2019-08-20
46. Michael Dianich 2019-08-21
47. Michael Wilson 2019-08-20
48. Mimi Maduro 2019-08-22
49. Patricia Rau 2019-08-21
50. Patrick Mulcahey 2019-08-20
51. Robbie Moller 2019-08-21
52. Samuel Urko 2019-08-21
53. Sheila Baraga 2019-08-21
54. Sissy Aron 2019-08-21
55. Stephanie E. 2019-08-21
56. Tom McCue 2019-08-21
57. William Prothero 2019-08-20
58. Duplicate Compiled Comments



## MARTEN LAW

August 22, 2019

Via E-mail and Hand Delivery

Mr. Barry Beyeler  
Chair, Energy Facility Siting Council  
c/o Oregon Department of Energy  
550 Capitol Street NE  
Salem, Oregon 97301

RE: Perennial Wind Chaser Station, Request for Amendment No. 1

Dear Chairman Beyeler and Members of the Council:

This firm represents Perennial-WindChaser LLC (“Perennial”), the holder of the Site Certificate for the Perennial Wind Chaser Station, dated September 18, 2015. I am writing in support of Perennial’s Request for Amendment No. 1 and in response to the letter of August 16, 2019 from multiple environmental groups led by the “Power Past Fracked Gas Coalition,” (the “August 16 Letter”) and similar submittals in this proceeding.

### **Background**

In Request for Amendment No. 1, Perennial seeks to extend by two years both the deadline to begin construction of the Wind Chaser Station and the deadline to complete construction. *No other changes* to the project as previously approved by the Council are proposed.

Appendix F to the Council’s Final Order of September 18, 2015 summarized the eight public comments received prior to the close of the public hearing on the Draft Proposed Order for the Wind Chaser Station. That summary is attached as Exhibit 1. The public hearing was held in Hermiston on May 14, 2015. Not one of the groups now aligned against Perennial’s Request for Amendment commented on the Draft Proposed Order on Perennial’s Application for Site Certificate. No one raised any concerns with respect to natural gas as a fuel. No one requested a contested case on the Proposed Order. The approval of a Site Certificate for the Wind Chaser Station was relatively non-controversial.

Pursuant to OAR 345-027-0075(2)(b), the focus of the Council’s review of Perennial’s Request for Amendment is on the Wind Chaser Station’s compliance with the laws and Council standards applicable to issuance of the Site Certificate:



For a request for amendment to extend the deadlines for beginning or completing construction, after considering any changes in facts or law since the date the current site certificate was executed, *the facility complies with all laws and Council standards applicable to an original site certificate application.*

Those opposing the Request of Amendment, however, do not identify a single applicable law or substantive standard of the Council with which the Request for Amendment, or the Wind Chaser Station, fails to comply. Rather, they have attempted to stitch together an argument based on the Oregon Supreme Court's recent decision in *Friends of the Columbia Gorge v. Energy Facility Siting Council*, coupled with issues that do not implicate Council standards.

## **Argument**

### **I. Perennial did not file its Request for Amendment under “invalid” rules.**

Perennial filed its Request for Amendment under the Council's Division 27 rules in effect at the time; there was no alternative process available. The Request for Amendment was timely under those rules.

On August 1, 2019 – nearly a year after Perennial submitted its “Preliminary Request for Amendment” and more than three weeks after the Draft Proposed Order and Notice of Public Hearing were issued – the Oregon Supreme Court issued its decision, holding that the Council's October 2017 rulemaking was invalid.

Pursuant to Oregon Rules of Appellate Procedure (ORAP) 14.05(2)(b), in cases involving judicial review of administrative agency proceedings, the decision doesn't take effect until “the date that the Administrator sends a copy of the appellate judgment to the administrative agency.” Under ORAP 14.05(3)(b), “the Administrator will not issue the appellate judgment for a period of 21 days after the order or decision to allow time for a petition for reconsideration under ORAP 9.25 or a petition for attorney fees or submission of a statement of costs and disbursements under ORAP 13.05 and ORAP 13.10.” Thus, the *soonest* the Supreme Court's decision could take effect would be August 22, *if* the appellate judgment is sent by the Administrator on that date. If the petitioners before the Oregon Supreme Court seek attorneys' fees or costs, the issuance of the appellate judgment would be delayed until the petition for fees and costs is resolved.

In other words, at no point up to and including today has it been the case that Perennial was proceeding under invalid rules or that the Site Certificate has expired.

## **II. Perennial's Preliminary Request for Amendment explained the need for the extension of construction deadlines.**

Pursuant to OAR 345-027-0085(1), a preliminary request for amendment seeking to extend deadlines for beginning or completing construction “must include an explanation of the need for an extension.” Perennial included such an explanation, as opponents concede. On June 21, 2019, the Department of Energy determined the Request for Amendment to be complete.

Opponents assert that Perennial's explanation – that it has not yet been able to obtain a power purchase agreement -- was inadequate. They do not explain, however, how that explanation is relevant to action by the Council. The findings required to approve a request to extend construction deadlines are described in OAR 345-027-0075(2)(b):

For a request for amendment to extend the deadlines for beginning or completing construction, after considering any changes in facts or law since the date the current site certificate was executed, the facility complies with all laws and Council standards applicable to an original site certificate application.

In summary, the Department determined Perennial's explanation of the need for an extension to be sufficient for a complete application. Nothing in the Council's standard for approval of the Request for Amendment, however, requires a determination of the adequacy of that explanation.

## **III. The Wind Chaser Station will comply with applicable laws and Council standards.**

As explained above, OAR 345-027-0075(2)(b) requires that the certificate holder address and the Council consider “any changes in facts or law since the date the current site certificate was executed ....” That inquiry has limits: it is circumscribed by the ultimate objective of determining whether “the facility complies with all laws and Council standards applicable to an original site certificate application.” In other words, changes in facts and law must be relevant to approval standards for the facility.

The August 16 Letter identifies no changes in law. The opponents, however, assert that there are new studies – none cited – regarding the “risks of fracked gas,” in particular with respect to climate change. They also claim that they have learned, in an unrelated proceeding, about the potential that “Perennial will contribute smog-forming pollution to an already impacted airshed.” August 16 Letter at 2. Finally, they use the Request for Amendment itself as basis to plead that the Council should not “authorize a gas-powered plant that is not needed or

wanted.” August 16 Letter at 2. These purported changes in facts do not undermine the conclusion of the Draft Proposed Order that the Wind Chaser Station complies with applicable laws and Council standards.

**a. Clean Air Act issues are not under the Council’s jurisdiction.**

Pursuant to ORS 469.503(3), the Council’s jurisdiction does not extend to determining compliance with “those statutes and rules for which the decision on compliance has been delegated by the federal government to a state agency other than the council ....”

The Council has previously made it clear that it will not encroach on the delegated authority of the Oregon Department of Environmental Quality with respect to the federal Clean Air Act. For example, in its Final Order on the Application for Site Certificate for the Coyote Springs Cogeneration Project, Sept. 16, 1994, the Council stated:

We conclude that the following programs are exempt from EFSC jurisdiction because they are federally delegated programs:

- (1) the Air Contaminant Discharge Permit program administered by DEQ, which includes the federally delegated new source review requirements of the Clean Air Act and the Prevention of Significant Deterioration (PSD) program.

Final Order, Sept. 16, 1994 at. 77. The Council reiterated this conclusion when, in 2013, it amended the site certificate for the Coyote Springs facility to remove conditions related to nitrogen oxides (NO<sub>x</sub>), a pollutant regulated under the Title V permit issued to the facility by DEQ. *See* Final Order on Amendment #10 for the Coyote Springs Cogeneration Project, May 3, 2013, at 26-27 (“the administration of the Clean Air Act was federally-delegated to ODEQ, and as a federally-delegated permit, the Council does not have jurisdiction”).

Potentially “smog-forming” pollutants are addressed under the Air Contaminant Discharge Permit for the Wind Chaser Station. Absent some link to a Council standard, opponents’ concern is not within the Council’s jurisdiction.

**b. Applicable statutes and rules do not require a demonstration of a “need” for the proposed facility.**

ORS 469.501 requires that the Council “adopt standards for the siting, construction, operation and retirement of facilities.” It also includes a non-exclusive list of subjects the Council may address in its standards.

There is no statutory requirement that the Council evaluate the need for a proposed generating facility. The only mention of “need” in the current statute concerns “*nongenerating facilities* as defined in ORS 469.503.” ORS 469.501(1)(L) (emphasis added). The Council’s rules also do not require any demonstration of “need” for a generating facility. Some history may help illustrate why.

Prior to 1997, ORS 469.501(1)(L) included a “need” standard applicable to generating facilities. That “need standard” required a demonstration of:

The need for the proposed facility, consistent with the state energy policy set forth in ORS 469.010 and 469.310. In adopting the need standard, the council shall consider all of the costs of the emission from energy facilities of gases that contribute to global warming.

ORS 469.501(2) (1995) provided:

(2) The council may adopt exemptions, except for coal or nuclear power plants, from any need standard adopted under subsection (1)(L) of this section if the exemption is consistent with the state’s energy policy set forth in ORS 469.010 and 469.310. In addition to any other exemption the council has adopted by rule prior to July 5, 1995, up to 500 megawatts of natural gas fired facilities shall be exempt from any need standard if the applications for such facilities are deemed complete on or before July 1, 1997.

That “500-megawatt exemption” led to a proceeding sometimes called the “best of batch” contested case, or more colloquially, the “500 MW Beauty Contest.” Three proposed baseload natural-gas fired combustion turbine power projects competed for the exemption in a proceeding that evaluated the impacts of the projects on land, water, and air (including climate).

In the 1997 legislative session, the “need standard” for generating facilities was eliminated, along with the requirement that in adopting a “need standard,” the Council must “consider all of the costs of the emission from energy facilities of gases that contribute to global warming.” 1997 Or. Laws, chapter 428, § 3. The result was the current version of ORS 469.501(1)(L), pursuant to which the “need” standard applies only to nongenerating facilities.

Opponents’ contention that the Council should deny the Request for Amendment based on some assessment of “market demand” for the proposed facility seeks to resurrect a “need” standard for generating facilities. The legislature buried that requirement over two decades ago. There is no legal basis for applying it now.

**c. The Wind Chaser Station will comply with the Carbon Dioxide Emissions Standard.**

The same 1997 legislation that eliminated the “need” standard for generating facilities also enacted the carbon dioxide emission standard. 1997 Or. Laws, chapter 428, § 3. The prior requirement that the Council “consider all of the costs of the emission from energy facilities of gases that contribute to global warming” was replaced with a clear, objective carbon dioxide emissions standard set forth in ORS 469.503(2) and implemented by the Council through its rules, OAR 345-024-0500 through OAR 345-024-0720.

As discussed in the Draft Proposed Order at 81-97, the Wind Chaser Station would comply with the Council’s standard for carbon dioxide emissions from a non-base load power plant, provided that the Council adopts amended site certificate conditions to reflect the current monetary offset rate (\$1.90 per ton of carbon dioxide emissions) in 2019 dollars.

Opponents do not mention the Council’s carbon dioxide emissions standards or the proposed findings and conditions of the Draft Proposed Order. Those standards, however, are the means selected by the legislature and implemented by the Council for addressing concerns with respect to climate change in the issuance and amendment of site certificates for power plants such as the Wind Chaser Station. As reflected in the Draft Proposed Order, the Wind Chaser Station will comply with those standards.

**IV. The Governor has no role in the review of Perennial’s Request for Amendment.**

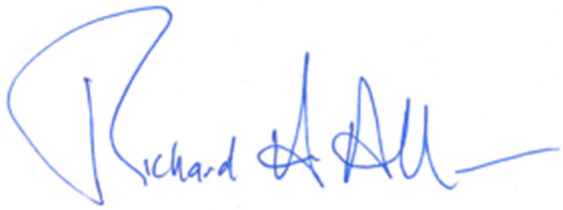
Opponents call on “the Governor and EFSC” to deny Perennial’s Request for Amendment. August 16 Letter at 2. All current members of the Council were appointed or reappointed by Governor Brown. By statute, however, the decision whether to approve an amendment to a site certificate rests solely with the Council. ORS 469.405(1).

Mr. Barry Beyeler  
Chair, Energy Facility Siting Council  
August 22, 2019  
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## **Conclusion**

The August 16 Letter, and similar submittals by email, raise no issues undermining the proposed findings of fact and conclusions of law in the Draft Proposed Order.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard H. Allan", with a stylized flourish at the end.

Richard H. Allan  
Attorney at Law

**Exhibit 1**

DateOfDoc	From: Last Name	From: First Name	From: Organization	Type	Issue(s) Raised	Consideration in Proposed Order
5/7/2015	Smith	Byron	City of Hermiston & Port of Umatilla	Written	Facility's use and reliance upon Port of Umatilla water right and the necessary infrastructure upgrades in order to provide water to the facility	Section IV.B.: Organizational Expertise and Section IV.R.: Ground Water
5/7/2015	Harrison	Glenn	N/A	Written	Facility's impact on oregon trails	Section IV.F.: Protected Areas and Section IV.L.: Recreation Standard
5/14/2015	Murdock	George	Umatilla County Board of Commissioners	Written	Requested that each specific land use permit to be issued to be identified within a condition; requested the applicant enter into a development agreement with the County to address road improvements, including icing and fogging as a result of facility operation; requested clarification of the Council's enforcement of the noise standard	Section IV.E.: Land Use; Section IV.M.: Public Services; and Section IV.P.: Noise
5/14/2015	Pedro	Lawrence	N/A	Oral	Impact of reconducted transmission line on agriculture pivots	Section IV.O.: Siting Standards for Transmisison Lines
5/14/2015	Echeverria	Dixie	ELH, LLC	Oral	Placement of proposed natural gas line and potential icing of roadways associated with the facility's plume during operation	Section II.B; Section IV.M.: Public Services
5/14/2015	Little	Chuck	Pendleton Building Construction Trades Council	Oral	In support of the facility	General Suport for the Facility, not addressed in the Proposed Order
5/14/2015	Gilbert	Irene	N/A	Oral	Impact of the facility's plume on military airspace and drones	Section IV.M.: Public Services
5/14/2015	Mabbott	Tamra	On behalf of Umatilla County Board of Commissioners	Oral	Summarized County's sumitted written comments (above)	Section IV.E.: Land Use; Section IV.M.: Public Services; and Section IV.P.: Noise

## CLIFFORD Katie \* ODOE

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**From:** Erin Saylor <erin@columbiariverkeeper.org>  
**Sent:** Thursday, August 22, 2019 2:48 PM  
**To:** PER Comments \* ODOE  
**Subject:** Comments for Perennial Wind Chaser Station RFA1  
**Attachments:** Comments on Perennial Wind Chaser RFA1 Aug. 22, 2019.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Ms. Clifford,

Please accept the attached comments on the Perennial Wind Chaser Station Complete Request for Amendment 1, submitted on behalf of Columbia Riverkeeper, Friends of the Columbia Gorge, Sierra Club, Northwest Environmental Defense Center, and Oregon Wild.

Thank you,

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**Erin Saylor** | Staff Attorney | Columbia Riverkeeper | 1125 SE Madison St., Suite 103A, Portland, OR 97214 | 541.399.4775

[\*\*River Currents 2019 Issue 2 Newsletter—Read it Now\*\*](#)

*The Playbook Issue: How Columbia Riverkeeper is tackling corporate polluters, staving off fossil fuel giants, and inspiring people to fight for clean water.*





August 22, 2019

Katie Clifford, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol Street NE, 1st Floor  
Salem, OR 97301

Submitted via email to: [PER.Comments@Oregon.gov](mailto:PER.Comments@Oregon.gov)

**Re: Perennial Wind Chaser Station — Request for Amendment 1**

Dear Ms. Clifford:

Please accept these comments from Columbia Riverkeeper, Sierra Club, Friends of the Columbia Gorge, Northwest Environmental Defense Center, and Oregon Wild. On behalf of our tens of thousands of members and supporters, we urge the Oregon Department of Energy's Energy Facility Siting Council (EFSC) to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's ("Perennial") site certificate for a proposed gas-fired power plant. In the five years since Perennial applied for a site certificate from EFSC, the environmental impacts of fracked gas have become increasingly apparent. To combat climate change, we need to rapidly phase out all fossil fuel infrastructure, not construct new gas-fired power plants like Perennial.

**1) The site certificate for this project is expired, void, and cannot be amended.**

As an initial matter, the site certificate for this project is expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the

deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules.<sup>1</sup> Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here “are invalid.”<sup>2</sup> Because the RFA was expressly submitted under invalid rules, it cannot be processed by ODOE and cannot be approved by EFSC.<sup>3</sup> Moreover, because the site certificate already expired on September 24, 2018 (one day after the construction start deadline), it is void and cannot be amended. Nor does the Council have authority to adopt any future new rules that might authorize the processing of any amendments to the Perennial certificate, which, again, is expired and void. The requested amendment can neither be processed nor approved. If Perennial wants to move forward, it must submit a new site certificate application.

Perennial could have avoided this result by timely submitting an alternate, contingent application for an amendment to the site certificate under the rules that were in effect prior to October 2017 (which rules are still in effect and valid today) and asking ODOE and EFSC not to process that alternate application unless and until the challenged (October 2017) rules were deemed invalid. In the alternative, Perennial could have commenced construction at any point over the past several years, which likely would have mooted the issue of whether the construction commencement deadline should be extended. By failing to pursue either approach, Perennial is responsible for allowing the site certificate to expire.

Requesters respectfully request a confirmation that (1) the Perennial site certificate has expired and is void because construction was not commenced prior to the September 23, 2018 deadline, (2) the RFA was submitted pursuant to invalid rules, and for these reasons, (3) the RFA will not be processed any further and/or will be rejected or denied.

**2) Perennial’s application is incomplete because the record indicates that its DEQ air permit is expired.**

EFSC’s rules require applicants for site certificates to demonstrate that they have obtained or will obtain all permits needed for construction and operation of proposed energy facilities. With respect to federally delegated permit applications, applicants must submit “evidence that the responsible agency has received a permit application and the estimated date

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<sup>1</sup> See RFA at § 1.

<sup>2</sup> *Friends of the Columbia Gorge, et al. v. Energy Facility Siting Council*, 365 Or 371, 396 (2019) (“The rules approved by the Energy Facility Siting Council through Permanent Administrative Orders EFSC 4-2017 and EFSC 5-2017 are invalid.”).

<sup>3</sup> The Oregon Court of Appeals has repeatedly held that invalid rules cannot be applied or enforced. See *Homestyle Direct, LLC v. Dep’t of Human Serv.*, 245 Or. App. 598, 263 P.3d 1118 (2011) (state agencies cannot enforce invalid rules); *Clark v. Public Welfare Division*, 27 Or. App. 473, 556 P.2d 722 (1976) (“The decision of the hearings officer having been made pursuant to invalid rules is itself invalid.”); *Kessler v. Or. Corr. Div.*, 26 Or. App. 271, 552 P.2d 589 (1976) (agency decision reversed and remanded because it applied invalid rules).

when the responsible agency will complete its review and issue a permit decision.”<sup>4</sup> In its completed RFA, dated June 26, 2019, Perennial notes that “[t]he Air Contaminant Discharge Permit and Prevention of Significant Deterioration Permit (Air Permit) were initially issued on January 26, 2016. An application to extend the construction start date was submitted on April 5, 2017. Oregon Department of Environmental Quality (DEQ) approved the extension on May 17, 2017. The Air Permit now has a required start date of January 26, 2019. The DEQ may grant an additional 18 month extension for good cause.”<sup>5</sup> But when Perennial made this statement, the Air Permit had apparently already expired. Perennial failed to disclose this fact, and failed to explain whether an 18-month extension was ever sought or approved by DEQ. Columbia Riverkeeper has confirmed with DEQ that Perennial did, in fact, apply for an 18-month extension, but as far as the record shows, the Air Permit has expired. At a minimum, Perennial’s application is incomplete and should never have been deemed complete by EFSC, and Perennial’s failure to address this issue should result in denial of the RFA.

### **3) Fracked gas is no longer considered a climate-friendly energy alternative**

When evaluating a request to extend construction deadlines under its invalid rules, EFSC must consider “any changes in facts or law since the date the current site certificate was executed.”<sup>6</sup> ODOE interprets this rule as requiring the review of any change to facility design, the existing environment, or changes in law since the current site certificate was issued. Since Perennial’s current site certificate was initially approved in 2015, multiple studies have demonstrated the cradle-to-grave climate change and air pollution impacts of fracked gas. For example, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood.<sup>7</sup> Additionally, Governor Brown has recognized climate change as “one of the most significant threats to Oregon’s economy, environment, and way of life.”<sup>8</sup> Fracked gas infrastructure, like Perennial’s 415-megawatt gas-powered facility, threatens the health of our communities and our climate.

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<sup>4</sup> OAR 345-021-0010(1)(e)(D).

<sup>5</sup> RFA at 5.

<sup>6</sup> See OAR 345-027-0075(2)(b) (2018).

<sup>7</sup> See Steven Mufson, *Methane Leaks Offset Much of the Benefits of Natural Gas, Study Says*, Wash. Post, June 24, 2018,

[https://www.washingtonpost.com/business/economy/methane-leaks-offset-much-of-the-benefits-of-natural-gas-new-study-says/2018/06/21/e381654a-7590-11e8-b4b7-308400242c2e\\_story.html](https://www.washingtonpost.com/business/economy/methane-leaks-offset-much-of-the-benefits-of-natural-gas-new-study-says/2018/06/21/e381654a-7590-11e8-b4b7-308400242c2e_story.html), see also Alvarez, et al., *Assessment of methane emissions from the U.S. oil and gas supply chain*, Science (2018), available at

<https://science.sciencemag.org/content/361/6398/186?rss=1>; Sierra Club, *Fracked Gas: Nothing “Natural” About It* (2018) (reviewing literature and estimating leakage rate of 3 percent), available at

[https://www.sierraclub.org/sites/www.sierraclub.org/files/blog/FACTSHEET\\_FrackedGasClimateImpacts.pdf](https://www.sierraclub.org/sites/www.sierraclub.org/files/blog/FACTSHEET_FrackedGasClimateImpacts.pdf)

<sup>8</sup> [https://www.oregon.gov/gov/policy/Pages/energy\\_climatechange.aspx](https://www.oregon.gov/gov/policy/Pages/energy_climatechange.aspx)

Specifically, the Council should consider and require accounting for the significant methane releases that would be connected to the Perennial project.<sup>9</sup> The Council must “determine the gross carbon dioxide emissions that are reasonably likely to result from the operation of the proposed energy facility.”<sup>10</sup> The term “carbon dioxide emissions” means either carbon dioxide itself or the “carbon dioxide equivalent of other greenhouse gases,” and the rules expressly consider methane as equivalent to 25 pounds of carbon dioxide.<sup>11</sup> In fact, EPA estimates methane to be 28 to 36 times more potent than carbon dioxide over 100 years.<sup>12</sup> Methane leaks are “reasonably likely to result from the operation” of Perennial. Many researchers have calculated the national average gas leakage rate with a central estimate of about three percent of total production.<sup>13</sup> Additionally, a new study, which utilized special flying lab-planes to collect data, found that natural gas power plants release 21 to 120 times more methane than what has been suggested in the EPA's Greenhouse Reporting Program data. This fly-over data collection method allowed the scientists to measure not only the regular emissions that came out of the plant's smokestacks, but also spilled methane that later rises to the atmosphere.<sup>14</sup> The Council must account for the methane emissions that will result from Perennial before issuing a site certificate, including methane leaks associated with the production, processing, storage, transmission, distribution, and use of the fracked gas.

Furthermore, recent experience with the Carty Generating Station has shown that gas-fired power plants have the potential to emit far greater levels of volatile organic compounds (VOCs) than energy companies such as Perennial have led permitting authorities and the public to believe. Perennial estimates 500 startups and shutdowns every year.<sup>15</sup> Pollution levels are much higher during startup and shutdown events because carbon monoxide and volatile organic compounds increase during partial load operations, and because pollution control devices like selective catalytic reduction controls cannot operate until the temperature reaches a certain threshold.<sup>16</sup> Perennial's DEQ Air Permit (if it is still in effect) allows it to emit pollution beyond

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<sup>9</sup> See OAR 345-024-0500—OAR 345-024-0720.

<sup>10</sup> OAR 345-024-0590(1)(emphasis added).

<sup>11</sup> *Id.*

<sup>12</sup> EPA, Understanding Global Warming Potentials, *available at* <https://www.epa.gov/ghgemissions/understanding-global-warming-potentials>

<sup>13</sup> See note 2.

<sup>14</sup> Tegan N. Lavoie, Paul B. Shepson, Chloe A. Gore, Brian H. Stirm, Robert Kaeser, Bernard Wulle, David Lyon, and Joseph Rudek, *Assessing the Methane Emissions from Natural Gas-Fired Power Plants and Oil Refineries* Environmental Science & Technology 2017 51 (6), 3373-3381, *available at* [https://pubs.acs.org/doi/abs/10.1021/acs.est.6b05531?\\_ga=2.16124726.1022368715.1566343387-837264606.1566343387](https://pubs.acs.org/doi/abs/10.1021/acs.est.6b05531?_ga=2.16124726.1022368715.1566343387-837264606.1566343387)

<sup>15</sup> Standard Air Contaminant Discharge Permit, Permit No. 30-0039-ST-01, Section 3.9 (Jan. 26, 2016).

<sup>16</sup> See Permit No.: 30-0039-ST-01, Application No.: 27470, Page 13 of 62; *see also* Joseph J. Macak III, *Evaluation of Gas Turbine Startup and Shutdown Emissions for New Source Permitting*, *available at* <https://d3pcsg2wj9izr.cloudfront.net/files/6709/articles/5647/evaluationofpermitting.pdf>

normal levels during startup and shutdown events, and fails to impose any limits on the amount of emissions during these events.<sup>17</sup>

Approving Perennial's RFA would contradict Oregon's goals to reduce greenhouse gas emissions. Oregon is one of twenty-four states that have signed the U.S. Climate Alliance, pledging to reduce greenhouse gas emissions consistent with the goals of the Paris Agreement. By joining the Alliance, Governor Brown committed to "implement policies that advance the goals of the Paris Agreement, aiming to reduce greenhouse gas emissions by at least 26–28 percent below 2005 levels by 2025" and to "accelerate new and existing policies to reduce carbon pollution and promote clean energy deployment at the state and federal level."<sup>18</sup> We must move rapidly away from fossil fuel infrastructure and toward renewable energy alternatives. Approving Perennial's RFA would be a step backwards.

At the time Perennial received its initial site certificate, so called "natural gas" was still considered a "bridge fuel" between coal and cleaner energy alternatives. In the intervening years, it has become abundantly clear that switching from coal to fracked gas is almost a wash from a climate perspective; the health of our planet demands investment in cleaner alternatives now.<sup>19</sup> The construction of a new fracked gas-fired power plant would lock the state into decades of dependence on fossil fuel that would impede the development of cleaner, safer alternatives. We no longer have the luxury of a "bridge"; the time to move away from fracked gas is now.<sup>20</sup>

#### **4) Perennial failed to adequately explain why it needs extensions of the construction deadlines.**

Perennial's purported explanation why it needs an extension of the construction deadlines for this project is legally inadequate. To the extent that EFSC's invalid rules can be applied here, those rules require Perennial to explain the need for an extension.<sup>21</sup> Implicit in that rule is a requirement that the applicant's explanation must be compelling. For example, an "explanation" that a project's backers were in jail for fraud or negligently missed the deadline to apply for an RFA would neither satisfy OAR 345-027-0085, nor entitle the applicant to an extension. Perennial merely claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." However, Perennial failed to explain what, if any, steps it took to attempt to obtain a power purchase agreement. More importantly, Perennial failed to explain *why* its inability to find customers

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<sup>17</sup> See Permit No. 30-0039-ST-01 at 3.3,3.4, 3.5,3.6 (excluding startup and shutdown periods from nitrogen oxide, carbon monoxide, and volatile organic compound limits); *see also* Permit No. 30-0039-ST-01 at 3.9 (limiting the time and frequency of startup and shutdown periods but not the emissions levels).

<sup>18</sup> See <https://www.usclimatealliance.org/alliance-principles>

<sup>19</sup> See <https://www.ucsusa.org/clean-energy/coal-and-other-fossil-fuels/infographic-climate-change-risks-natural-gas>

<sup>20</sup> See The Guardian, *World has no capacity to absorb new fossil fuel plants, warns IEA* (November 12, 2018).

<sup>21</sup> See OAR 345-027-0085 (2018).

warrants reviving the void site certificate and keeping it alive even further by granting a construction time extension. Perennial has failed to proffer an explanation sufficient to justify an extension.

In addition, under the invalid rules, EFSC has authority to approve an extension for *up to* two years.<sup>22</sup> In other words, EFSC could approve an extension, but for a period of *less than* two years. Perennial's RFA fails to demonstrate why it needs full two-year extensions of *both* the construction start deadline and the construction completion deadline, and why extensions of less than two years for either of these deadlines would not be sufficient.

Such an explanation is especially necessary given that Perennial itself has admitted that the construction deadline in its DEQ Air Permit cannot be extended more than 18 months past Jan. 26, 2019.<sup>23</sup> The regulations governing DEQ's approval of the Air Permit are clear that if construction does not begin within 54 months of the initial permit issuance, the permit is void and the permittee must apply for a new permit.<sup>24</sup> The initial Air Permit was issued on Jan. 26, 2016; since the regulations require construction to begin within fifty-four months, the current Air Permit may not be extended beyond July 26, 2020. Since Perennial's Air Permit requires construction to begin, at the absolute latest, by July 26, 2020, there is no reason for EFSC to extend the construction start deadline in the site certificate beyond that date.

Perennial's attempted explanation of the need for construction extensions, in addition to being legally insufficient, admits a lack of market demand for energy from this project. Perennial's application states that "[t]here have been tremendous changes in the energy market and in pending federal regulations covering the energy sector since the issuance of the Site Certificate. Perennial is optimistic that as soon as future energy planning becomes stable, the need for the Facility will become apparent to the marketplace." Perennial made no effort to explain the source of its optimism that the market will somehow swing in its favor, particularly when state energy policy is clearly moving in the opposite direction, away from fossil fuel infrastructure. There is simply no room in Oregon for a new fracked gas-fired power plant; EFSC should not continue to allow this zombie project to linger any longer, given the absolute lack of need for the project.

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<sup>22</sup> OAR 345-027-0085(5)(d) (2018)

<sup>23</sup> RFA at 5.

<sup>24</sup> OAR 340-224-0030(5)(c) ([e]xcept as provided in subsection (i), the permit will be terminated 54 months after it was initially issued if construction does not commence during that 54 month period. If the owner or operator wants approval to construct beyond the termination of the permit, the owner or operator must submit an application for a new Major NSR or Type A State NSR permit).

For these reasons, Perennial's RFA should be denied. Thank you for considering this comment.

Sincerely,

Erin Saylor, Staff Attorney  
Columbia Riverkeeper  
1125 SE Madison St., Suite 103A  
Portland, OR 97214  
erin@columbiariverkeeper.org  
(503) 399-4775

Nathan Baker, Senior Staff Attorney  
Friends of the Columbia Gorge  
nathan@gorgefriends.org  
333 SW 5th Ave., Suite 300  
Portland, OR 97204-1717  
(503) 241-3762 x101

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Sierra Club Environmental Law Program  
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Oakland, CA 94612  
415.977.5544  
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Jonah Sandford, Staff Attorney  
Northwest Environmental Defense Center  
10015 SW Terwilliger Blvd.  
Portland, OR 97219  
jonah@nedc.org  
(503) 768-6726

Doug Heiken, Conservation and Restoration Coordinator  
Oregon Wild  
PO Box 11648  
Eugene, OR 97440  
dh@oregonwild.org  
541.344.067

## CLIFFORD Katie \* ODOE

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**From:** Dan Serres <dan@columbiariverkeeper.org>  
**Sent:** Thursday, August 22, 2019 10:45 AM  
**To:** PER Comments \* ODOE; CORNETT Todd \* ODOE  
**Subject:** Submittal of over 1,200 Comments Opposing RFA for Perennial Wind Chaser Gas Plant  
**Attachments:** 2019.8.22 CRK Collected Signatures and Comments Perennial Wind Chaser RFA.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Clifford and Oregon Energy Facility Siting Council:

Please see the attached comments of Columbia Riverkeeper members and supporters who urge Oregon EFSC to reject the Request for Amendment to Perennial Wind Chaser's site certificate. Over 1,200 people support and submit the following comment below, and many added their own distinct comments (which are included in the attached table to ease your review).

Thank you for considering these comments,

Dan Serres

Conservation Director,  
Columbia Riverkeeper

*Dear Oregon Energy Facility Siting Council:*

*I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat climate change we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.*

*I urge EFSC to deny Perennial's RFA because:*

- 1. The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.*
- 2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.*
- 3. EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.*



*EFSC should deny Perennial's RFA.*

*Thank you for considering this comment.*

--

Dan Serres | Conservation Director  
Columbia Riverkeeper | 1125 SE Madison Suite 103A Portland 97214  
503.890.2441 | [dan@columbiariverkeeper.org](mailto:dan@columbiariverkeeper.org)

**[River Currents 2019 Issue 2 Newsletter—Read it Now](#)**

*The Playbook Issue: How Columbia Riverkeeper is tackling corporate polluters, staving off fossil fuel giants, and inspiring people to fight for clean water.*

Dear Oregon Energy Facility Siting Council:

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*agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.*

*EFSC should deny Perennial's RFA.*

*Thank you for considering this comment.*

#	First Name	Last Name	Email Address	City	Stat	Additional Comment
1	Susanna	Askins	tlknkr@gmail.com	Portland	OR	NO FRACKED GAS IN OREGON. PERIOD!
2	Joan	Balfour	sofjoanb@aol.com	Boynton Beach	FL	
3	Georgeann	Courts	gfcourts@gmail.com	Portland	OR	
4	Michael	Lombardi	mike.lombardi@rcn.com	Levittown	PA	
5	Lenny	Dee	ldeepdx@yahoo.com	Portland	OR	
6	Sandra	Siegner	ssiegner3@gmail.com	Portland	OR	
7	Edward	del Val	edwardjamesdelval@gmail.com	Cascade Locks	OR	
8	Virginia	Feldman	feldmanvi@gmail.com	Portland	OR	
9	Steven	Vogel	steven.j.vogel@earthlink.net	Falls Church	VA	I personally know three private-property owners whose drinking-water wells have been permanently polluted with toxic fracking chemicals from nearby fracking wells that destroyed the local aquifers. Two live in northeastern Utah and one lives in northeastern Pennsylvania. It would be a real shame for Oregon to allow a power plant to burn such ill-gotten fossil fuel.
10	Kathryn	Ellis	daybreak.tech@gmail.com	Otis Orchards	WA	Protect our Water, our Land & our People! No fracked gas or oil.
11	Tabitha	Thomasson	tabithathomasson@windstream.net	Dahlongega	GA	

						Only to reiterate that Oregon has no need to promote any project that develops new infrastructure that requires fossil fuels. I can appreciate that we need to wean ourselves from existing dependence on fossil fuels, but it pure folly to develop NEW power plants that depend on it (not to mention the environmental cost of fracking, itself). Let's focus on NEW and RENEWABLE and SUSTAINABLE environmentally supportive sources of energy..... Leave fossil fuels behind.
12	Diana	Pope	diana.s.pope@gmail.com	Portland	OR	
13	P Anna	Johnson	aj@mercedlake.com	Portland	OR	
14	Kate	Skolnick	krs1123@gmail.com	Brooklyn	NY	
15	JL	Angell	jangell@earthlink.net	Rescue	CA	
16	Philip	Shook	huisbaas@yahoo.com	Tempe	AZ	
17	Nick	Szumlas	szumlasnl@yahoo.com	Seattle	WA	
18	Steve	Sheehy	sheehy.s@charter.net	Klamath Falls	OR	
19	Denise	Lytle	centauress6@live.com	Woodbridge	NJ	

						I'm already worried enough about what I'll do when the BIG ONE hits here. I don't need fracking coming in and making man-made earthquakes. Much less all the horrible water pollution that comes along with this completely destructive means of energy production. Don't the salmon have enough to deal with? No thanks, keep your fracking out of Oregon.
20	Jocelyn	Jones	jocelynjones@gmail.com	Portland	OR	
21	Michael	O,ÃBrien	obrien@hevanet.com	Portland	OR	Dear Governor Brown, We urge you to be a climate warrior and stop development of new fossil fuels extraction and transport. We are in a climate crisis and must take action. Best wishes, Mike and Vana O,ÃBrien
22	Kelly	McConnell	kellymccnnl@yahoo.com	Portland	OR	
23	John	Tyler	johnbtyler.ashland@gmail.com	Ashland	OR	
24	Anne Marie	Benjamin	amfitzie@aol.com	Portland	OR	
25	Nancy	Pfeiler	nancypfeiler6@gmail.com	West Saint Paul	MN	I used to live in Oregon. I care deeply.
26	Lauren	Fenenbock	shainablue@gmail.com	El Paso	TX	
27	Meya	Law	zardiva1@aol.com	District Heights	MD	
28	Moraima	Suarez	moraima48@earthlink.net	Brooklyn	NY	
29	Christine	Mayou	chrismayou@gmail.com	Silverton	OR	KEEP IT IN THE GROUND! For our children. PLEASE!
30	A.L.	Steiner	asteinerny@gmail.com	Cornwallville	NY	
31	Kristin	Lee	kplee@centurylink.net	Portland	OR	

32	Sherry	Williams	selketw@aol.com	Renton	WA	
33	Jane	Butler	butlertwins97@aol.com	Hedgesville	WV	
34	Joyce	Peck	joycepeck@q.com	Portland	OR	
35	Ed	Fiedler	sparkplug2525@gmail.com	Austin	TX	
						The IPCC and also the US national climate agency have both reported that we only have another decade to make major changes before climate chaos becomes unstoppable. We can,Äôt expect the Trump administration to make any decisions that would lead in the right direction. It is up to the States, counties and cities to take action, It would be irresponsible for Oregon to fail to do so.
36	Mike	Litt	littm10@comcast.net	Portland	OR	
						Fracking is causing huge environmental issues, both air and ground pollution that can not be undone easily, in fact, the ground is permanently destroyed. We the People need a clean(er) environment and so do the plants and animals.... Please do not give the Hermiston oil/gas polluter a license to ruin the land, the water and the atmosphere. Thank you for thinking and doing something positive about our future on Planet E.
37	karol	dietrich	wonmor@pacifier.com	Corbett	OR	

38	Walter	Burkhardt	waltskiburkhardt@gmail.com	Hood River	OR	Fracking is killing our planet from the ground up lets nip this in the bud!! Just say NO!
39	Rebecca	Picton	sevenswans7@gmail.com	Corvallis	OR	
40	Tania	Malven	tmalven@yahoo.com	Tucson	AZ	Fracked gas pollutes water and air!!!! HELL NO!!!!!!
41	Douglas	Cooke	squirrelnest@yahoo.com	Brooklyn	NY	
42	Stephen	La Serra	slas1841@gmail.com	Stoneham	MA	
43	Connor	DeVane	connor@hikethedivide.com	Portland	OR	This is a non-starter. We need to kickstart the just transtition immediately; no new fossil fuel infrastructure! We are in the midst of an emergency, we must behave accordingly.
44	Robert	Granger	rgranger36@gmail.com	Eugene	OR	
45	Melba	Dlugonski	melbajade@hotmail.com	Portland	OR	
46	Kirsten	Oliver	knoliver@frontier.com	Seaside	OR	
47	Marian	Rauch	mdrfrdr@gmail.com	Portland	OR	
48	Ellen	Mickle	mickle.ellen@gmail.com	Portland	OR	
49	Andrew	Friedman	adfriedman@gmail.com	Oakland	CA	
50	Gill	Fahrenwald	anvilman@orcalink.com	Olympia	WA	
51	Jessica	Greenleaf	groovygreenleaf@gmail.com	Hillsboro	OR	
52	myra	lighthart	myralighthart@gmail.com	Portland	OR	
53	Kathryn	Yearsley	yearkat@hotmail.com	Portland	OR	
54	Anthony	Buch	maritoni_buch@yahoo.com	Seattle	WA	
55	Abigail	Gindele	agindele@gmail.com	Portsmouth	NH	
56	Andrea	Milano	elleroy@hotmail.com	Portland	OR	
57	Elizabeth	Kelly	simmygirl34@gmail.com	Dalton	GA	



58	Ken	Jackson	akovia@yahoo.com	Hillsboro	OR	,ÄÜPerennial Wind Chaser,ÄÜ! THAT is the name of a gas power plant? The name is deceptive enough to be considered fraudulent. Reject this con-jod.
59	Laura	Saunders	tolsaunders@yahoo.com	San Francisco	CA	
60	Chris	Hazynski	mchazy77@hotmail.com	Burlington	NJ	
61	Kathleen	Findlay	kathleen.findlay48@gmail.com	Albany	OR	The destruction of the environment, the health issues, the precedent for dollars over common sense have all proven disastrous in every instance of fracking. This is something not only to avoided but to be prosecuted for proposing this kind of domestic terrorism. Do not allow this.
62	Phyl	Morello	1432phyl@gmail.com	White Pine	TN	
63	Cl	K	krsnan11@yahoo.com	Stuart	FL	
64	Steve	Rauworth	steve.rauworth@gmail.com	Portland	OR	
65	Jean	Hoene	greyhorsejean@aol.com	Boise	ID	
66	Becky	Andrews	becand025@aol.com	Baton Rouge	LA	
67	Ruthanne	Cox-Carothers	ruthanne1111@comcast.net	Lake Oswego	OR	
68	Kathleen	Butt	kateabutt@hotmail.com	Redmond	WA	Putting the oil/toxins/waste back into the earth in a way which is not harmful is not possible. Remember that generations will remember if you do the wrong thing.
69	Paul	Palla	paulpalla69@yahoo.com	Greencastle	PA	ALL FOSSIL FUELS = DEATH! STOP KILLING THE EARTH!!
70	Jerry	Smith	digjerrydig@gmail.com	Eugene	OR	stop producing climate chaos

71	Robert	Stabbert	robert@stabbert.org	Portland	OR	
72	Phil	Ritter	philr@sonic.net	Sammamish	WA	
73	Lyle	Larson	lljjoly@yahoo.com	Beaverton	OR	The fracking process is bad for the earth. Let's do the right thing and stop it now.
74	Nancy	Ellingham	nancyee@comcast.net	Mercer Island	WA	
75	Virgene	Link-New	linkerwan@yahoo.com	Anacortes	WA	
76	Judith	Eda	judyeda@gmail.com	Portland	OR	Every aspect of fracking harms the environment: methane release, aquifer contamination, silicon mining, wastewater filled with radioactive elements and undisclosed toxic chemicals . . . There is nothing 'natural' about natural gas. Just Say No.

