BEFORE THE
ENERGY FACILITY SITING COUNCIL
OF THE STATE OF OREGON

In the Matter of Request for Amendment 1 to the Perennial Wind Chaser Station Site Certificate	))))	FINAL ORDER ON REQUEST FOR AMENDMENT 1 TO THE SITE CERTIFICATE

November 22, 2019

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ACRONYMS AND ABBREVIATIONS

AC	Alternating Current
BMP	Best Management Practice
BPA	Bonneville Power Administration
Council	Oregon Energy Facility Siting Council
dBA	A-weighted decibel
Department	Oregon Department of Energy
DEQ	Oregon Department of Environmental Quality
DOGAMI	Oregon Department of Geology and Mineral Industries
DSL	Oregon Department of State Lands
EFSC	Oregon Energy Facility Siting Council
ESCP	Erosion and Sediment Control Plan
EFU	Exclusive Farm Use
HMP	Habitat Mitigation Plan
kV	Kilovolts
MW	Megawatt(s)
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance Building
OAR	Oregon Administrative Rule
ODFW	Oregon Department of Fish and Wildlife
ODOE	Oregon Department of Energy
ODOT	Oregon Department of Transportation
ORBIC	Oregon Biodiversity Information Center
ORS	Oregon Revised Statutes
RAI	Request for Additional Information
RFA	Request for Amendment
ROW	Right-of-Way
SAG	Special Advisory Group
USFWS	United States Fish and Wildlife Service

I. INTRODUCTION

The Energy Facility Siting Council (Council or EFSC) issues this final order, in accordance with Oregon Revised Statute (ORS) 469.405(1) and Oregon Administrative Rule (OAR) 345-027-0371, based on its review of the Request for Amendment (amendment request or the RFA) to the Perennial Wind Chaser Station site certificate. This order considers oral comments made at the August 22, 2019 public hearing, written comments received before the close of the record of the public hearing, agency consultation, and comments received from the Energy Facility Siting Council (Council or EFSC) following its review of the draft proposed order at the September 27, 2019 Council meeting. The certificate holder is Perennial-WindChaser, LLC (Perennial or certificate holder), which is wholly-owned by Perennial Power Holdings, Inc., a subsidiary of Sumitomo Corporation and Sumitomo Corporation of America.

The certificate holder requests that the Council approve changes to the site certificate to extend the construction commencement and completion deadlines. In accordance with the existing site certificate, construction must begin three years after the effective date of the site certificate (that is, before September 23, 2018) and construction must be completed by September 23, 2021.[1] The RFA requests to extend each of these construction deadlines by two years, for a requested construction commencement date of September 23, 2020 and a requested construction completion date of September 23, 2023.

Based upon review of this amendment request, in conjunction with comments received from members of the public during the draft proposed order comment period and recommendations received from state agencies and tribal and local governments, the Council issues the first amended site certificate for the Perennial Wind Chaser Station, subject to the existing, new, and amended conditions set forth in this final order.

I.A. Name and Address of Certificate Holder

Perennial-WindChaser, LLC
600 Third Avenue, 30F
New York, NY 10016-2001

[1] In accordance with OAR 345-027-0385(2), receipt of the amendment request prior to the deadline suspends expiration of the site certificate until Council acts on the request for amendment.

Parent Company of the Certificate Holder
Perennial Power Holdings, Inc.
a wholly-owned subsidiary of Sumitomo Corporation and Sumitomo Corporation of America
300 Madison Avenue
New York, NY 10017

Certificate Holder Contact
JJ Jamieson, Senior Director, Operations and Development
Perennial Power Holdings, Inc.
24 Waterway Ave, Suite 740
The Woodlands, TX 77380

I.B. Description of the Approved Facility[2]

The Perennial Wind Chaser Station (facility) is an approved but not yet constructed facility that would be located in Umatilla County. The facility would be comprised of up to four General Electric LMS100 (or equivalent) natural gas-fired combustion turbine generators in simple cycle, producing up to 415 megawatts (MW) of electric power. In this type of system, natural gas is combusted in the combustion turbine generator, then expanded to drive the turbine generator, producing electric power.[3]