						<p>The human race is presently doing all it can to slow global warming . One o the way that humans are effecting it is the constant and committed use of Fossil Fuel . We need to get seriously about our efforts to stop the use of Fossil Fuel in this country any way we can .It's like a diet that we say we are going to start but because of lack of commitment we never reach our goals . The same is happening with us , humans , to reach our goals we can not be tempted by financial gain , since with fossil fuel it's a lost in the end . We need long term planning not to be cougth with a mess that will fall on the state of Oregon , and its residence . Please say NO , to power plants that work with fossil fuel . The term Natural Gas , refers to gas that is obtained via Fracking which is not anything Natural at all . Thank YOU FOR YOUR TIME .</p> <p>Regards jorge Tamargo</p>
77	Jorge J	Tamargo	dutchelm@netzero.net	Miami	FL	
78	Elaine	Powrie	ecpowrie@gmail.com	Hood River	OR	
79	Mary Lou	Soscia	wallymolly@gmail.com	Portland	OR	
80	Richard	Weinhold	gr8trips@yahoo.com	Florence	OR	
81	Heide	Coppotelli	goodshepherd@comporium.net	Cedar Mountain	NC	
82	Heather	Carver	tierrabodhi@gmail.com	Portland	OR	

83	nancy	johnson	nanjc@comcast.net	Beaverton	OR	
84	jeff	kipilman	jkip@comcast.net	Portland	OR	
85	Jared	Cornelia	jaredc1200@gmail.com	Wilmington	DE	
86	Dorothy	Louis	dorothylouis@yahoo.com	Corvallis	OR	
87	John	S	jleestim@aol.com	Seattle	WA	
88	Robin	Weage	rweage@dataspinners.com	Portland	OR	
89	Chris	Lima	limasherps@aol.com	Orofino	ID	
90	Jean	Toles	jeantoles@comcast.net	Portland	OR	Fracking is very damaging. No plant that does it should ever be allowed.
91	Pat	Bognar	bognar@up.edu	Portland	OR	
92	Ila	Newman	ilag@centurytel.net	Twisp	WA	thanks!!!!
93	Ellen	Bailey	ellen361@gmail.com	Portland	OR	
94	Diana	Saxon	moondaughter72@hotmail.com	Salem	OR	Oregon doesn't need a fracked gas-fired power plant. Period.
95	Michael and Barb	Hill	theelbehills@gmail.com	Mineral	WA	No Gas Thank you
96	Taylor	Smith	taylor-smith1051@gmail.com	New Carlisle	OH	
97	Sandra	Smith	7schipperkes@gmail.com	Seattle	WA	
98	Donna	Harris	kermit.donna@gmail.com	Bend	OR	
99	Ja	Vranka	javranka@gmail.com	Portland	OR	This is not the way forward. Please take a stand with me and oppose any fracked gas plans. Let's try to change our course and make a better world for our children and grandchildren.
100	Linda	Chapman	lgchapman63@comcast.net	Olympia	WA	
101	Winston	Anderson	wh_anderson@msn.com	Portland	OR	
102	Rachael	Pappano	shamrock.magic@yahoo.com	Mattawamkeag	ME	
103	Karla	Van Dyke	karlavandyke@gmail.com	Portland	OR	
104	Kay	Reinfried	kmreinfried@gmail.com	Lititz	PA	

105	Ana	Day	theanieday@gmail.com	Portland	OR	
106	Jamie	Green	springhead.jg@gmail.com	Ventura	CA	
107	Michele	Paxson	michelepaxson@gmail.com	East Meadow	NY	
108	Theodora	Tsongas	ttsongas@gmail.com	Portland	OR	
109	Lloyd	Vivola	nouveladam@hotmail.com	Portland	OR	
110	R	Weiss	reweiss38@gmail.com	Seattle	WA	
111	Adrienne	Fong	afong@jps.net	San Francisco	CA	
112	Monica	Gilman	monicagilman@yahoo.com	Estacada	OR	
113	Esther	Weaver	edw200@gmail.com	Highland	NY	

						<p>term safety reasons ,Ã well-supported by science and current events ,Ã for opposing the creation of any more fracking infrastructure. Among these are: A June 2019 compendium of over 1,700 scientific reports, peer-reviewed studies and investigative journalism reports about the threats to the climate and public health from fracking shows that (1) methane leaks at every stage of the fracking process from drilling to storage; (2) fracking contributes to smog (ground-level ozone), which is linked to strokes, heart attacks, asthma and preterm births; (3) harms to wildlife from fracking include toxic water, habitat destruction, light &amp; noise pollution; and (4) fracking infrastructure is disproportionately sited in nonwhite, indigenous or low-income communities</p> <p>[<a href="https://therevelator.org/fracking-health-studies/?utm_source=eeo&amp;utm_medium=email&amp;utm_campaign=eeo99">https://therevelator.org/fracking-health-studies/?utm_source=eeo&amp;utm_medium=email&amp;utm_campaign=eeo99</a>]</p>
114	Jane	Kwiatkowski	draws.it@gmail.com	Eugene	OR	
115	Karol	Bryan	wcbryan@yahoo.com	Lake Worth	FL	
116	Katrin	Sippel	katrin_sippel@yahoo.es	New York	NY	
117	David	Ibbotson	helenljo@pacifier.com	Portland	OR	

118	Jill	Taylor	jillyjtaylor@me.com	West Linn	OR	
119	Jennifer	Moore	windypine69@gmail.com	La Grande	OR	let's go with clean, green energy, so that the people, and all Earth's children, may live.
120	Katherine	Silva	keathsilva@gmail.com	Hood River	OR	
121	David	Burns	dcb1995@comcast.net	Louisville	CO	Building more plants requiring more fracked gas affects the health of my community where some of that gas will come from. It interferes with our attempts to limit and ultimately eliminate fracking here. And it threatens the health of our planet.
122	Alan	Winter Yehudah	alanyehudah@gmail.com	Portland	OR	
123	Jan	Turpin	jant822@hotmail.com	Jefferson	IA	
124	Gary	Hull	realcheap60@yahoo.com	Ogden	UT	...
125	Cynthia	Bayne-Davison	cindydavison1949@gmail.com	Ashland	OR	
126	Dana	Leftwich	danaleftwich@gmail.com	Colorado Springs	CO	
127	Donna	Marchetti	dmarc@q.com	Ashland	OR	
128	Michael	Manzulli	manzulli@gmail.com	Cannon Beach	OR	
129	Bob	Steininger	steininger.bob@gmail.com	Phoenixville	PA	
130	George	Latta, M.D., MBA	ghlatta3@comcast.net	Draper	UT	
131	Debbie	Krapf	dkrocks1@aol.com	Valdosta	GA	No fracking...no pollution!!!
132	Harold	Robinson	vtyankee@charter.net	Talladega	AL	
133	Laura	Hanks	laura.hanks@comcast.net	Portland	OR	
134	Teresa	Iovino	tmi_darktower@yahoo.com	Germantown	TN	
135	Michelle	Avdek	tormichab@yahoo.com	Grants Pass	OR	It's true; there are no jobs on a dead planet!
136	Cathie	Bell	cathiebell@gmail.com	Portland	OR	

						Dear Governor Brown and EFSC, A fracked gas power plant would be incredibly detrimental to the state of Oregon and its residents. You claim to be concerned for the environment. I ask you to show your demonstrate your concern by denying this project.
137	Natalie	Ranker	nattim7072@gmail.com	North Bend	OR	
138	Brian	Garrison	sumatopoppih@gmail.com	Deer Island	OR	



						<p>The proposal of a new fracked gas power plant on the Columbia river seem ludicrous to me. The air quality in the gorge is already poor and choked with pollution. The same goes for the water flowing in the Columbia river- one of the most polluted in the US. Adding pressure such as this is just unthinkable. In addition, I grew up climbing and skiing on Mt. Hood and throughout the cascades. For 30 years I've watched the glaciers melt and retreat far faster than anyone expected. Hundreds of feet of thickness and miles of lineal retreat. The volcanoes will soon be big piles of volcanic dirt. Our valley is completely reliant on glacial melt to get our agriculture through the summer and fall. At this rate the irrigation will be turned off in our lifetimes. Let's find a different way forward, and move away from this type of infrastructure.</p>
139	Cody	Taylor	codyetaylor@hotmail.com	Hood River	OR	
140	Donna	Leavitt	donnaleav@gmail.com	Edmonds	WA	<p>We all now know the effects of fracking on ground water.....and other environmental dangers. Who needs that?</p>
141	Joe	Schott	jschott47@gmail.com	Central City	IA	

142	Tui	Mullein	tuimull@icloud.com	Seattle	WA	
143	Dinah	Urell	hipfish@charter.net	astoria	OR	
144	Sheila Ford	Richmond	sheilafordrichmond@gmail.com	Hood River	OR	
145	susan	dickerson	lola2danz@gmail.com	Clinton	MD	
						I support Columbia Riverkeeper for a clean, safe and healthy river system. I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser,Âs (Perennial) site certificate for a proposed gas-fired power plant. I oppose transportation of fracked gas through the Willamette/Columbia Rivers. EFSC should deny Perennial,Âs RFA. Thank you.
146	Caroline	Skinner	caro4321@earthlink.net	Portland	OR	
147	Elaine	Becker	elainebecker@yahoo.com	Roanoke	VA	
148	Bruce	Cantwell	bruceec@myenvoy.com	Portland	OR	
149	Alice	Levey	willowl@earthlink.net	Talent	OR	
150	Randy	Harrison	ran6711@comcast.net	Eugene	OR	
151	Denise	Day	denisedays65@outlook.com	Tacoma	WA	
152	Nancy	Carey	nancy@carebee2001.com	Roseburg	OR	
153	Mary Lou	Bennington	mlbnn9@aol.com	Spokane	WA	
154	Jeanne	Poirier	jeannepoirier@yahoo.com	Cashmere	WA	
155	Amy	van Saun	avansaun@centerforfoodsafety.org	Portland	OR	
156	Gregory	Penchoen	gapenchoen@yahoo.com	Roy	WA	

						Dear Governor, As you well know, if we are to have any chance of moving to 100% renewable energy by 2050 and being a credible leader world-wide to save the planet, this kind of project must be rejected. Thank you for your wisdom on this absolutely critical issue. Sincerely, Jim Pritchard
157	James	Pritchard	pritchard.james2@gmail.com	Portland	OR	
158	Brad	Nahill	turtleactivist@hotmail.com	Beaverton	OR	
						Please show the courage we need to address no new fossil fuel infrastructure within our state. We have such a limited time to turn things around and your legacy should be one of recognizing the climate crisis we are in and doing everything in your power towards decarbonization and the survival of a million species, including our own.
159	Diane	Meisenhelter	meissun@hotmail.com	Portland	OR	
160	Faye	Bennett	mfayebennett@comcast.net	Portland	OR	We must protect our water and soil so we can protect people, animals, plants, fish, etc.
161	Lorenz	Steininger	schreibdemstein@posteo.de	stafford	DE-BY	

						Fracking produces more FOSSILFUEL! We want clean, alternative energy. And! a clean energy law that supports the people, the environment, the business community. Supports all constituents. A balanced solution! PLEASE!
162	Mary	McGaughey	marymcgaughey@yahoo.com	Gresham	OR	
163	Jaromir	Guzinski	jaroguzinski@gmail.com	Woking	GB-SRY	
164	MaryAnna	Foskett	maryanna@foskettco.com	Arlington	MA	
165	Victoria	Holzenhof	vinvanmo@yahoo.com	Lake Oswego	OR	
166	Jan	Monical	jancrowsnest@q.com	Warren	OR	NO FRACKING! NO Fracked Gas Infrastructures!!! We can do better for us and the planet.
167	Benton	Elliott	benton.elliott@gmail.com	Eugene	OR	
168	Allison	Ciancibelli	newbelli@centurytel.net	Twisp	WA	
169	Steven	Schafer	steven.schafer@gmail.com	Portland	OR	No fracked gas!
170	Juliana	Cyman	julianacyman2@yahoo.com	Hillsboro	OR	
171	Judith	Dunn	judern@gmail.com	Portland	OR	
172	Evelyn	Pietrowski-Ciullo	kisadancer@comcast.net	Salem	OR	
173	Paulette	Lichatowich	plich@comcast.net	Columbia City	OR	I urge due diligence for this project.
174	Patty	Bonney	pattybonney@hotmail.com	Portland	OR	Please do your part to save us from more pollution that will affect us all. Keep Oregon GREEN, please.
175	Steve	Prince	cands78@comcast.net	Eugene	OR	
176	Linda	McGavin	mccgavinski@gmail.com	Portland	OR	

177	Angela	Zehava	angela.zehava@stanfordalumni.org	Portland	OR	This project is not a good fit for Oregon. We need to be on the cutting edge of climate protection. Alternative energy is what Oregon needs.
178	Glenna	Hayes	gahportland@yahoo.com	Portland	OR	The time is now to be a climate hero, before it is too late There is a lot to lose if we fail.
179	Morgan	Clark	morgan.cl@gmail.com	South Orange	NJ	
180	John	Swaner	johnswaner@yahoo.com	Portland	OR	There is no need for this poisonous plant. Do not extend their permit. All Oregonians will benefit from you refusal.
181	Linore	Blackstone	llblackstone@comcast.net	Portland	OR	Governor Brown, be alert to your legacy which stands as a weak conservationist and supporter of 'target' management practices of your ODFW. What is your ethic? When will you pay attention to the life of this earth and just how endangered it is. I am so disappointed in you. You must not allow this fracking to begin. You know ALL THE FACTS. You know the emergency. Act with integrity now.
182	Lesli	Bair	leslibair@mac.com	Zionsville	IN	
183	Lynn	Miller	lmmiller444@gmail.com	Portland	OR	
184	Margaret	Mogg	sheepdog1@wcta.net	Menahga	MN	
185	Eric	Lambart	eric-350@nomeaning.org	Portland	OR	
186	Kerrin	Moeller	kerrin446@hotmail.com	Portland	OR	

187	Linda	Firestone	lindafirestone@hotmail.com	Port Orford	OR	As we experience and learn more about climate change, it becomes evermore important that our actions will not have long-term detrimental effects. Please deny Perennial's RFA.
188	Richard	Craig	ricbarry_1999@yahoo.com	Warm Springs	OR	
189	Debi	Holt	debilholt@yahoo.com	Holley	NY	
190	Francis	Henninger	fralie@neo.rr.com	Akron	OH	We need to decrease, not to increase, our emission of carbon. Climate change is real, threatening us and our descendants.
191	Steven	Cooper	swooper420@comcast.net	Portland	OR	NO! NO! NO! NO! NO! NO! Ten thousand times, NO!
192	Shemayim	Elohim	the8th_chakra@yahoo.com	Seattle	WA	
193	Doug	Kruse	krusedoug@comcast.net	Tualatin	OR	
194	Karen	Stansbery	karenstansbery@gmail.com	Ellensburg	WA	Fracked gas is just as bad as Coal. Wake up people, we have simply got to stop using fossil fuel to save our world.
195	Sylvia	Gray	sylviagraypdx@msn.com	Portland	OR	
196	Adam	D'Onofrio	bigadfromlb@comcast.net	North Dinwiddie	VA	
197	Aleks	Kosowicz	guerillawordfare@yahoo.com	Hayward	WI	We can no longer afford our dangerous dependence on fossil fuels--ecologically, economically, or technologically. Please help us transition to renewables NOW! Thank you!

						As a native Oregonian currently living in Washington State, I have not forgotten my concerns for Oregon, the Pacific Coast, all of America, or our only planet. Fracked gas and LNG facilities threaten the future of all the places I love. Do not permit ANY fracked gas or LNG infrastructure to be built in Oregon! Thank you!
198	Meryle A.	Korn	meryle.korn@gmail.com	Bellingham	WA	
199	Heidi	Perry	perry.heidi@gmail.com	Portland	OR	
200	Karen	Dindia	kdindia@comcast.net	Portland	OR	

						No fracking in Oregon. I don't care what side of the aisle you sit on, this is not a liberal vs. conservative issue. This is a safety and health issue that affects ALL Oregonians. You want poisoned waterways and earthquakes and dozens upon dozens of chemicals in our farmlands and food supply? It is a deal with the devil. You are elected to protect the people and the land of this state. Please look in your child's eyes before you make a decision that would ruin this state. How would your son or daughter feel, knowing their parent did this to them and to their water and their planet? The answer to that question is precisely the responsibility you hold in your hands.
201	DREW	BRADBURY	drewbradbury@gmail.com	Portland	OR	
202	Tika	Bordelon	tikab1@gmail.com	Seattle	WA	
203	Sandra	Middour	smiddour@rstarmail.com	Round Hill	VA	
204	Nancy	Winn	nansuwin08@gmail.com	Portland	OR	
205	Rachel	Slocum	rachel_slocum@hotmail.com	Portland	OR	
206	Gail,	Smiley	gailsmiley1@comcast.net	West Linn	OR	
207	Jan	Kuhl-Urbach	jankuhlurbach@gmail.com	Portland	OR	
208	mary	n	seagoddess75@hotmail.com	Vancouver	WA	
209	John	Gastineau	john@gastineau.net	Portland	OR	



						<p>I urge EFSC to deny Perennial,Äôs RFA because: The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules. The rules provide that EFSC must consider ,Äúany changes in facts or law since the date the current site certificate was executed,Äù in its evaluation of a request to extend the construction deadlines. EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has ,Äúbeen unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date.,Äù Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. EFSC should deny Perennial,Äôs RFA. Thank you for considering this comment. Sincerely, Patricia Perron</p>
210	p	perron	patriciaperron@hotmail.com	seattle	WA	
211	Naomi	Bishop	ibinaomibishop@gmail.com	Portland	OR	
212	Phillip	Norman	pjnorman@gmail.com	Lake Oswego	OR	
213	Teresa	Sullivan	spiritbody@earthlink.net	Los Angeles	CA	
214	Dennis	Gray	wyndenny@hotmail.com	Portland	OR	

215	Norm	Enfield	njenfield@comcast.net	Vancouver	WA	
216	Carol	Colleran	cacolleran@msn.com	Lakewood	WA	Clean energy must be our present and future. No more fossil fuel development!!!
217	Pat	Copenhaver	patcope@ymail.com	Iowa Falls	IA	We need to get away from fossil fuels now. There is no room for debate. We need to turn the effects of climate change now if we want our planet to continue existing. Also, fracking leads to earthquakes. Oklahoma has an average of 100 earthquakes a day since fracking began there.
218	Georgiana	Gordon	gigigo317@msn.com	Saint Helens	OR	The climate crisis is real. Any activities that do anything but improve the environment is adding to the problem and pushes any solution further away. Stop tearing up the earth with fracking. Put your energy into alternative energy such as wind and solar. If we fail to act immediately, our children will perish with the earth.
219	Barbara	Roberts	bjroberts7@hotmail.com	Portland	OR	

						As a community college instructor teaching climate change politics I,Ãd love to cite governor Brown as an example of someone whom my students can confidently vote for as someone we can count on to protect our planet and our futures. Fracking is not a bridge to green energy. Methane research is evolving and climate impacts from fracking are worse than originally thought. Oregon can not afford more fossil fuel infrastructure.
220	Sydney	Brahmavar	sydney.brahmavar@gmail.com	Portland	OR	
221	George	Davidson	georgedavidson@comcast.net	Portland	OR	
222	Maxine	Clark	maxclark90@gmail.com	Sekiu	WA	
223	Christie	Bradley	hrcbradley@gmail.com	Hood River	OR	Let's take the time now to invest in clean, renewable energy. It is time for Oregon to lead the way in moving away from fossil fuels.
224	Mona	McNeil	monarandy@monarandy.com	Vancouver	WA	Please deny more fracked gas projects! We need to move forward to clean energy.
225	Terry	McClain	terrymcclain@earthlink.net	Portland	OR	
226	Avril	Harville	aaharvy@yahoo.com	Watauga	TX	
227	Carol	Scherer	waltzn123@gmail.com		OR	
228	Richard	Lamb	rlamb2@outlook.com	Minneapolis	MN	

						Jordan Cove project should have been dead in the water two years. There are no cogent reasons for continuing this ruinous project. Perennial's application for a Request for Amendment perpetuates a fearful energy policy that ignores the impending existential crisis of global warming, and it relies on fracking, which delivers unknown and dangerous chemicals that can and have seeped into underground water sources. Deny the permit! Greg Jacob, Ph.D.
229	Greg	Jacob	jacobgk@comcast.net	Hillsboro	OR	
230	Kevin	Hughes	anevolver@gmail.com	Anacortes	WA	
231	Beth	Darlington	bedarlington@vassar.edu	Poughkeepsie	NY	
						Why must leaders like yourself allow the destruction of our ONLY environment? Why? We humans have no other planet to move to today or tomorrow!!!!
232	Don	Abing	dya21rainlander@hotmail.com	Astoria	OR	
233	michelle	plochere	mplochere@icloud.com	Los Angeles	CA	
234	George	Feldman	feldmange@gmail.com	Portland	OR	I don't need to tell you how awful fracking is. You can stop this!
235	Ann	Luft	aaluft@yahoo.com	Douglas	MI	
						I used to live in Vancouver WA and made frequent visits to many sites in Oregon. I am asking you not to give in to Perrenial. A gas powered plant is not needed.
236	Nancy	Melton	genevalimerick@gmail.com	Seattle	WA	

						I know that you understand the seriousness of the climate crisis. Please do everything within the law to eliminate the use of fossil fuels. A new fracked has plant would lock us into 40 years of emissions.
237	Stephen	Bachhuber	srbachhuber1@gmail.com	Portland	OR	
238	Olivia	Marshall	oliviamarshall92@gmail.com	Portland	OR	
239	jeremiah	jenkins	miah66@yahoo.com	Portland	OR	
240	Isaac	Ehrlich	autoblaster7@gmail.com	Rhododendron	OR	
						Fracked gas is a disaster for our planet and the local communities through which it passes. Reject the Request for Amendment to Perennial Wind Chaser,Äôs site certificate. We need to be running away from fossil fuels as fast as we can if we have any hope of averting climate disaster.
241	Katherine Anne	Stansbury	kathycallaway@whiz.to	Oregon City	OR	
242	Rebecca	Berlant	rsberlant@aol.com	Brooklyn	NY	
						Oregon can do better. Please for the sake of all our children. Respect,
243	Hailey	Gurung	flanighb@gmail.com	Portland	OR	Hailey Flanigan Gurung Mother of Sahas, age 8 And Balakaji, age 5

						I urge you to please deny Perennial's RFA. There are many reasons to deny the RFA including the Oregon Supreme Court the rules under which Perennial applied for an RFA are invalid and EFSC can't legally apply invalid rules. And most importantly, we need to protect our environment and move away from new fossil fuel infrastructure. Thank you very much for your time and consideration of this important matter.
244	Nina	Rollow	nrollow37@comcast.net	Portland	OR	
245	Noel	Barnes	n2barnes@comcast.net	Renton	WA	
246	susan	rankin	achalihall@yahoo.com	Portland	OR	
247	David	Bly	ilps9000@yahoo.com	Ithaca	NY	
248	Marcel	Liberge	pmasiac@yahoo.com	Murphy	OR	We must rid ourselves of both the fossils industry and the fossils who support them!
249	Scott	Anderson	jscottgms@gmail.com	Owatonna	MN	
250	Bob	Thomas	rockthomas@hughes.net	Myrtle Creek	OR	
251	Erika	Kane	erikabkane@gmail.com	Hubbard	OR	
252	Sherry	Monie	sherry.monie@gmail.com	Damascus	OR	
253	bert	corley	bert_corley@yahoo.com	Hanahan	SC	
254	joyce	schwartz	disneyfan01@yahoo.com	Altamonte Springs	FL	
255	Arlene	Burns	arlene.burns@cityofmosier.com	Mosier	OR	
256	Erica	Johanson	stonebrook50@comcast.net	Hopewell	NJ	
257	Anne	Doane	anne@thedoanes.net	Camas	WA	
258	Marilyn	Britton	mbrittons@comcast.net	Peterborough	NH	Bad for air, water, soil and people.
259	Ron	Erz	oldsaabguy@hotmail.com	Portland	OR	

						We should NOT be building ANY infrastructure that continues our dependence on fossil fuels. Numerous prestigious governmental agencies have validated the contribution of CO2 towards the warming of our atmosphere and the disastrous effects of Climate Change. Focus resources on renewables; solar, wind (esp NW Columbia Gorge) etc.
260	Robert	Posch	robertposch323@gmail.com	St Petersburg	FL	
261	Liz	Terhaar	liz@columbiariverkeeper.org	Hood River	OR	
262	Kathy	Durrum	kathydurrum@comcast.net	Aurora	CO	
263	toni	syring	tcentori77@hotmail.com	Sandy	OR	
264	Lois	White	loeyw1@gmail.com	Grants Pass	OR	
265	Michael	Essex	m_essex@comcast.net	El Dorado Hills	CA	
266	Paul	Landau	pglpls@gmail.com	Hood River	OR	We need more wind and solar power generation!
267	Sharon	Parshall	parssh@icloud.com	Fall City	WA	
268	Diana	Bohn	nicca@igc.org	Berkeley	CA	
269	Janiece	Staton Retired R	ms.jdstaton@frontier.com	Beaverton	OR	
270	Fredericka	Hoeveler	fkhoeveler@mac.com	Portland	OR	Please stop this power plant. We need different approaches that combat climate change not contribute to it.
271	Amanda	Eastman	aeastman2014@gmail.com	Cascade Locks	OR	We do not want any fracked gas plants here
272	Kacey	Donston	lultrees@gmail.com	Westlake	OR	
273	Candace	LaPorte	candiphantom@aol.com	Las Vegas	NV	
274	Maureen	O'Neal	momoneal77@gmail.com	Portland	OR	

275	Linda	Gillaspy	lgillaspy@charter.net	Reno	NV	
						This would pose a great deal of health concerns not only for humans that use the river, but also for the animals that live in or near the river. Please do not let this fracking plant be built.
276	David	Frias	dfrias7733@gmail.com	Portland	OR	
						Fossil fuels kill. It's as simple as that. They are destroying the ability of the planet to support life, and that includes human life.
277	Ellen	Koivisto	offstage@earthlink.net	San Francisco	CA	
278	Judith	Schwab	jkschwab40@msn.com	Mercer Island	WA	
279	Pat	McAleer	pmc970@gmail.com	Portland	OR	We must do ALL we can to care for our earth.
280	Lynn	Kush	lynn.kush001@gmail.com	Gardiner	OR	
281	Larry	Morningstar	manapranabanana@gmail.com	Talent	OR	
						Seriously!! We're better than this! Keep Oregon GREEN!!!! Don't keep bending to the pressure of consolidated corporate interests! Nobody gets rich but THEM!!!
282	Alison	Derum	alderum@gmail.com	Rainier	OR	
283	Matthew A	Weaver	bmweaver2624@frontier.com	Genoa	OH	
284	Steve	Graff	stevegraff12@hotmail.com	Los Angeles	CA	
285	Tami	Linder	junipermoon@fastmail.fm	Rio Rancho	NM	
						We don't need any frack gas power plants. We need more wind powered energy.
286	John	Poffenberger	dpoffenberger@whe-law.com	Cincinnati	OH	



						I agree totally with everything outlined above. The destruction caused by fracking alone should also be considered as it detrimentally impacts the environment. In addition, who is going to be responsible for any accidents as a result of having this facility.
287	Lee	Dayfield	leedayfield@hotmail.com	Portland	OR	
288	Nancy	Hamer	oomooagain@gmail.com	Portland	OR	
289	Ann	Bronson	bopbronson@gmail.com	Hood River	OR	
290	Sarah	Deumling	sdeumling@gmail.com	Rickreall	OR	NO MORE FOSSOL FUEL INFRASTRUCTURE! We must 'leave it in the ground' and new infrastructure just ensures that we will not. For the sake of your grandchildren and mine do not allow this. Please! I want to say 'I beg you' it is so important. If we don't have a livable planet/state nothing else matters. Thank you for making the right decision - please. Sarah Deumling
291	Sue	Moon	sueamoon@gmail.com	Seattle	WA	
292	Bruce	Hake	bhake07@gmail.com	Portland	OR	
293	Barbara	Manildi	bmanildi@earthlink.net	Lake Oswego	OR	
294	Phil	Hanson	phanson@spiretech.com	Salem	OR	
295	Gemma	Kim	hyunjrkim@yahoo.com	Alpharetta	GA	
296	Charlotte	Pirch	dpirch@socal.rr.com	Fountain Valley	CA	
297	Martha	Clemons	clemm12@comcast.net	Corvallis	OR	

						<p>Fracking adds a potent greenhouse gas, methane, to the atmosphere. Increasing evidence points to natural gas as a serious contributor to the disruption in the climate. See below. This recent increase in methane is massive,,Äù Howarth said. ,Äùlt,Äôs globally significant. It,Äôs contributed to some of the increase in global warming we,Äôve seen and shale gas is a major player.,Äù</p> <p><a href="https://www.theguardian.com/environment/2019/aug/14/fracking-causing-rise-in-methane-emissions-study-finds">https://www.theguardian.com/environment/2019/aug/14/fracking-causing-rise-in-methane-emissions-study-finds</a> It's also financially risky. Consider the ' almost \$23 billion writedown GE announced in October [as] demand for gas turbines collapsed ...as clean energy became more affordable.,Äù</p> <p><a href="https://www.bloomberg.com/news/articles/2018-10-22/ge-s-23-billion-writedown-stems-from-a-bad-bet-on-fossil-fuels">https://www.bloomberg.com/news/articles/2018-10-22/ge-s-23-billion-writedown-stems-from-a-bad-bet-on-fossil-fuels</a></p>
298	Louise	Stonington	lstoning@msn.com	Seattle	WA	
299	Lauren	Murdock	murdock_ls@hotmail.com	Santa Barbara	CA	
300	Karen	Fletcher	drquotes@hotmail.com	Waynesboro	TN	
301	Megan	Warren	alicencyberland@hotmail.com	Bloomington	IL	
302	Jeni	Harris	jenihh@hotmail.com	Hood River	OR	
303	Jack	DePue	facilitator09@gmail.com	Portland	OR	No fracking way!

304	Sean	Cearley	sean@cearley.com	Saint Helens	OR	
305	Juanita	Dawson-Rhodes	balance210@aol.com	South Salem	NY	
306	Karen and Edward	Osgood	karenedo@yahoo.com	Citrus Heights	CA	
						Kate Brown cannot have it BOTH WAYS by taxing the HELL OUT OF CONSUMERS to heat their homes and drive. However, she wants to BUILD the pipeline and now build a fracked gas facility? WHAT THE HECK? SHE IS DESTROYING OUR STATE! SHE CANNOT DO THIS. I am OUTRAGED at her behavior by allowing these projects to continue, yet tax the hell out of the people they serve. SHE WINS money from BOTH SIDES. I already signed the petition to recall her, as I NEVER WILL VOTE DEMOCRAT AGAIN. Not while I watch her FICKLE decisions which benefit HER and ILLEGAL residents ONLY~
307	Liz	Dunlap	bettyloodunlap@gmail.com	Medford	OR	
308	Thomas	Thrall	tom_thrall@hotmail.com	Forest Grove	OR	
						Please do NOT allow fracking in Oregon. We are better than buying into fracking. Not only is it a bad environmental practice, we must wean off fossil fuels. Thank you!
309	CR	Hutchison	crhutch@onlinenw.com	Yamhill	OR	
310	Robyn	Reichert	scooteacha@aol.com	Lake Worth	FL	
311	Tedd	Ward Jr.	teddsdead@gmail.com	Petersburg	IL	

312	Andrew	Wade	wade.home@gmail.com	Hood River	OR	
313	Curtis	Cawley	cawley_21@hotmail.com	Seattle	WA	
314	Tracy	Cole	r1tbeach@aol.com	Glendale	AZ	
						Given the most recent news that irreversible damage to our climate is as near as 11 years away, it is simply insane to permit this very dirty fossil fuel infrastructure to be built in Oregon. PLEASE do not allow this! The jobs this facility may provide will be pretty damn meaningless with a climate completely out of control. We need to be far more creative and proactive in creating energy and providing jobs. Please look to the future, which is upon our doorstep right now. DO NOT ALLOW THIS FRACKED GAS POWER PLANT TO BE BUILT!!
315	Ellen	Brotherson	maiellazamu@gmail.com	Portland	OR	
316	Priscilla	Lane	lanekappes@comcast.net	Portland	OR	
317	marianne	mauldin	mariannemauldin@gmail.com	Portland	OR	
318	Paul	Eisenberg	eisenber@indiana.edu	Bloomington	IN	
319	Celeste	Hong	celestehong@earthlink.net	Los Angeles	CA	
320	bernardo	alayza mujica	beralmu@hotmail.com	Sioux City	IA	
321	Susan	Temple Bolt	madelinetea@yahoo.com	Portland	OR	
322	Mary	Buckley	mfbuckley@sbcglobal.net	Portland	OR	
323	John	Burns	jmbjeb@gmail.com	Ashland	OR	
324	Leland	Block	leland.block@comcast.net	Portland	OR	
325	carol	Denning	seasoned5@yahoo.com	Arlington	TX	

						Air does not respect state borders. We need to protect the planet and our grandchildren NOW.
326	Jim	BYRNE	byrnejim7@gmail.com	Ridgefield	WA	
327	francis	mastri	famastri@me.com	Monroe	CT	
328	Jan	Thorne	janusthorne@gmail.com	Spokane	WA	
329	Wayne	Davison	wedavison9@gmail.com	Ashland	OR	
330	Brent	Rocks	brent_rocks@comcast.net	Portland	OR	

						we cannot continue to build out Natural Gas infrastructure particularly because Fracking for natural gas is so destructive both in its extraction, with irreparable effects on our water supply, and the unregulated flaring of NG with associated methane emissions. The usage of Natural Gas as base load has validity in the short term however it is not a long term strategy with Climate Change our most challenging and imminent threat. Battery technology is quickly advancing to allow more use of renewable energy in base load capacity. If we are to use Natural Gas then mandate that the 22% Renewable Natural Gas cited by NWNG as possible in Oregon be developed before any new NG infrastructure is permitted. These are crucial decisions that will effect us all into the future, we need to make wise and careful choices here.
331	Linda	Kelley	earthspirits@comcast.net	Eugene	OR	
332	Stephen and Kath	Hulick	kaweah50@gmail.com	Brush Prairie	WA	Fracking should have no place in our future. Solar power should be our goal. No more fossil fuels.
333	Jackie	Stolfi	jacqueline4sight@aol.com	Massapequa Park	NY	
334	Ingri	Benson	ingri.b33@gmail.com	Portland	OR	

335	Teresa	Keane	teresadot@comcast.net	Portland	OR	No to new fossil fuel infrastructure!!!
						<p>Dear Governor Brown and the Oregon Energy Facility Siting Council: I urge you and EFSC to deny Perennial,Ãs RFA because: 1. The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules. 2. The rules provide that EFSC must consider ,Ãúany changes in facts or law since the date the current site certificate was executed,Ãù in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial,Ãs proposal demonstrate the climate change impacts of fracked gas. Methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. EFSC should deny Perennial,Ãs RFA. Thank you for considering this comment. Sincerely, Emilia Novo</p>
336	emilia	novo	oisinhelios@yahoo.com	queluz	AL	
337	Kevin	Walsh	walshkevink@yahoo.com	Madison	CT	
338	kathy	grieves	kgg007@aol.com	Peoria	AZ	

339	Jan	Polychronis	jp21florida@gmail.com	The Dalles	OR	NO FRACKED GAS TERMINAL!!! PLEASE SUPPORT RENEWABLE, CLEAN ENERGY SOURCES!!!
340	Pamela	Smith	pamelasmith1974@yahoo.com	Portland	OR	
341	Steve	V.	sevols.ear@gmail.com	Port Angeles	WA	
342	Shawn	Ritterbush	ritterbsh@gmail.com	Portland	OR	
343	Ronald	Clayton	se-larvae@hotmail.com	Cove City	NC	We need clean, renewable energy resources ..... NOT MORE POLLUTION. Earth's climate and future is more important than Perennial's easy profits. 'Perennial Wind Chaser' is an oxymoron. They are only chasing profits. Perennial should be 'Wind & Solar Catcher' ..... NOT POLLUTER and CLIMATE DESTROYER.
344	Laura	Ackerman	simahafarm@gmail.com	Spokane	WA	
345	Dianne	Applegate	drapplegate@comcast.net	Portland	OR	Keeping our lands from being polluted should be a primary focus of Oregon legislation. Please preserve our Oregon lands and waters.
346	Janet	Kirkland	jbkirkland@comcast.net	Portland	OR	
347	Joseph	Stenger	joseph.stenger@gmail.com	Portland	OR	Act for our grandchildren. This is a climate emergency. No new fossil fuel power plants!
348	kristy	overton	qristyoverton@gmail.com	Portland	OR	
349	Diane	Pugh	pepe.arty@yahoo.com	Newport	OR	



350	Jude	Green	greencardz@comcast.net	Bellingham	WA	I do not support fracking, or the exporting of fracked gas. We don't want terminals on the West Coast.
351	Patricia Browning	Browning	pattibrowning444@gmail.com	Ashland	OR	Stop wasting precious time and tax dollars on failed agendas that poison the environment and drain vital resources. We need innovative solutions to the crisis at hand and are counting on your wise counsel and support. Thank you
352	Robinson	Kurth	robikelly@earthlink.net	Tualatin	OR	Please reject this quick proposal and permit for Fracking. We have the means to get clean energy from other sources. Fracked gas has too many problems that we do not want nor need. Thorough environmental evaluations would highlight the numerous problems with this type of energy source. Oregon can do better! Thank you.
353	Ann	Turner, MD	annturnerpx106@gmail.com	Portland	OR	
354	Nancy	White	nancypendletonwhite@comcast.net	Spokane Valley	WA	
355	Kristin	Normansen	devriesdesign@gmail.com	Portland	OR	
356	Adina	Parsley	dickandpat3@gmail.com	Stanwood	WA	
357	Stephen	Durbin	kilo34@cablespeed.com	Coupeville	WA	...the time to stop big oil and big gas is now...we MAY have time to save this planet if we act immediately...!!!
358	Kenneth	Gibb	kengibb@gmail.com	Zephyr Cove	NV	
359	Kimberly	Wiley	kwiley16@hotmail.com	Rochester	NY	

360	Wendy	Tsien	wglobetsien@gmail.com	Eugene	OR	
361	Victoria	Miller	vemiller0426@gmail.com	Encino	CA	
362	M.	Stein	mnugstein@yahoo.com	Cottonwood	AZ	
363	Shauna	Sparlin	shauna.k.sparlin@gmail.com	Wichita	KS	
364	Nora	Polk	nora.mattek@gmail.com	Portland	OR	
365	George	Barton	bartongeo@gmail.com	Oregon City	OR	
366	CL	Riley	carol@carolriley.com	Warrenton	OR	
367	Thomas	Windberg	tjwindberg@hotmail.com	Austin	TX	
368	Pablo	Bobe	pablomartinbobe@hotmail.com	New York	NY	
369	Paul	Halliday	phalliday@charter.net	The Dalles	OR	
370	John	Nikkel	jonniki@gmail.com	Portland	OR	
371	Andrew	Wadsworth	andywadsworth23@hotmail.com	Reading	PA	
372	Zechariah	Heck	zheck24@gmail.com	Bend	OR	
373	Lenore	Reeves	lerves@gmail.com	Mokena	IL	
						It's hard for me to believe -- though this happens often -- that anyone can think their financial gain will be of use to them in our rapidly deteriorating land, and that their own lives and health will not be just as adversely affected as everyone else's. It's a mystery.
374	Judith	Arcana	ja@juditharcana.com	Portland	OR	
375	Cynthia	Enlow	hienlow@msn.com	Albany	OR	
376	Linda	Humphrey	sunbirdlinda@wavecable.com	Grapeview	WA	
377	Ande	Kobek	andekobek1960@gmail.com	Olympia	WA	The time is now to do what is right.
						If Oregon can't hold a line that protects its citizens from harm, then shame on us. We're better than this. Shut it down!
378	Lisa	Frech	ljfrech@juno.com	Hillsboro	OR	

						Fracking is not the way or the future nor healthy for this earth and its inhabitants.
379	Lyndee	Cunningham	lyndeee2@gmail.com	Camas	WA	
380	Tamara	Wecker	teekay177@gmail.com	Portland	OR	
381	Stashia	Cabral	stashia@hotmail.com	Portland	OR	
382	Harry	Wohlsein	harryjwjr@gmail.com	Portland	OR	
383	Gerald	Walsh	laxbears@comcast.net	Brewster	NY	
384	Marcia	Hoodwin	marcia@accentsaway.com	Sarasota	FL	
385	Erin	Galey	erin.galey@gmail.com	Portland	OR	
386	Lorraine	Brabham	tweety336@gmail.com	Hoboken	NJ	
387	Craig	Mackie	beachbum@nehalemtnet.net	Nehalem	OR	No fracked gas in OREGON!!!!!!!!!!!!!!!!!!!!!!
388	Jai	Boreen	jailoon@gmail.com	Friday Harbor	WA	
389	Kelly	O'Hanley	kohanley@gmail.com	Portland	OR	Please act on the behalf of future generations. Keep fossil fuels in the ground. Phase to renewables as soon as possible.
390	David	Arntson	dchristiemusic@hotmail.com	Bothell	WA	Are you going to be one the list of those who destroyed human civilization?
391	Ben	Martin	bendicoot@yahoo.com	Wallingford	CT	
392	Joyce	Sherman	joycesherman481@gmail.com	Portland	OR	It is time to attempt to save the Earth...not add to its' destruction.
393	Melinda	Parke	melindap317@hotmail.com	Seattle	WA	Fracking is nothing but bad news for every body.
394	Mike	Brinkley	mbrinkle@comcast.net	Eugene	OR	
395	Linda	Bescript	sadie8882@gmail.com	Langhorne	PA	
396	Darcy	Reeves	reevesda@ohsu.edu	Portland	OR	

						Stop attempting to turn Oregon and the entire Northwest region into the 'new rust belt' for the U.S. These technologies are obsolete and must be replaced with renewable infrastructure and urgently needed research and development.
397	Theresa	Nuccio	tnfireweed@yahoo.com	Seattle	WA	
398	Laura	Long	lauralynn7@gmail.com	Chicago	IL	
399	Jk	Deller	jkdeller@gmail.com	Bellevue	WA	
400	Rowan	Everard	wax.delerium@gmail.com	Portland	OR	Water pollution, earthquakes and methane emissions? No thanks!
401	Karen	Paule	kapaule@hotmail.com	Portland	OR	
402	Carol	Jurczewski	cjurczewski@sbcglobal.net	Riverside	IL	There needs to be a more sustainable answer to energy production than environmentally damaging fracking!
403	Mack	Hunter	mr.hunter.no39@hotmail.com	Astoria	OR	
404	Bob	Hannigan	hanniganjb@comcast.net	Corvallis	OR	
405	Lorraine	Hartmann	lorrainehartmann@comcast.net	Seattle	WA	

						To combat climate change we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. I'm among those who write to tell Governor Brown and the Energy Facility Siting Council (EFSC) to reject the so-called Perennial Wind Chaser facility (aka fracked gas power plant) proposed near Hermiston, Oregon. Do everything possible to protect the still beautiful, yet increasingly vulnerable planet we share.
406	J.	Chodorow	loujoan@mac.com	Fairfax	CA	
407	Tamara	Mathews	tamimathews@gmail.com	Portland	OR	solar and wind energy no more fossil fuels.
408	Eva	Kronen	evachava@hotmail.com	Eugene	OR	It is time we stop taking oil and it's cousins out of the ground, from the earth and oceans. It's time to focus on hard changes in how we deliver basic necessities using renewable resources that minimize greenhouse gases. It's time to start truly being conservative of our precious resources.
409	Ronlyn	Schwartz	ronlyn53@earthlink.net	Langley	WA	
410	Hal	White	czhal@yahoo.com	Lakewood	WA	Fracked gas ruins our unfixable water tables.
411	Pat	Pearson	pearsonpat@me.com	Port Ludlow	WA	

						Natural gas continues our dependence on fossil fuels. Fracking is a foul practice that wastes water, and sends poisonous chemicals deep underground. We must do better than this to preserve our future.
412	Douglas	Peterson	hdtvwiz@gmail.com	Medford	OR	
413	Ann	Watters RPE,BCF	twofivestars@comcast.net	Salem	OR	This would not be a good idea for Oregon.
414	Glenn	Hufnagel	gphufnagel@hotmail.com	Buffalo	NY	
415	Miriam	Perez	miriamperez55@gmail.com	Salinas	CA	Thank you for caring and for all that you do to protect our environment.
416	Ian	Shelley	ianjs@comcast.net	Portland	OR	
417	Jenny	Kastner	jennynews@aol.com	Cambridge	MA	Unfortunately, your decisions affect all of us. Fracked gas is in no way 'safe,' and you know it. Renewable energy is now cheaper than destructive forms. Use it!
418	Janet	H.	oregonsoma@peak.org	North Bend	OR	
419	Jill	James	jillpdx747@gmail.com	Portland	OR	Once again, NO to FRACKED GAS! Period.
420	Sylvia	Black	yobuddy@comcast.net	Portland	OR	
421	Ellen	Atkinson	jeanne184490@gmail.com	Charlotte Court H	VA	
422	barbara	colleran	bacolleran123@comcast.net	Portland	OR	
423	Thomas	Giblin	twgiblin@yahoo.com	Binghamton	NY	

						Say 'NO!' to Perennial Wind Chaser,Â proposal for a gas-fired power plant. Instead we need a final vote to pass the Clean Energy Jobs bill (HB 2020). Go forward, not backward!
424	Julianne	Ramaker	ramaker@coinet.com	Bend	OR	
425	Carol	Gerl	plumeria56@charter.net	Lincoln City	OR	
426	Joan	Smith	joanesq93@gmail.com	Greenbrae	CA	
						It,Â past time to stop manmade climate change. You can start here by stopping this plant. You can move Oregon to renewable energy. Do something before it,Â too late.
427	Laura	Allen	lauraallen@allenmead.com	Seaside	OR	
428	Tom	Keys	tkeyshike@msn.com	Gresham	OR	
429	Jeanne	Crowley	mgcrow2@msn.com	Astoria	OR	
430	Elaine	Bettzig	ebettzig@yahoo.com	Portland	OR	
431	Charlie	Graham	cgraham@teleport.com	Hillsboro	OR	
432	Peter	Sanchez	petersanchezguy@gmail.com	Portland	OR	
433	John	Cruz	jcncqk@msn.com	Vancouver	WA	Please help protect our quality of life along the Columbia River.
434	Tim	Holbert	timholbert2002@yahoo.com	Portland	OR	Fracked gas is too costly to the environment! Methane is 20 times the greenhouse gas as CO2.

						Fracking is a hugely inefficient business model and a process that poisons our waters and our soils forever. We are dependent on our world. Why would we want to kill ourselves and all in it? Let's us stop for a bit and think of the consequences of our actions.
435	Rosemary	Forester	rforester9@gmail.com	Ashland	OR	
436	Harold	Watson	watsonh1956@gmail.com	Springfield	MO	
437	David	Hedges	david@hedges.name	West Linn	OR	Read up on fracking. Governor. You too, Oregon Energy Facility Siting Council. Fracking poisons the environment, and it poisons people. Do the right thing. .



						I am an Olympia, Washington resident but was raised on and continue to own/operate ranch/farmland in Klickitat and Clark Counties located, in the Columbia River Gorge. With the continuing reduction/elimination of federal Environmental Protection Agency rules/regulations pertaining to accessing/siting/processing/storing and transporting of carbon-based energy producing resources, it is incumbent on all western state governments/residents to assiduously do all in our power to protect our environment to every extent possible. I ask that all affected governmental entities deny the Perennial Wind Chaser's proposed gas-fired power plant cite certification. Thank you for the opportunity to comment. Ilene Le Vee Olympia, WA
438	Ilene	Le Vee	leveeis@comcast.net	Olympia	WA	
439	Tom	Schwegler	tomlschwegler@gmail.com	Kansas City	MO	
440	Michael	Schumann	mikethemouthpiece@gmail.com	Portland	OR	
441	Jodie	Zupancic	disneysports5@aol.com	Flushing	NY	
442	Jeff	Reynolds	wutsup1@yahoo.com	Bangor	ME	
443	bob	e devereux	poppiwithonei@yahoo.com	Portland	OR	
444	Brian	Yanke	muzic2umann@yahoo.com	Madison	WI	
445	June	Elliott-Cattell	cattellmail@hotmail.com	West Columbia	SC	

446	Dana	Allen	rebelfarms@peak.org	Corvallis	OR	NO LNG power plants! This is moving in the WRONG direction to mitigate climate chaos. Just STOP!
447	Miranda	Lovelong	4joylovelong@gmail.com	Portland	OR	Let's invest in clean technology in Oregon.
448	Katherine	Jesch	kathjesch@earthlink.net	Portland	OR	Oregon is already suffering impacts from a changing climate. Additional methane emissions from this proposal would make our situation even worse. Oregon cannot afford this proposed plant. The permit extension must be denied.
449	Emily	Boliver	senilenurse@yahoo.com	Laurel	MS	
450	Mark	Dariento	markdari@pacifier.com	Portland	OR	
451	Alain	Gauthier	alainjgauthier@gmail.com	Portland	OR	
452	Susan	Hathaway	susanhathaway@earthlink.net	Pico Rivera	CA	
453	Ies	roberts	hobo17pollie@gmail.com	Serafina	NM	
454	Steve	Wozniak	wozniak.steve@rocketmail.com	Encinitas	CA	
455	Harry	Kershner	harrykershner@msn.com	Portland	OR	
456	Jennifer	Smoose	jennifer.smoose@gmail.com	Seattle	WA	
457	Susan	Wechsler	susanwechsler@comcast.net	Corvallis	OR	
458	Phyllis	Cordero	pandabearcordero@yahoo.com	Beaverton	OR	
459	Juli	Kring	juli3@aol.com	Houston	TX	As a mother and grandmother, I believe it is our duty to protect and preserve the environment and our precious natural resources for all future generations. 'But man is a part of nature, and his war against nature is inevitably a war against himself.' ~Rachel Carson

460	Keith	D,ÂAlessandro	keith_dalessandro@outlook.com	Canton	MI	
461	George	Keefe	georgewanc@gmail.com	Edmonds	WA	I respectfully urge you to protect the health of our children and our environment. Please heed the warnings of climate science.
462	Aubrey	Pullman	aubrey@rendermack.com	Seattle	WA	I was born in Hood River and have lived in the PNW most of my life. I strongly oppose any new fossil fuel infrastructure or the expansion of existing infrastructure. Fossil fuels are a dead end for our communities and our environment.
463	Carl	Dominey	carldominey1943@gmail.com	Astoria	OR	
464	Janet	Melton	haneyjanet@netscape.net	Vancouver	WA	
465	Marco	Pardi	mpardi@aol.com	Lawrenceville	GA	
466	Cleo	Chappell	iiiseecolor@gmail.com	Portland	OR	Keep Saying no. We can do it.
467	fay	forman	fayf355@yahoo.com	New York	NY	
468	annick	baud	annickbaud@yahoo.com	Malden on Hudso	NY	
469	Gail	Atkins	gailatkins@comcast.net	Raymond	WA	Any short term gains for a few are out-weighed by long term harm to us all.
470	S	Smith	timespirt@aol.com	Sound Beach	NY	
471	Georganne	BENDALL	gbendall3@icloud.com		ME	
472	Steve	Erickson	steveerickson720@gmail.com	White Salmon	WA	
473	Dennis	Pennell	dennisnpennell@yahoo.com	VANCOUVER	WA	Just say NO to fracked gas.
474	Rosalie	Sable	rsable@live.com	Medford	OR	
475	Debora	Tramposh	dtramposh@gmail.com	Portland	OR	
476	Colleen	McMullen	colleen@kanab.net	Kanab	UT	
477	Chris	Guillory	chris_no51@yahoo.com	Port Angeles	WA	

478	Linda	Studley	ruralrunner62@yahoo.com	Marysville	WA	The country needs to move away from fossil fuels to clean energy. Fracked gas is definitely going the wrong way.
479	Genevieve	Raymond	genevieve@other98.com	Portland	OR	
480	Sarah	Prowell	sprowell@ix.netcom.com	Portland	OR	Dear Governor Brown and the Oregon Energy Facility Siting Council, I urge you to reject the application for this fracked gas power plant as it takes the state in exactly the wrong direction. It will increase dangerous methane greenhouse gas releases to our atmosphere and will exacerbate the existing Climate Crisis that we are in. We Oregonians need and deserve responsible green energy sources for all of our future energy development plans. The peer reviewed science tells us we have just a few years to aggressively reduce greenhouse gas releases to the atmosphere to mitigate the worst of the Climate Crisis disaster we will otherwise face. Please do the right thing and deny this irresponsible application.

						STOP the damn fracking of every kind!!!! Enough is enough, you are abusing our only home, our only God given home and we are not taking care of our beautiful home. The only ones that protect the planet are all animals!!! We should all learn from them, simply because they are not evil, greedy monsters!!!!
481	Guadalupe	Yanez	lupe.yanez49@gmail.com	El Paso	TX	
482	Axel	Vogt	vogt@ub.uni-freiburg.de		DE-BW	
483	Rosemarie	Kozdron	rosemariekozdron@mac.com	Rockton	PA	
484	Tim	Murphy	tim@murphylawfirm.biz	Portland	OR	We don't want fracked gas in our state because it is polluting, among other matters. New fracked gas infrastructure is irresponsible and imposes burdens on Oregonians in violation of our rights and desires. NO NEW FRACKED GAS.
485	Angeline	Johnson	joanel@umich.edu	Seattle	WA	
486	Julie	Anderson	julia98290@yahoo.com	Stevenson	WA	

						'Perennial Wind Chaser' is a poetic name to make us all think this has something to do with clean energy. BS! This is a fracked gas powered plant by any other name and has no place in Oregon. Fracking is ruining aquifers and poisoning people across this country and needs to stop. No expensive public relations firm can clean up the reality of fracking. This request needs to be rejected. That's why I voted for a Liberal Democratic Governor and that's what I expect from my vote.
487	Barbara	Pikus	bapa.pk@gmail.com	Portland	OR	
488	Linda	Browning	lembrowning5@gmail.com	Beaverton	OR	
489	Judy	Wyeth	judy@wyethdigital.com	Lodi	WI	
490	Diane	Daiute	dmarried@protonmail.com	Sweet Home	OR	

491	Annette	Keen	quiteawake@yahoo.com	Portland	OR	<p>The health of climates, earth, human beings depend upon our abilities as stewards to readily and earnestly examine our collective ,Ã¸needs,Ã¸. What I,Ã¸m saying is it is time to set aside the capitalistic approaches providing unhealthy results for our human betterment. Attend to gaining others,Ã¸ appeals for consideration of the larger picture and collaborating with those receiving the brunt of negligence in concern for our present and future life on earth.</p>
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492	Lynn	Stiglich	lstiglich@comcast.net	Vancouver	WA	Having gone through the lengthy process that led to the rejection of the proposed Tesoro-Savage fracked gas refinery in Vancouver, WA - many facts about the transport, detrimental health concerns, and negative environmental impact came to light. ALL of these concerns come to light when evaluating his project. Oregon and the Pacific Northwest are in solidarity with regard to the dangers and downsides of fracked gas and oil related projects. Do not allow a for-profit oil company to despoil the beauty and health of this unique area of the country. The importance of changing our use of fossil fuels has never been greater. Please think of our Earth and it,Äôs inhabitants and stand against this project. Thank you for that.
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						<p>administration saying one thing, then lie and do the opposite, especially concerning the environment. An example of this is Alaska and their concern over mining copper and gold, which will devastate the Salmon Industry up there. The same holds true for 'fracking.' This industry has a devastating affect on the environment. The air, aquifers and the land. Not only that, geological issues enter the picture. While still living in Ohio when this type of gas mining started, not long after, farmers and people who lived in the rural areas could not drink or cook with their well water. It was to volatile, in other words it could ignite and or poison them if they drank it. Then the seismic issues, 3.0-3.5 tremors. THIS NEEDS YOUR ATTENTION !!! We need you to be more out spoken and more visible. Especially concerning environmental laws in place being violated by these corporations. PLEASE GIVE THIS</p>
493	Eddie	Tucker	egtucker1@gmail.com	Portland	OR	
494	Iris	Rochkind	hemabug@aol.com	Flushing	NY	

495	Ari	Divine	ari.divine@gmail.com	Portland	OR	Invest in green energy in Oregon. Let us lead in the economy to come. Do the right thing and don't be part of the genocide
496	ArdisAnn	Szala	zalive@hughes.net	Bandon	OR	TIME'S UP on DIRTY ENERGY!
497	EDWARD	KOLBE	erkolbe1@gmail.com	Portland	OR	
498	Helen	Stuehler	hastuehler@gmail.com	Reno	NV	
499	Valentine	Clark	valentineleo9@gmail.com	Portland	OR	We will hold you accountable, trust me.
500	Joan	Cole	giovannacole@gmail.com	Port Townsend	WA	
501	Mark	Canright	rebeccagroovypeace@gmail.com	Rockport	WA	
502	Alicia	Liang	liangaf@gmail.com	Portland	OR	
503	Larry	Weymouth	lcweymouth@peak.org	Corvallis	OR	
504	AuTumn	Davidson	davidson.autumn@gmail.com	Portland	OR	Oregon does not need another polluting power plant. The state should be investing in clean, not dirty energy
505	Dena	Turner	denaturn62@gmail.com	Portland	OR	Keep it in the ground in order that your grandchildren and mine have a livable planet.
506	Kathryn	Sundermann	csund5@msn.com	Portland	OR	No more fossil fuel infrastructure. We need clean, renewable energy NOW.
507	Randall	Webb	lawrkw@comcast.net	Portland	OR	
508	Todd	Clark	tbradyclark@yahoo.com	Indianapolis	IN	
509	Steven	Bruckner	sbruckner615@gmail.com	Portland	OR	

						Catch up to the rest of the industrial world and increase the amount of renewable fuel we produce. It will create more jobs and protect our people.
510	Yola	Hesser	geoyo@oregonfast.net	Florence	OR	
511	Eldon	Haines	rain.cat@comcast.net	Portland	OR	
512	John AND Jean	Fleming	johnandjeanfleming@msn.com	Lakeville	MN	
513	Dirk	Rogers	1dog2dogs3dogs@gmail.com	Wichita Falls	TX	
514	Clayton	Burford	richburford@comcast.net	Keizer	OR	
515	Sally	Gillette	salarlene@comcast.net	Portland	OR	
516	Sherry	Perkins	perksher@gmail.com	Seattle	WA	
517	Elizabeth	Johnson	libbo@comcast.net	Stevenson	WA	
518	Sue	Van Loon	suevanloon@gmail.com	Portland	OR	Say 'No!' to fracked gas!
519	Ed	Lee	edlee69@hotmail.com	Beaverton	OR	
520	Kimberly	Maun	kmaun976@gmail.com	Rhododendron	OR	
521	NANCY	OBERSCHMIDT	nancyoberschmidt@gmail.com	Portland	OR	Not in our Oregon!
522	Nancy	Loeb	nancyloeb@yahoo.com	Portland	OR	
523	Amy	Hansen	pittle.r.us@gmail.com	Rockport	WA	
524	Susan	Donohoe	susanedonohoe@gmail.com	Portland	OR	
525	Joell	Ellis	jody1622@gmail.com	Portland	OR	Save the Gorge! Save Oregon! We don't need fracking!
526	Barry	LeBeau	blebeau123@yahoo.com	West Warwick	RI	
527	Phyllis	Richardson	prichardson350@gmail.com	Portland	OR	We are in a climate crisis; it is folly to even think about adding more sources of climate changing methane and carbon!
528	Natalie	Van Leekwijck	hoepagirl@gmail.com	Hazard	NE	
529	Ken	Humke	xkalbr@aol.com	Portland	OR	
530	Brian	Ainsley	brian.ainsley@gmail.com	Altamonte Springs	FL	

531	Richard	Olson	richmo41@gmail.com	Gresham	OR	
532	Sally	Stevens	sallyjstevens@yahoo.com	Portland	OR	No fracked gas if we want a future!
						Fracking has proven to be an environmental nightmare. We cannot continue with fracked natural gas or any other fossil fuel. The consequences are well understood and the facts are widely available. If you are paying attention you know them well. I won,Â restate them here.
533	William	Crawford	bill.crawford.95442@gmail.com	Portland	OR	
534	Mark	Wheeler	mark@rootsrealty.com	Portland	OR	
535	MARCELLA	CRANE	mouseychic@gmail.com	Phoenix	AZ	
						Oregonians do not want new fossil fuel plants! We want strong action to address climate change and that means new sources of energy must be renewable and non-polluting.
536	Phillip	Callaway	phillip_callaway@msn.com	Crawfordsville	OR	
537	Lela	Perkins	lelaperkins@comcast.net	Everett	WA	
538	Gregory	Ellsworth	ellsworth2359@comcast.net	Portland	OR	Keep it in the ground ! Thank you !
539	Dan	Sherwood	dan@dansherwood.com	Portland	OR	

						Circumstances in the nearby Arctic, driven by fracked gas pollution: Temperatures are spiking due to loss of reflective sea ice, which melts more sea ice Ocean food web is disintegrating due to inability of plankton and krill to thrive in warmer water Permafrost is venting methane which warms the Arctic and releases more methane Extensive Alaskan and Siberian forest fires are releasing black carbon which settles on ice and accelerates melting FYI None of these interrelated Arctic runaway hazards are even reported yet by the IPCC There has never been a greater justification for revolting against unresponsive Oregon carbon policies than now.
540	Tracy	Farwell	tracy@better-energy-llc.com	Portland	OR	
541	Leigh	Hood	leighoh@me.com	Ashland	OR	
542	Judy	Shively	jashively01@gmail.com	San Diego	CA	
543	Carol	Becker	carolfirstmd@gmail.com	Sherman Oaks	CA	
544	Steven	Woolpert	stevenwoolpert@gmail.com	Lyle	WA	

						Fracked gas is destroying water tables and leaking out of pipelines all over America. No new fossil fuel infrastructure can be allowed if we want to stop the sever weather patterns that are costing billions of dollars in devastation.
545	Ellen	Saunders	ellen_l_saunders@me.com	Manning	OR	
546	Jorge	De Cecco	bndass@yahoo.com	Ukiah	CA	
547	Kevin	Gallagher	kevingal@uw.edu	Lake Forest Park	WA	
548	JB	Jensen	joybfutrell@gmail.com	Corvallis	OR	

549	Liz	Amsden	lizamsden@hotmail.com	Los Angeles	CA	<p>water, clean air, maintaining the water table, safe crops, good health and a future for our country. Fracking involves injecting a cocktail of toxic chemicals into the ground that find their way into our water table, our food and the air we breathe. Those exposed to these chemicals suffer further because Big Oil outright REFUSES to tell us and our doctors WHAT they put in their cocktail. 'Proprietary trade secrets' is NOT an excuse to go on poisoning our land, our water, our people. Scientists and physicians have long said that there is no way for fracking to be done safely. Fracking has indisputably been linked to increased seismic activity. Fracking infrastructure is associated with spills of the chemicals used and ruptures in the pipeline transporting it. Will the companies make the land whole? Doubt it. Carbon-based energy companies like to declare bankruptcy and flee or demand public dollars clean up their private</p>
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						<p>Methane. Fracked gas. Natural gas. no matter what you call it, it is a grossly green-washed, under-acknowledged, potent and volatile greenhouse gas and fossil fuel that plays a large part in global warming. Methane is not a bridge to a clean future, it's determined charge towards climate breakdown. It is not a cleaner fossil fuel. That statement is simply unfounded. Methane is way more potent than carbon dioxide, and as a result, methane facilities have been considered many times more potent at contributing to climate change as other fossil fuel burning plants. Even with explosions aside, when you consider the consequences of emissions, resource consumption and impact on the health of the local communities, the dangers and risks fossil fuels poses are not just a possibility, but a certainty. Compared to renewable energy, the risk versus gains don't make sense. Fossil Fuels are like a broken cistern. It doesn't hold water.</p>
550	Kelly	Jensvold	kellyjensvold@gmail.com	Beaverton	OR	
551	Randall	Koch	randallkoch1@me.com	Neskowin	OR	
552	ken	gunther	ecocosm@icloud.com	Jupiter	FL	
553	Ellen	Yarnell	yarnell3439@comcast.net	Portland	OR	



554	Jeanne	Raymond	raymondj@peak.org	Corvallis	OR	No pollution causing, CO2 producing, fracking in Oregon.
555	Brent	Maynard	brent.maynard@yahoo.com	Portland	OR	
556	Jean	Butcher	jeanb7719@gmail.com	Portland	OR	
557	Jessica	Kelley	burtjessica@gmail.com	Portland	OR	Please deny Perennial's RFA. We do NOT want Fracked Gas in our community. It's dangerous and it's devastating for the environment.
558	Jeff	Kulp	jskulp1@gmail.com	Raleigh	NC	
559	hillary	bryan	hillarypdxmarketing@gmail.com	Portland	OR	
560	Tracy	Ouellette	tracyjouellette@gmail.com	Bow	WA	
561	PETER	CURIA	pgeometro@gmail.com	Scottsdale	AZ	CLIMATE CHANGE IS HERE AND NOW. STOP BURNING FOSSIL FUELS.
562	Kristin	Siess	kboneybruiser@gmail.com	Portland	OR	
563	Rick	Ray	riverkeeper@rickray.com	Troutdale	OR	
564	Deborah	Brown	debarino07@gmail.com	Portland	OR	Please, let's get ahead of things and stop ruining our planet! We know the damage that fracking causes. Governor Brown, please be a brave leader!
565	Debra	McGee	zap_oregon@msn.com	Eugene	OR	The atmosphere is currently at 415 ppm of carbon pollution. This is too high for human survival. We will soon hit tipping points for earth systems feedback loops we cannot control. The ice sheets are melting, the Oceans are acidifying. For the sake of all life, deny the Perennial certificate! Deb McGee
566	Noreen	Arnold	noreenarnold7755@gmail.com	Oakland	OR	

						Continuing to use fracking is part of a desperate attempt to stave off the inevitable end of fossil fuels. The consequences of this are going to do much harm and delay the necessary shift to green energy, if we will still have time to do so.
567	Ute	Saito	utesaito@hotmail.com	Portland	OR	
568	Suzanne	Geraci	s.geraci@comcast.net	Eugene	OR	I am absolutely opposed to fracking!
569	L.	Fielder	malankad@hotmail.com	Carrollton	TX	It is clear that to combat climate change we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.
570	Debra	Rehn	bibleegirl@aol.com	Portland	OR	
571	Cale	Christi	cale.austin@gmail.com	Chiloquin	OR	
572	Tracie	Hornung	tah@embarqmail.com	Mount Hood Park	OR	
573	Mark	Koritz	mkoritz2002@yahoo.com	Atlanta	GA	
574	Dorothy	Maxwell	dorop2@gmail.com	Blauvelt	NY	
575	Genevieve	Weber	genevieveelweber@gmail.com	Portland	OR	
576	Philip	Ratcliff	skazz999w@hotmail.com	Salem	OR	Fracking involves injecting water, sand, and chemicals at high pressure, deep underground, to release methane and oil. Fracking pollutes ground water, creates seismic instability, and releases greenhouse gas into the atmosphere.
577	William	Hoffer	sunengser@gmail.com	White Salmon	WA	
578	John	Steppert	steppjs@comcast.net	Longview	WA	
579	Doris	Potter	dorispotter99@gmail.com	Saint-Laurent	QC	

580	Diane	Rose	ddrose@earthlink.net	Bellevue	WA	
581	Carol	Masuda	sunsetcat17@hotmail.com	Chicago	IL	
582	Juan	Calvillo	juan@dancingredband.com	Portland	OR	Twelve years to get things straight, not further twist them.
583	Rick	Nunno	ricknunno@gmail.com	Portland	OR	
584	Maurine	Canarsky	canarskyymo@gmail.com	Portland	OR	Don't enable more fossil fuel production. We must continue the shift to clean energy sources. Allowing fracked gas into our state is not the way.
585	Michelle	Mayfield	mmayfield@gorge.net	White Salmon	WA	
586	Kelsey	Anderson	kelsey.arai@gmail.com	Portland	OR	PLEASE STOP HARMING OUR EARTH
587	Karlyn	Gedrose	gedrosek@gmail.com	Rainier	OR	
588	J C	Bettencourt	jcacourt@yahoo.com	Salem	OR	
589	Anita	Melbo	anime2or@hotmail.com	Portland	OR	
590	Russell	Novkov	rnovkov@gmail.com	Madison	WI	
591	Rev. Gordon	Hills	revgordonhills@yahoo.com	Palmerton	PA	
592	Jay	Humphrey	blue1jay@yahoo.com	Estacada	OR	
593	Brooke	Siskey	bsiskey@hotmail.com	Washougal	WA	
594	Dustin	Kearns	kearnsmdustin@gmail.com	Portland	OR	
595	Anne	Elkins	rustyanne1@yahoo.com	Anacortes	WA	
596	Quyen	Le	eskimoquyen@mac.com	Portland	OR	
597	Dennis	Ledden	lcs5779@gmail.com	Fiddletown	CA	
598	kathy	e	26kate9@gmail.com	Portland	OR	
599	Michael	Burmester	mike.burmester625@gmail.com	Happy Valley	OR	
600	Kristine	Karnezis	kckarnezis@msn.com	Portland	OR	Fracked gas is a needlessly dangerous way to get fuel. Let's not reward frackers with a plant to burn their ill-gotten fuel!

601	Sharon	Miller	smilertoo@aol.com	Vancouver	WA	
602	Isadora	Roth	isadroth@gmail.com	Portland	OR	
603	Louise	Quigley	chuckgyver@aceweb.com	Braintree	MA	Fracking is an environmental disaster in and of itself -- and we need to get away from ALL fossil fuels NOW. Any new fracked gas infrastructure therefore must be rejected, and not allowed to start.
604	Sabolch	Horvat	sabolch.horvat@gmail.com	Portland	OR	
605	Beth	Levin	bethagl@yahoo.com	Portland	OR	
606	Pamela	Mattson McDon	matmcd2002@gmail.com	Astoria	OR	With all of the sustainable energy projects increasing, the old polluting technology has no place in our state.
607	Mirco	Dinelli	mircodinelli@yahoo.com	Talent	OR	
608	Arrin	Schoedinger	ahs73@icloud.com	Portland	OR	To be honest, I don't even understand why things like this are even an issue anymore.
609	Richard	Johnson	jazzpacnw@yahoo.com	Bellingham	WA	
610	justine	cooper	justinenm@yahoo.com	Eugene	OR	
611	Deborah	Crohn	dddddddddd98104@yahoo.com	Portland	OR	The voters don't want more carbon intensive energy infrastructure. Block it. That's why voters vote for Democrats. What is the point of voting for Democrats if they won't block this kind of harmful, climate changing energy production?
612	p	bryer	pbryer@hotmail.com	Eugene	OR	
613	Wendy	Bowman	wbowman17@msn.com	Lacey	WA	
614	Richard	Stern	rsisyh@yahoo.com	New York	NY	

615	Ann Marie	Colucci	annmarie@bendpatrick.com	Portland	OR	
616	Thomas	Lewis	gamodato@aol.com	Portland	OR	Please allow Salmon thru Hells Canyon Dams. No Dirt in air, water or Mother Earth. Member of Sho Ban Nation, Tom
617	Barbara	KrupnikGoldman	bkgold2@gmail.com	Portland	OR	
618	Frances J	Kievet	fjkievet@comcast.net	Portland	OR	
619	Bruce	Cox	bchapul@gmail.com	Brevard	NC	Aside from the fact that the proposed power plant wants to use fossil fuels, they want exceptional treatment by using invalid rules. The continued focus on fossil fuel is backward thinking and dangerous to the world.
620	Eva	Coombs	zeloda.media4z@hushmail.com	Camano Island	WA	Soon we will be using free energy from the vacuum and other such proven technologies, which will make all this obsolete by the time it is built...we will be able to phase out oil, gas & other forms of energy, and all will be clean free & we will finally get to use TESLA, Tom Bearden, John Bedini's proven inventions, plus newer ones not yet as proven
621	Ruth	Harmon	tashamail@comcast.net	Happy Valley	OR	
622	Deborah	Gardner	upgradient451@gmail.com	Snoqualmie	WA	
623	Katie	Obriot	katieobriot@gmail.com	Portland	OR	
624	Tim	Fleischer	timfle@netzero.com	Louisville	KY	
625	Michael	Heumann	heumanncycle@gmail.com	Portland	OR	
626	Marge	Dakouzlian	footstepsinthesand@hotmail.com	Staten Island	NY	

627	Pam	Larsen	mesatopmama@mindspring.com	Hood River	OR	
628	Toni	Mills	toniann1966@gmail.com	Seattle	WA	
629	Usha	Honeyman	usha.honeyman@gmail.com	Corvallis	OR	
630	Alice	trexler	trexleralice@yahoo.com	Arlington	MA	Fracked gas produces terrible health effects for humans and adds hugely to the problems of greenhouse gases for the planet as a whole. This gas-powered plant is not needed or wanted.
631	Pamela	Yates	yates890@comcast.net	Gresham	OR	
632	Nancy	James	swmbkrunnrj@comcast.net	Ladson	SC	I am hoping you will be the strong leader that future generations needed. Please do the right thing.
633	Deborah	ODonnell	deborahfine@gmail.com	Astoria	OR	Stop, now
634	Craig	Heverly	heverlyjc@hevanet.com	Portland	OR	
635	Luca	Dinelli	ldinelli@yahoo.com	Talent	OR	We need clean energy not fracking!
636	Bev	Hedin	bevhedin@comcast.net	Portland	OR	
637	Grace	Neff	graceswallow@aol.com	Albany	OR	We should be working to save our planet, not destroy it!
638	Mary	Warren	maryewarren2@mac.com	Dallas	TX	
639	judith	lienhard	lienjud@aol.com	Portland	OR	
640	Dave	Potts	dav1189pot2@gmail.com	Cornelius	OR	

						I am fed up! I feel Americans in general are fed up too. Does anyone in government understand we are facing a climate challenge we have never faced before? Does it make sense to keep fracking anything and everything? Doing this would harm water, land and so much more. And why? This type of energy is not going to sustain the future. We need new approaches but those may not payoff the big corporations. PLEASE ... JUST SAY NO!!!!!! Thank you
641	Paula	Morgan	paulaymorgan@gmail.com	Winter Springs	FL	
642	Kristeen	Davis	1kristeendavis@gmail.com	Salem	OR	
643	David	Edwards	david@riverbird.com	Eugene	OR	This expresses my feelings exactly!
644	Marceline	Gearry	marcelineg@gmail.com	Portland	OR	
645	Ineke	Deruyter	ideruyter@hotmail.com	Portland	OR	
646	R.	Zierikzee	inor@earthlink.net	San Francisco	CA	
647	Susan	Thurairatnam	suz10250@aol.com	North Olmsted	OH	
						No new infrastructure should be for fossil fuels - all new development must be sustainable, like solar, thermal, & wind. Climate change it going to end us if we don't slow it down.
648	Nate	Hildebrand	nate@innategraphix.com	Portland	OR	
649	Mary	Peterson	mary.peterso@gmail.com	Newport	OR	Stop the madness.