The energy facility or "Station" would include four generating units, each consisting of one General Electric LMS100 combustion turbine, intercooler heat exchanger, electrical generator, selective catalytic reduction unit, catalytic oxidation unit, and stack. The certificate holder

[2] The majority of comments on the record of the draft proposed order public hearing characterize the Perennial Wind Chaser Station as "fracked gas" infrastructure and express concern about the environmental and health impacts of hydraulic fracturing, or "fracking." The certificate holder does not propose to drill for natural gas. The proposed facility would include a lateral natural gas pipeline that would transport natural gas to the generating station by tapping an existing pipeline owned by Gas Transmission Northwest located approximately 4.63 miles south of the generating station site. Gas Transmission Northwest's interstate natural gas pipeline system transports natural gas sourced from multiple basins in the United States and Canada. PERAMD1Doc42 About Gas Transmission Northwest LLC_accessed 2019-09-05. The proposed facility does not include drilling for natural gas; furthermore, a natural gas drilling project would not fall within the definition of an "energy facility" under ORS 469.300(11). Therefore, comments regarding the environmental impacts of hydraulic fracturing are outside the scope of the Council's review.
[3] ASC Exhibit B, B-4.

would only burn natural gas, and each generating unit would be connected to a common cooling tower.[4]

OAR 345-001-0010(40) defines a "non-base load power plant" as a "fossil-fueled generating facility that is limited by the site certificate to an average number of hours of operation per year of not more than 6,600 hours. For a non-base load power plant designed to operate at variable load, the facility's annual hours of operation are determined by dividing the actual annual electric output of the facility in megawatt-hours by the facility's nominal electric generating capacity in megawatts." Perennial proposes to operate the Station no more than 4,400 hours per year at full load, with an expected 500 startups and shutdowns each year, for a total of 4,736 hours.[5]

The certificate holder is also authorized to construct and operate the following related or supporting facilities:

Buildings

The facility would include a single pre-engineered metal building to serve as a control room and administration building. This building would also house the water treatment equipment.[6] Separate smaller buildings and enclosures would house the chemical feed equipment, turbine control and main power, distribution power, 5-kV distribution panel and gas compressor motor control center, gas compressors, compressor lube oil skid, diesel fuel pump, the continuous emission monitoring shed and the alternative zero liquid discharge system, if this option is selected. The zero liquid discharge system is discussed in further detail below. Table INTRO-1, below, identifies the units of each building component.

Table INTRO-1: Building Dimensions

Component[1]	Number of Units	Dimensions (L x W x H) (feet)	Total Area (square feet)
Administration and Water Treatment Building	1	200 x 40 x 20	8,000
ZLD Building	1	60 x 120 x 45	7,200
Chemical Feed Skid	2	30 x 40 x 10	2,400

[4] ASC Exhibit B, B-2.

[5] ASC Exhibit B, B-2. This request for amendment assumes fewer annual hours (3,000 instead of the 4,400 hours assumed in ASC Exhibit Y) of power plant operations for the purposes of calculating excess tons of carbon dioxide expected to result from operation of the facility. RFA Attachment 11. This change is reflected in Section III.P.2, *Standards for Energy Facilities that Emit Carbon Dioxide* of this order.

[6] Total area: 8,000 square feet. ASC Exhibit B, B-6.

Table INTRO-1: Building Dimensions

Component[1]	Number of Units	Dimensions (L x W x H) (feet)	Total Area (square feet)
Turbine Control & Main Power Distribution Center	2	45 x 71 x 10	6,400
5-KV Distribution Panel & Gas Compressor MCC Gas Compressor	3	7.5 x 20 x 8	450
Gas Compressor	5	8 x 17.5 x 6	700
Compressor Lube Oil Skid	5	5 x 15 x 5	375
Diesel Fire Pumps	1	10 x 15 x 5	150
CEMS	2	10 x 15 x 10	300

Key: CEMS = continuous emission monitoring shed: H = height; kV = kilovolt; L = length; MCC = motor control center W = width; ZLD = zero liquid discharge

Notes:

1. Dimensions are approximate (plus or minus 1 foot). Dimensions represent one unit.

Figure B-3 in the ASC provides location details for each building.