650	Anne-Marie	Claire	amclaire_2000@yahoo.com	Portland	OR	Fracking natural gas is contributing to our overall climate warming by releasing more carbon into our atmosphere. We must not support this industry in any way . Thank you.
651	Daniel	Jaffee	dsjaffee@gmail.com	Portland	OR	
652	Barbara and Geo	Rofkar	rofkarb@openaccess.org	Bellingham	WA	This is absolute craziness to continue doing the same thing we have been and expect different results! We need to plan to work toward renewable energy with all our efforts directed at maintaining and nurturing the earth that feeds, shelters and clothes us!!
653	Brenda	Morrison	lashlaruex2@yahoo.com	Portland	OR	
654	Jewel	Hall	chickiebird08@yahoo.com	Eugene	OR	
655	Lucy	Corbett	lucy_corbett@yahoo.com	Portland	OR	
656	Jessica	Czereszka	jessicalin11@outlook.com	Hillsboro	OR	
657	Joe	Giordano	columbiariverkeeper@thegiordanos.org	Hood River	OR	
658	Beatriz	Sunderland	beasund@hotmail.com	Portland	OR	
659	Thomasin	Kellermann	kthomasin2@aol.com	Cumberland	RI	We must invest in green energy and energy efficiencies.
660	Jo	Hebberger	jhebberger@yahoo.com	Des Moines	IA	
661	Richard	Bergner	fidalgowildlifehabitat@gmail.com	Anacortes	WA	We need to use renewable energy not fossil fuels---for the sake of the planet.
662	Elke	Hoppenbrouwer	ehoppenbrouwers@comcast.net	East Haven	CT	Fracking is dirty business.



						Oregon and the nation should be investing in CLEAN ENERGY NOT fracking, drilling, mining or all the other ANTIQUE methods of extraction which is KILLING THE PLANET!
663	Erin	Marshall	erin@kismet-design.com	Portland	OR	
664	Jean	Bryant	skinnybuttjean@gmail.com	Portland	OR	
665	benjamin	gipson	just.like.zhei@gmail.com	Portland	OR	
666	Dr. Ralph	Hollingsworth	retiro47@me.com	Eugene	OR	
667	Carla	Morin	cfapjm@aol.com	Peoria	AZ	
668	joan	viers	joan@wbcable.net	Hubbard	OR	
669	Joseph	Start	rockstart@frontier.com	Silverton	OR	
670	William	Bennett	w.l.bennett.ii@gmail.com	Portland	OR	No new fossil fuels in our state!
671	jules	moritz	mazda63@comcast.net	Corvallis	OR	

						The result of installing and running this fracked gas station would be to dump methane into the Oregon atmosphere. Methane is more toxic and less identifiable than some other fossil fuel infrastructure building and operation. Therefore, this proposed station would be MORE dangerous and MORE toxic than usual. Please prevent Oregon from being destroyed by these toxic, unreliable and earth/air contaminating fossil fuel extraction facilities. Please prevent the ruination and destruction of life, earth and air in OREGON. Do not allow the building and operation of this facility Perrenial proposes to put in our State.
672	Patricia	Janesh	psyckdoc908@gmail.com	Portland	OR	
673	John	Comella	john.comella1@gmail.com	Philadelphia	PA	Natural gas would be fine IF it WERE NOT almost 100% MORE effective as a GREENHOUSE GAS. So methane is making climate change WORSE and we only have 1 DECADE to stop it before it RUNS AWAY irreversably. So, NO MORE FRACKED GAS PLANTS.
674	John	Nettleton	jpn5710@yahoo.com	Portland	OR	
675	Lynne	Campbell	lynnecamp@earthlink.net	Sagle	ID	
676	Jenet	Johnsen	jenetjohnsen@gmail.com	Ashland	OR	

677	Jeffrey	Watson	evr_green@msn.com	Issaquah	WA	We are in a climate crisis. It is way beyond 'warming'. This is not needed and it is definitely not wanted.
678	Bruce	Cratty	brucecratty@gmail.com	Akron	OH	
679	Sandi	Cornez	sandicornez@gmail.com	Portland	OR	
680	Tracy	Ellison	tellison44@gmail.com	Columbus Junction	IA	
681	Linda	Bolduan	lindabolduan@comcast.net	Lake Oswego	OR	
682	Patricia	Blackwell-March	patmarchant@comcast.net	Castro Valley	CA	
683	Helen	Jones	shej@mind.net	Ashland	OR	
684	John	Springer	john100@sprallio.com	Camano Island	WA	
685	David	Hermanns	dhermann@earthlink.net	Portland	OR	
686	Judy Arielle	Fiestal	judyarielle@gmail.com	Portland	OR	We need courageous leaders to walk away from the fossil fuel industry to save our planet.
687	Jean & John	Culp	jazcfhc@gmail.com	Bandon	OR	We need to put the health of the planet and our children and their children as the PRIORITY, not the profits of industry.
688	Teresa	Mcfarland	terefar@mykolab.com	Portland	OR	Fracked gas is a dirty fossil fuel that contributes to global warming. We don't want it in our state and we will act to stop it. Think about my grandson and all the other children growing up--they need a future and they don't need fossil fuels!
689	James	Bates	james.bates3@comcast.net	Seattle	WA	
690	Claudia	Devinney	tippynine@yahoo.com	Perry	NY	toxins are killing our planet
691	Christopher	Kralik	misterkite@comcast.net	Camas	WA	

692	Cynthia	Taylor	cetaylor66@hotmail.com	Ashland	OR	Please, please, please don't approve this!
						<p>DISASTER that should NEVER be an energy source in the Great State of Oregon. From beginning to end it is the cause of environmental, human and especially wildlife sickness. If the state of Oregon were to go ahead with allowing fracking within our state then I would have to say that the elected officials who support fracking as an energy source are negligent in their duties. Fracking as we know is the cause for the destruction of clean water resources - pumping toxic chemicals into streams, rivers and aquifers. Fracking uses value water sources needed for growing horticultural crops and for providing hydration for wildlife and agriculture. But the greatest concern for this Oregonian is the fact that fracking disturbs the earth's crust and causes EARTHQUAKES! Please do everything in your power to not only oppose and prevent short term fracking proposals but all future proposals.</p>
693	Diane	Craig	creativekiwi@comcast.net	Beaverton	OR	
694	JANE	MARA	jemara3@yahoo.com	Talent	OR	

695	Peter	Sergienko	petersergienko@gmail.com	Portland	OR	
696	Robert and Dolor	Scheelen	scheelen@earthlink.net	Medford	OR	
697	Willem Adriaen	van Rees	willemvanrees1996@gmail.com	Portland	OR	
698	Cathy	Davis	cathynelsondavis@gmail.com	Senatobia	MS	
						<p>Methane leaks from fracked-gas production are greatly accelerating climate change. We need to aggressively move away from fossil fuel consumption and toward renewable sources of energy. Despite this, energy companies are looking to develop new fracked gas-fired power plants in our region. Building additional fracked gas infrastructure would only entrench our region in fossil fuel use for decades to come.</p>
699	Jay	Roelof	jtroelof@outlook.com	Lincoln City	OR	
700	Betty	Abadia	amarone3@gmail.com	Portland	OR	
701	Lori	Kunkel	kunkelpdx@comcast.net	Portland	OR	

						<p>Every new source of fossil fuel developed now and every newly-constructed facility of fossil-fuel infrastructure are more nails in the coffin of humanity's future on earth. The amount of of carbon-dioxide already in our atmosphere -- 415 PPM -- is already enough to cause extreme weather events all over the earth: floods, wildfires, droughts, heat waves and superstorms. This is the 'new normal' for earth's climate; it won't ever get any better, but it will get a lot worse, eventually unliveably worse. Every day we are still pouring millions of tons of CO2 into the atmosphere. We obviously cannot stop this overnight, but we must phase out fossil fuels as rapidly as we can and do everything else we can to remove CO2 , such as planting billions more trees wherever they can survive.</p>
702	William	Schoene	williamschoene@gmail.com	Santa Monica	CA	
703	Susan	Heath	forbux@hotmail.com	Albany	OR	
704	Dean	Sigler	muchcatfur@comcast.net	Beaverton	OR	<p>Think of all that sunshine out there, and the steady winds blowing down the Gorge. Why burn fossil fuels when they need to stay buried?</p>
705	Ann	Littlewood	annlittlewood3@gmail.com	Portland	OR	<p>Please do not support any additional fossil fuel infrastructure. That way lies madness.</p>

706	Aloysius	Wald	ajwaldtwo@yahoo.com	Columbus	OH	
707	Sarah	Thomas	sarahthomas@gmail.com	Portland	OR	
						<p>don't you get it yet? Alaska on fire, Europe on fire, glaciers gone in Switzerland, arctic ice GONE, Doug Fir plantations dying, Salmon on the edge of extinction, 99% of scientists agree we are killing the planet....What part of we are killing every life form on the planet do you not get? Some where some time some politicians have to lead...so far it ain't Oregon....We are still letting the corporations wag our forestry into plantations that have no resistance, we are still letting corporations try to site dirty oil and gas exploiting activities along our best but sadly abused rivers....California is miles ahead of Oregon, Washington too...when is Oregon going to wake up and join the other western states in resistance to death by fossil fuels.????????????????????</p>
708	Mary	Duvall	mudpuddle@hughes.net	Clatskanie	OR	
709	Diane	Kent	jdkent@aol.com	Phoenix	AZ	

						We cannot encourage any more fossil fuel development in our state - approving this facility sends the wrong message about our priorities. Deny this RFA, and focus on sustainable energy infrastructure for our state.
710	Rick	Brodner	rbrodner@gmail.com	Portland	OR	
711	Linda A.	Heath	heathster52@gmail.com	Grafton	OH	
						I am currently in my mid 20s, and I have many friends around that age. I have cousins who are in elementary school, and several of my friends have kids of their own. Climate change is already wreaking havoc on our world, and we will undoubtedly live to see its calamitous, irreversible impacts ,Ã rising temperatures and sea levels, the agricultural and economic destruction they will cause, and the societal breakdowns that will inevitably follow ,Ã should they go unmitigated. I do not want myself, my friends, my family, or anyone else to suffer. We cannot ignore what the vast majority of scientists have been warning us about for years any longer.
712	Kevin	Chiu	kevinchiupetit@gmail.com	Seattle	WA	
713	Janet	Wynne	jmarwy@msn.com	Bellingham	WA	
714	Dana	Sewall	dlsewall@comcast.net	Gresham	OR	



						We have scientific data and long standing evidence of the damage that will be caused by allowing such an action to occur. One of the key roles of government is to preserve public safety. Willfully ignoring clear evidence of an impending catastrophe is a dereliction of duty. Scientists have worked for decades to assemble an incontrovertible body of evidence related to our changing climate, and ignoring that information is insidious. Future generations' resources, health and prosperity is dependent on us acting immediately, significantly and broadly.
715	Matthew	Genaze	aquarover@hotmail.com	Cambridge	MA	
716	Carol	Bosworth	cbosworth@cmug.com	Portland	OR	
717	David	Milholland	encanto@ochcom.org	Portland	OR	Fracking is a dangerous activity for people, fellow beings and overall planetary health. Do not allow its tentacles into a state that has largely resisted its presence.
718	Jackie	Cole	jlwmcole@comcast.net	Woodinville	WA	
719	stephen	wolfe	stephen.wolfe@uit.no	Portland	OR	This has to be stopped since the company has no buyer, and fracking is very dangerous polluting work and should not be shipped anywhere. Thanks, Stephen F. Wolfe
720	Beth	Levin	levin.beth@gmail.com	Portland	OR	

						If we value the quality of our drinking water, we DON'T want any fracking going on anywhere near this pristine terrain we live in and cherish.
721	Susan	Miller	lelierre88@gmail.com	Lake Oswego	OR	
722	Maureen	Belle	renieb@gmail.com	Salem	OR	
723	Kent	Sugnet	kent@fossilcartel.com	Portland	OR	
724	Emily	Frank 1	efrank26@comcast.net	Portland	OR	
725	Kathie E	Takush	ktakush@yahoo.com	Reading	PA	
726	Steve	Robey	steve.robey@gmail.com	Berkeley	CA	
727	Lynn	Shoemaker	shoemakl@uww.edu	Whitewater	WI	
728	John	Bremer	johnpaulbremer@gmail.com	Bellingham	WA	
729	Cristy	Murray	doglady8@gmail.com	Oregon City	OR	
730	JANET	HEINLE	janetheinle@yahoo.com	Santa Monica	CA	
						We need to take better care of what is left of our environment, our wildlife, and our marine life.
731	Priscilla	Martinez	priscillamartinez486@yahoo.com	Bothell	WA	
732	Annalee	Dammann	alord@ymail.com	Vancouver	WA	
733	Heidi	Welte	capa_7@yahoo.com	Beaverton	OR	

						<p>Not only are there the methane flares which make fracked gas a very dirty form of energy, fracked gas has polluted numerous waterways and ground water. Allowing our water supplies to be polluted by fracking is foolish to the point of global suicide. Fracking is also associated with earthquakes. The damage it causes is not tallied when the expense of this energy form is calculated. The producers of fracked gas to not bear the burden of this cost. We the taxpayers are left holding the bill. Whether fracked gas is being transported by rail or pipeline, the risks to surrounding communities, to water supplies, to the air we breathe, and to the soil needed to grow food are too costly. This compounds the risk to the entire planet that the development of this fuel source causes. Climate catastrophe is in our future if we do not leave this very dirty form of fossil fuels in the ground.</p>
734	Susan	Haywood	susansaphone2@yahoo.com	Portland	OR	
735	Maggie	Knapp	knappmaggie@gmail.com	Berkeley	CA	
736	Teresa	Van Haalen	tvanhaal@icloud.com	Spokane Valley	WA	
737	Holly	Marczak	hollylee57@yahoo.com	Ledyard	CT	
738	Robin	Miller	robin4miller@icloud.com	Bend	OR	

739	Joan	Smith	sydjoans@gmail.com	Columbia City	OR	
						I do not support any new projects related to fossil fuels. I reject the Request for Amendment (RFA) to Perennial Wind Chaser,Âs (Perennial) site certificate for a proposed gas-fired power plant. Fossil fuels are dirty and dangerous to surrounding communities and harm our fragile environment. Stop this project.
740	Charles	Townsend	charlesntownsend@gmail.com	Portland	OR	
						No fracked gas power plants. This is 180 degrees away from the direction that we know we need to be headed if we're going to deal with climate change. Fracked gas is harmful to our planet. Fracked gas is harmful to the ground water sources. Fracked gas is the cause of increased seismic activity. Fracked gas is dangerous to the communities that live along the transportation corridors. Just say 'No, hell no!' to fracked gas.
741	Liz	Trojan	elizat8@pobox.com	Portland	OR	
742	Charissa	Clifford	charissaniles@me.com	Portland	OR	

						Please don't permit any fracked gas plant into Oregon. There is enough fossil fuel pollution in the air now. My great grandchildren deserve a better future than that. We still don't know how dangerous fracking is, but I believe it's very dangerous.
743	Sandra	Armstrong	armstrong.sandy@gmail.com	Portland	OR	
744	Cynthia	Marrs	marrs_cynthia@yahoo.com	Junction City	OR	
745	Charlotte	Walker	mocam37@gmail.com	Navarre	FL	This is a terrible idea moving in the wrong direction of energy resources. Please do not support it.
746	Mike	Conlan	mickconlan@hotmail.com	Redmond	WA	
747	Jennifer	Brace	spiralight8@gmail.com	Joshua Tree	CA	
748	BEPPIE	SHAPIRO	beppie@hawaii.edu	Portland	OR	As a grandmother, I do everything I can to protect the health and environment in Oregon, so they can live here as well as I have. Please, consider the future as well as the present in thinking about fracked gas infrastructure in our state.
749	Lehman	Holder	tripsguy@aol.com	Vancouver	WA	My wife and I see coal as a dying industry. We strongly believe it to everyone's advantage to invest in clean, renewable energy sources.
750	Annie	Christensen	anniedc53@gmail.com	Saint Helens	OR	
751	James	Roane	jlroane@yahoo.com	Renton	WA	

						Please REJECT this request for amendment. We do not need fracking in our state. We do not need to add to the climate chaos situation. Please do not act like the Federal Government.
752	Diane	Colcord	ceciletc2003@yahoo.com	Tillamook	OR	
753	Jaime	Ramirez	yunohuayam@yahoo.com	Corvallis	OR	
754	Sam	Hackney	samonwry@gmail.com	Portland	OR	
755	Margaret	Hammitt-McDon	dragonheartfarm@hotmail.com	Cannon Beach	OR	
756	Rebecca	Clark	bjclark@siderial.com	Portland	OR	
						I live right across the river in Vancouver. We're trying hard to clean up and keep clean our environment. We are too close in proximity not to have your 'gas' blow on us. A big fat NO.
757	Susan	Atwood	rnc112124@gmail.com	Vancouver	WA	
758	Ellen	Halbert	ellenhalbeet@hotmail.com	Drayden	MD	
759	Jonathan	Gottlieb	jhgottlieb@gmail.com	Natick	MA	
760	Bea	Ogden	bea.ogden@outlook.com	Portland	OR	
761	Nancy	Robinson	robinson@peak.org	Corvallis	OR	
762	Adonai	Booth	sirdavidbooth@yahoo.com	Portland	OR	
763	Stephanie	Bourdelle	stephanieb638@aol.com	Sheffield	VT	
764	Wallace	Iimura	wiimura@gmail.com	Cupertino	CA	
765	Donald	Lahti	dm2lahti@hotmail.com	Allyn	WA	GO GREEN NOW.
766	Robert	Oberdorfer	roboberdorfer@gmail.com	Portland	OR	
						You must stop destroying our planet! This is it, then there is nothing! Stop selling out for cash! No more fracking!
767	Tami	Lukachy	tlukachy@yahoo.com	Henderson	NV	
768	Mary	Davis	cysliders@aol.com	Portland	OR	

769	Nancy	Stamm	nancystamm@edc-inc.com	Fort Pierce	FL	
770	mr.g.	west	kimly.west@gmail.com	Dallas	TX	
771	Marshall	Sanders	sandyssanders@att.net	Eugene	OR	We don't want centrally controlled carbon and nuke energy that the 1% controls to their profit. We want decentralized, localized rooftop solar subsidized by taxation of corporations and the 1%.
772	Kathy	Oppenhuizen	salzberryhill@gmail.com	West Olive	MI	
773	Nancy	Hedrick	nanhedrick2@hotmail.com	Portland	OR	
774	Larry	Siglin	larrysiglin@earthlink.net	Coeur D Alene	ID	There does not appear to be a real need for this facility as they cannot find any customers.
775	Betsy	McCarthy	betsymccarthy@hotmail.com	Portland	OR	Let,Äôs be leaders and get rid of any possibility of fracked gas in our lovely state. We want clean water and land for our children and grandchildren.
776	Paul	Blackburn	paulrblackburn@msn.com	Hood River	OR	
777	Emilia	Ponti	emiliaroseponti@gmail.com	Saint Helens	OR	We cannot support fracking. We cannot build new fossil fuel infrastructure in this climate emergency. Please stop this madness!
778	Lorraine	Hersey	lorraine47@msn.com	Pendleton	OR	
779	Diana	Talcott	diana.talcott@gmail.com	Portland	OR	
780	Pam	Chestnut	plc19@peak.org	Astoria	OR	
781	Hugh	Cochran	hughc1937@gmail.com	Eugene	OR	Please, no....thank you.
782	Debra	Slater	dslater@west-connect.com	Portland	OR	

783	Tracy	Landboe	tracyandknut@comcast.net	Shoreline	WA	Let's use tax payer dollars to support sustainable infrastructure and long term jobs which will not damage our ecosystems costing us more money in the long term.
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						and public health advocate who very much supported the decision in New York to not allow environmental and public health hydraulic fracturing to occur in our state. At this time, I strongly urge Governor Brown and the Energy Facility Siting Council (EFSC) to reject the so-called Perennial Wind Chaser facility (aka fracked gas power plant) proposed near Hermiston, Oregon. Please be aware that in addition to the environmental and public health damage that will be a threat for all families and wildlife in Oregon, Perennial claims that it has „Äbeen unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date.,Ä Perennial also failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not
784	Jean	Naples	jeannaples7@gmail.com	Suffern	NY	
785	Dolly and Roy	Sutherland	royanddolly@gmail.com	Tacoma	WA	

786	Joann	Macey	jomace123@gmail.com	McMinnville	OR	We do not want fracking in Oregon. Such work has caused earthquakes in a landlocked state of Oklahoma. We are a earthquake risk state. We do not need this, too. Oregon prides itself on its environmental condition and laws. This invasive project is completely contrary to our cultural standards.
787	Laura	Goldberg	dickandlaura@peoplepc.com	Arlington	WA	We must keep fossil fuels in the ground and focus instead on clean, green energy!!!!
788	Kaitlin	Grammer	grammerk@comcast.net	Mount Hood Park	OR	
789	Jeri	Renner	jeri.renner@gmail.com	Adrian	MI	
790	Hillary	Tiefer	hillarytiefer@hotmail.com	Portland	OR	
791	michele	mcferran	mlmcferran@hotmail.com	Bend	OR	
792	Maureen	Bigler	maureenbigler@msn.com	Glide	OR	
793	Christopher	Warren	oneworldatpeace@comcast.net	Springfield	OR	The Gas Industry refuses to repair THE EXISTING LEAKS THEY HAVE so why give them more pipe to leak? They also insist on powering their Pressure Reducing Valves by using the Methane to power them by exhausting gas into the atmosphere and that makes warming escalate rapidly. We need SOLAR AND WIND ENERGY more than another polluting power plant just built for some rich guys to get richer!

794	Michael	Terry	michaelgterry@hotmail.com	Santa Monica	CA	The first step in phasing out fossil fuels is to stop building fossil-fuel infrastructure that will continue polluting for decades!
795	Abigail	Houghton	frogwitch@aol.com	University Place	WA	
796	patricia	reynolds	dreamthisone@yahoo.com	Washougal	WA	our planet needs help
797	J.	Woodworth	wpjtiger@comcast.net	Newman Lake	WA	
798	G	Rowe	rowtoo@comcast.net	Bend	OR	
799	Denise	Tschann	dmtschant@gmail.com	Ashland	OR	Citizens in Oregon have been battling to keep Oregon and greenhouse gases to a minimum, this issue is critical especially with the current federal administration cutting back on all regulations. I say 'No' to extending this request for for an extension.
800	Jan	Castle	jancastle@comcast.net	Lake Oswego	OR	
801	Laurie And Dave	King	landd_2@q.com	Portland	OR	
802	Jessica	Rojas	jessica@necoalition.org	Portland	OR	That type of infrastructure has no business in Portland. The harm caused will exceed the profits.
803	Anne	Y	buttersalt@me.com	Portland	OR	We must end fossil fuel extraction as fast as possible.
804	Betsy	Pendergast	ptgramma57@gmail.com	Port Townsend	WA	
805	BC	Shelby	bcshelby@gmail.com	Portland	OR	
806	SJ	van Rees	jonevanrees@hotmail.com	Portland	OR	Please consider the future of our environment, for your children, your children's children, for all flora and fauna, for the earth. Renewable energy is the path to our future.

807	Stephen	Dutschke	sdutschke@gmail.com	Louisville	KY	
						As a Democratic PCP who worked on your election campaign, I am totally opposed to all aspects of fracked gas. First, the high-pressured pushing into the Earth of a 500-plus chemical (not disclosed due to proprietary laws) solution cannot fail to contaminate water sources and cause earthquakes. Burning such natural gas (plus releasing methane, during extraction) releases untold amounts of greenhouse gases, shortening the time on Earth for humans.
808	Richard	Freeman	richcfreeman@yahoo.com	Portland	OR	
809	Stephen Craig	Rolston	craigrolston@frontier.com	Mount Vernon	WA	
810	Vernon	Batty	aussiedogweb@gmail.com	Pagosa Springs	CO	
811	Donna	Wehrley	thewehrleys@yahoo.com	Portland	OR	
812	EILEEN	MASSEY	eilmassey@yahoo.com	Emeryville	CA	
813	Henry	Berkwitz	hlemc@verizon.net	Sabinsville	PA	Perhaps you need to consider global warming in deciding if this is a good thing for our planet.
814	Dennis	Higgins	kimballshirley@frontier.com	Manzanita	OR	The voice of Oregon's governor is vital in this effort. Many thanks.
815	Peter	Luciano	pncolumbia@comcast.net	Columbia City	OR	
816	Joene	Pike	cheetah212@frontier.com	Hillsboro	OR	
817	Mauria	McClay	mauria_rhys@yahoo.com	Portland	OR	
818	Ruba	Leech	rubat@hotmail.com	Portland	OR	

819	Amy	Roberts	homerjim82@gmail.com	Albany	OR	Fracking is bad for communities and bad for the environment. It is a short-term solution to a long-term problem, but has very long-term negative affects.
820	Marguery Lee	Zucker	lee.m.zucker@gmail.com	Eugene	OR	Please:No new fracked gas. The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules. Which is fine with us; enough of this polluting industry.
821	satya	vayu	satyavayu@gmail.com	Portland	OR	
822	Joan	Spiering	joanspiering@msn.com	Rockaway Beach	OR	In this time of doing all we can to mitigate the effects of science based climate change, we must put a stop to fracking altogether.
823	Roger	Kofler	rkofler@aol.com	Portland	OR	Fracking alone is harmful to our environment. Oklahoma is a good example; they now have earthquakes where they never had them before.
824	Judith	Mackenzie	jpmackenzie@comcast.net	Minneapolis	MN	
825	Jane	Heisler	rroberts8001@msn.com	Portland	OR	On the heels of the failed Clean Energy Jobs bill, we must do the right thing this time.
826	Gloria	Rhyne	gloria.rhyne@gmail.com	Portland	OR	
827	Christi	Dillon	racegirl1971@yahoo.com	Mooresville	NC	

						Just say no to additional infrastructure for extractive industry development.
828	Paul	Borcherding	pb_palomine@hotmail.com	La Grande	OR	
829	Michael	Robertson	mikeysaurus.pdx@gmail.com	Portland	OR	
830	Bobbee	Murr	bobbeemurr@gmail.com	Portland	OR	
831	Cathy	Bledsoe	clbledsoe@comcast.net	Portland	OR	
						Fracking is the very worst, environmentally destructive method of obtaining natural gas, at a time when we have no need of it. Hence, fracking is nothing but a desperate attempt to eke out a little more profit from a dying industry before non-polluting, sustainable energy systems completely take over the market. The era of environmental destruction for industry profit is over!
832	Michael	Wilson	michaelamarwilson@gmail.com	Portland	OR	
833	Jon	Hager	stormcrow60@xmission.com	Riverton	UT	
834	Rita	Heinz	ritaheinz@hotmail.com	Ashland	OR	POWER FROM RENEWABLES IS THE ONLY SANE WAY TO GO!!!
835	Fred	Mallery	flmalery@efn.org	Eugene	OR	
836	Tiffany	Spahn	devilspahn@hotmail.com	Portland	OR	
837	Wendy	McGowan	ramblin@rosenet.net	Eugene	OR	
						There is an abundance of wind power to use in that location. NO to fracked gas. It is helping to destroy our atmosphere. Thank you. Sue Craig Lane County
838	Sue	Craig	sueacraig@gmail.com	Eugene	OR	

839	Susan	Parks	sbparks7@gmail.com	Bend	OR	Let,Ãs not stray from the natural beauty that Oregon is.
840	Mary	Neuendorf	mkneuendorf@comcast.net	Salem	OR	
841	Setsuko	Maruki-Fox	smarukifox@gmail.com	Grants Pass	OR	I thought that Gov. Kate Brown banned fracking in Oregon.
842	Linda	Alstad	lalstad@q.com	Salem	OR	
843	Maryellen	Redish	mredish@aol.com	Palm Springs	CA	
844	Kathryn	TenHoopen	lunamayah3@gmail.com	Portland	OR	Keep it in the ground!
						Wife Marilyn and I want 'no more' fracked gas, O.K.?!? Obtaining it many times miscellaneously 'wrecks' the geology of the underlying rock strata, plus diverts underground waters! But the 'main reason' why we object is because the fracked gas is a FOSSIL FUEL, which, when burned and used, only 'adds' to the climate change-global warming problem Planet Earth 'already' has! Ie., using fracked gas only adds more CO2 and methane emissions to the air we, our children, and grandchildren have to breathe!! Do you really want to make that worse?!? So...NO more fracked gas, O.K.?!?
845	David	Scheer	scheerdc@outlook.com	Bellingham	WA	
846	Fredrick	Seil	seilf@comcast.net	Berkeley	CA	

						DON'T SELL OUR CLEAN AIR FOR LYING PROFITEERING GREEDHEADS WHO DON'T CARE WHO THEY HARM!!!!
847	John	Goeckermann	misterg@wizzards.net	Grants Pass	OR	
848	Michelle	Sewald	masewald@yahoo.com	Denver	CO	
849	Virginia	Davis	ginny1218@yahoo.com	Woodinville	WA	
850	Terry	Lopata	talopata@msn.com	Portland	OR	We are long past the point where fracking can be considered a viable solution to energy needs. It's time for twenty-first century, sustainable solutions. Oregon can and should be a leader in renewable energy. We must leave the Victorian era thinking in the past, or there will be no future for any of us.
851	Judy	Sibelman	sib@hevanet.com	Beaverton	OR	Fracking is wrong on so many levels, most importantly that it irrevocably pollutes fresh water, taking it out of the water cycle forever, and destroying aquifers. We don't need this plant and we don't want it, because it supports this disastrous, unsustainable practice.
852	Juanita	Hull	utahkittymom@yahoo.com	Ogden	UT	...
853	Vaughn	Zeitzwolfe	vzeitzwolfe@yahoo.com	Portland	OR	Oregon first! Corporations get the back seat.
854	Don	Stephens	shreddad@mac.com	Portland	OR	This project should have no place in Oregon's progressive energy future.
855	Katherine	Howard	mymusings@msn.com	Newport	OR	
856	Sarah	Stewart	sarahbstewart@yahoo.com	Watertown	MA	



857	Joan	Lawson	joanvlawson@gmail.com	Seattle	WA	
858	Mr. Shelley	Dahlgren, PhD	shelley@dahlgren.com	Sammamish	WA	
859	P	Scoville	michael799@optonline.net	Hewitt	NJ	
860	Richard	Benner	rpeterbenner@gmail.com	Portland	OR	Save the planet
861	Joe	Worth	joewrth1@hotmail.com	Not Available	OR	
862	Shelley Z.	Klappholz	shelleyk@efn.org	Eugene	OR	
						I firmly believe that Perennials request should be denied. Fracking is evil. Considering the impacts displayed in other states (earthquakes, poisoned water, increase in methane gas release, etc). We do not want this construction completed here in Oregon and the accompanying damage. Please deny.
863	Nancy	Harger	eckharg@comcast.net	Portland	OR	
864	Tom	Bender	tbender@nehalem.tel.net	Nehalem	OR	
865	Gloria	Fisher	chaskafisher@gmail.com	Portland	OR	
866	Barbara	Branham	barbhb@comcast.net	Portland	OR	There is no market for this proposal. We need to get off fossil fuels.
867	Meg	Ruby	megruby@gmail.com	Portland	OR	Please reject Perennial,Âs proposal for this dangerous, unnecessary project. Oregon Can and must do better. Please help us to be part of the solution to save our planet.
868	dale	riehart	dale@daleriehart.com	San Francisco	CA	
869	Emil	Gerth	emil.gerth@gmail.com	Portland	OR	
870	David	Filer	davidfiler@comcast.net	Portland	OR	
871	Kathy	Kleczek	kathy@lalunaloa.com	Cannon Beach	OR	
872	Shelly	Cash	sjccash@icloud.com	Roseburg	OR	Fracking causes cancer

873	Bill	O'Brien	wobobr123@yahoo.com	Beaverton	OR	No fossil fuel burning energy plants in Oregon.
874	Ken	Wheeler	wheeler.ken@gmail.com	Beaverton	OR	
875	Jennifer	Logan	mniosniwin@hotmail.com	Sioux Falls	SD	
876	Janice	Karpenick	jkarpenick@gmail.com	Portland	OR	
877	Kay	Ross	kaylaross@q.com	Portland	OR	
878	Don	Worley	mzee.worley@gmail.com	Kettle Falls	WA	People and Planet are more important than corporate profit.
879	Amanda	Feaver	amamdafeaver@gmail.com	Portland	OR	
880	Veronica	Poklemba	ronnie717@comcast.net	Portland	OR	We just passed a 5 yr. moratorium on fracking during the legislative session. It does not make sense to allow further plans for fracking in the state of Oregon. The data is in, fracking is extremely damaging to our environment. The plans for this facility should be terminated.
881	Mary Ann	Jasper	burbage@centurytel.net	Shedd	OR	
882	Anne	Ryland	annejory@aol.com	Ashland	OR	
883	Scott	Species	sspecies@yahoo.com	Seattle	WA	it looks likes this project falls under what i like to refer to it as the '3 Strikes rule' It fails for at least 3 good reasons. Therefore, it needs to be called out! Deny the RFA.
884	Jamie	Fillmore	jfillmore66@gmail.com	Portland	OR	
885	Terry	Tedesco	ttedesco49@cox.net	Phoenix	AZ	
886	Jennifer	Nitz	grizzalo@hotmail.com	Missoula	MT	
887	Cindy	Stein	cinfish65@yahoo.com	Thousand Oaks	CA	
888	Don	Jacobson	donjphoto@gmail.com	Portland	OR	
889	Eileen	Hufana	ejhufana@msn.com	Portland	OR	

890	Gregory	Whiting	gregoryhugh@yahoo.com	Portland	OR	Completely Unacceptable when already clear that „fracking“ is both DESTRUCTIVE in multiple ways & this venture is one more step backwards in terms of environmental DESTRUCTION. NOW is the time for evolutionary creative decision making in terms of Energy & The Planet & Oceans - CITIZEN
891	James	Marquard	james.marquard@gmail.com	Portland	OR	There are options for peak use power plants, for instance battery storage units. Tesla has been successfully putting these units, at scale, to realistically replace natural gas fired units.

						<p>as possible in order to make investment decisions. Mercurial decision making or kicking the can down the road never helps business in the longer run. Let's say a different kind of energy company, one that didn't utilize the most toxic to the environment source--fracked gas- wanted to utilize the wind power widely available near Hermiston and build a power plant. Competition from a possibility of a gas powered plant would scuttle that alternative energy investment. The talking points in this letter are sufficient to deny this permit extension but the bigger picture is the chilling effect it could have on any alternative energy construction. US Supreme Court decides cases based upon how the justices want to decide. Their law clerks then supporting cases. You know the carbon footprint of fracking, transporting and burning is not what we all need now. You have the 'case law' to deny this permit. Just do it.</p>
892	Rick	Rappaport	rick@rickrappaport.com	Portland	OR	
893	Cheryl	Speer	cherylaspeer@gmail.com	Camas	WA	
894	Sue	Lyon-Myrick	s2adi@msn.com	Portland	OR	

						Numerous incidences have shown that fracked gas is not good for individuals, the land, the environment. Please--no fracked gas in Oregon. And by the way, the name is very misleading. As if it were wind power. Thank you for your attention to this. Christine Weber-Kearney
895	Christine	Weber-Kearney	christinejwk@gmail.com	Portland	OR	
896	Diana	Rempe	dianarempe@gmail.com	Portland	OR	
897	Sammy	Low	cougarcreek7@gmail.com	Stanwood	WA	
898	Nancy	Anderson	nkanderson5@comcast.net	Portland	OR	
899	Nancy	Hartman	ng3hart@yahoo.com	Louisville	CO	
900	TERESA	OBARR	tutuobarr@gmail.com	Bend	OR	
901	Jack	Stansfield	jstansfield8981@gmail.com	Stanwood	WA	
902	Jean	Aslakson i	jleena@comcast.net	Vancouver	WA	
903	Rebecca	Wolfe	rebecca.moon.wolfe@gmail.com	Portland	OR	Fracking causes earthquakes!! Look at Oklahoma. Absolutely the LAST thing we should do so close to the old Hanford site!