Fencing and Roads

The certificate holder would access the Station from Westland Road via Interstate Highway 82 or 84. A paved loop road approximately 24 feet wide and 3,000 feet long would be constructed to serve normal truck and operator vehicle traffic, with connection to Westland Road. An entrance bridge would be constructed to cross the irrigation canal at the entrance to the Station.[7]

A spur road off the loop road would be constructed to allow for access to structures and equipment. A paved road, 20 feet wide and 232 feet long, would also be constructed through the center of the four combustion turbine generators so that each turbine could be accessed from the paved loop. No temporary access roads would be constructed.[8]

To service and access the 550-kV step-up substation, the certificate holder would use an existing dirt road, branching off from the road parallel to Brownell Ditch. To utilize this road,

[7] ASC Exhibit B, B-8.

[8] ASC Exhibit B, B-8.

the only improvement necessary is the addition of gravel to the road surface.[9] Table B-2 in the ASC provides a summary of the expected gravel uses, including the dimensions and square yardage.[10]

A chain-link fence with three strands of barbed wire would surround the Station. The on-site switchyard would be surrounded by its own chain-link fence to separate the high-voltage switchyard from the rest of the Station.[11] Additionally, the 550-kV step-up substation would be surrounded by a security fence.

Stormwater Detention Basin

One stormwater detention basin, approximately 0.9 acres in size, would be located within the 20-acre Station fence. The basin would have a water storage depth of approximately 11 feet and would be sized to contain a 100-year, 24-hour rainfall with 50 percent extra capacity. Stormwater collected in the basin would infiltrate into the ground under the basin through gravity and natural drainage.[12]

Natural Gas Pipeline

A natural gas pipeline lateral would provide fuel for the Station. The lateral, to be owned and operated by Cascade Natural Gas Corporation (CNG), would bring natural gas to the Station from an existing pipeline owned by Gas Transmission Northwest (GTN). The natural gas pipeline lateral would tap the GTN pipeline approximately 4.63 miles south of the Station, at an existing metering station, and would be approximately 12 to 18 inches in diameter. The lateral would be located underground within an already established 50-foot-wide right-of-way (ROW) associated with the Hermiston Generating Plant (HGP) gas pipeline.[13]

The natural gas pipeline does not qualify as an "energy facility" itself because is it not five miles or more in length as required under ORS 469.300(11)(E)(i); therefore, a corridor selection assessment is not necessary for the natural gas pipeline.

Transmission Line

The certificate holder would primarily utilize existing transmission structures to convey electricity from the Station to a 500-kV step-up substation. The existing transmission structures currently support two distinct circuits: 1) the HGP's 230-kV circuit to the Bonneville Power Administration (BPA) McNary Substation on one side; and 2) Umatilla Electric Cooperative's

[9] ASC Exhibit B, B-16.
[10] ASC Exhibit B, B-8.
[11] ASC Exhibit B, B-16.
[12] ASC Exhibit B, B-9.
[13] ASC Exhibit B, B-14.