904	Jerald	Boger	motaki22@gmail.com	Spokane Valley	WA	<p>dangers to our environment are not worth the waste and risk. Once a plant , traffic of shipped in product is constantly being used , the risk of shipping environmental and health risks aren,Äôt worth the profits verses costs equals a great long term losses. This plant will also depreciate all property values , raise health risk that the state will eventually ,depreciate the over all lives of state and public, all while the corporations profit and the state ends up with the debt. What a great loss of resources ,health and over all value. We realize that this seems like they will create jobs, taxable base and opportunities , well we must realize the corporations will pollute at states expense, ruin the environment for local communities and put our natural environment at risks. Fracked products have been linked to long term cancers, devalued property value, lose of taxable base, depletion of our natural resources of water etc, and put everyone at risk</p>
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905	Dakora	Schee	dschee@greenpeace.org	Portland	OR	It is irresponsible in a time of climate crisis when we have 11 years to cut emissions in half to approve an expensive, dangerous project that will only exacerbate our dangerously high carbon emissions. Stop allowing new fossil fuel infrastructure and invest in renewable energy!
906	Donna	Pedroza	donnageorge2@gmail.com	Alameda	CA	I come to Oregon to camp hike visit friends and family several times a year. The beauty of your state needs preserving not exploiting as does mine
907	Alice	Warner	alouisewarner@gmail.com	Eugene	OR	My children and grandchildren need us to stop using fossil fuel.
908	Camille	Jackson	camjackson1@comcast.net	Beaverton	OR	
909	Anna	Fritz	anna@annafritz.com	Portland	OR	
910	Lori	Triggs	princessladycat@yahoo.com	Ocala	FL	
911	Jean	Rosenbalm	jean.rosenbalm@gmail.com	Hillsboro	OR	
912	John	McSwigan	mcswigan@gmail.com	Hillsboro	OR	
913	Dr. Dorothy	Black Crow	dorothyblackcrow@gmail.com	Depoe Bay	OR	
914	William	Sharfman	sharfman@umich.edu	New York	NY	Fracking is wrong. It's been wrong all along for the myriad kinds of damage it causes to humans and the surroundings they depend on, it's especially wrong now when we are in a climate crisis and we know better.
915	Javier	Rivera	javierocker@aol.com	Brooklyn	NY	

916	William	Ryerson	bryerson@comcast.net	Indianapolis	IN	
917	Erik	Henriksen	erik.henriksen@gmail.com	Portland	OR	
918	Theodore	Cooper	topcat15@msn.com	Seaside	OR	
919	Brontv'	McKinnis	brontemckinnis@gmail.com	Portland	OR	
920	Dave	Bean	revdaveb@hotmail.com	Portland	OR	
921	Eleanor	Dowson	eleanordowson@comcast.net	Mill Creek	WA	
922	Harry	Mozen	htmoze@gmail.com	Johnson City	TN	
923	Bonnie	Mitchell	camperbon@aol.com	Portland	OR	
924	Bettina	Anter	ba97223@gmail.com	Portland	OR	
925	Kimetha	Stallings	kimetham@yahoo.com	Roseburg	OR	We must stop supporting dirty energy and the fossil fuel industry. This state and nation must switch to clean, renewable energy sources only.
926	Lori	Erbs	lorieji@cs.com	Acme	WA	
927	Chuck	Gehling	chuck50fis@aol.com	Hood River	OR	
928	Bill	Hinman	hinmanwilliam@yahoo.com	Longview	WA	Fracking should be banned entirely
929	Jef	Gunn	zopa@hevanet.com	Portland	OR	We don't want any part of this technology. Fracking is harmful and dangerous to both the wild environment and to humans. We need to transition to clean energy now, so let's put energy into clean energy.
930	Arthur	Noble	vidanob@gmail.com	Bandon	OR	This is a violation of Oregon clean air act.
931	John	Kus	kustomizer9@gmail.com	Kennewick	WA	
932	Daniel	Goldberg	dano41d@comcast.net	Santa Cruz	CA	
933	Mary	Steele	online-activist@alumni.stanford.edu	Laguna Niguel	CA	
934	Linda	Cramer	viking3678@comcast.net	Antioch	IL	



935	Kim	Beck	kim.beck@comcast.net	Rogue River	OR	
936	Jen	Messina	jjnmessina@yahoo.com	Ely	NV	We NEED to leave dirty fuel in the ground and embrace clean energy if our grandkids are going to be able to exist!
937	Howard	Wade	howardbwade@gmail.com	Portland	OR	
938	Duane	Tucker	duane.tucker@gmail.com	Palm Springs	CA	
939	Kathy	Bradley	khayb55@aol.com	Lugoff	SC	
940	Jay	Russo	stellarjay1@gmail.com	Stevenson	WA	
941	Letitia	Tarver	tishatwork@yahoo.com	Astoria	OR	
942	Karen	Alexander-Brown	kjalexander@hotmail.com	Portland	OR	In a crisis such as now, this is the wrong direction; turn back now!
943	Carole	Onasch	leafyoasis@gmail.com	Portland	OR	
944	Kristin	Conrad-Antoville	a2antoville@gmail.com	Portland	OR	
945	Alan	Bartl	abartl@sonic.net	Coos Bay	OR	We need to move on to sustainable power if we want to make it through climate change. Thank you.
946	David	Ringle	d.ringle@ieee.org	Macungie	PA	
947	Sandra	Pongracz	pongaczsd@me.com	Florence	OR	
948	JIM	Fletcher	jimtwopersons@comcast.net	West Linn	OR	PLEASE, PLEASE keep these 'F R A C K I N G B...s' OUT OF OUR STATE! There's not a Boardroom in the Country that's AS IMPORTANT as the HEALTH and FATE of the 'Last grasp on our State!'

949	Pamela	McDonald	plmatdhs@yahoo.com	Riverside	CA	<p>Just what we DON,ÂT need..... another fossil fuel installation. How ,Âúnecessary,Â is this if it contributes to air pollution? If a company isn,Ât intelligent enough to install and run their plant on ,Âúgreen,Â energy, how effective will it be? Innovation is imperative. This isn,Ât 1960, and to be competitive today, every new facility must keep our environment safe.</p>
950	Gregory	Monahan	gregorymonahan29@gmail.com	Portland	OR	<p>We should not be building more fossil fuel powered electrical power plants, but rather should be supporting the development of clean renewable resources of power. The technology has changed since the original permit was issued and the permit should not be re-issued.</p>

						We are FAR past the time that we could in good conscience condone permitting and building another piece of fossil fuel infrastructure in Oregon. The people have spoken - we do NOT want to further the fossil fuel economy. And the climate crisis is continuing to speak. We have numerous and cleaner alternatives for energy generation. I urge you to deny Perennial's request for a time extension on their permit.
951	Bonnie	New	bnew1@live.com	Hood River	OR	
952	Mathias	Quackenbush	mathiasquackenbush@gmail.com	Portland	OR	
953	Bob	Shippee	rsoxbob@gmail.com	Henrico	VA	
954	Elena	perez	eleartemis@yahoo.com	Bronx	NY	
955	Tom	Bugas	bluebugtom@hevanet.com	Portland	OR	Save our planet by saving Oregon and the Columbia River when we have the power to do so.
956	Ellen	McCann	ellenmccann63@hotmail.com	Escondido	CA	
957	kurt	france	kfrance@brenntag.com	Portland	OR	I understand that gas generated power is better than coal or oil but fracking has many other nasty side effects that offset it's lesser carbon footprint in my opinion. And in this case there is no buyer making it even less appropriate.
958	A.	Todd	todd87701@gmail.com	Eugene	OR	
959	Robert	Bresky	bobthenatureguy@gmail.com	Oregon City	OR	

						No one wants these obsolete and harmful fossil fuels. They are increasingly expensive, risky, and harmful to extract. They only profit offshore trans-national corporations and leave us with all the risk and damage. Just say no.
960	Jerry	Rosenkoetter	rbigshepherd@gmail.com	Salem	OR	
961	Karen	Pickering	karenpickering@mac.com	Vancouver	WA	
962	Jill	Wyatt	chrysalis@eoni.com	Baker City	OR	Clean renewable energy NOT dirty climate destroying energy!
963	Vanessa	Hartman	nessahartwoman@gmail.com	Corvallis	OR	
964	Margaret	Comfort	ms.cmfrt@yahoo.com	Portland	OR	NO !
965	Diane	Luck	dianeluck@mac.com	Portland	OR	No FRACKING!!!
966	James	Plunkett	jimplunkett66@hotmail.com	Portland	OR	
967	Don	Thompson	thompson_don@comcast.net	Cambridge	MA	
968	Christine	Taylor	litasberrypatch@gmail.com	Portland	OR	
969	Rob	Bradley	bradl319@msu.edu	Portland	OR	
970	Gail	Roberts	igailroberts@gmail.com	Tecate	CA	
971	Esther	Garvett	egarvett@gmail.com	Miami	FL	
972	Lisa	Caine	lcaine530@gmail.com	Portland	OR	
973	Alain	Millar	jakeshouseajm@comcast.net	Portland	OR	
974	Teresa	DeLorenzo	tde@teleport.com	Astoria	OR	What a bad idea! There is nothing good about fracking, and nothing good about a plant to use its products. We're better than fossil fuels. We need to be leading with imagination and new technologies that do not contribute to climate change.
975	Helen	Wald	helen.wald@gmail.com	Portland	OR	

976	Joseph	Wythe	jhw2901@frontier.com	Sandpoint	ID	
977	Elizabeth	Roberts	robertsliz9@gmail.com	Chicago	IL	
978	Barbara	Harper	jandbharper@yahoo.com	Castroville	CA	
979	r	c	palapadospa@gmail.com	Ashland	OR	No Fracking, anywhere, anytime! We don't need Fracking...we need a Healthy Planet!
980	Nancy	Cushwa	tenwa@jps.net	Portland	OR	
981	Bob	Gendron	bobgendron@mindspring.com	Chicago	IL	
982	David	Medford	parkermedford@gmail.com	Portland	OR	
983	Grady	Goodenough	grady.goodenough@gmail.com	Portland	OR	
984	karen	Heinemann	kodonoh@yahoo.com	Hood River	OR	
985	Michael	Bordenave	mbordenave1016@gmail.com	Fresno	CA	
986	Jeff	Wells	hznfrst@yahoo.com	San Diego	CA	
987	Kathy	Divens	kalollar@yahoo.com	Vancouver	WA	It is essential to keep our air clean so that our families and communities can live in a healthy environment for all. Let us instead of fracking look for other more environmentally-sound ways to be found for the benefit of all. Thank You.
988	Dan	Jensen	danjsr52@gmail.com	North Plains	OR	
989	Ron	Ennis	ronfennis@gmail.com	Portland	OR	
990	Philip	Colvard	prcolvard@gmail.com	Medford	OR	
991	Blaine	Ackley	blaineackley@me.com	Hillsboro	OR	Please say NO to fracked gas in Oregon. It is not good for our health, our environment, or the world.
992	Hugh	O'Haire	ohaire@comcast.net	Eugene	OR	
993	Paulette	Meyer	meyer4842@comcast.net	Portland	OR	

994	Sandra	Henderson	sandrawow@gmx.com	Silverton	OR	
995	Meryl	Pinque	merylpinque@yahoo.fr	Paris	FR-IDF	
996	Carolyn	Buhl	carolynbuhl@gmail.com	Portland	OR	
997	Emily	van Alyne	oceanminded09@gmail.com	West Richland	WA	
998	Michelle	Barber	michelle.f.barber@gmail.com	Portland	OR	
999	Daphne	Wysham	daphne.wysham@gmail.com	West Linn	OR	
1000	Dan	Clapsadle	tclapsadle@gmail.com	Springfield	OR	
1001	Neilia	Pierson	nbpierson71@hotmail.com	Cave Junction	OR	
1002	K	F	keldawg8@hotmail.com	Salem	OR	
1003	Aleeza	Nussbaum	ajnu@comcast.net	Portland	OR	This issue has been of great concern to me for years. I never thought my adopted State would be in danger of making this mistake. Oregon's brand is it's environmental record and purity. Please do all you can to preserve it! ~ With gratitude for all you do, Aleeza Nussbaum
1004	Richard	Shepard	shepardconsulting@verizon.net	Claremont	CA	Indeed, the EFSC should not authorize a gas-powered plant that is neither needed or wanted. The Perennial proposal is ridiculously weak and wrought with flaws. It should be laid to rest once and for all.

						I love visiting Oregon. It is a very beautiful and green state. It does not need and should not get a new fracked gas power plant. All of your energy should be provided by renewable energy and building a gas power plant will just set you back from reaching that goal.
1005	Charlotte	Sines	ladycatx@yahoo.com	Yosemite	CA	
1006	John	Schenck	johnbschenck@yahoo.com	Camden	SC	
1007	diane	marks	shenyen@wavecable.com	Port Angeles	WA	
1008	Patti	Brandt	prmbandt@aol.com	Waukegan	IL	
1009	Phyllis	Oster	poster@easystreet.net	Portland	OR	We should be encouraging safe, environmentally friendly renewable energy!
1010	Bryan	Doss	bdoss02@gmail.com	Portland	OR	
1011	Bryan	Branson	blbranson1@msn.com	Spokane	WA	Please keep the Columbia River areas clean and don't add pollution to the air. Thank you.
1012	Alice	West	agentsassysquirrel@hotmail.com	Portland	OR	
1013	Jennifer	Scott	jjscott9@gmail.com	Fort Myers Beach	FL	
1014	Anthony	Albert	albert2910@msn.com	Corvallis	OR	
1015	Julia	Cranmer	jcranmer3@comcast.net	Southampton	NJ	
1016	Andrea	Pellicani	artspace@sonic.net	Coos Bay	OR	Methane leaks from fracked-gas production are greatly accelerating climate change. We need to aggressively move away from fossil fuel consumption and toward renewable sources of energy.
1017	Berklee	Robins	berkrobin@gmail.com	Lake Oswego	OR	

						This project will compete with the solar industry for capital. Use biogas from the dairies for on-site generation during peak demand. Stop spending capital on more climate destroying projects. We're way overbuilt in the energy sector.
1018	Don	Steinke	crvanwash@gmail.com	Vancouver	WA	
1019	Ronald	Hubert	rhubertaz@gmail.com	Flagstaff	AZ	
1020	George	Pantely	rustytruck65@gmail.com	Mount Hood Park	OR	
1021	Tiffany	Baker	tanchella@aol.com	Nicholasville	KY	
						With the understanding that climate change is a significant threat to Oregon's way of life, and with all that we have learned about the detrimental relationship between fracked gas and climate change, in addition to the admission by the company that there is no market demand for its product, I URGE you, Governor Brown and the Oregon EFSC to deny Perennial's Request for Amendment. Thank you.
1022	Carol	Newman	caroltov@pacifier.com	Astoria	OR	
1023	Suzanne	Hamer	tedsuza@gmail.com	Woodinville	WA	
						I adamantly oppose fracking as being anti environment. At this point we cannot afford to continue to add fossil fuels and use dangerous drilling methods!
1024	Yvonne	Wright	whywrite@charter.net	Warrenton	OR	
1025	Tonya	Morrison	coolpharmacist@yahoo.com	Normandy	TN	
1026	Ansula	Press	ansula@gmail.com	Portland	OR	



1027	Georgia	Mattingly	glmattingly@earthlink.net	Longmont	CO	
						I want CLEAN air and water and I'm damned tired of begging for them. NO MORE FRACKING, it DESTROYS our drinking water, and for WHAT? To further enrich a few greedy rich assholes. NO MORE. STOP allowing these greedy rich pukes to destroy OUR land and water for their profits.
1028	Kelly	McConnell	prvt@2ezgroup.com	Portland	OR	
1029	Mari	Dominguez	maridelsol34@gmail.com	Linden	CA	
1030	Corinne	Sherton	djmccs@comcast.net	Salem	OR	
1031	Janet	Falcone	janf1907@gmail.com	Louisville	KY	
1032	Michael	Coulson	mikecoulson48@icloud.com	Leeds	GB-NYK	
1033	jan	nelson	nellie.jan@gmail.com	Eugene	OR	WHY?
1034	Maye	Thompson	mayethompson@gmail.com	Portland	OR	
1035	A	Bigelow	abigelowpdx@gmail.com	Portland	OR	
1036	Celia	Davis	celiaastoria@charter.net	Astoria	OR	
1037	Vince	Mendieta	vinceofdarkness@yahoo.com	Austin	TX	
1038	Timothy	Beitel	beiteltimothy@gmail.com	Pitman	NJ	
1039	Jan	Stone	shorttailcat28@gmail.com	Beaverton	OR	
1040	Melody	Shapiro	melodyshapiro28@gmail.com	Hood River	OR	
						Fracking has unknown consequences, why are we such awful stewards of Mother Earth?
1041	Susan	McFarlane	mcfarlanesf@yahoo.com	Gresham	OR	
1042	Maureen	O'Reilly	ommalasi108@gmail.com	Seattle	WA	
1043	Janet	Ehrenfreund	janet6867@gmail.com	Portland	OR	
1044	Stephanie	Clark	sclarkenterprises@gmail.com	Brookfield	MA	

						I live in your neighboring state, Washington, but what happens in Oregon affects us. Especially when it comes to any new projects that accelerate global warming and ocean acidification. Be the leader in sustainability and put your sights on cleaner safer forms of energy production. Thank you.
1045	Shaun	Hubbard	shaunalice@gmail.com	Friday Harbor	WA	
1046	Charles	Carroux	carroux@ymail.com	Belmont	CA	
1047	Patty	Larsen	pklaaslarsen@yahoo.com	Astoria	OR	
1048	Susan	Chandler	wobblywarriors@comcast.net	Fort Pierce	FL	
1049	susan	janelle	sjanelle@charter.net	Walla Walla	WA	
1050	Lawrence	Nagel	nagel@mind.net	Ashland	OR	
1051	Casey	Cunningham	redpeelingbark@gmail.com	Portland	OR	
1052	Maureen	Lauran	maureenlauran@gmail.com	Hood River	OR	
1053	Mark	Wirth	mark.purple@gmail.com	Seattle	WA	
1054	Aileen	Taylor	aileent575@gmail.com	Spokane	WA	
1055	Dana	Regan	jd_regan@live.com	Bend	OR	
1056	Cindi	Lund	cindilund@sbcglobal.net	Lopez	WA	
1057	miriam	israel	remedytiger@live.com	Seattle	WA	what can I say that has not already been said? there is nothing good that can come of this except a very few people will get a lot of money. meanwhile the air and water all (including yours) our live depend on are poisoned . do a good thing for once and make the right choice. NO MORE FRACKING ANYWHERE. respectfully miriam

1058	Wanda	Ballentine	raginggrannie@icloud.com	San Rafael	CA	
1059	Michael	Halloran	mshalloran2605@gmail.com	Salem	OR	
1060	Fred	Coppotelli	coppotelli@earthlink.net	Bradenton	FL	
1061	Shannon	Nelson-Deighan	sldeighan1@aol.com	Hood River	OR	
						We need to transition to renewable energy sources ASAP. Fracked gas and its infrastructure, is too volatile and dirty to use anymore. We MUST lower emissions and stop the pipeline construction which encourages use of these polluting fuels. The pipelines have proved hazardous and are failing, exploding, in many old and new structures now in use. The fires from these explosions damage the forests, the air and water, destroy property and endanger lives. We need to halt use of this type of fuel, and end the expansion of these projects.
1062	Claudia	Gray	ccloudgray@gmail.com	Drain	OR	
1063	Alex	Mach	machone1@mac.com	University Place	WA	
1064	Debra	Lutje	debra.lutje@gmail.com	The Dalles	OR	No Fracking Way should this power plant be allowed!
1065	Linda	Hart	linhart317@gmail.com	Portland	OR	
1066	Susan	DeWitt	sedewitt4@gmail.com	Largo	FL	
1067	Julia	Skelton	julieskelton@msn.com	Van Buren Twp	MI	
1068	Neil	Shargel	smithrockneil@gmail.com	Portland	OR	
1069	Robert	Helm	rhelmd@comcast.net	Portland	OR	
1070	Nancy	Spaan	nspaan347@gmail.com	Astoria	OR	

						Please protect the future of Oregon's citizens by refusing to build any fossil fuel plants. We owe a healthy environment to our children and our children's children.
1071	Mira	Wiegmann	mira.wiegmann@cune.org	Portland	OR	
1072	Ivan	Russell	ivanrussell@gmail.com	Pittsburgh	PA	
1073	Valerie	Blackmore	bobval22@comcast.net	Columbia City	OR	
1074	Alexander	Gardner	alxgardner@gmail.com	Portland	OR	
1075	Billy	Angus	wizardofhamilton@hotmail.com	Hamilton	MT	
1076	Holly	Holly	rushholly109@gmail.com	Eagle Point	OR	
						Not all the chemicals used in the fracking process are made known to the public. It has already been proven that this process does interfere with the safety of our ground water & access to our drinking water. Please, keep Oregon's water as pristine as possible. We do not need to add to the pollution these companies have done to the world by allowing them to build here in Oregon.
1077	Frances	Davis	crrfran1936@gmail.com	Terrebonne	OR	
1078	Karen	May	klmay@wamail.net	Tacoma	WA	
						The world is fast coming to a point of no return as far as the climate is concerned. The last thing that is needed is more fracking, especially anywhere on the west coast which is prone to earthquakes. This is insane! Don't do it!
1079	Susan	Allen	su.allen50@gmail.com	Raleigh	NC	

1080	Howard	Shapiro	howeird3@gmail.com	Portland	OR	Since Perennial has not been able to market its energy product this seems to prove there is no need for it. If approved for siting it will become another edifice that is obsolete and would become a blight or worse yet, a hazard to the area.
1081	David	Hunt	davidjameshunt@hotmail.com	Spokane	WA	Please demonstrate strong leadership for our regional community, and our land, air, and water. It is TIME to change the old paradigm of fossil fuel tycoons controlling the future of our lives and now even our very survival - and to ENACT the steps that we all know will begin to restore and heal our region, our planet, and our community.
1082	Angie	Dixon	angied@whidbey.com	Clinton	WA	
1083	Mary	Guard	guard52@yahoo.com	Friday Harbor	WA	
1084	Dennis	Paul	paulcommadennis@gmail.com	Portland	OR	You must be criminally blind to the effects of climate change to continue to promote fossil fuel expansion. Your grandchildren will know what you did to allow it to worsen.
1085	Cheryl	Erb	awdsn@gmx.com	Salem	OR	

						It is imperative that the conflicts of interest and the propensity to ignore science and public health that EFSC has exhibited in the past not be allowed to continue. This is a perfect example of the kind of project that EFSC must no longer rubber-stamp.
1086	Ted	Gleichman	tedgleichman@mac.com	Portland	OR	
1087	A	Bonvouloir	ra3ajw@sbcglobal.net	Sunnyvale	CA	
1088	Sally	Riley	sallyenberg@hotmail.com	Portland	OR	Please protect our natural resources and water for our future generations!
1089	Ted	Dreier	teddreier@gmail.com	Portland	OR	
1090	Sarah	Sercombe	moe9bean8@att.net	Royal Oak	MI	
1091	Melissa	Hathaway	infomavn@teleport.com	Portland	OR	
1092	Josie	Peper	peper.jo@gmail.com	Astoria	OR	This proposal needs to be reconsidered and rejected, considering all available and new data. Fracked gas should be a thing of the past.
1093	Sa	Re	reilsshera@aol.com	Carmel	CA	
1094	Monroe Edwin	Jeffrey, Without	itbnla@gmail.com	Shawnee	OK	
1095	Bill	Kucha	billkucha@gmail.com	Depoe Bay	OR	Please no Fracking anywhere in Oregon. It,Äôs costly, deadly and stupid. Bill Kucha

1096	Laurie	Caplan	lcaplan2010@gmail.com	Astoria	OR	Governor Brown and members of the EFSC, What a unique opportunity you have to help Oregon meet its air, water, and climate goals. You can make a difference in our small corner of the world and set a great green example to inspire government leaders in other states. Make the right decision for the future of OR and our planet: Deny Perennial's RFA. Thank you.
1097	Donna	Murphy	murph1949@aol.com	Portland	OR	If we are to believe the scientists, we must not build any more fossil fuel infrastructure!
1098	Milan	Mehta	milan_mehta@collegiate-va.org	Midlothian	VA	Please, Do the Right Thing for Ours and Our Children's Future. What would They be Proud Of?
1099	Steve	Berman	berm0022@umn.edu	Berkeley	CA	

						<p>Aside from the standard arguments, which I fully endorse, I want to add a note. We know. You and I know. Fracking makes no sense economically. We don't calculate the real costs of production, shipment, refining, and consumption. If we did, the total cost would dwarf the small benefit (limited profits for a few and the 'convenience' of fossil fuel use for others). Not to mention the fact we sit on the edge of ecological catastrophe. I plead with you. My children and grandchildren plead with you: Don't approve any site anywhere that enables further fossil fuel consumption and its concomitant global warming. Please. Be smart. Listen to your heart.</p>
1100	John	Villaume	jmvillaume@yahoo.com	Portland	OR	
1101	Deborah	Honthaner	honthand@yahoo.com	Portland	OR	
1102	M	Leszczynski	kochski@chartermi.net	Lapeer	MI	
1103	Elizabeth	Graser-Lindsey	eaglsing@gmail.com	Beavercreek	OR	<p>It is past time for us all to make the switch to clean energy. Do right by Oregonians and deny this proposal.</p>



						Fracking is so dangerous to the earth. Causing earthquakes, disrupting habitats and neighborhoods. All for no reason but greed. The earth is tapped out. Please stop trying to squeeze the last drops of oil out of her wild spaces when there are cheaper, easier and more efficient forms of energy. We don't still send telegrams in the cell phone era and we should also evolve past the age of greed for oil.
1104	Valerie	Pflug	valeriepflug@gmail.com	Havana	FL	
1105	Sandra	Joos	joosgalefamily@comcast.net	Portland	OR	
1106	Susan	Tarjan	soozyt@comcast.net	Portland	OR	It's time to stop all permitting related to fracking and the products thereof. Keep it in the ground!
1107	Ellen	Maddex	ellenmaddex@msn.com	Eugene	OR	
1108	JOHN	SINGISER	jsingiser@hotmail.com	PORTLAND	OR	
1109	Melinda	Messore	melindasmusiclessons@gmail.com	Portland	OR	
1110	Michael	Snouffer	canyonwinds@zoho.com	Medford	OR	
1111	John	Dunkum	dunkum@bresnan.net	Missoula	MT	

						<p>Given the argument of item 3, above I do not understand how there can be any motivation to approve the construction of this apparently unneeded power plant. Allowing projects that involve expanded use of fossil fuels to proceed just locks the Pacific Northwest into an extended exposure to the effects of fossil fuel usage. Once the infrastructure is in place, the pressure for continued operation of fossil fuel users will continue and efforts to reduce fossil fuel usage will face ongoing resistance. Instead of approving new generating facilities, Oregon would be better served by emphasizing energy conservation through 'green' building techniques and by promoting distributed generating through promotion of rooftop solar.</p>
1112	Lloyd	Johnston	lajceoigthi@gmail.com	Seattle	WA	
1113	Jerry	Kessinger	jerrykessinger@me.com	Lynnwood	WA	
1114	Duane	Ray	duaneray@frontier.com	Gresham	OR	<p>We need to move away from fossil fuels entirely. Nuclear power should be included in the mix if water, wind and solar are not able to provide capacity as soon as needed.</p>

						I fully support the comment above. We are beyond the tipping point for moving away from fossil fuels, especially fracked gas which has such an enormous carbon footprint. Please do the right thing to safeguard our future.
1115	Nancy	Mogielnicki	mogsaway@yahoo.com	Portland	OR	
1116	Gail	Ohara	gail@chickfactor.com	Portland	OR	
1117	Erin	Chipps	erinchipps@gmail.com	Portland	OR	
						I'd like to add that what really upsets me is that fossil fuels are fossil fuels, and we should not be burning them because they already add to excessive CO2 in our atmosphere - so the bottom line is don't burn fossil fuels and any extracted gas from below the surface is a fossil fuels and should not be burned. We have to start reversing our burning of fossil fuels - PERIOD!!! end of story!
1118	stephen	couche	steveco1948@comcast.net	Portland	OR	
1119	Carolyn	Eckel	tlew4002@earthlink.net	Portland	OR	
1120	DK	Bolen	dkbolen@gmail.com	Saint Petersburg	FL	
1121	Tracy	Hollister	tracyjhollister@yahoo.com	Hood River	OR	
1122	D	Stirpe	dolcezza077@yahoo.com	Portland	OR	
1123	Jane	Heisler	janeheisler@outlook.com	Portland	OR	No, No, No to this polluting enterprise!
1124	Deb	Lawless	xiaomifong@hotmail.com	Portland	OR	
1125	Tracey	Katsouros	traceycsmallwood@gmail.com	Waldorf	MD	
1126	Rick	Ray	columbiariverkeeper@rickray.com	Troutdale	OR	

						We do not need this resource of gas in the Oregon power mix. we are already an exporter of energy to California We need grid upgrades. cybersecurity and microgrids as well as being more focused on AI and advanced technology for energy storage. This is an unnecessary investment that would line the pockets of stockholders while polluting the air of Oregon. It is a cash cow at best paid for by ratepayers who do not have much say-so over long term investments and their consequences.
1127	Kate	Miller	millerjkate@gmail.com	Lake Oswego	OR	
1128	Ms	Zentura	zeejaz@yahoo.com	Casper	WY	
1129	Melanie	Plaut	melanie.plaut@gmail.com	Portland	OR	
1130	Alice	Shapiro	alice.shapiro2@gmail.com	Portland	OR	
1131	Mary Lou	Emerson	marylouemerson1947@gmail.com	Portland	OR	Fracking pollutes drinking water that is so precious and causes minor tremors that can destabilize buildings. We need eco friendly energy production--wind, solar and wave.

						Dear Governor Brown, Please act and urge EFSC to deny Perennial,Ãs RFA because we must stop the expansion of fossil fuel pollution in our state and region. Please look to protecting the health and future of our land and people! Sincerely, Deena T. Grossman
1132	Deena T.	Grossman	deenatgrossman@gmail.com	Portland	OR	
1133	Norman	Traum	dougiemacd67@gmail.com	Boulder	CO	
1134	Laurie	Fisher	lauriefisher55@gmail.com	Portland	OR	
1135	Sandra	Whitmore	swhitmore3@comcast.net	Olympia	WA	
1136	Gavin	Bornholtz	gbglide@comcast.net	Grand Blanc	MI	
1137	Jack	West	jpwest@teleport.com	Portland	OR	
1138	Jeffrey	White	rogue576@gmail.com	Forest Grove	OR	No more fossil fuels. Stop destroying the planet.
1139	Leslie	Martinsen	lesliemartinsen1@frontier.com	Lake Oswego	OR	
1140	Ben	Basin	ben_basin@yahoo.com	Portland	OR	
1141	Eric	Edwards	eeguinness@hotmail.com	West Chicago	IL	
1142	Marianne	Larkins-Strawn	mari.larkinss@gmail.com	Vancouver	WA	
1143	Peter	Karnig	pkarnig@gmail.com	Oceanside	OR	
1144	Heather	Chapin	heatherchapin@comcast.net	Portland	OR	
1145	Anna	Cowen	annaysun@yahoo.com	Portland	OR	
1146	Rolando	Rodriguez	juanyrolando@yahoo.com	Port Orford	OR	
1147	Chris	Loo	cdloo@hotmail.com	Gilroy	CA	
1148	Paul	Spindel	pspindel@msn.com	West Linn	OR	No new fossil fuel infrastructure. We need to STOP this now for the sake of future generations
1149	emily	merollis	emerollis@gmail.com	Portland	OR	
1150	Ellen	Stearns	stearnsohana@gmail.com	Portland	OR	

1151	Sheri	Staley	staleyagate@peoplepc.com	Shelton	WA	Stop the madness!
						<p>their children, deserve a pollution-free environment in which to grow and thrive. Their future will depend on decisions made now to eliminate fossil fuels and develop alternative energy. They cannot know economic security if their health is jeopardized by construction of a fuel plant powered by fracking. No one can. The economic argument for a future fueled by fossil fuel development ignores the wasteland it will ultimately create. Even the short-term argument that such development can provide an intermediate step while longer-range green technologies are developed is no longer defensible. There is no more time. All of our children, All of them, and their children and their children,Äôs children, may have a chance to survive and live in and create hope for a sustainable future. Let us stand beside them, and support them. Give the children a chance. You can.</p>
1152	Chris	Adamson	cladamson326@gmail.com	Gig Harbor	WA	Deny Perennial,Äôs RFA.

						At a time when rapid action must be taken to reduce global greenhouse gas emissions, we cannot continue to leave the door open for new fracked gas power plants to be built. Please deny the site certificate Request for Amendment.
1153	Damon	Motz-Storey	dmotzstorey@gmail.com	Portland	OR	
1154	Christina	Irwin	chris.irwin@comcast.net	Lake Oswego	OR	
1155	Randall	Nerwick	rnerwick@gmail.com	Portland	OR	
1156	Heather	Dury	heather.dury@gmail.com	Portland	OR	
1157	Michael	Hall	micahall1@yahoo.com	Portland	OR	
1158	Theresa	Schumacher	theresa.schumacher@gmail.com	Saint Helens	OR	
1159	Gerritt and Elizabeth	Baker-Smith	egbakersmith@gmail.com	East Stroudsburg	PA	
1160	Jynx	Houston	jynxcdo@gmail.com	Portland	OR	I'm imploring you, Kate, to do the right thing for Oregon & keep fracked gas out.
1161	Janet	Roxburgh	hummingbirdzoo@yahoo.com	Portland	OR	
1162	Bridget	Bayer	punchbridges@gmail.com	Portland	OR	Focus instead on wind, solar and renewables for energy production will be a greater win-win for the companies who want to profit on energy production and Oregonians who want to use from it.

						Things are finally beginning to shift. It is already too late, our whole planet will shift. Clear and moral action is required. There must be no new infrastructure, no more drilling, no more fossil fuels. A massive clean up awaits the survivors of climate change. Our mourning for our losses began decades ago. We must not fail to salvage what life is left. Governor, there can be no more investment in fossil fuels.
1163	Richenda	Fairhurst	pastorrichenda@gmail.com	Ashland	OR	
1164	Louise	Wallace	lfdw4@aol.com	Fairfax	VA	
1165	Linda	Nagy	1715nagy@gmail.com	Portland	OR	
1166	Julie	Bush	bushjulie92@yahoo.com	Corpus Christi	TX	
1167	Gerhard	Letzing	letzing@outlook.com	Portland	OR	Please stop this plant.
1168	Ryan	Schwartz	losetheshoes@gmail.com	Portland	OR	
1169	Amy	Houchen	ahouchen@comcast.net	Portland	OR	
1170	gisela	zech	gzech@gmx.com	Boise	ID	
1171	Joyce	Follingstad	joyfoll@teleport.com	Portland	OR	
1172	Linda	Tighe	ltighe835@gmail.com	Portland	OR	Invest in 'green' technology only. We must refrain from any new fossil fuel forms of energy.
1173	Alan	Smith	a23smith@yahoo.com	Portland	OR	



						<p>Oregon must not give frackers a pass, and must use every legal and political means possible to stop them. The fracking industry's disregard for health, safety, environmental issues, and climate change is well known, and its titans would jeopardize the health and safety of Oregonians without blinking an eye. The reckless leaders and science deniers of the energy cartels now embedded in the White House administration will stop at nothing -- nothing -- that gets in the way of their profits. We have to join our neighbors to the north and south (Washington and California, as well as beyond the international boundaries). Draw a line in the sand up and down the entire West Coast and just. say. no. I strongly urge the EFSCA to deny Perennial Wind Chaser's RFA and put this terrible idea of fracking Oregon to rest once and for all. Thank you.</p>
1174	Betsy	Toll	betsy.toll@gmail.com	Portland	OR	
1175	Tammy	Robinson	shewearsgardenboots@gmail.com	Clatskanie	OR	Thank you for caring.