(UEC) 115-kV line on the other. The certificate holder would replace UEC's 115-kV line on the existing structures with a new 230-kV single circuit transmission line. The initial tie-in to the existing line would occur at the northwest corner of the Station site. From the northwest corner, the line would cross Westland Road to a new pole on the western side of Westland Road. This pole would connect to the existing structures of the Hermiston to McNary line. As stated in the ASC, the first connecting pole of the existing line may need to be replaced as well. From the onsite switchyard in the southwest corner of the Station site, the certificate holder anticipates that the installation of four new towers or poles would be required to reach the Station's northwestern corner boundary. If the first existing pole must be replaced, a total of six new poles would be required for the facility. If the existing pole does not need to be replaced, a total of five new poles would be required.[14]

Umatilla Electric Cooperative has existing ROWs for the western side of Westland Road. If two new poles are required on the west side of Westland Road (i.e., if the first existing pole requires replacement), the certificate holder estimates that about 0.46 acres of land would be temporarily disturbed during this installation. A new ROW is also expected to be necessary across Westland Road to connect the new transmission line from the northwest corner of the Station to the first new pole that would be constructed on the west side of Westland Road. The first new connecting pole would be 215 feet from the boundary at the northwest corner of the Station. The new ROW would, therefore, be 215 feet long and 100 feet wide. However, any ground disturbance associated with the installation of the new pole and potential replacement pole would occur within the boundary of the Station site or in the existing UEC ROW. Any disturbances associated with the four new poles that would be located within the Station site are considered permanent impacts and considered in the disturbance areas for the site as a whole (see ASC Exhibit C, Table C-1).[15]

From the tie-in, the new 230-kV line would extend approximately 11.59 miles, using the existing infrastructure, before terminating at the 500-kV step-up substation. No new poles would be constructed for this portion of the line. To replace the 115-kV line with the proposed 230-kV line, pulling stations would be required approximately every 3 miles and at turns, pulling and tightening the wires of the transmission lines. The equipment would not extend beyond the boundary of the existing transmission line ROW.[16]

The transmission line does not qualify as an "energy facility" itself because ORS 469.300(1)(a)(C) excludes from the energy facility definition lines constructed entirely within 500 feet of an

[14] ASC Exhibit B, B-15.
[15] ASC Exhibit B, B-15.
[16] ASC Exhibit B, B-15. The certificate holder proposes to work with the HGP to ensure that there would be no interruptions of service to the plant during reconductoring activities.

existing corridor occupied by a high-voltage transmission line with a capacity of 230-kV or more. The certificate holder would utilize the existing infrastructure, which currently includes a line with a capacity of 230-kV, by upgrading the current 115-kV side of the towers to 230-kV. Therefore, a corridor selection assessment is not necessary for this transmission line.

500-kV Step-Up Substation

In order to tie in to the open bay at the McNary Substation, the voltage of the transmission line must be stepped up from 230-kV to 500-kV. Therefore, the certificate holder would locate a 500-kV step-up substation south of the BPA McNary Substation. The 500-kV transformer yard would be open-air, of alternating current, and constructed on a leveled and graveled area approximately 3 acres in size and surrounded by a security fence.

Additionally, an underground cable would be required to connect the 500-kV step-up substation to the McNary Substation tie-in location. The underground cable would be 477 feet long and installed in a concrete-encased duct bank approximately 2 feet wide by 2 feet high, with 3 feet of cover. A fenced termination structure (riser) occupying about 0.51 acres would also be constructed to connect the underground line to the aboveground McNary lines. The riser termination structure would bring the underground cable into the McNary Substation.[17]

Interconnecting Water Pipelines

The certificate holder would use the Port of Umatilla as the source of all non-potable water required to meet the Station's needs. The certificate holder would install a pipe to connect the Station to the existing Port of Umatilla water, which would be constructed below grade with a trench under the railroad tracks. The new pipeline would be approximately 208 feet long and 12 to 14 inches in diameter.

Cooling tower blowdown[18] from the Station would be reclaimed and sent to the cooling tower basin of the HGP for reuse as circulating water for the HGP. An additional wastewater pipeline would be constructed from the Station to the HGP to reclaim this blowdown. The pipeline would be approximately 538 feet in length, below grade, and 10 to 12 inches in diameter. As discussed below, if the Station is unable to send cooling tower blowdown to the HGP, the certificate holder would install a zero liquid discharge system.[19]

[17] ASC Exhibit B, B-16.