1179	Rachel	Ellison	methuselah90@yahoo.com	Vancouver	WA	
1180	Au	Nguyen	au@maryemerson.org	Portland	OR	
1181	Linda	Covert	linvin@comcast.net	Portland	OR	
						By far the most urgent action needed in our times is action to slow down climate change and, if we can be successful, perhaps to reverse it. We cannot have new energy infrastructure that exacerbates climate change. That is a crime against humanity and against Nature and all living beings. Please prohibit development of another fracked gas power plant in Oregon. Oregon must join the world-wide struggle against climate change. This plant would nullify much of our efforts to be part of that struggle. Every place on the planet has to participate in this struggle. There is no room, no time for exceptions. We must fight for life, not betray that fight for money.
1182	Maria	Sause	mkrausster@gmail.com	Newport	OR	
1183	Sarah	Spansail	spansail2@yahoo.com	Ashland	OR	
						Not now, not ever. We will blow that fucking plant to kingdom come if it's built.
1184	Robert	Jones	rjones553@yahoo.com	Salem	OR	
1185	Adam	Lee	adaml81@gmail.com	Portland	OR	
1186	Karen	Stimson	karenstimson@icloud.com	Orange	CT	
1187	Nina	Diamante	ninadiamante321@yahoo.com	Los Angeles	CA	T

						Who do you think you are that will be exempt from the effects to the environment that Perennial Wind Chaser will bring? It will be your water, air, and very life that will be diminished by permitting Perennial to defile our life-giving earth. You too will be silenced and bulldozed into cheaper and more cramped quarters in your own life; buried in the indifference bred by greed. Reject the amendment to Perennial's site certificate. Stand up and be courageous in the face of a few coins dribbled from the pockets of the filthy rich. 'Life shrinks or expands in proportion to one's courage.' Anais Nin.
1188	Jane	Nicolai	jane.nicolai@gmail.com	Vancouver	WA	
1189	Marianne	Brevard	mariannebrevard@yahoo.com	Hood River	OR	
1190	Dianne	Ensign	roughskinnednewt@hotmail.com	Portland	OR	I strongly support a clean energy future, renewable resources and expanding incentives for energy efficiency, protecting our environment, and working for a price on carbon.
1191	Phil	Harris	p.harris.pdx@gmail.com	Portland	OR	
1192	Carolyn	Savage	captainsis@comcast.net	Olympia	WA	
1193	Barbara	Bernstein	mediapro1@comcast.net	Portland	OR	
1194	Heather	Davis	heatherannedavis@hotmail.com	Beaverton	OR	Oregonians don't want any fracked gas

1195	Susan	Linden	suelinden@yahoo.com	Palm Bay	FL	
1196	Patrick	Bushart	jpb55aeb61@aol.com	Beaverton	OR	
1197	James	Spooner	jpat_spooner@yahoo.com	Portland	OR	
						I'm confused as to why Oregon would even consider a gas-fired powered plant when our future depends on moving forward to cleaner technologies. It would be a waste of money to build such a plant now. Tell Perennial's RFA to give it up, Oregon is not interested and instead focusing on investing in our future.
1198	LYDIA	SWAGERTY	lydiaswagerty@gmail.com	Portland	OR	
1199	Sandra	Butler	sriveral9@hotmail.com	Los Angeles	CA	
						We must STOP building and supporting ALL fossil fuel facilities....or...we will sign the death certificate for our whole world!
1200	Hank	Keeton	hakeeton@keetoncorp.com	Scotts Mills	OR	
1201	James	Roberts	jimrobj@yahoo.com	Sandpoint	ID	
						Do now allow new carbon polluters' infrastructure projects.
1202	John	Wood	unclebob@gorge.net	Hood River	OR	
1203	Elaine	Donovan	donovaneb@frontier.com	Cedar Rapids	IA	
1204	Claudia	Sanzone	sanzoneclaudia@yahoo.com	Portland	OR	
1205	Jill	Hamilton	jckress@yahoo.com	Bremerton	WA	
1206	Mark	Hollinrake	mark.hollinrake@ntlworld.com	New York	NY	
1207	Jane	Church	janechrch@yahoo.com	Chapel Hill	NC	
						We want no more fossil fuel developments in Oregon, the USA or the Whole World.
1208	Jan	Edwards	clayjan@mac.com	Portland	OR	
1209	Maureen Stapler	Crowell	staplercrowell@charter.net	Grants Pass	OR	

1210	Darise	Weller	dweller972@comcast.net	Portland	OR	more wind power,more solar, let's not go backwards
1211	Douglas	Church	douglasdchurch@gmail.com	Hillsboro	OR	
1212	Sheila	Ward	asopao@yahoo.com	San Juan	PR	
1213	S.	Nam	snam5370@ymail.com	New York	NY	
1214	Kima	Gari	kimasuegarrison@gmail.com	Portland	OR	Anything that doesn't help mitigate climate change should NOT go forward!
1215	William	Barnett	willbarnett1@hotmail.com	Astoria	OR	I can personally attest that on my little dead-end street in Astoria, making up a neighborhood of six houses & 11 residents, the 10 that I have spoken to are all in agreement that we need to conserve energy, & should plan to make any new facilities operate using renewable resources.
1216	John	Ardner	jack.jacque1@icloud.com	Gresham	OR	

						We here in Oregon are already seeing the consequences of our past actions and ignorance with regard to the excessive use of fossil fuels, a wildfires burns less than 30 miles from my home today and it's just one of many in our now endless wildfires season. The hottest years on record have happened within the last ten years and more are expected to come hotter and more frequently. Stupidity is the act of doing something over and over again and expecting different results, are we truly this stupid?
1217	Rodney	Whisennhunt	rod.l.whisenhunt@gmail.com	Roseburg	OR	
1218	Jill	Blaisdell	jillblaisdell@earthlink.net	Snohomish	WA	
1219	Robert	Carothers	bobcarothers@comcast.net	Lake Oswego	OR	Leave it in the ground.
1220	Timothy	Mullen	mullentim13@yahoo.co.uk	Saint Charles	MN	
1221	Jennifer	Calvert	jennifercalvert@comcast.net	Spokane Valley	WA	A gas-fired power plant is not a good long-term idea. We need to be moving away from gas, not planning on using it in our future.

						For the sake of this planet i foresee that we will be fighting vested for-profit industries for long into the future. Until the human race wakes up to the consequences of its actions. Or until the human race has been diminished to the point of survival (like all the other animals in the long history of this planet) and no long has the wherewithal to impact the earth. Please, Governor Brown, step up to the plate in behalf of all life on earth.
1222	Lucile W.	Brook	babbles@nehalemtel.net	Nehalem	OR	
1223	Christine	Bonney	christine.bonney@gmail.com	Portland	OR	
1224	James	Mulcare	xsecretsx@cableone.net	Clarkston	WA	
1225	Jean	Evens	jjevens@frontier.com	International Falls	MN	
1226	Matthew	Barmann	chiakacomm@mac.com	Hood River	OR	
1227	Annie	Orourke	tres07@bendbroadband.com	Bend	OR	
1228	Susan	Vosburg	fgtaxsusan@gmail.com	Gales Creek	OR	
1229	Douglas	Matney	dougedwards477@gmail.com	Portland	OR	Fracking is bad for the water and can cause sinkholes, these are even more detrimental as immediate problems. Thank you for your work to this important problem.
1230	Nancy	Carl	dlnlcarl2@gmail.com	Carlton	OR	
1231	Paul	Sansone	psansone2@gmail.com	Gales Creek	OR	Wrong way to develop of energy infrastructure! Reject more fossil fuel developments and get on with developing renewable energy!
1232	Kyle	Rolnick	charo33@centurylink.net	Lorane	OR	



1233	Lois	Butterfield	lbutterfield2@comcast.net	Vancouver	WA	
1234	Barbara	Blackwood	barbara.bb@comcast.net	Spokane Valley	WA	
1235	Scott	Lesko	scottl@casco.net	Philomath	OR	
1236	JL	Charrier	jcharrier21@gmail.com	Wayzata	MN	
1237	Melissa	Rehder	misslissr@yahoo.com	Portland	OR	
1238	Robert	Herzog	rherzog04@aol.com	Sun Lakes	AZ	Any legislator who is bent on destroying America,Äôs environment is as big a FUCKING IDIOT as trump is a FUCKING MORON!
1239	Daniel	Sandvig	daniel.sandvig@gmail.com	Monroe	WA	
1240	David	Michalek	edm_austin@yahoo.com	Hood River	OR	Leave the fossil fuels in the ground. I want clean air and clean water.
1241	Jucy	Steinberger	jlasteinberger@gmail.com	Portland	OR	
1242	Marty	Bankhead	marty.b@comcast.net	Lake Oswego	OR	Fracked gas has already been proven to be a poor choice as a power source for our nation, and for the planet. Stop letting this project waste your time and energy - reject it and be done! We have many more issues facing our state and nation that need and deserve immediate attention, and the considerable mental resources that can be brought to the table for their equitable solution.
1243	Linny	Stovall	linnystovall@me.com	Portland	OR	
1244	Annie	McCuen	mccuen7691@comcast.net	Salem	OR	Fracking is horrifying 🍏üø
1245	Mark	Grzegorzewski	esrucdesrever@yahoo.com	Saint Petersburg	FL	

						Recent research has demonstrated that natural gas is 85 times as polluting in the atmosphere as carbon. It is time to move from old, dirty, expensive fuels to modern, clean, cheap ones.
1246	Linda	Carroll	lindalouise701184951@yahoo.com	Spokane	WA	
1247	Tracy	Eberwein	mrs.ebes1409@gmail.com	Coos Bay	OR	
1248	Gwen	Hadland	mousery@comcast.net	Hillsboro	OR	
1249	Kelley	Albrecht	chizzops@gmail.com	Portland	OR	
1250	Linda	mulder	mulder.linda643@gmail.com	Northville	MI	
1251	Phil	Goldsmith	phil@lopglaw.com	Portland	OR	
1252	Michael	MacDougall	mmacdougall2@excite.com	Nine Mile Falls	WA	
1253	Kenneth	Roundy	kroundy1991@gmail.com	Albany	OR	Oregon needs to be a leader on green energy, jobs, and progressive policies that help all Oregonians. I know our state is not necessarily unified on a vision for our future, but I know that approving sites like these will hurt all of us in the long run, regardless of how we may vote/our political loyalties. Be brave, be bold, and resist pressure from the fossil fuel industry that continues to value profit over people and the planet.

						<p>around at what is happening on the planet. We are on the brink of extinction if we don't end our fossil fuel dependence, and clear cutting of precious trees now. What we have done, (when I say 'we,' I mean corporations,) in the name of American interests, is invaded our neighbors to the south of us and have overthrown governments that wouldn't permit corporations to interfere in the running of their countries. We have assisted in the overthrow of these governments and even had leaders assassinated. We have permitted corporations to invade and control for the purpose of raping natural resources from our neighbors. This is also why we now have an immigration problem. Climate warming is the cause of dangerously high temperatures and destructive storms and the loss of farms thus the inability to grow food. Our oceans are dying. We have potable water shortages. If we don't act now to try to reverse</p>
1254	Anita	Brandariz	anna12lago16@aol.com	Brooklyn	NY	
1255	Gloria	Guy	totallygloria@gmail.com	Portland	OR	
1256	Sharon	Longyear	sharonmlongyear@gmail.com	Yorktown Heights	NY	
1257	natasha	myers	whitewaterotter@aol.com	Deer Island	OR	

1258	Laree	Johnson	laree@lareejohnson.com	Astoria	OR	PLEASE deny this plan. We need to concentrate on renewable resources. Fracked gas has been shown to be detrimental to water tables and possible ground movement in some areas. NO, NO, NO!
1259	Mary	Taylor	mary.k.taylor@mac.com	Portland	OR	From wildfires to heat waves to intense storms and melting glaciers, it is clear that climate change is here. We can stop the most devastating consequences if we act now. Oregon should be a leader in alternative energy sources, creating technology, jobs and example for others. Deny this permit so my children and granddaughter have a safe world to live in!
1260	Nancy	Rupp	nancylrupp@yahoo.com	Glen Burnie	MD	
1261	Maryellen	McFadden	ellenmcf@pacifier.com	Portland	OR	Save it for our children, from a fifth generation 91 year old Oregonian Maryellen McFadden

## CLIFFORD Katie \* ODOE

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**From:** Teara Farrow Ferman <TearaFarrowFerman@ctuir.org>  
**Sent:** Monday, August 12, 2019 7:17 PM  
**To:** PER Comments \* ODOE  
**Subject:** CTUIR comments on Perennial Wind Request Amendment 1 & Draft Proposed Order  
**Attachments:** 8-12-19 CTUIR Comments\_Perrenial Wind Request Amendment 1 & Draft Proposed Order.pdf

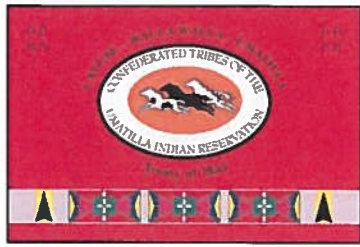
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

### TEARA FARROW FERMAN

Manager | Cultural Resources Protection Program  
Confederated Tribes of the Umatilla Indian Reservation  
46411 Timíne Way | Pendleton | Oregon 97801  
541.276.3447 Office | 541.429.7230 Fax  
TearaFarrowFerman@ctuir.org

Assistant General Manager | Átaw Consulting, LLC  
A Small Business Enterprise of the CTUIR  
46411 Timíne Way | Pendleton | Oregon 97801  
541.429.7230 Office | Fax  
TearaFarrowFerman@ctuir.org

The information in this e-mail may be confidential and intended only for the use and protection of the Confederated Tribes of the Umatilla Indian Reservation. If you have received this email in error, please immediately notify me by return e-mail and delete this from your system. If you are not an authorized recipient for this information, then you are prohibited from any review, dissemination, forwarding or copying of this e-mail and its attachments. Thank you.



**Confederated Tribes *of the*  
Umatilla Indian Reservation**  
**Department of Natural Resources**

46411 Timine Way, Pendleton, Oregon 97801

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## MEMORANDUM

**To:** Katie Clifford, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol Street NE, 1st Floor  
Salem, OR 97301  
Email: PER.Comments@Oregon.gov

**From:** Teara Farrow Ferman, Cultural Resources Protection Program Manager  
Confederated Tribes of the Umatilla Indian Reservation *Teara Farrow Ferman*  
46411 Timine Way, Pendleton, OR 97801  
TearaFarrowFerman@ctuir.org  
541-276-3447

**Date:** August 12, 2019

**RE:** Confederated Tribes of the Umatilla Indian Reservation's Comments on the Perennial Wind Chaser Station Request for Comments on the Complete Request for Amendment 1 and Draft Proposed Order

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General Comments:

Thank you for contacting the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) regarding the Perennial Wind Chaser Station Request for Comments on the Complete Request for Amendment 1 and Draft Proposed Order. The CTUIR offers the following concerns with the project.

Specific Comments:

This project is located within the CTUIR's ceded lands. The CTUIR does not object to the request for an extension of the build date for this project. The CTUIR recommends that a cultural resources monitor be present during the ground disturbing portion of this project when construction is scheduled in the future.

## CLIFFORD Katie \* ODOE

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**From:** Gary Kahn <gkahn@rke-law.com>  
**Sent:** Thursday, August 8, 2019 2:45 PM  
**To:** "katie.clifford\"""@oregon.gov; PER Comments \* ODOE  
**Cc:** JJ.Jamieson@perennialpower.net  
**Subject:** Perennial Wind Chaser Station – Proposed Amendment #1

To Whom It May Concern:

I am writing on behalf of Friends of the Columbia Gorge, Northwest Environmental Defense Center, Oregon Natural Desert Association, Oregon Wild, Thrive Hood River, Columbia Riverkeeper, WildLands Defense, Greater Hells Canyon Council, and Oregon Coast Alliance regarding the above-referenced matter.

On August 1, 2019, the Oregon Supreme Court held that the rules under which this application was submitted are invalid. Because this application was submitted pursuant to invalid rules, the application is likewise invalid and cannot be processed by ODOE nor approved by EFSC.

Nor can this application be retroactively processed under rules that were not in effect at the time the application was submitted, nor under rules that might be adopted at a later date. Again, this application was expressly submitted pursuant to invalid rules. To begin processing this application under a completely different set of rules mid-stream would be unlawful and would prejudice the substantial rights and interests of my clients and the general public. If the applicant wishes to proceed, it has the option of filing a new application at any time.

Please confirm that the application will not be processed any further.

Thank you very much for your time and consideration.

Gary K. Kahn

--

Gary K. Kahn  
Reeves, Kahn, Hennessy & Elkins  
4035 S.E. 52nd Avenue  
P.O. Box 86100  
Portland, OR 97286  
Tel: (503) 777-5473  
Fax: (503) 777-8566  
Email: [gkahn@rke-law.com](mailto:gkahn@rke-law.com)

## CLIFFORD Katie \* ODOE

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**From:** Dan Serres <dan@columbiariverkeeper.org>  
**Sent:** Friday, August 16, 2019 3:35 PM  
**To:** PER Comments \* ODOE  
**Cc:** CORNETT Todd \* ODOE  
**Subject:** Letter Regarding Perennial Wind Chaser Request for Amendment  
**Attachments:** 2019.8.16 Perennial Wind Chaser, Final Coalition Sign-on Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Ms. Clifford, Mr. Cornett, Chair Beyeler, and Members of the Oregon Energy Facility Siting Council:

Please see the attached letter which conveys our concern and opposition regarding the Request for Amendment by Perennial Wind Chaser.

Sincerely,

Dan Serres

--

Dan Serres | Conservation Director  
Columbia Riverkeeper | 1125 SE Madison Suite 103A Portland 97214  
503.890.2441 | [dan@columbiariverkeeper.org](mailto:dan@columbiariverkeeper.org)

**[River Currents 2019 Issue 2 Newsletter—Read it Now](#)**

*The Playbook Issue: How Columbia Riverkeeper is tackling corporate polluters, staving off fossil fuel giants, and inspiring people to fight for clean water.*





August 16, 2019

Honorable Governor Kate Brown  
Office of the Governor  
900 Court Street NE, Suite 254  
Salem, OR 97301-4047

Todd Cornett, Division Administrator  
Oregon Department of Energy  
550 Capitol St. NE, 1st Floor  
Salem, OR 97301

Katie Clifford, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol St. NE, 1st Floor  
Salem, OR 97301

Oregon Energy Facility Siting Council  
Oregon Department of Energy  
550 Capitol St. NE, 1st Floor  
Salem, OR 97301

**RE: Reject New Fracked Gas Power Plant (415 MW Perennial Wind Chaser)**

Dear Honorable Governor Brown, Mr. Cornett, Ms. Clifford, and Energy Council Members Beyeler, Jenkins, Roppe, Grail, Gravatt, Howe, and Winters:

Now, more than ever, we need state leaders to stand firm against the threats from fossil fuels. This includes rejecting the proposed Perennial Wind Chaser (“Perennial”) gas-fired power plant. In the wake of HB 2020, Oregon’s cap-and-invest climate legislation which aimed to reduce fossil fuel power in Oregon, the Power Past Fracked Gas Coalition and the undersigned organizations urge Governor Brown and the Energy Facility Siting Council (the Council) to protect Oregonians and our climate from new fracked gas infrastructure.

This month the Council must decide whether to amend the site certificate for the Perennial gas-fired power plant. Under the Request for Amendment (RFA), Perennial seeks approval to extend construction deadlines by two years. Perennial requests to extend the construction start deadline to September 23, 2020, and to extend the construction completion deadline to September 23, 2023. We urge the Council to deny this request.

As an initial matter, the site certificate for this project is expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its

amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here “are invalid.” See *Friends of the Columbia Gorge, et al. v. Energy Facility Siting Council*, 365 Or 371, 396 (2019) (“The rules approved by the Energy Facility Siting Council through Permanent Administrative Orders EFSC 4-2017 and EFSC 5-2017 are invalid.”). Because these rules are invalid, they cannot be used to process or approve any amendment to the Perennial site certificate, which expired on September 24, 2018 (one day after the construction start deadline). Nor does the Council have authority to adopt any future new rules that might authorize the processing of any amendments to the Perennial certificate, which, again, is expired and void. The requested amendment can neither be processed nor approved.

If EFSC continues to unlawfully process Perennial’s RFA, the undersigned urge the Governor and EFSC to deny the RFA. Under Oregon law, EFSC must consider any changes in facts or law since Perennial obtained the Site Certificate in 2015. Studies released since 2015 demonstrate that the risks of fracked gas are vast—and far greater than previously understood. New studies released since EFSC approved Perennial’s original site certificate demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Furthermore, we learned during Oregon agencies’ review of the Carty gas-fired power plants that gas-fired power generators can be major sources of air pollution, and we are concerned that Perennial will contribute smog-forming pollution to an already-impacted airshed.

Additionally, EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has “been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date.” Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

Denying Perennial’s amendment request is consistent with policy statements and actions by the Governor’s Office. For example, Governor Brown recently signed a bill curtailing the practice of fracking in the Pacific Northwest. The Governor invested considerable energy in HB 2020, stating “[c]limate change threatens our communities, our economy, our ecosystems, and our way of life in Oregon.” Yet fracked gas infrastructure, like Perennial’s 415 MW gas-powered facility, still threatens the health of our communities and our climate.

In recent years, the Pacific Northwest has been targeted for major new gas pipeline, LNG, and gas-fired power plant proposals. At the same time, research shows us that the majority of gas produced in North America now comes from the harmful practice of hydraulic fracturing (“fracking”).<sup>1</sup> This summer, health professionals produced a new compendium of information that details the public health harms of the fracked gas industry at every stage from extraction to combustion.<sup>2</sup> For the health of our communities and for the stability of our climate, we urge the Council to deny the RFA for the Perennial facility. At a time when international climate

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<sup>1</sup> <https://www.sightline.org/2019/02/12/calling-natural-gas-a-bridge-fuel-is-alarmingly-deceptive/>

<sup>2</sup> <https://www.psr.org/wp-content/uploads/2019/06/compendium-6.pdf>

scientists agree we have less than 12 years to take action and avert the most catastrophic impacts of climate change, climate leaders must speak out loud and clear against the folly of building new major fossil fuel infrastructure.

Sincerely,

Daniel Serres, Co-Director, Power Past Fracked Gas Coalition

Stephanie Hillman, Co-Director, Power Past Fracked Gas Coalition

Lauren Goldberg, Legal & Program Director, Columbia Riverkeeper

Damon Motz-Storey, Healthy Climate Program Director, Oregon Physicians for Social Responsibility

Laura Ackerman, Energy Program Director, The Lands Council

Nick Caleb, Staff Attorney, Center for Sustainable Economy

Hannah Sohl, Executive Director, Rogue Climate

Thomas Meyer, Regional Organizing Manager, Food & Water Watch

Dineen O'Rourke, Campaign Organizer, 350 PDX

Jess Wallach, Keep it in the Ground Organizer, 350 Seattle

Meredith Connolly, Oregon Director, Climate Solutions

Rhett Lawrence, Conservation Director, Oregon Chapter Sierra Club

Nathan Baker, Senior Staff Attorney, Friends of the Columbia Gorge

Climate Action Coalition

Stop Fracked Gas PDX

## CLIFFORD Katie \* ODOE

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**From:** alan amoth <alan.amoth.221440368@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I definitely support the construction of a new gas-fired power plant in Eastern Oregon and I'm very confident that it will meet all stringent environmental regulations that are applicable to its construction and operation.

The very unsightly wind turbines that have been allowed to populate the eastern Columbia River Gorge region provide, at best, intermittent power generation and MUST be backed up by more conventional power generation sources since the power demand continues even when the wind doesn't blow.

Again, I STRONGLY SUPPORT THE CONSTRUCTION OF A GAS-FIRED POWER PLANT IN EASTERN OREGON

Alan Amoth

Regards,  
alan amoth  
215 NE Walnut St. Cascade Locks, OR  
Cascade Locks, OR 97014

## CLIFFORD Katie \* ODOE

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**From:** Alex Prentiss <Alex.Prentiss.221442762@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

No more fossil fuel plants. I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Alex Prentiss  
15685 SW 116th Ave  
King City, OR 97224

## CLIFFORD Katie \* ODOE

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**From:** Alexander Miller <Alexander.Miller.221644542@p2a.co>  
**Sent:** Wednesday, August 21, 2019 2:08 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future. Oregon should, and can, do better than this, and you have an important role to play in making sure we do what's right here.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Alexander Miller  
1036 Adams St  
Eugene, OR 97402



## CLIFFORD Katie \* ODOE

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**From:** Andreas Kyriacou <Andreas.Kyriacou.221438055@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:44 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Further more consider non-climate warming technology like wind power generation. That is where the future is. Recognizing of course that an environmental impact should be assessed. Some give on that aspect is a good compromise from my perspective

Regards,  
Andreas Kyriacou  
1723 NE 50th Ave  
Portland, OR 97213

## CLIFFORD Katie \* ODOE

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**From:** Bernadette Rodgers <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:48 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant because MORE FOSSIL FUEL INFRASTRUCTURE IS THE WRONG DIRECTION! In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Bernadette Rodgers

## CLIFFORD Katie \* ODOE

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**From:** Bonnie McKinlay <goto350pdx@gmail.com>  
**Sent:** Thursday, August 22, 2019 2:32 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Windchaser RFA

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Oregon Dept Of Energy  
Senior Siting Analyst  
Katie Clifford

Dear Ms Clifford,

I urge you to deny Perennial's Request for Amendment for the Windchaser gas-fired power plant. I believe that for Oregon and any of its agencies to approve further expansion of greenhouse gas emissions is irresponsible. We can be grateful that Perennial has thus far been unable to begin construction. Let's cut our planetary losses and preserve our state's reputation by ending Perennial's project now. The science has overwhelmingly indicated that we have for too long delayed effective action on climate disruption---Oregon must not perpetuate the fossil fuel folly.

Why build new fracked gas facilities on a planet that must limit its greenhouse gas emissions?  
Please do not approve Perennial's Request for Amendment on Windchaser.

Respectfully,  
Bonnie McKinlay  
7112 SW 53rd Avenue  
Portland 97219

## CLIFFORD Katie \* ODOE

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**From:** Brock Roberts <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:34 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Governor Brown and the Oregon Energy Facility Siting Council,

Please stop this poorly planned effort to continue polluting the Northwest's air. I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Brock Roberts

## CLIFFORD Katie \* ODOE

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**From:** Carla Wise <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:16 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I am writing to urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Carla Wise

**CLIFFORD Katie \* ODOE**

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**From:** Chris Baker <outreach@csadvocate.io>  
**Sent:** Thursday, August 15, 2019 5:24 PM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant.

We need no more fossil fuel infrastructure in Oregon. It will become a stranded asset for the investors and and a CO2 emitting plant that is needed in Oregon.

Sincerely,  
Chris Baker

**CLIFFORD Katie \* ODOE**

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**From:** Chris Baker <outreach@csadvocate.io>  
**Sent:** Wednesday, August 21, 2019 2:11 PM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I wrote to urge you to not extend the opportunity for building fossil fuel infrastructure in Oregon. New construction will not see a useful life and will become a stranded asset and a liability to the investors and the state. The best available science says we should not build any more carbon fuel power plants. These days are behind us.

Sincerely,  
Chris Baker



## CLIFFORD Katie \* ODOE

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**From:** Connie Coleman <Connie.Coleman.221464885@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:50 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment. THE COLUMBIA GORGE NEEDS TO BE PROTECTED FROM THIS SITING.

Regards,  
Connie Coleman  
2013 NE Ridgewood Dr  
Portland, OR 97212

## CLIFFORD Katie \* ODOE

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**From:** CRYSTAL TOLMIE <CRYSTAL.TOLMIE.221479735@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:52 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

The Columbia River Gorge is no place for power plant of any sort. The Gorge is a recreational treasure, so I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If

such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
CRYSTAL TOLMIE  
6892 LITTLE BUCK CREEK ROAD  
Underwood, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** Daivati Bharadvaj <Daivati.Bharadvaj.221654479@p2a.co>  
**Sent:** Wednesday, August 21, 2019 3:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

### NO FRACKED GAS!

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Daivati Bharadvaj

180 SW 130th Ave, Apt, Suite, Bldg. (optional)

Beaverton, OR 97005

## CLIFFORD Katie \* ODOE

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**From:** Daniel Frye <Daniel.Frye.221650725@p2a.co>  
**Sent:** Wednesday, August 21, 2019 2:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

Climate change is the most significant economic issue of time and will be for some generations. The worldwide scientific community has proven beyond a doubt that human-created greenhouse gases are the principle driving force of climate change. We need to stop building unnecessary fossil fuel facilities that will make climate change worse. We need to invest exclusively in energy generation by renewables (wind, solar, hydro, geo, etc.).

I strongly urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful and is directly contrary to what our energy future needs to be.

It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in greenhouse gases is a direct threat to the economy and social welfare of ourselves, our children, and their descendants.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Daniel Frye  
9326 NW Murdock Street  
Portland, OR 97229



## **CLIFFORD Katie \* ODOE**

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**From:** Daryl Grenz <drgrenz@gmail.com>  
**Sent:** Tuesday, August 20, 2019 1:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station

Please approve the Perennial Wind Chaser Station Permit. As Coal power generation continues to decline, the region need this reduced carbon generation to provide a reliable and dependable power source as our region continues to grow.

Daryl Grenz  
1930 SW River Drive, #404  
Portland, OR 97201

## CLIFFORD Katie \* ODOE

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**From:** Dave King <Dave.King.220142702@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:27 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Dave King  
8728 N Edison St  
Portland, OR 97203

## CLIFFORD Katie \* ODOE

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**From:** david westerlund <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:49 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and the Oregon Energy Facility Siting Council,

Fracking is very bad for the environment. A gas plant to support fracking adds to the harm. PLEASE, no fracking power plant.

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
david westerlund

## CLIFFORD Katie \* ODOE

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**From:** Donna Steadman <Donna.Steadman.221705373@p2a.co>  
**Sent:** Wednesday, August 21, 2019 9:49 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

It's a well-established fact that Fracking is very bad for the environment. This, I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.

2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.

3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Donna Steadman  
7770 SW Kingfisher Way  
Portland, OR 97224

## CLIFFORD Katie \* ODOE

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**From:** Edward Cleary <Edward.Cleary.220148904@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:04 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

Clean energy is the energy of today; fossil fuels like fracked gas are the energy of the past. We've committed to cleaner, plentiful sources of energy like solar and wind that don't threaten our air and water—and, unlike fossil fuels, are getting cheaper by the day. ng-term, good-paying jobs.

Since fracking is now illegal in Oregon, liquefied methane would have to be transported from outside the state by rail or pipeline, adding the very real risk of leakage and fire.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Edward Cleary  
19150 SW Murphy Ct  
Beaverton, OR 97078



**From:** Emilie Marlinghaus <Emilie.Marlinghaus.221439847@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:56 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

As a long time Oregonian, deeply concerned about escalating climate change and environmental degradation, I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I strongly urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.

2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.

3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If

such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

It is unthinkable given all that we now know, with new and frightening studies from a variety of reliable sources being released in just the past year, that this project would even be considered for approval. The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Emilie Marlinghaus  
P.O. Box 7586  
Bend, OR 97708

## CLIFFORD Katie \* ODOE

---

**From:** Frank Payne <Frank.Payne.221724129@p2a.co>  
**Sent:** Thursday, August 22, 2019 5:34 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

Very simply, in a location where both wind and solar power can thrive, a gas driven power plant is both unnecessary, and completely at odds with the energy future that both Oregon, and America, need to be concentrating on building for our power needs. This is a very easy no, both for the energy consumption required, and the environmental impact this plant would have on the Columbia River and surrounding areas.

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement

and it is unlikely that one will be obtained before the required construction start date.” Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Frank Payne  
2095 NE 11th Place  
Bend, OR 97701

## CLIFFORD Katie \* ODOE

---

**From:** FREDERICK TOLMIE <FREDERICK.TOLMIE.221479735@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:54 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

No, No, No! I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
FREDERICK TOLMIE  
6892 LITTLE BUCK CREEK ROAD  
Underwood, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** George Milne <George.Milne.221633544@p2a.co>  
**Sent:** Wednesday, August 21, 2019 1:09 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

Speaking as President of the Federation of Western Outdoor Clubs, representing 40 clubs and organizations in seven states, we agree with the Friends of the Columbia Gorge and urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

We urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
George Milne  
1864 SE ANSPACH ST  
Milwaukie, OR 97267



## CLIFFORD Katie \* ODOE

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**From:** ott.irene@frontier.com  
**Sent:** Thursday, August 8, 2019 10:51 PM  
**To:** CLIFFORD Katie \* ODOE  
**Subject:** invalid amendment rulea

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I believe following the Aug. 1 court decision that overturned the revised amendment rules no further action will occur regarding the perennial wind chaser amendment 1. Would you please confirm this?

As you know, I commented on the 4th amended site certificate for the Montague wind development. Since the Oregon Supreme Court ruled the amended rules were invalid, I am assuming that the amended site certificate action has stopped. Please confirm this.

I have been very frustrated with the amended rules due to the way the public was provided no influence. I am pleased that the court agreed.

## CLIFFORD Katie \* ODOE

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**From:** JACKIE NIGH <JACKIE.NIGH.219393779@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

NO MORE DIRTY ENERGY IN OREGON! I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
JACKIE NIGH  
2425 NE AINSWORTH ST  
Portland, OR 97211

**From:** James Lanz <James.Lanz.219634636@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:37 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I am strongly opposed to the proposed Perennial Wind Chaser Station. Additional fossil fuel power plants of any kind will only cause more air pollution throughout our region and in the Columbia River Gorge National Scenic Area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an

extension of any construction deadlines. Perennial claims it has “been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date.” Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
James Lanz  
1713 SE Manor Ave  
Vancouver, WA 98683

## CLIFFORD Katie \* ODOE

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**From:** Janet Kavanagh <Janet.Kavanagh.218834130@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:17 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

No more dirty energy! The Gorge is a one of the most splendid natural places on our planet. urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Janet Kavanagh  
600 Garrison St  
The Dalles, OR 97058

## CLIFFORD Katie \* ODOE

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**From:** Janet Trygstad <Janet.Trygstad.221528721@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:20 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

Energy from Fracking is outdated and really, no-one wants that energy anymore.

Many young people that are aware of Environmental issues will not support a gas-fired plant, ego no financial support.

We don't think this is economically realistic!

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what,



if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Janet Trygstad  
7545 SW 32nd Ave  
Portland, OR 97219

## CLIFFORD Katie \* ODOE

---

**From:** Jenny Holmes <Jenny.Holmes.221576809@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:23 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

Oregon's future is in renewable energy and efficiency. The Columbia Gorge is a national treasure that already is too polluted. I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jenny Holmes  
2325 NE 44th Ave  
Portland, OR 97213

## CLIFFORD Katie \* ODOE

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**From:** Julie Chapman <juliebchap@gmail.com>  
**Sent:** Thursday, August 22, 2019 6:30 PM  
**To:** PER Comments \* ODOE  
**Subject:** Refuse the Request for Amendment (RFA) to Perennial Wind Chaser's site certificate

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To: Katie Clifford, Senior Siting Analyst, ODOE

Climate change will continue to affect our air quality, food security, water resources, wild fires, fisheries, and coastal communities through the century to come. Reducing greenhouse gas emission is critical for Oregon and for the planet.

Fracked gas pollutes groundwater in the communities where it is extracted, and, through the well-documented leakage of methane, pollutes the atmosphere from point of extraction to the point of combustion.

Perennial admits that there is no market demand for the development of the "Perennial Wind Chaser" power plant (a nomenclature remarkable for its uncommon level of obfuscation). We have a duty to transition to renewable energy sources for electricity. Expansion of fossil fuel infrastructure is inappropriate for the long-term. The construction of this plant will likely result in a "stranded asset," reducing the region's financial flexibility to pursue renewable resources as caps on GHG emissions tighten to reach state, national and global goals.

The EFSC should not renew Perennial's RFA.

Thank you for your attention,

Julie Chapman  
[juliebchap@gmail.com](mailto:juliebchap@gmail.com)

## CLIFFORD Katie \* ODOE

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**From:** Julie DeSmith <Julie.DeSmith.221524842@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:27 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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And we do not need this kind of energy source!!

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Julie DeSmith

PO Box 551 Carson WA

Carson, WA 98610

## CLIFFORD Katie \* ODOE

---

**From:** Karen Stark <Karen.Stark.221571183@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:47 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

PLEASE:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.

2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.

3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If

such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. PLEASE! Thank you for considering this comment.

Regards,  
Karen Stark  
71 Cedar Fork, PO Box 754  
Washougal, WA 98671



## CLIFFORD Katie \* ODOE

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**From:** Kenneth Fine <Kenneth.Fine.221452734@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and flies in the face of Oregon's ability to join pioneers in demonstrating how energy can be clean.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Kenneth Fine  
3456 NW Savier Street  
Portland, OR 97210

## CLIFFORD Katie \* ODOE

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**From:** Lara Gardner <Lara.Gardner.221774935@p2a.co>  
**Sent:** Thursday, August 22, 2019 8:29 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

We keep saying no and they keep coming back like a bad rash. NO! Abusers ignore no. Obviously, these guys are abusers who just don't get it that profits for a very small number should not outweigh the planet or the rest of us.

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no

market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lara Gardner  
90114 Marcola Rd  
Springfield, OR 97478

## CLIFFORD Katie \* ODOE

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**From:** Leigh Hood <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:30 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Let's think about the future instead of pathetically holding on to the past. Our earth has no time for this nonsense of looking backward to gas-powered energy.

Thank you.

Sincerely,  
Leigh Hood

## CLIFFORD Katie \* ODOE

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**From:** Linda Browning <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:05 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Linda Browning

## CLIFFORD Katie \* ODOE

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**From:** Maija Schaefer <Maija.Schaefer.221621772@p2a.co>  
**Sent:** Wednesday, August 21, 2019 12:08 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and unnecessary for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Maija Schaefer  
2 Adobe Court  
Novato, CA 94945



## CLIFFORD Katie \* ODOE

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**From:** mary daily <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:09 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

CLIMATE CHANGE IS REAL AND HAPPENING NOW. NO MORE DEGRADATION TO THE PLANET!!! NO MORE FRACKING FOR GAS. THIS IS THE ONLY PLANET WE HAVE TO LIVE ON. MONEY MAKING IS IRRELEVANT. STAND UP FOR WHAT IS RIGHT, WHAT IS LIFE SAVING-FOR ALL LIFE ON EARTH!

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
mary daily

## CLIFFORD Katie \* ODOE

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**From:** maxine sheets-johnstone <maxine.sheetsjohnstone.218922592@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:07 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

LET THERE BE NO DOUBT: REJECT THE REQUEST!!!! PROTECT AND PRESERVE AMERICA THE BEAUTIFUL!!!! DON'T DECIMATE AND DESTROY IT!!!!

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what,

if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
maxine sheets-johnstone  
330 King St  
Yachats, OR 97498

## CLIFFORD Katie \* ODOE

---

**From:** Michael Dianich <Michael.Dianich.218847190@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

The RFA does not adequately address how substantial additional CO2 emissions from a 415 MW facility will enable Oregon to reach its CO2 reduction goals. Nor does the RFA adequately address all combustion byproducts such as toxic and heavy metal effects on the downstream plume fallout.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what,

if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Michael Dianich  
42740 E Larch Mt Rd  
Corbett, OR 97019

## CLIFFORD Katie \* ODOE

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**From:** Michael Wilson <Michael.Wilson.220725723@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

The days of fossil fuel extraction are through! Therefore, I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Michael Wilson  
1405 SE Taylor St  
Portland, OR 97214

## CLIFFORD Katie \* ODOE

---

**From:** Mimi Maduro <Mimi.Maduro.221973439@p2a.co>  
**Sent:** Thursday, August 22, 2019 4:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

There is a significant level of pollution in the Columbia Gorge already. This would only make it worse. We live in the Columbia Gorge and I am concerned about the potential for increased air and water pollution.

The era of fossil fuels is coming to an end. This is not the time to invest in fossil fuel technology. Our resources in Oregon must be directed to clean energy and innovative fuels and technologies of the future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here “are invalid.” Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an “emergency” and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.

2. The rules provide that EFSC must consider “any changes in facts or law since the date the current site certificate was executed” in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial’s proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as “one of the most significant threats to Oregon’s economy, environment, and way of life,” yet fracked gas infrastructure projects, including Perennial’s proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.

3. Assuming EFSC’s invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has “been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date.” Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.