[18] Cooling tower blowdown is the flushing of a portion of high mineral concentration cooling tower system water down the drain, while simultaneously replacing it with fresh water. This process dilutes the system water mineral concentrations that steadily increase due to water evaporation. PERAMD1Doc18 What is Cooling Tower Blowdown.

[19] ASC Exhibit B, B-16.

Zero Liquid Discharge System (Alternative Scenario)

As explained in the ASC, Lamb Weston's Water Pollution Control Facilities permit allows Lamb Weston's facility to manage and dispose of the HGP's wastewater by land application for beneficial use on the North Farm and Madison Farm in accordance with the Operations, Monitoring and Management Plan approved by the Oregon Department of Environmental Quality (DEQ). Lamb Weston has not yet indicated that it would accept reclaimed water from the HGP that was provided by the Station (see Section III.B., *Organizational Expertise* of this order). If Lamb Weston is not able to accept reclaimed water from the HGP that has come from the Station, the certificate holder would install a Zero Liquid Discharge (ZLD) system.[20]

As described in the ASC, the ZLD system would consist of a clarifier, a high efficiency reverse osmosis (HERO) system and a crystallizer. In this system, cooling tower blowdown and miscellaneous plant wastewaters would first be routed to the clarifier to remove suspended solids. The clarifier effluent would then enter the HERO system. Reject water from the HERO system would be sent to the crystalizer for complete crystallization and precipitation of solids. An electric boiler would be used to generate low pressure steam for the crystallization process.[21] The system would be sized to approximately 140 gallons per minute (gpm) of blowdown from the cooling tower and miscellaneous plant wastewaters. A 200,000-gallon tank would handle any potential fluctuations in the operation of the ZLD system. Effluent from the ZLD system could be returned to the cooling tower basin as makeup water, and the solids would be transported offsite as waste. The certificate holder estimates that 16,830 pounds per day of solids would be produced and transported offsite at a frequency of one truck load per day.[22] With a ZLD system, the electrical output would be approximately 411.9 megawatts, with the actual output dependent upon the technology selected, as opposed to the proposed 415 megawatts. The certificate holder attributes the decrease entirely to the ZLD system.[23]

Utility Lines

The certificate holder would add two new telecommunication lines to connect the Station telephone and data system to the nearby City of Hermiston system. Both lines would be located in a utility corridor. The specific details on placement location are depicted in the ASC at Exhibit B, Figure B-3.

Temporary Construction Facilities

The certificate holder would develop temporary construction facilities – including five construction offices, construction parking, construction laydown, and temporary storage of soil

[20] ASC Exhibit B, B-17.
[21] ASC Exhibit B, B-17.
[22] ASC Exhibit B, B-17.
[23] RFA Attachment 11, Exhibit Y, Appendix Y-1.

displaced during construction – in an additional area adjacent to the Station. The temporary construction area totals approximately 5.11 acres and would be located to the southwest of the Station. The specific location is depicted in the ASC at Exhibit B, Figure B-2.

I.C. Description of Approved Facility Site Location

As defined in OAR 345-001-0010(55), the term "site boundary" means the perimeter of the site of a proposed energy facility, its related or supporting facilities, all temporary laydown and staging areas and all corridors proposed by the applicant. "Site" means all land upon which an energy facility and its related or supporting facilities is located or proposed to be located.[24] "Corridor" means a continuous area of land not more than one-half mile in width and running the entire length of a proposed transmission line or pipeline.[25]

The site boundary includes portions of unincorporated Umatilla County, the City of Umatilla, and the City of Umatilla urban growth area (UGA). The Station and the natural gas pipeline corridor would be located entirely within unincorporated Umatilla County. The transmission line corridor crosses unincorporated lands within Umatilla County and also intersects both the City of Umatilla and the City's UGA en route to the McNary Substation. The step-up substation and the underground transmission line would be located entirely within the City of Umatilla's UGA (outside the city limits).[26]