The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Mimi Maduro  
2203 Dundas Way  
Mosier, OR 97040

## CLIFFORD Katie \* ODOE

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**From:** Patricia Rau <Patricia.Rau.221452301@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:00 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

I lived in Pendleton/Hermiston area for 12 years and I know how fragile the environment is in this area.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Patricia Rau  
3169 Royce Way  
Lake Oswego, OR 97034

## CLIFFORD Katie \* ODOE

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**From:** patrick mulcahey <yehpax2@gmail.com>  
**Sent:** Tuesday, August 20, 2019 9:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** Please reject the RFA to the site certificate for Perennial Wind Chaser Station

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

As a former property owner and resident of the Columbia River Gorge, I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Patrick Mulcahey  
Concrete, Washington 98237

## CLIFFORD Katie \* ODOE

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**From:** Robbie Moller <Robbie.Moller.221494594@p2a.co>  
**Sent:** Wednesday, August 21, 2019 2:30 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I strongly urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant.

Perennial's proposal is clearly unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid."
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood.

Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.

3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement.

Moreover, the company admitted that there is currently no market demand for its proposal.

EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Robbie Moller  
425 Eugene St  
Hood River, OR 97031

## CLIFFORD Katie \* ODOE

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**From:** Samuel Urko <Samuel.Urko.221438424@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.



Also, we should be investing in a future for CLEAN energy. Not allowing old, pollution heavy energy production sources is what's best for our state and Earth.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Samuel Urko  
8821 SE 29th Ave  
Milwaukie, OR 97222

## CLIFFORD Katie \* ODOE

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**From:** Sheila Baraga <Sheila.Baraga.221577303@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:28 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

Please reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station. Perennial will be harmful to the environment, and fracked gas is not needed for our energy future.

Why do they call it wind chaser anyway?

It is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general.

Thank you for taking care of our health (including yours and your families)

Regards,  
Sheila Baraga  
1424 SE Oak Street  
Portland, OR 97214

## CLIFFORD Katie \* ODOE

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**From:** Sissy Aron <Sissy.Aron.219703107@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:33 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I very stronglyt urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I very strongly urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sissy Aron  
10 Brookview Lane  
New Milford, CT 06776

## CLIFFORD Katie \* ODOE

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**From:** Stephanie E. <Stephanie.E.221443842@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:22 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

Please reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Stephanie E.  
2922 SE Van Waters St.  
Milwaukie, OR 97222

## CLIFFORD Katie \* ODOE

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**From:** Tom McCue <Tom.McCue.221528910@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:24 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.

2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.

3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

If this gas power plant would speed up the shutdown of the coal fired boardman plant then maybe my thoughts would change. Hard to imagine there still is an operational coal power plant east of the Gorge.

Regards,  
Tom McCue  
10804 NE 30TH AVE  
Vancouver, WA 98686

## CLIFFORD Katie \* ODOE

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**From:** William Prothero <William.Prothero.221461978@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:26 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Governor Brown and Oregon EFSC:

My Personal Comment: It is foolish to invest resources in CO2 emitting power plants. Climate change is real and requires an all out effort to reduce greenhouse gas emissions to the lowest practical level. This is a bad investment.

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what,



if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
William Prothero  
241 Lakeside Dr  
White Salmon, WA 98672

**From:** Carol Randell <Carol.Randell.218864650@p2a.co>  
**Sent:** Wednesday, August 21, 2019 9:16 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Carol Randell  
8320 SW Maverick Terrace  
Beaverton, OR 97008

**From:** Michael Robertson <Michael.Robertson.221593134@p2a.co>  
**Sent:** Wednesday, August 21, 2019 10:05 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Michael Robertson  
2304 SE 32nd Ave  
Portland, OR 97214

## CLIFFORD Katie \* ODOE

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**From:** Maureen Luran <Maureen.Luran.218833591@p2a.co>  
**Sent:** Wednesday, August 21, 2019 10:28 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Maureen Luran  
509 Montello Ave  
Hood River, OR 97031

**From:** James Milling <James.Milling.221597400@p2a.co>  
**Sent:** Wednesday, August 21, 2019 10:33 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
James Milling  
1215 Methodist Rd  
Hood River, OR 97031

**From:** Debrah Miles <Debrah.Miles.221466315@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:00 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Debrah Miles  
35517 Gustafson Ln  
Astoria, OR 97103

**From:** Shelley Ries <Shelley.Ries.221467549@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:02 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Shelley Ries  
100 SW Alexander ave apt 216  
Corvallis, OR 97333

## CLIFFORD Katie \* ODOE

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**From:** Karen Pickering <Karen.Pickering.220147374@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:08 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Karen Pickering  
25909 NE 52nd Way  
Vancouver, WA 98682

**From:** Blaine Ackley <Blaine.Ackley.219172224@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Blaine Ackley  
655 NE 67th Ave  
Hillsboro, OR 97124

## CLIFFORD Katie \* ODOE

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**From:** jack amon <jack.amon.221467981@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
jack amon  
po box 187  
Santa Ynez, CA 93460

## CLIFFORD Katie \* ODOE

---

**From:** Mary Bennett <Mary.Bennett.221469934@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:15 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Mary Bennett  
3965 SE Oak St  
Portland, OR 97214

## CLIFFORD Katie \* ODOE

---

**From:** Connie Butler <Connie.Butler.221469853@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:15 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Connie Butler  
6405 N Burrage Ave  
Portland, OR 97217

**From:** MARILEE HENRY <MARILEE.HENRY.221469006@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
MARILEE HENRY  
14042 97th Ave NE  
Kirkland, WA 98034

**From:** Lynne Oulman <Lynne.Oulman.218926840@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:18 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lynne Oulman  
816 14th St  
Bellingham, WA 98225

**From:** Tom Briggs <Tom.Briggs.221470211@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:17 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Tom Briggs  
1502 SE Bybee  
Portland, OR 97202

## CLIFFORD Katie \* ODOE

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**From:** Robin Anderson <Robin.Anderson.221471652@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Robin Anderson  
155 Endresen Rd  
Hoquiam, WA 98550

**From:** Ellen Thayer <Ellen.Thayer.221471841@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Ellen Thayer  
PO Box 710, White Salmon WA  
White Salmon, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** Cynthia Bentley <Cynthia.Bentley.220130390@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:24 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Cynthia Bentley  
1050 Larrabee Ave. Ste. 104 PMB438  
Bellingham, WA 98225

## CLIFFORD Katie \* ODOE

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**From:** Duane Ray <Duane.Ray.220130642@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:29 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Duane Ray  
85 SE 16th Ct  
Gresham, OR 97080

## CLIFFORD Katie \* ODOE

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**From:** William Neuhauser <William.Neuhauser.221474596@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:31 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
William Neuhauser  
19075 NE Woodland Loop Rd  
Yamhill, OR 97148

**From:** Betty Sinnett <Betty.Sinnett.221474640@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:31 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Betty Sinnett  
2615 NE 359th Ave  
Washougal, WA 98671

## CLIFFORD Katie \* ODOE

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**From:** Penny Greenwood <Penny.Greenwood.221475711@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:36 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Penny Greenwood  
PO Box 965  
White Salmon, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** Nancy Cushwa <Nancy.Cushwa.218847352@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:32 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Nancy Cushwa  
2715 N Terry St  
Portland, OR 97217

**From:** Linda Bahr <Linda.Bahr.221476071@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:38 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Linda Bahr  
1913 NE Leichner Rd #3  
Vancouver, WA 98686

## CLIFFORD Katie \* ODOE

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**From:** Marianne Larkins-Strawn <Marianne.LarkinsStrawn.218871445@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:44 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Marianne Larkins-Strawn  
16415 NE 11th St  
Vancouver, WA 98684

**From:** Bryan Mullaney <Bryan.Mullaney.221477304@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Bryan Mullaney  
2385 SW Balsam Ave  
Beaverton, OR 97005

**From:** Mana-Jean Wagnon <ManaJean.Wagnon.221480382@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:55 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Mana-Jean Wagnon  
2834 Johnson Ave  
Alameda, CA 94501

**From:** Luan Pinson <Luan.Pinson.220693701@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:06 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Luan Pinson  
826 SE Morgan Rd  
Vancouver, WA 98664

**From:** theodor marshall <theodor.marshall.221481084@p2a.co>  
**Sent:** Tuesday, August 20, 2019 4:58 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
theodor marshall  
14915 SE Bluff Rd  
Sandy, OR 97055

## CLIFFORD Katie \* ODOE

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**From:** Dani Maron-Oliver <Dani.MaronOliver.221483244@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:04 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Dani Maron-Oliver  
75 Heron Point Drive  
Longview, WA 98632

## CLIFFORD Katie \* ODOE

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**From:** Sinu Cletus <Sinu.Cletus.221484036@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:07 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sinu Cletus  
2815 SW Carolina St  
Portland, OR 97239

**From:** Abigail Burns <Abigail.Burns.221484450@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:08 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Abigail Burns  
5445 SW Dover Ln  
Portland, OR 97225

**From:** Alice Shapiro <Alice.Shapiro.221486115@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:17 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Alice Shapiro  
7426 SE 21st Ave  
Portland, OR 97202

## CLIFFORD Katie \* ODOE

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**From:** Jim Jarzabek <Jim.Jarzabek.221487169@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:22 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jim Jarzabek  
4209 SE 177th LN  
Vancouver, WA 98683

## CLIFFORD Katie \* ODOE

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**From:** Nora Polk <Nora.Polk.218830071@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:20 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Nora Polk  
6405 SE 62nd Ave  
Portland, OR 97206

## CLIFFORD Katie \* ODOE

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**From:** Jane Williams-Grube <Jane.WilliamsGrube.221487259@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jane Williams-Grube  
3717 S.E. Cooper Street  
Portland, OR 97202

## CLIFFORD Katie \* ODOE

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**From:** kathy seabrook <kathy.seabrook.221488429@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:29 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
kathy seabrook  
1906 c street  
Vancouver, WA 98663

**From:** Ben Asher <Ben.Asher.219298856@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:31 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Ben Asher  
400 NE 100th Ave Apt 107  
Portland, OR 97220

## CLIFFORD Katie \* ODOE

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**From:** Sarah Cook <Sarah.Cook.220037970@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:33 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sarah Cook  
316 E 13th St  
The Dalles, OR 97058

**From:** Gary McCuen <Gary.McCuen.218847550@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:32 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Gary McCuen  
1825 Fairmount Ave S  
Salem, OR 97302

## CLIFFORD Katie \* ODOE

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**From:** Mary Marsiglio <Mary.Marsiglio.221490688@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Mary Marsiglio  
5026 NE 10th Ave  
Portland, OR 97211

**From:** Chris Sokol <Chris.Sokol.221490958@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:35 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Chris Sokol  
3750 NW Skyline Blvd Portland OR 97229  
Portland, OR 97229

## CLIFFORD Katie \* ODOE

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**From:** Patricia Pauly <Patricia.Pauly.218832718@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:36 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Patricia Pauly  
3871 May Stret  
Hood River, OR 97031

**From:** Joel Kay <Joel.Kay.218871481@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Joel Kay  
10707 SE Stanley Ave  
Milwaukie, OR 97222

**From:** Jon Nystrom <Jon.Nystrom.221492541@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:45 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Jon Nystrom  
1107 NE 9th Ave.  
Portland, OR 97232

## CLIFFORD Katie \* ODOE

---

**From:** Paula Wood <Paula.Wood.219504360@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:54 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Paula Wood  
23831 NE Treehill Dr  
Wood Village, OR 97060

**From:** DELTON YOUNG <DELTON.YOUNG.218831908@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:52 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
DELTON YOUNG  
7731 21st Ave NE  
Seattle, WA 98115

## CLIFFORD Katie \* ODOE

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**From:** Gayle Weatherson <Gayle.Weatherson.221493289@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:50 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Gayle Weatherson  
P.O. Box 354  
Echo, OR 97826

## CLIFFORD Katie \* ODOE

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**From:** Kelly OHanley <Kelly.OHanley.218879997@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:56 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Kelly O'Hanley  
6134 NE Alameda St  
Portland, OR 97213

## CLIFFORD Katie \* ODOE

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**From:** Kelly OHanley <Kelly.OHanley.218879997@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:57 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Kelly O'Hanley  
6134 NE Alameda St  
Portland, OR 97213

**From:** Jane Heisler <Jane.Heisler.221494639@p2a.co>  
**Sent:** Tuesday, August 20, 2019 5:58 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jane Heisler  
2731 SE Harrison St.  
Portland, OR 97214

**From:** Janet Kimball <Janet.Kimball.220144098@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Janet Kimball  
8051 28th Ave NE  
Seattle, WA 98115

## CLIFFORD Katie \* ODOE

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**From:** Nadine Morris <Nadine.Morris.220344249@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:17 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Nadine Morris  
7106 SE 71st Ave  
Portland, OR 97206

**From:** Sandra Siegner <Sandra.Siegner.220440972@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:18 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sandra Siegner  
9640 SW Lancaster Rd  
Portland, OR 97219

**From:** John Narver <John.Narver.221498969@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:20 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
John Narver  
725 9th Ave  
Seattle, WA 98104

**From:** Rachel Heath <Rachel.Heath.221499850@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:26 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Rachel Heath  
301 SE 15th Ave.  
Portland, OR 97214

**From:** Peter Aron <Peter.Aron.219703107@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:32 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Peter Aron  
10 Brookview Ln  
New Milford, CT 06776

## CLIFFORD Katie \* ODOE

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**From:** Marshall Goldberg <Marshall.Goldberg.221503025@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:36 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Marshall Goldberg  
3080 SW Raleighview Dr  
Portland, OR 97225

**From:** Monica Gilman <Monica.Gilman.221502981@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:36 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Monica Gilman  
25525 S. Laura Ln  
Estacada, OR 97023

**From:** Jay Humphrey <Jay.Humphrey.221502981@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:37 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jay Humphrey  
25525 S. Laura Ln  
Estacada, OR 97023

**From:** James Marquard <James.Marquard.221504600@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
James Marquard  
9329 NW Old Skyline Blvd  
Portland, OR 97231

## CLIFFORD Katie \* ODOE

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**From:** Michael Spence <Michael.Spence.221506392@p2a.co>  
**Sent:** Tuesday, August 20, 2019 6:57 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Michael Spence  
5810 S 144th St  
Tukwila, WA 98168

**From:** Kathleen Barta <Kathleen.Barta.221508688@p2a.co>  
**Sent:** Tuesday, August 20, 2019 7:06 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Kathleen Barta  
1538 Pine Street  
Lake Oswego, OR 97034

**From:** Eric Weeks <Eric.Weeks.221509939@p2a.co>  
**Sent:** Tuesday, August 20, 2019 7:15 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Eric Weeks  
15264 SW Teal Blvd  
Beaverton, OR 97007

## CLIFFORD Katie \* ODOE

---

**From:** Jan Aszman <Jan.Aszman.220147545@p2a.co>  
**Sent:** Tuesday, August 20, 2019 7:21 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Jan Aszman  
2277 Glenwood Hwy  
Goldendale, WA 98620

**From:** Meredith Long <Meredith.Long.221510711@p2a.co>  
**Sent:** Tuesday, August 20, 2019 7:22 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Meredith Long  
150 Keisala Rd  
Woodland, WA 98674

## CLIFFORD Katie \* ODOE

---

**From:** Tika Bordelon <Tika.Bordelon.220132677@p2a.co>  
**Sent:** Tuesday, August 20, 2019 7:25 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Tika Bordelon  
1400 Hubbell Pl  
Seattle, WA 98101

## CLIFFORD Katie \* ODOE

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**From:** Maliea Yakymi <Maliea.Yakymi.221513051@p2a.co>  
**Sent:** Tuesday, August 20, 2019 7:36 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Maliea Yakymi  
6 Wilkes Rd  
White Salmon, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** Deborah Buckley <Deborah.Buckley.221514960@p2a.co>  
**Sent:** Tuesday, August 20, 2019 7:51 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Deborah Buckley  
5818 n.e.Mason St.  
Portland, OR 97218

**From:** Sarah Collmer <Sarah.Collmer.220396765@p2a.co>  
**Sent:** Tuesday, August 20, 2019 7:35 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sarah Collmer  
704 W 20th St  
Vancouver, WA 98660

## CLIFFORD Katie \* ODOE

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**From:** Solea Kabako <Solea.Kabako.221516760@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:00 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I live in The Dalles and I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Solea Kabako  
2021 W Scenic Dr  
The Dalles, OR 97058

**From:** Lori Hood <Lori.Hood.218835760@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lori Hood  
PO Box 154  
Corbett, OR 97019

**From:** Ken Long <Ken.Long.221517642@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Ken Long  
150 Keisala Rd  
Woodland, WA 98674

**From:** Darise Weller <Darise.Weller.218829244@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Darise Weller  
9259 NW Germantown Rd  
Portland, OR 97231

**From:** Sheila Dooley <Sheila.Dooley.218834167@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:16 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sheila Dooley  
3300 Vensel Rd  
Mosier, OR 97040

**From:** Ineke Deruyter <Ineke.Deruyter.220893259@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:16 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Ineke Deruyter  
9322 N Oswego Ave  
Portland, OR 97203

## CLIFFORD Katie \* ODOE

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**From:** Virginia White <Virginia.White.220145934@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:18 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Virginia White  
1229 29th St  
Port Townsend, WA 98368

## CLIFFORD Katie \* ODOE

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**From:** DONALD GARNER <DONALD.GARNER.221518353@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:18 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
DONALD GARNER  
589 NW COUNTRY VIEW RD  
White Salmon, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** Gloria Fisher <Gloria.Fisher.218836480@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:49 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Gloria Fisher  
8725 NE Davis St  
Portland, OR 97220

**From:** Elizabeth Laskey <Elizabeth.Laskey.221521728@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:52 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Elizabeth Laskey  
4838 NE 41st Ave  
Portland, OR 97211

## CLIFFORD Katie \* ODOE

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**From:** Cathy Sampson-Kruse <Cathy.SampsonKruse.221522169@p2a.co>  
**Sent:** Tuesday, August 20, 2019 8:58 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Cathy Sampson-Kruse  
545 SW Sunrise Cir  
Metolius, OR 97741

## CLIFFORD Katie \* ODOE

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**From:** Gina Cox <Gina.Cox.221522295@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:00 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Gina Cox  
655 Pinecrest Drive  
Port Townsend, WA 98368

## CLIFFORD Katie \* ODOE

---

**From:** Brian Anderson <Brian.Anderson.221523285@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:03 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Brian Anderson  
1405 Sterling Court  
White Salmon, WA 98672

**From:** Lois Bancroft <Lois.Bancroft.220372545@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:07 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lois Bancroft  
50 Moore Rd  
White Salmon, WA 98672

**From:** Richard Beam <Richard.Beam.218829352@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Richard Beam  
19773 Bellevue Way  
West Linn, OR 97068

## CLIFFORD Katie \* ODOE

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**From:** Sharon Rickman <Sharon.Rickman.221524545@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:22 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sharon Rickman  
1165 Officers Row  
Vancouver, WA 98661

**From:** Todd Corbett <Todd.Corbett.218834617@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Todd Corbett  
10815 Hubbard Creek Road  
Umpqua, OR 97486

## CLIFFORD Katie \* ODOE

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**From:** John Harris <John.Harris.218943490@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:24 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
John Harris  
8407 NW 15th Ct  
Vancouver, WA 98665

## CLIFFORD Katie \* ODOE

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**From:** Dermot Noonan <Dermot.Noonan.221524987@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:29 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Dermot Noonan  
4510 48th Ave NE  
Seattle, WA 98105

## CLIFFORD Katie \* ODOE

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**From:** Camilo Marquez <Camilo.Marquez.221525878@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:33 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Camilo Marquez  
2934 NE 60th Ave  
Portland, OR 97213

## CLIFFORD Katie \* ODOE

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**From:** Jef Gunn <Jef.Gunn.221526101@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:37 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jef Gunn  
1745 SE 101st Ave  
Portland, OR 97216

## CLIFFORD Katie \* ODOE

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**From:** Susanna Cicerone <Susanna.Cicerone.221526499@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:44 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future. We do not need to aggravate the tectonic plates of a state which is already waiting for "the big one" the overwhelming loss a massive earthquake would cause is not worth the wealth acquired on any level.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Susanna Cicerone  
5703 SW Corbett  
Portland, OR 97239

## CLIFFORD Katie \* ODOE

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**From:** Michele Class <Michele.Class.221527191@p2a.co>  
**Sent:** Tuesday, August 20, 2019 9:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Michele Class  
1430 NE Village St  
Fairview, OR 97024

**From:** Shira Fogel <Shira.Fogel.218943841@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:07 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Shira Fogel  
15496 SE Adair Pl  
Clackamas, OR 97015

**From:** Martha Neuringer <Martha.Neuringer.221527245@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:00 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Martha Neuringer  
4140 SE 37th Ave Apt 9  
Portland, OR 97202

**From:** Wesley Kempfer <Wesley.Kempfer.221528163@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:09 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Wesley Kempfer  
5324 NE AINSWORTH ST  
Portland, OR 97218

**From:** Linda Hart <Linda.Hart.221528334@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:13 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Linda Hart  
4224 SE Clay St  
Portland, OR 97215

**From:** John Nettleton <John.Nettleton.220135719@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
John Nettleton  
4311 SE 37th Ave  
Portland, OR 97202

## CLIFFORD Katie \* ODOE

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**From:** Sherry Salomon <Sherry.Salomon.221530070@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:44 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sherry Salomon  
2393 SW Park Place #204  
Portland, OR 97205

## CLIFFORD Katie \* ODOE

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**From:** Mark McCormick <Mark.McCormick.221530223@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:49 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Mark McCormick  
5602 SE Lexington St  
Portland, OR 97206

## CLIFFORD Katie \* ODOE

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**From:** Virginia Tarango <Virginia.Tarango.221530359@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:56 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Virginia Tarango  
2311 SE 34th Ave  
Portland, OR 97214

**From:** Ryan Rittenhouse <Ryan.Rittenhouse.220673929@p2a.co>  
**Sent:** Tuesday, August 20, 2019 11:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Ryan Rittenhouse  
8008 SE Malden St.  
Portland, OR 97206

**From:** Scott Hayes <Scott.Hayes.221530377@p2a.co>  
**Sent:** Tuesday, August 20, 2019 10:57 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Scott Hayes  
623 NW 185th St.  
Shoreline, WA 98177

## CLIFFORD Katie \* ODOE

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**From:** John Ghormley <John.Ghormley.221532393@p2a.co>  
**Sent:** Tuesday, August 20, 2019 11:58 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
John Ghormley  
597 N Dekum St # 227  
Portland, OR 97217

## CLIFFORD Katie \* ODOE

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**From:** Judith Walker <Judith.Walker.221532339@p2a.co>  
**Sent:** Tuesday, August 20, 2019 11:53 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Judith Walker  
5609 SE 56th Avenue  
Portland, OR 97206

## CLIFFORD Katie \* ODOE

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**From:** Jack West <Jack.West.218837047@p2a.co>  
**Sent:** Wednesday, August 21, 2019 12:45 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jack West  
3914 SE Licyntra Ln  
Milwaukie, OR 97222

## CLIFFORD Katie \* ODOE

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**From:** Janiece Staton <Janiece.Staton.218846047@p2a.co>  
**Sent:** Wednesday, August 21, 2019 1:00 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Janiece Staton  
817 SW 171st Ave  
Beaverton, OR 97006

## CLIFFORD Katie \* ODOE

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**From:** Eileen Kennedy <Eileen.Kennedy.221534058@p2a.co>  
**Sent:** Wednesday, August 21, 2019 1:10 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Eileen Kennedy  
1302 8th Street South  
La Crosse, WI 54601

**From:** Mary Hill <Mary.Hill.220362708@p2a.co>  
**Sent:** Wednesday, August 21, 2019 2:09 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Mary Hill  
7104 Christina Dr  
Catlettsburg, KY 41129

**From:** Tracy Hardwick <Tracy.Hardwick.221542059@p2a.co>  
**Sent:** Wednesday, August 21, 2019 4:18 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Tracy Hardwick  
1903 Oakwood Dr  
The Dalles, OR 97058

## CLIFFORD Katie \* ODOE

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**From:** Joel Hildebrandt <Joel.Hildebrandt.221537343@p2a.co>  
**Sent:** Wednesday, August 21, 2019 3:04 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Joel Hildebrandt  
2776 Wagner Ct.  
Ann Arbor, MI 48103

**From:** Carolyn Caldwell <Carolyn.Caldwell.221542581@p2a.co>  
**Sent:** Wednesday, August 21, 2019 4:24 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Carolyn Caldwell  
735 SW Dillan Dr  
Beaverton, OR 97006

## CLIFFORD Katie \* ODOE

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**From:** William Fulton <William.Fulton.221545506@p2a.co>  
**Sent:** Wednesday, August 21, 2019 4:56 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
William Fulton  
775 Cascade ST APT 301  
Oregon City, OR 97045

**From:** James Soares <James.Soares.221551563@p2a.co>  
**Sent:** Wednesday, August 21, 2019 5:44 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
James Soares  
PO BOX 559  
Everson, WA 98247

**From:** Colleen Wright <Colleen.Wright.218837029@p2a.co>  
**Sent:** Wednesday, August 21, 2019 5:09 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Colleen Wright  
4160 Chapman Way  
Lake Oswego, OR 97035

## CLIFFORD Katie \* ODOE

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**From:** Dana Hardwick <Dana.Hardwick.221551725@p2a.co>  
**Sent:** Wednesday, August 21, 2019 5:46 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Dana Hardwick  
1903 Oakwood Dr  
The Dalles, OR 97058

## CLIFFORD Katie \* ODOE

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**From:** Tod Johnston <Tod.Johnston.221556252@p2a.co>  
**Sent:** Wednesday, August 21, 2019 6:20 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Tod Johnston  
3965 SW Pendleton St  
Portland, OR 97221

## CLIFFORD Katie \* ODOE

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**From:** Jan Polychronis <Jan.Polychronis.220161666@p2a.co>  
**Sent:** Wednesday, August 21, 2019 6:29 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jan Polychronis  
PO Box 639  
The Dalles, OR 97058

## CLIFFORD Katie \* ODOE

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**From:** Cody Traweek <Cody.Traweek.221559042@p2a.co>  
**Sent:** Wednesday, August 21, 2019 6:31 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Cody Traweck  
4240 Lemon Rd NE,  
Olympia, WA 98506

**From:** CA O'Donnell <CA.ODonnell.221559510@p2a.co>  
**Sent:** Wednesday, August 21, 2019 6:35 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
CA O'Donnell  
20009 106th Ave NE  
Bothell, WA 98011

**From:** Scott McKnight <Scott.McKnight.221561724@p2a.co>  
**Sent:** Wednesday, August 21, 2019 6:51 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Scott McKnight  
1250 SE 214th Ave  
Gresham, OR 97030

## CLIFFORD Katie \* ODOE

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**From:** Mauria McClay <Mauria.McClay.218952120@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:01 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Mauria McClay  
8125 NE Wygant  
Portland, OR 97218

## CLIFFORD Katie \* ODOE

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**From:** Rachael Pappano <Rachael.Pappano.220168687@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:01 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Rachael Pappano  
330 River Rd  
Mattawamkeag, ME 04459

## CLIFFORD Katie \* ODOE

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**From:** Lizbeth Hermansen <Lizbeth.Hermansen.220167912@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:05 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lizbeth Hermansen  
90 SW Russell Ave  
Stevenson, WA 98648

**From:** Susan Miller <Susan.Miller.220130129@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:13 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Susan Miller  
PO Box 564  
Mosier, OR 97040

## CLIFFORD Katie \* ODOE

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**From:** Robert Connor <Robert.Connor.220372545@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:11 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Robert Connor  
50 Moore Rd  
White Salmon, WA 98672

**From:** Angie Holwege <Angie.Holwege.221567502@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:26 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Angie Holwege  
31708B NE Wand Rd  
Troutdale, OR 97060

**From:** Cindy Kimball <Cindy.Kimball.221569519@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:33 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Cindy Kimball  
1260 21st St. NE  
Salem, OR 97301

**From:** Linda Curry <Linda.Curry.218837155@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:36 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Linda Curry  
253 Crescent Dr  
Kelso, WA 98626

## CLIFFORD Katie \* ODOE

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**From:** Linda Hanson <Linda.Hanson.221576638@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:22 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Linda Hanson  
688 Dry Creek Rd  
Mosier, OR 97040

**From:** Carolyn Williams <Carolyn.Williams.220721916@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:01 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Carolyn Williams  
3322 NE 127th Ave  
Portland, OR 97230

## CLIFFORD Katie \* ODOE

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**From:** Patricia Mizutani <Patricia.Mizutani.220354266@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:27 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Patricia Mizutani  
2335 NE 24th Ave  
Portland, OR 97212

**From:** Paul Moyer <Paul.Moyer.221579149@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:35 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Paul Moyer  
PO. Box 930, 477 NE. Academy St.  
White Salmon, WA 98672

**From:** Matt Morrissey <Matt.Morrissey.221579879@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:41 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Matt Morrissey  
2758 NE Rodney Ave  
Portland, OR 97212

**From:** Phil Pizanelli <Phil.Pizanelli.220577638@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:39 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Phil Pizanelli  
38835 H. Columbia River Hwy.  
Corbett, OR 97019

## CLIFFORD Katie \* ODOE

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**From:** Claudia Sanzone <Claudia.Sanzone.221581164@p2a.co>  
**Sent:** Wednesday, August 21, 2019 8:52 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Claudia Sanzone  
3149 NW Miller Rd  
Portland, OR 97229

**From:** Mark Darienzo <Mark.Darienzo.221437984@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:44 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Mark Darienzo  
6923 NE Morris St  
Portland, OR 97213

## CLIFFORD Katie \* ODOE

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**From:** Laura Morello <Laura.Morello.218828371@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Laura Morello  
1004 Main St  
Vancouver, WA 98660

## CLIFFORD Katie \* ODOE

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**From:** Susan McLaughlin <Susan.McLaughlin.221436804@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Susan McLaughlin  
2015 NW 17th Avenue  
Camas, WA 98607

**From:** Debra Rehn <Debra.Rehn.221436714@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Debra Rehn  
5130 SE 30th Ave Apt 9  
Portland, OR 97202

## CLIFFORD Katie \* ODOE

---

**From:** Diane Kondrat <Diane.Kondrat.221436886@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:35 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Diane Kondrat  
2124 NE 60th Ave.  
Portland, OR 97213

**From:** Diane Kondrat <Diane.Kondrat.221436886@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:35 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Diane Kondrat  
2124 NE 60th Ave.  
Portland, OR 97213

**From:** Christine TOLOTTI <Christine.TOLOTTI.221436895@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:35 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Christine TOLOTTI  
3451 Cook-Underwood Rd  
Cook, WA 98605

**From:** Marv Binegar <Marv.Binegar.221436903@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:35 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Marv Binegar  
12347 Boynton Street  
Oregon City, OR 97045

## CLIFFORD Katie \* ODOE

---

**From:** Virginia White <Virginia.White.220145934@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:37 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Virginia White  
1229 29th St  
Port Townsend, WA 98368

**From:** Jean Butcher <Jean.Butcher.218847758@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:36 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jean Butcher  
3635 SW 70th Ave  
Portland, OR 97225

## CLIFFORD Katie \* ODOE

---

**From:** Tim Sherry <Tim.Sherry.221437263@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:38 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Tim Sherry  
4208 N Juneau St  
Portland, OR 97203

**From:** Jeremy Benjamin <Jeremy.Benjamin.221437489@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:40 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jeremy Benjamin  
817 S St Andrews Place, 107  
Los Angeles, CA 90005

## CLIFFORD Katie \* ODOE

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**From:** Sarah Hafer <Sarah.Hafer.218828560@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:41 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Sarah Hafer  
12111 NE 4th St  
Vancouver, WA 98684

## CLIFFORD Katie \* ODOE

---

**From:** David Richmond <David.Richmond.221437533@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:41 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

Please do the right and legal thing and reject the RFA. Even if it were the legal thing to do, we need cleaner power not Thank you.

David Richmond

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
David Richmond  
2137 NE 40th Ave  
Portland, OR 97212

**From:** Laurie Turner <Laurie.Turner.220142469@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Laurie Turner  
11333 SE Powell Ct.  
Portland, OR 97266

**From:** Stephen Bachhuber <Stephen.Bachhuber.218831061@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Stephen Bachhuber  
3428 SE 9th Ave  
Portland, OR 97202

**From:** Donna Murphy <Donna.Murphy.221437957@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Donna Murphy  
2134 NE 37th Ave  
Portland, OR 97212

**From:** Anna Shook <Anna.Shook.218830017@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:44 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Anna Shook  
7326 N Wilbur Ave  
Portland, OR 97217

## CLIFFORD Katie \* ODOE

---

**From:** Barbara Waxman <Barbara.Waxman.221438172@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:45 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Barbara Waxman  
7731 21st Ave. NE  
Seattle, WA 98115

**From:** Brian Gibson <Brian.Gibson.221438118@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:45 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Brian Gibson  
1709 Mount Hood St  
The Dalles, OR 97058

**From:** Roy Moulton <Roy.Moulton.221438406@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Roy Moulton  
4 Birdie Ln  
White Salmon, WA 98672

**From:** Kim Kosa <Kim.Kosa.221438253@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:46 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Kim Kosa  
7106 N Commercial Ave  
Portland, OR 97217

**From:** Mary Twombly <Mary.Twombly.219968933@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:48 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Mary Twombly  
842 Little Rock Creek Rd  
Cook, WA 98605

## CLIFFORD Katie \* ODOE

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**From:** Adina Parsley <Adina.Parsley.218853427@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Adina Parsley  
20420 Marine Drive, Apt P-2  
Stanwood, WA 98292

## CLIFFORD Katie \* ODOE

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**From:** Lin Reedijk <Lin.Reedijk.221438541@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:48 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and NOT needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lin Reedijk  
19561 River Rd  
Gladstone, OR 97027

**From:** Lyndee Cunningham <Lyndee.Cunningham.220216980@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:49 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lyndee Cunningham  
1529 Division St  
Camas, WA 98607

## CLIFFORD Katie \* ODOE

---

**From:** Marceline Gearry <Marceline.Gearry.221439018@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:51 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Marceline Gearry  
2884 NW Savier St  
Portland, OR 97210

**From:** Earl Redding <Earl.Redding.221439054@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:51 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Earl Redding  
13221 SE Blackberry Cir  
Portland, OR 97236

**From:** Jay Maxwell <Jay.Maxwell.220213424@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:54 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Jay Maxwell  
1432 SW College St  
Portland, OR 97201

## CLIFFORD Katie \* ODOE

---

**From:** Lailah Hamblin <Lailah.Hamblin.221439595@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:54 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lailah Hamblin  
5020 NE Emerson Court  
Portland, OR 97218

**From:** John Koenig <John.Koenig.218830387@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:54 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
John Koenig  
3968 Brae Burn Dr  
Eugene, OR 97405

## CLIFFORD Katie \* ODOE

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**From:** Michael Stathatos <Michael.Stathatos.219066132@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:55 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Michael Stathatos  
1121 Riverside Dr  
Washougal, WA 98671

## CLIFFORD Katie \* ODOE

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**From:** Carolyn Boatsman <Carolyn.Boatsman.218828687@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:55 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Carolyn Boatsman  
3210 74th Ave SE  
Mercer Island, WA 98040

**From:** Cory Buckley <Cory.Buckley.218837704@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:56 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Cory Buckley  
11338 SW 91st Ct  
Tigard, OR 97223

## CLIFFORD Katie \* ODOE

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**From:** Vicki kolberg <Vicki.kolberg.218840827@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Vicki kolberg  
3749 NE 23rd Ave  
Portland, OR 97212

**From:** Laurie Kerr <Laurie.Kerr.221440061@p2a.co>  
**Sent:** Tuesday, August 20, 2019 12:57 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Laurie Kerr  
11102 NE 196th St  
Battle Ground, WA 98604

## CLIFFORD Katie \* ODOE

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**From:** Chad lehn <Chad.lehn.221441736@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:01 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Chad lehn  
4830 SE Hans Nagel Rd  
Washougal, WA 98671

## CLIFFORD Katie \* ODOE

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**From:** Emilia Brasier <Emilia.Brasier.221441790@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:02 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Emilia Brasier  
4132 NE Hayes St  
Camas, WA 98607

**From:** John Nelson <John.Nelson.221442014@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:02 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
John Nelson  
524 W 3rd Pl  
The Dalles, OR 97058

## CLIFFORD Katie \* ODOE

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**From:** JL Angell <JL.Angell.219503000@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:03 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
JL Angell  
2391 Ponderosa Rd  
Rescue, CA 95672

**From:** Ken Zeman <Ken.Zeman.220128230@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:04 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Ken Zeman  
25612 207th Place Southeast  
Covington, WA 98042

**From:** Kim Kovalik <Kim.Kovalik.221442276@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Kim Kovalik  
PO Box 663  
Mosier, OR 97040

## CLIFFORD Katie \* ODOE

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**From:** Jeff Forbes <Jeff.Forbes.221442285@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:06 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Jeff Forbes  
4625 SE 67th Ave  
Portland, OR 97206

**From:** Merle Clifton <Merle.Clifton.218831395@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:09 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Merle Clifton  
4457 NE CAMPAIGN ST  
Portland, OR 97218

**From:** Christopher Hansen <Christopher.Hansen.221443374@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:16 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Christopher Hansen  
3303 NW Dahlia Dr  
Camas, WA 98607

## CLIFFORD Katie \* ODOE

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**From:** Cynthia Clements <Cynthia.Clements.221443121@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:14 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Cynthia Clements  
5408 SE Long St  
Portland, OR 97206

## CLIFFORD Katie \* ODOE

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**From:** Todd Simmler <Todd.Simmler.218832745@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:17 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Todd Simmler  
917 W 23rd St  
The Dalles, OR 97058

## CLIFFORD Katie \* ODOE

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**From:** Richard Kolber <Richard.Kolber.218834897@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:18 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Richard Kolber  
11412 NE 49th St  
Vancouver, WA 98682

**From:** Robert Thinnies <Robert.Thinnies.221443536@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:19 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Robert Thinnies  
3207 NE 22nd Ave  
Portland, OR 97212

**From:** Eric Lubell <Eric.Lubell.221443707@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:21 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Eric Lubell  
300 NW 3rd Ave  
John Day, OR 97845

**From:** Martin Velez <Martin.Velez.218838479@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:22 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Martin Velez  
6118 NE 32nd Ave  
Portland, OR 97211

**From:** Lois Bancroft <Lois.Bancroft.220372545@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:25 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lois Bancroft  
50 Moore Rd  
White Salmon, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** Steve Erickson <Steve.Erickson.221444021@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Steve Erickson  
720 Cherryview Ln  
White Salmon, WA 98672

**From:** Antoinette Peterson <Antoinette.Peterson.220134369@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:25 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Antoinette Peterson  
7118 SE Steele St  
Portland, OR 97206

## CLIFFORD Katie \* ODOE

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**From:** Richard Osmun <Richard.Osmun.218946208@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:31 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Richard Osmun  
2726 NW Valley St  
Camas, WA 98607

## CLIFFORD Katie \* ODOE

---

**From:** Eric Brentlinger <Eric.Brentlinger.221444580@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:29 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Eric Brentlinger  
4160 Post Canyon Drive  
Hood River, OR 97031

**From:** Craig Heverly <Craig.Heverly.218834932@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Craig Heverly  
3712 SE 9th Ave  
Portland, OR 97202

**From:** Roger Kofler <Roger.Kofler.221447343@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Roger Kofler  
17177 SE Jennings Crest Lane  
Milwaukie, OR 97267

**From:** Peter Zurcher <Peter.Zurcher.221448162@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Peter Zurcher  
1956 Belmont Dr.  
Hood River, OR 97031

**From:** Erica Risberg <Erica.Risberg.221448342@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Erica Risberg  
950 SW 21st Ave  
Portland, OR 97205

**From:** RICHARD WEIGEL <RICHARD.WEIGEL.221448379@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
RICHARD WEIGEL  
12300 NE WASCO ST  
Portland, OR 97230

**From:** Roland Begin <Roland.Begin.218900109@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:35 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Roland Begin  
2722 SW Huber St  
Portland, OR 97219

## CLIFFORD Katie \* ODOE

---

**From:** Andrea Almeida <Andrea.Almeida.221449017@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:37 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Andrea Almeida  
8009 SE Yamhill St  
Portland, OR 97215

**From:** Bebe Chiarito <Bebe.Chiarito.221449071@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:38 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Bebe Chiarito  
9329 NW Old Skyline Blvd  
Portland, OR 97231

## CLIFFORD Katie \* ODOE

---

**From:** Stephen Hulick <Stephen.Hulick.220181952@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:38 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Stephen Hulick  
16607 NE 197th Ave  
Brush Prairie, WA 98606

**From:** Peggy Leslie <Peggy.Leslie.221450006@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:45 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Peggy Leslie  
1465 OR-35  
Hood River, OR 97031

**From:** SUSAN HAYNES <SUSAN.HAYNES.221450187@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:48 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
SUSAN HAYNES  
711 Skamania Landing Rd  
Stevenson, WA 98648

## CLIFFORD Katie \* ODOE

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**From:** Roberta Munger <Roberta.Munger.221450123@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Roberta Munger  
3830 SE 150th Ave  
Portland, OR 97236

## CLIFFORD Katie \* ODOE

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**From:** Brittany Saeman <Brittany.Saeman.218847460@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:50 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Brittany Saeman  
20665 SW Imperial Ln  
Aloha, OR 97006

## CLIFFORD Katie \* ODOE

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**From:** April Atwood <April.Atwood.218912007@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:50 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
April Atwood  
6306 SE 21st Ave  
Portland, OR 97202

**From:** Shireen Press <Shireen.Press.218831935@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:51 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Shireen Press  
5032 NE Simpson St  
Portland, OR 97218

**From:** Janie Cohen <Janie.Cohen.221450727@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:55 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Janie Cohen  
1702 SE 57th Ave  
Portland, OR 97215

## CLIFFORD Katie \* ODOE

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**From:** Chaz Smith <Chaz.Smith.221450934@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:57 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant.

While there is more information below, simply put its not needed or wanted and not in the public's best interest.

Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Chaz Smith  
12817 se main st  
Portland, OR 97233

## CLIFFORD Katie \* ODOE

---

**From:** Carolyn Stewart <Carolyn.Stewart.218831557@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:58 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Carolyn Stewart  
515 SW Cheltenham St  
Portland, OR 97239

**From:** Paul Wilcox <Paul.Wilcox.221451069@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Paul Wilcox  
1030 SW 17th Way  
Troutdale, OR 97060

**From:** Carmen Sanchez <Carmen.Sanchez.221451078@p2a.co>  
**Sent:** Tuesday, August 20, 2019 1:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Carmen Sanchez  
2837 Islander Ave NW  
Salem, OR 97304

**From:** Kalama Reuter <Kalama.Reuter.221452428@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:02 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Kalama Reuter  
920 NE Field Ave  
White Salmon, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** Janet Johnson <Janet.Johnson.221452536@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:03 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Janet Johnson  
556 NE 20TH PL  
Newport, OR 97365

## CLIFFORD Katie \* ODOE

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**From:** TAMMIE MURRAY <TAMMIE.MURRAY.221452743@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
TAMMIE MURRAY  
82270 RED BLUFF RD  
Seaside, OR 97138

**From:** Sally Stevens <Sally.Stevens.218828551@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:06 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sally Stevens  
9935 SE Grant Ct  
Portland, OR 97216

## CLIFFORD Katie \* ODOE

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**From:** Nicole Calvert <Nicole.Calvert.218846777@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:05 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Nicole Calvert  
12901 NE 28th St  
Vancouver, WA 98682

**From:** Collyn Baldwin <Collyn.Baldwin.221452833@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:07 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Collyn Baldwin  
2815 NE 13th St  
Gresham, OR 97030

## CLIFFORD Katie \* ODOE

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**From:** Mary Grout <Mary.Grout.218836606@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:08 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Mary Grout  
3712 NW Sandpiper Dr  
Woodland, WA 98674

**From:** Stephanie Heisler <Stephanie.Heisler.221453364@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:12 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Stephanie Heisler  
sheisler6@comcast.net  
Portland, OR 97211

**From:** Sherry Wolfson <Sherry.Wolfson.221453481@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:14 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Sherry Wolfson  
1215 SE 49th Ave  
Portland, OR 97215

**From:** Robert Kimbro <Robert.Kimbrow.221453544@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:14 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Robert Kimbro  
7625 SW Wilson Ave, 76  
Beaverton, OR 97008

## CLIFFORD Katie \* ODOE

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**From:** ANDREW WADE <ANDREW.WADE.221453814@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:17 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
ANDREW WADE  
3413 Brookside Drive  
Hood River, OR 97031

## CLIFFORD Katie \* ODOE

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**From:** Elaine Nelson <Elaine.Nelson.218831430@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:21 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Elaine Nelson  
6786 SW 204th Ave  
Aloha, OR 97078

**From:** George Cummings <George.Cummings.218828182@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:25 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
George Cummings  
3816 NE 17th Ave  
Portland, OR 97212

## CLIFFORD Katie \* ODOE

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**From:** Denise Jacobson <Denise.Jacobson.221454705@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:27 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Denise Jacobson  
1529 NE 21st Ave Apt 206  
Portland, OR 97232

## CLIFFORD Katie \* ODOE

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**From:** Joe Worth <Joe.Worth.221454732@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:27 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Joe Worth  
Not Available  
Beaverton, OR 97005

## CLIFFORD Katie \* ODOE

---

**From:** David Milholland <David.Milholland.220247913@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:28 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

We're on track to suooky the lion's share of our energy needs with renewables. Let's leave the fracked gas in the ground where it belongs.

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.

2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.

3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
David Milholland  
2000 NE 42nd Ave  
Portland, OR 97213

**From:** Amber Armstrong <Amber.Armstrong.218950681@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:28 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Amber Armstrong  
185 NE Snohomish Ave  
White Salmon, WA 98672

**From:** ed moye <ed.moye.221455056@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:30 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
ed moye  
70 W 30th Ave  
Eugene, OR 97405

## CLIFFORD Katie \* ODOE

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**From:** Christie Bradley <Christie.Bradley.221456163@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:33 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Christie Bradley  
1383 Tucker Rd  
Hood River, OR 97031

**From:** Irene Svete <Irene.Svete.221456398@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:36 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Irene Svete  
308 E Republican St  
Seattle, WA 98102

**From:** Christopher Kralik <Christopher.Kralik.218847857@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:38 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Christopher Kralik  
631 NW 18th Loop  
Camas, WA 98607

**From:** Ryan Murtfeldt <Ryan.Murtfeldt.221456587@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:39 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Ryan Murtfeldt  
51 Columbia Ave  
Underwood, WA 98651

**From:** Judy Henderson <Judy.Henderson.220230966@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:40 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Judy Henderson  
2541 SW Miles St  
Portland, OR 97219

**From:** Shayna Snyder <Shayna.Snyder.221456929@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Shayna Snyder  
4746 N Borthwick Ave  
Portland, OR 97217

## CLIFFORD Katie \* ODOE

---

**From:** Carole Beauclerk <Carole.Beauclerk.218896998@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:46 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Carole Beauclerk  
1500 SW Park Ave  
Portland, OR 97201

**From:** Lloyd Vivola <Lloyd.Vivola.221457199@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:46 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Lloyd Vivola  
12120 SE Foster Pl  
Portland, OR 97266

**From:** Logen Williams <Logen.Williams.221457531@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:49 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Logen Williams  
1214 16th St  
Hood River, OR 97031

## CLIFFORD Katie \* ODOE

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**From:** kathy cain <kathy.cain.218829019@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:49 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
kathy cain  
6231 NE 22nd Ave  
Portland, OR 97211

**From:** Daniel McGuire <Daniel.McGuire.218829325@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:52 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Daniel McGuire  
28681 Emanuel St  
Easton, MD 21601

## CLIFFORD Katie \* ODOE

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**From:** Erica Maranowski <Erica.Maranowski.220149462@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:52 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Erica Maranowski  
503 SE 12th Ave  
Portland, OR 97214

**From:** Polly Wood <Polly.Wood.219014463@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Polly Wood  
PO Box 962  
Hood River, OR 97031

**From:** Tom Hopkins <Tom.Hopkins.221458882@p2a.co>  
**Sent:** Tuesday, August 20, 2019 2:57 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Tom Hopkins  
19698 SE Cottonwood St.  
Milwaukie, OR 97267

**From:** Jacqueline Abel <Jacqueline.Abel.221460087@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:00 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Jacqueline Abel  
3707 NE 16th Avenue  
Portland, OR 97212

## CLIFFORD Katie \* ODOE

---

**From:** Colleen Bonin <Colleen.Bonin.218835841@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:04 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Colleen Bonin  
22824 ne 254th ct  
Battle Ground, WA 98604

**From:** Laurie Fisher <Laurie.Fisher.221460799@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Laurie Fisher  
10414 SW Bonanza Way  
Tigard, OR 97224

## CLIFFORD Katie \* ODOE

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**From:** Laura Anderson <Laura.Anderson.221460861@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Laura Anderson  
415 NE 128th Ave  
Portland, OR 97230

**From:** Mary Bailey <Mary.Bailey.221460889@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:11 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Mary Bailey  
3131 NW Clubhouse Dr  
Bend, OR 97703

**From:** Peter Christ <Peter.Christ.220338273@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:20 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Peter Christ  
28818 NE Hancock Rd  
Camas, WA 98607

## CLIFFORD Katie \* ODOE

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**From:** Norma Reich <Norma.Reich.218948404@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:12 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Norma Reich  
1221 SW 10th Ave  
Portland, OR 97205

## CLIFFORD Katie \* ODOE

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**From:** Sharlane Blaise <Sharlane.Blaise.218828704@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:21 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Sharlane Blaise  
2545 SW Terwilliger Blvd. #314  
Portland, OR 97201

## CLIFFORD Katie \* ODOE

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**From:** Timothy Sherburne <Timothy.Sherburne.221461653@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:22 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Timothy Sherburne  
2501 NE 57th St  
Vancouver, WA 98686

## CLIFFORD Katie \* ODOE

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**From:** T Hennessy <T.Hennessy.221461743@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
T Hennessy  
1202 33rd Ave  
Forest Grove, OR 97116

## CLIFFORD Katie \* ODOE

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**From:** Roy Sendek <Roy.Sendek.221461888@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:25 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Roy Sendek  
31485 NE Wand Rd  
Troutdale, OR 97060

**From:** Gary McCuen <Gary.McCuen.218847550@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:27 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Gary McCuen  
1825 Fairmount Av. S.  
Salem, OR 97302

## CLIFFORD Katie \* ODOE

---

**From:** tom whittaker <tom.whittaker.219504469@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:28 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
tom whittaker  
12140 SW Riverview Ln  
Wilsonville, OR 97070

## CLIFFORD Katie \* ODOE

---

**From:** Ellen Stearns <Ellen.Stearns.221462076@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:28 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Ellen Stearns  
3920 SW Hillsdale Ave  
Portland, OR 97239

**From:** Richard Johnson <Richard.Johnson.218863200@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:28 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Richard Johnson  
PO Box 3138  
Bellingham, WA 98227

## CLIFFORD Katie \* ODOE

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**From:** Darryl Lloyd <Darryl.Lloyd.221463264@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:32 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Darryl Lloyd  
1025 State St  
Hood River, OR 97031

**From:** Barbara Manildi <Barbara.Manildi.218847802@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:29 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Barbara Manildi  
3525 Re  
Lake Oswego, OR 97035

**From:** Tammy Hodgson <Tammy.Hodgson.221463291@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:32 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Tammy Hodgson  
722 SE Bidwell St  
Portland, OR 97202

**From:** Rob Karnuth <Rob.Karnuth.218942059@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:32 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Rob Karnuth  
951 W 7th Ave  
Eugene, OR 97402

**From:** Susan Tracy <Susan.Tracy.220456056@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:33 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Susan Tracy  
4311 NE 106th St  
Vancouver, WA 98686

**From:** Rob Karnuth <Rob.Karnuth.218942059@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:34 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Rob Karnuth  
951 W 7th Ave  
Eugene, OR 97402

**From:** Wendy Bartlett <Wendy.Bartlett.220136330@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:37 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Wendy Bartlett  
255 N Forest St  
Bellingham, WA 98225

**From:** Helen Jaskoski <Helen.Jaskoski.221463741@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:39 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Helen Jaskoski  
P.O. BOX 66074  
Portland, OR 97290

## CLIFFORD Katie \* ODOE

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**From:** Matthew Barmann <Matthew.Barmann.221463895@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:41 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Matthew Barmann  
417 17th Street  
Hood River, OR 97031

## CLIFFORD Katie \* ODOE

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**From:** Derek Gendvil <Derek.Gendvil.220141181@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Derek Gendvil  
9030 W Sahara Ave  
Las Vegas, NV 89117

## CLIFFORD Katie \* ODOE

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**From:** haris wolfgang <haris.wolfgang.218828641@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
haris wolfgang  
PO Box 2266  
Lake Oswego, OR 97035

## CLIFFORD Katie \* ODOE

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**From:** Steven Bruckner <Steven.Bruckner.221465055@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:52 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Steven Bruckner  
2448 NW Westover Rd., Unit 501  
Portland, OR 97210

**From:** Debrah Miles <Debrah.Miles.221466315@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Debrah Miles  
35517 Gustafson Ln  
Astoria, OR 97103

## CLIFFORD Katie \* ODOE

---

**From:** Keith Brown <Keith.Brown.220219590@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.



Regards,  
Keith Brown  
211 Malfait Tracts Rd  
Washougal, WA 98671

## CLIFFORD Katie \* ODOE

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**From:** Aleita Hass-Holcombe <Aleita.HassHolcombe.221466333@p2a.co>  
**Sent:** Tuesday, August 20, 2019 3:59 PM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Aleita Hass-Holcombe  
2022 NW Myrtlewood Way  
Corvallis, OR 97330

**From:** Fayette Krause <Fayette.Krause.218977079@p2a.co>  
**Sent:** Wednesday, August 21, 2019 9:11 AM  
**To:** PER Comments \* ODOE  
**Subject:** [Fortimail Spam Detected] Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Fayette Krause  
2315 Madrona St  
Port Townsend, WA 98368

## CLIFFORD Katie \* ODOE

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**From:** Kathleen Jones <Kathleen.Jones.221665477@p2a.co>  
**Sent:** Wednesday, August 21, 2019 4:18 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Kathleen Jones  
6812 SW Mayo St  
Portland, OR 97223

## CLIFFORD Katie \* ODOE

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**From:** Adina Parsley <Adina.Parsley.218853427@p2a.co>  
**Sent:** Wednesday, August 21, 2019 4:11 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Adina Parsley  
20420 Marine Dr, Apt P2  
Stanwood, WA 98292

## CLIFFORD Katie \* ODOE

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**From:** Maura Schotter <Maura.Schotter.221664342@p2a.co>  
**Sent:** Wednesday, August 21, 2019 4:09 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Maura Schotter  
2128 SE 11th Ave  
Camas, WA 98607

## CLIFFORD Katie \* ODOE

---

**From:** Maura Schotter <Maura.Schotter.221664342@p2a.co>  
**Sent:** Wednesday, August 21, 2019 4:09 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Maura Schotter  
2128 SE 11th Ave  
Camas, WA 98607

## CLIFFORD Katie \* ODOE

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**From:** marguery zucker <marguery.zucker.221660968@p2a.co>  
**Sent:** Wednesday, August 21, 2019 3:49 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

marguery zucker  
1966 Orchard St  
Eugene, OR 97403

## CLIFFORD Katie \* ODOE

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**From:** Jean Wyman <Jean.Wyman.221651355@p2a.co>  
**Sent:** Wednesday, August 21, 2019 2:51 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Jean Wyman  
3914 NE 75th Ave  
Portland, OR 97213

**From:** Gary Bushman <Gary.Bushman.221647170@p2a.co>  
**Sent:** Wednesday, August 21, 2019 2:27 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Gary Bushman  
1107 Methodist Rd  
Hood River, OR 97031

## CLIFFORD Katie \* ODOE

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**From:** Charles Gadway <Charles.Gadway.221647116@p2a.co>  
**Sent:** Wednesday, August 21, 2019 2:27 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Charles Gadway  
256 Bates Rd  
White Salmon, WA 98672

## CLIFFORD Katie \* ODOE

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**From:** Rabecca Whalen <Rabecca.Whalen.221646207@p2a.co>  
**Sent:** Wednesday, August 21, 2019 2:20 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Rabecca Whalen  
23445 NE Glisan St  
Wood Village, OR 97060

## CLIFFORD Katie \* ODOE

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**From:** Abigail Corbet <Abigail.Corbet.221640582@p2a.co>  
**Sent:** Wednesday, August 21, 2019 1:45 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Abigail Corbet  
6637 SE 57th Ave  
Portland, OR 97206

## CLIFFORD Katie \* ODOE

---

**From:** John Silvertooth <John.Silvertooth.221636398@p2a.co>  
**Sent:** Wednesday, August 21, 2019 1:26 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

John Silvertooth  
45474 Main St  
Antelope, OR 97001

**From:** Richard Faith <Richard.Faith.221636325@p2a.co>  
**Sent:** Wednesday, August 21, 2019 1:26 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Richard Faith  
2635 Coeur D Alene Dr  
West Linn, OR 97068

## CLIFFORD Katie \* ODOE

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**From:** Mary Wilson <Mary.Wilson.221636299@p2a.co>  
**Sent:** Wednesday, August 21, 2019 1:25 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Mary Wilson  
210 Pine Forest Rd.  
Goldendale, WA 98620

## CLIFFORD Katie \* ODOE

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**From:** Kyle Haines <Kyle.Haines.220132569@p2a.co>  
**Sent:** Wednesday, August 21, 2019 1:15 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Kyle Haines  
2685 Swyers Drive  
Hood River, OR 97031

## CLIFFORD Katie \* ODOE

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**From:** Fredrick Seil <Fredrick.Seil.220182014@p2a.co>  
**Sent:** Wednesday, August 21, 2019 12:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Fredrick Seil  
1 Twain Ave  
Berkeley, CA 94708

## CLIFFORD Katie \* ODOE

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**From:** Mark Weinsoft <Mark.Weinsoft.221618730@p2a.co>  
**Sent:** Wednesday, August 21, 2019 11:56 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Mark Weinsoft  
4106 SW 40th Place  
Portland, OR 97221

## CLIFFORD Katie \* ODOE

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**From:** Michael Young <Michael.Young.219271701@p2a.co>  
**Sent:** Wednesday, August 21, 2019 11:54 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Michael Young  
2004 E 13th St  
The Dalles, OR 97058

**From:** steve miesen <steve.miesen.221615175@p2a.co>  
**Sent:** Wednesday, August 21, 2019 11:40 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



steve miesen  
6275 Holmes St  
West Linn, OR 97068

## CLIFFORD Katie \* ODOE

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**From:** Mona McNeil <Mona.McNeil.218828867@p2a.co>  
**Sent:** Wednesday, August 21, 2019 11:18 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Mona McNeil  
15704 NE 28th Ct  
Vancouver, WA 98686

**From:** David Tvedt <David.Tvedt.221609181@p2a.co>  
**Sent:** Wednesday, August 21, 2019 11:14 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

David Tvedt  
801 Lynn Lane  
Eugene, OR 97404

## CLIFFORD Katie \* ODOE

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**From:** Linda Avinger <Linda.Avinger.221606788@p2a.co>  
**Sent:** Wednesday, August 21, 2019 11:03 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.

2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.

3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,  
Linda Avinger  
2638 E Smith Rd  
Bellingham, WA 98226

## CLIFFORD Katie \* ODOE

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**From:** Cliff Lehman <Cliff.Lehman.221666313@p2a.co>  
**Sent:** Wednesday, August 21, 2019 4:26 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Cliff Lehman  
2897 SE Caruthers St  
Portland, OR 97214

**CLIFFORD Katie \* ODOE**

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**From:** Ansula Press <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:49 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Ansula Press

## CLIFFORD Katie \* ODOE

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**From:** Paulette Lichatowich <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:42 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Paulette Lichatowich

## CLIFFORD Katie \* ODOE

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**From:** Gary McCuen <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:42 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Gary McCuen

**CLIFFORD Katie \* ODOE**

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**From:** Maggie Stock <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:38 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Maggie Stock

## CLIFFORD Katie \* ODOE

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**From:** Peter Sergienko <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:38 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Peter Sergienko

## CLIFFORD Katie \* ODOE

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**From:** Joyce Sherman <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:30 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Joyce Sherman

## CLIFFORD Katie \* ODOE

---

**From:** Lawrence Nagel <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:29 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Lawrence Nagel



## CLIFFORD Katie \* ODOE

---

**From:** Fuji Kreider <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:28 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Fuji Kreider

## CLIFFORD Katie \* ODOE

---

**From:** Patricia Schafer <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:28 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Patricia Schafer

**CLIFFORD Katie \* ODOE**

---

**From:** David Coffin <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:26 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

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Thank you.

Sincerely,  
David Coffin

## CLIFFORD Katie \* ODOE

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**From:** Amy Roberts <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:23 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Amy Roberts

## CLIFFORD Katie \* ODOE

---

**From:** matt glidden <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:18 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
matt glidden

## CLIFFORD Katie \* ODOE

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**From:** Karen Drescher <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:17 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Karen Drescher

## CLIFFORD Katie \* ODOE

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**From:** Sky Yeager <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:16 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Sky Yeager

**CLIFFORD Katie \* ODOE**

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**From:** Steven Schafer <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:13 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Steven Schafer



## CLIFFORD Katie \* ODOE

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**From:** A Michael Dianich <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:13 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
A Michael Dianich

## CLIFFORD Katie \* ODOE

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**From:** Ann Watters RPE,BCPP <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:12 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Ann Watters RPE,BCPP

**CLIFFORD Katie \* ODOE**

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**From:** Paul Spindel <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:11 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Paul Spindel

## CLIFFORD Katie \* ODOE

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**From:** Dan Sherwood <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:10 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Dan Sherwood

## CLIFFORD Katie \* ODOE

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**From:** Pepper Trail <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:08 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Pepper Trail

## CLIFFORD Katie \* ODOE

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**From:** Marvin Higgins <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:05 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Marvin Higgins

## CLIFFORD Katie \* ODOE

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**From:** Jan Monical <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:04 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Jan Monical

## CLIFFORD Katie \* ODOE

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**From:** Mark Darienzo <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:01 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Mark Darienzo



## CLIFFORD Katie \* ODOE

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**From:** Marilyn Costamagna <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:00 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

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Thank you.

Sincerely,  
Marilyn Costamagna

## CLIFFORD Katie \* ODOE

---

**From:** Annie McCuen <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:59 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Annie McCuen

**CLIFFORD Katie \* ODOE**

---

**From:** frances Parson <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:56 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

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- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
frances Parson

## CLIFFORD Katie \* ODOE

---

**From:** John Gasperoni <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:54 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Sincerely,  
John Gasperoni

## CLIFFORD Katie \* ODOE

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**From:** Anthony Albert <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:46 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

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Thank you.

Sincerely,  
Anthony Albert

**CLIFFORD Katie \* ODOE**

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**From:** Steve Rauworth <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:45 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

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Thank you.

Sincerely,  
Steve Rauworth

**CLIFFORD Katie \* ODOE**

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**From:** Alice Shapiro <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:45 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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Thank you.

Sincerely,  
Alice Shapiro

## CLIFFORD Katie \* ODOE

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**From:** Arthur Noble <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:45 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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Thank you.

Sincerely,  
Arthur Noble



## CLIFFORD Katie \* ODOE

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**From:** Sarah Deumling <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:42 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Sarah Deumling

## CLIFFORD Katie \* ODOE

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**From:** Charlie Graham <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:42 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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Sincerely,  
Charlie Graham

## CLIFFORD Katie \* ODOE

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**From:** Allan Peterson <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:41 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

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Thank you.

Sincerely,  
Allan Peterson

## CLIFFORD Katie \* ODOE

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**From:** Tom Bender <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:40 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

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## CLIFFORD Katie \* ODOE

---

**From:** Theron Brayman <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:40 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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## CLIFFORD Katie \* ODOE

---

**From:** Donlon McGovern <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:40 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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Sincerely,  
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## CLIFFORD Katie \* ODOE

---

**From:** Ian Shelley <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:40 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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Thank you.

Sincerely,  
Ian Shelley

## CLIFFORD Katie \* ODOE

---

**From:** Don Jacobson <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:39 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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Thank you.

Sincerely,  
Don Jacobson



## CLIFFORD Katie \* ODOE

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**From:** Bob Thomas <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:35 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Bob Thomas

**CLIFFORD Katie \* ODOE**

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**From:** Michael Herbert <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:33 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Michael Herbert

## CLIFFORD Katie \* ODOE

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**From:** Peter Luciano <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:28 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Peter Luciano

## CLIFFORD Katie \* ODOE

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**From:** Linda Covert <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:27 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Linda Covert

## CLIFFORD Katie \* ODOE

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**From:** Lauren Thompson <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:26 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Lauren Thompson

## CLIFFORD Katie \* ODOE

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**From:** brad bush <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:25 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
brad bush

**CLIFFORD Katie \* ODOE**

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**From:** CJ James <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:24 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
CJ James

**CLIFFORD Katie \* ODOE**

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**From:** Troy Horton horton <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:23 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Troy Horton horton



## CLIFFORD Katie \* ODOE

---

**From:** Michael Halloran <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:22 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Michael Halloran

## CLIFFORD Katie \* ODOE

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**From:** Joseph Micketti <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:18 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Joseph Micketti

## CLIFFORD Katie \* ODOE

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**From:** Maggie Underwood <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:18 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

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Thank you.

Sincerely,  
Maggie Underwood

## CLIFFORD Katie \* ODOE

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**From:** Anne Ryland <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:17 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Anne Ryland

## CLIFFORD Katie \* ODOE

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**From:** joan viers <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:16 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
joan viers

## CLIFFORD Katie \* ODOE

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**From:** Dean Sigler <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:14 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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Thank you.

Sincerely,  
Dean Sigler

**CLIFFORD Katie \* ODOE**

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**From:** Angelita Surmon <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:12 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Angelita Surmon

**CLIFFORD Katie \* ODOE**

---

**From:** BERKLEE ROBINS <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:09 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
BERKLEE ROBINS



## CLIFFORD Katie \* ODOE

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**From:** Courtney Neubauer <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:09 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Courtney Neubauer

## CLIFFORD Katie \* ODOE

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**From:** Robert Rineer <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 7:08 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

I urge EFSC to deny Perennial's RFA because:

- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
- 2). The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure, like Perennial's proposed 415 megawatt gas-powered facility, still threatens the health of our communities and our climate.
- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Robert Rineer

**CLIFFORD Katie \* ODOE**

---

**From:** Sharon Holford <outreach@csadvocate.io>  
**Sent:** Wednesday, August 14, 2019 8:52 AM  
**To:** PER Comments \* ODOE  
**Subject:** Reject Perennial Wind Chaser Station's RFA

Dear Governor Brown and the Oregon Energy Facility Siting Council,

I urge you to reject the Request for Amendment (RFA) to Perennial Wind Chaser Station's (Perennial) site certificate for a proposed gas-fired power plant. In the four years since Perennial received its initial site certificate from the Energy Facility Siting Council (EFSC), the environmental impacts of fracked gas have become increasingly apparent. It is clear that to combat the climate crisis we need to reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial.

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- 1). The Oregon Supreme Court recently ruled that the rules under which Perennial applied for an RFA are invalid and EFSC cannot legally apply invalid rules.
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- 3). EFSC rules require that a preliminary RFA include an explanation of the need for an extension. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is not needed or wanted.

For these reasons, EFSC should deny Perennial's RFA which is now invalid, and require the company to file a new application for a site certificate.

Thank you.

Sincerely,  
Sharon Holford

**From:** Ruth Flemming <Ruth.Flemming.218831007@p2a.co>  
**Sent:** Thursday, August 22, 2019 11:23 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Ruth Flemming  
10320 NE 20th Cir  
Vancouver, WA 98664

## CLIFFORD Katie \* ODOE

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**From:** Nancy Vanderpool <Nancy.Vanderpool.218912854@p2a.co>  
**Sent:** Thursday, August 22, 2019 10:52 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Nancy Vanderpool  
25702 75th Ave SW  
Vashon, WA 98070

## CLIFFORD Katie \* ODOE

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**From:** Joshua Bickley <Joshua.Bickley.221840841@p2a.co>  
**Sent:** Thursday, August 22, 2019 10:48 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Joshua Bickley  
6426 NE 36th Ave  
Portland, OR 97211

## CLIFFORD Katie \* ODOE

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**From:** Monica Maxa <Monica.Maxa.221834965@p2a.co>  
**Sent:** Thursday, August 22, 2019 10:18 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Monica Maxa  
2115 E St  
Washougal, WA 98671

## CLIFFORD Katie \* ODOE

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**From:** John Rogers <John.Rogers.218834554@p2a.co>  
**Sent:** Thursday, August 22, 2019 9:29 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

John Rogers  
2014 Lonely Ln  
Mosier, OR 97040

## CLIFFORD Katie \* ODOE

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**From:** Celina McClaren <Celina.McClaren.221821707@p2a.co>  
**Sent:** Thursday, August 22, 2019 9:29 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Celina McClaren  
4320 SW Corbett Ave Apt 206  
Portland, OR 97239

**From:** Therese LIVELLA <Therese.LIVELLA.221812554@p2a.co>  
**Sent:** Thursday, August 22, 2019 9:12 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Therese LIVELLA  
10015 NE 339th St  
La Center, WA 98629

## CLIFFORD Katie \* ODOE

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**From:** John Worsley <John.Worsley.218835012@p2a.co>  
**Sent:** Thursday, August 22, 2019 8:47 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

John Worsley  
PO Box 596  
Mosier, OR 97040

**From:** Paul Spindel <Paul.Spindel.220179199@p2a.co>  
**Sent:** Thursday, August 22, 2019 8:10 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Paul Spindel  
1465 Holly St  
West Linn, OR 97068

## CLIFFORD Katie \* ODOE

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**From:** Jo Landefeld <Jo.Landefeld.221762091@p2a.co>  
**Sent:** Thursday, August 22, 2019 7:43 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Jo Landefeld  
3145 NE 21st Ave  
Portland, OR 97212

**From:** Mark Leed <Mark.Leed.221756601@p2a.co>  
**Sent:** Thursday, August 22, 2019 7:30 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Mark Leed  
3419 E. 21st St., Unit 4  
Vancouver, WA 98661

## CLIFFORD Katie \* ODOE

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**From:** Gina fuller <Gina.fuller.221739286@p2a.co>  
**Sent:** Thursday, August 22, 2019 6:50 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Gina fuller  
41 Kelly-Henke Rd  
Stevenson, WA 98648

## CLIFFORD Katie \* ODOE

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**From:** Stephanie Smith <Stephanie.Smith.221733642@p2a.co>  
**Sent:** Thursday, August 22, 2019 6:36 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Stephanie Smith  
418 NE 154th St  
Vancouver, WA 98685

## CLIFFORD Katie \* ODOE

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**From:** Brook Kirklin <Brook.Kirklin.221730906@p2a.co>  
**Sent:** Thursday, August 22, 2019 6:30 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Brook Kirclin  
12700 SW Jennett Ct  
Beaverton, OR 97008

## CLIFFORD Katie \* ODOE

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**From:** Marie McKim <Marie.McKim.221714517@p2a.co>  
**Sent:** Thursday, August 22, 2019 2:52 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Marie McKim  
2140 NW Savier St  
Portland, OR 97210

**From:** Michelle Baggio <Michelle.Baggio.221712096@p2a.co>  
**Sent:** Thursday, August 22, 2019 12:38 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Michelle Baggio  
7509 NE Vancouver Mall Drive F23  
Vancouver, WA 98662

**From:** David kelley <David.kelley.221712005@p2a.co>  
**Sent:** Thursday, August 22, 2019 12:35 AM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

David kelley  
3831 NE 72nd Ave  
Portland, OR 97213

## CLIFFORD Katie \* ODOE

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**From:** Jane Camero <Jane.Camero.221710593@p2a.co>  
**Sent:** Wednesday, August 21, 2019 11:49 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Jane Camero  
1027 Columbia St  
Hood River, OR 97031

## CLIFFORD Katie \* ODOE

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**From:** Patricia Always <Patricia.Always.218853012@p2a.co>  
**Sent:** Wednesday, August 21, 2019 11:23 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



Patricia Always  
10511 W. Kingswood Circle  
Sun City, AZ 85351

## CLIFFORD Katie \* ODOE

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**From:** Theresa Gevurtz <Theresa.Gevurtz.221707632@p2a.co>  
**Sent:** Wednesday, August 21, 2019 10:29 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Theresa Gevurtz  
1055 SE Liberty Ave  
Gresham, OR 97080

## CLIFFORD Katie \* ODOE

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**From:** Kris Alman <Kris.Alman.221706381@p2a.co>  
**Sent:** Wednesday, August 21, 2019 10:04 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Kris Alman  
5444 SW Dover Ct  
Portland, OR 97225

## CLIFFORD Katie \* ODOE

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**From:** jon Gramstad <jon.Gramstad.221705445@p2a.co>  
**Sent:** Wednesday, August 21, 2019 9:51 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

jon Gramstad  
1306 NE 153rd Ave  
Portland, OR 97230

## CLIFFORD Katie \* ODOE

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**From:** KRISTINE beam <KRISTINE.beam.220187686@p2a.co>  
**Sent:** Wednesday, August 21, 2019 9:28 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



KRISTINE beam  
19773 Bellevue Way  
West Linn, OR 97068

**From:** Michael Wolf <Michael.Wolf.220220219@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:11 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Michael Wolf  
3126 NE 7th Ave  
Portland, OR 97212

## CLIFFORD Katie \* ODOE

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**From:** Martha Wright <Martha.Wright.221690712@p2a.co>  
**Sent:** Wednesday, August 21, 2019 7:10 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Martha Wright  
3223 N Kerby Ave  
Portland, OR 97227

## CLIFFORD Katie \* ODOE

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**From:** Joe Wiederhold <Joe.Wiederhold.221688247@p2a.co>  
**Sent:** Wednesday, August 21, 2019 6:57 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is already degraded, partially by NOx emissions from power plants in the region causing acid deposition during inversion events. Perennial would make this even worse.

I urge the Council to deny the Request for Amendment because:

1. The site certificate for this project is already expired, void, and cannot be amended. Perennial was required to begin construction by September 23, 2018. Perennial failed to either begin construction by that deadline or to submit a valid application to extend the deadline in compliance with valid Council rules. Instead, Perennial expressly filed its amendment application pursuant to invalid rules. Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid." Because these rules are invalid, they cannot be used to process or approve any amendment to the expired Perennial site certificate. And if EFSC attempts to declare an "emergency" and re-adopt the invalid rules, it will be too late to resurrect the site certificate, which is already expired and void.
2. The rules provide that EFSC must consider "any changes in facts or law since the date the current site certificate was executed" in its evaluation of a request to extend the construction deadlines. New studies released since EFSC approved Perennial's proposal demonstrate the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood. Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life," yet fracked gas infrastructure projects, including Perennial's proposed 415-megawatt gas-powered facility, still threaten the health of our communities and our climate.
3. Assuming EFSC's invalid rules can be applied here, those rules require Perennial to adequately explain the need for an extension of any construction deadlines. Perennial claims it has "been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date." Perennial failed to explain what, if any, steps it took to obtain a power purchase agreement. Moreover, the company admitted that there is currently no market demand for its proposal. EFSC should not authorize a gas-powered plant that is neither needed nor wanted. If such a need or want arises in the future, there is nothing stopping Perennial from reapplying.

The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Joe Wiederhold  
1405 Edwards St  
Bellingham, WA 98229

## CLIFFORD Katie \* ODOE

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**From:** mary n <mary.n.220176507@p2a.co>  
**Sent:** Wednesday, August 21, 2019 6:43 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,



mary n  
14005 SE 38th St  
Vancouver, WA 98683

## CLIFFORD Katie \* ODOE

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**From:** Delores Porch <Delores.Porch.218833663@p2a.co>  
**Sent:** Wednesday, August 21, 2019 5:16 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Delores Porch  
1212 34TH AVE SE, Apt 63  
Albany, OR 97322

## CLIFFORD Katie \* ODOE

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**From:** Sarah Duvall <Sarah.Duvall.221962008@p2a.co>  
**Sent:** Thursday, August 22, 2019 3:47 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Sarah Duvall  
600 SE 177th Avenue, Apt. Z-282  
Vancouver, WA 98683

## CLIFFORD Katie \* ODOE

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**From:** Cheri Ceridwen <Cheri.Ceridwen.221979802@p2a.co>  
**Sent:** Thursday, August 22, 2019 5:15 PM  
**To:** PER Comments \* ODOE  
**Subject:** Perennial Wind Chaser Station Construction Deadline Extension Request

Dear Governor Brown and Oregon EFSC:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser Station (Perennial), a proposed gas-fired power plant. Perennial's proposal is unlawful, harmful to the environment, and not needed for our energy future.

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The Council should deny the requested amendment. Thank you for considering this comment.

Regards,

Cheri Ceridwen  
2020 NW Northrup St. # 806  
Portland, OR 97209