The Station would be located approximately 5 miles southwest of Hermiston, Oregon, adjacent to the existing HGP in Township 4 North, Range 28 East, Willamette Meridian. From the Station, the supporting natural gas lateral pipeline would be routed 4.63 miles south and the transmission line would be routed 11.59 miles north. Overall, the certificate holder estimates approximately 23 acres of permanent impact and 37 acres of temporary impact.[27] The Station would be accessed via Westland Road, which provides access to Interstate Highways 82 and 84. The Station location is currently clear of any significant structures or vegetation.[28]

I.D. Procedural History

The Council issued the *Final Order on the Application for Site Certificate* (*Final Order on the ASC*) for the Perennial Wind Chaser Station on September 18, 2015. The site certificate became effective upon execution on September 23, 2015.

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[24] ORS 469.300(25).
[25] OAR 345-001-0010(13).
[26] ASC Exhibit K, K-6.
[27] ASC Exhibit C, C-2.
[28] ASC Exhibit B, B-2.

II. AMENDMENT PROCESS

II.A. Requested Amendment

The certificate holder requests that the Council approve changes to the site certificate to extend the construction commencement and completion deadlines. In accordance with the existing site certificate, construction must begin three years after the effective date of the site certificate (that is, before September 23, 2018) and construction must be completed by September 23, 2021. The RFA requests to extend each of these construction deadlines by two years, for a requested construction commencement date of September 23, 2020 and a requested construction completion date of September 23, 2023.

OAR 345-027-0360(1)(d) requires that the certificate holder provide the specific language of the site certificate, including conditions, that the certificate holder proposes to change, add or delete through the amendment. The certificate holder proposes altering the dates contained within Conditions A.1 and A.2 to reflect the requested changes to the construction commencement and completion deadlines.

II.B. Amendment Review Process

Council rules describe the differences in review processes for the Type A and Type B review paths at OAR 345-027-0351. The Type A review is the standard or "default" amendment review process for changes that require an amendment. A key procedural difference between the Type A and Type B review process is that the Type A review requires a public hearing on the draft proposed order, and provides an opportunity to request a contested case proceeding on the Department's proposed order. Another difference between the Type A and Type B review process relates to the time afforded to the Department in its determination of completeness of the amendment and issuance of the draft proposed order. It is important to note that Council rules authorize the Department to adjust the timelines for these specific procedural requirements, if necessary.

A certificate holder may submit an amendment determination request to the Department for a written determination of whether a request for amendment justifies review under the Type B review process. The certificate holder has the burden of justifying the appropriateness of the Type B review process described in OAR 345-027-0351(3). The Department may consider, but is not limited to, the factors identified in OAR 345-027-0357(8) when determining whether to process an amendment request under Type B review.

On August 2, 2018, the certificate holder submitted a Type B review amendment determination request (Type B Review ADR) in conjunction with its preliminary RFA. The Type B Review ADR

requested that the Department review and determine if the RFA should be reviewed under the Type B review process. On August 22, 2018, the Department determined that the certificate holder had not justified the appropriateness of the Type B review process, because the Type B Review ADR did not provide supporting analysis for OAR 345-027-0357(8) factors (a) through (d). Therefore, the Department determined that Type A review is the appropriate review process for the RFA.[29]

In accordance with OAR 345-027-0363(2), on September 7, 2018 the Department determined that the RFA was incomplete and issued a request for additional information.[30] On December 10, 2018, following review of the certificate holder's October 11, 2018 response[31] to the information request, the Department issued its second request for additional information.[32] The certificate holder provided responses to the second information request on January 10, February 22, and June 19, 2019.[33]

After reviewing the responses to its information request, on June 21, 2019 the Department determined that the RFA was complete. Under OAR 345-027-0363(5), an RFA is complete when the Department finds that a certificate holder has submitted information adequate for the Council to make findings or impose conditions for all applicable laws and Council standards. On June 28, 2019, the Department posted an announcement on its project website notifying the public that the complete RFA had been received.

As presented in Attachment B of this order, the Department received comments on the preliminary RFA from the following tribal and local governments and state agencies:

- Confederated Tribes of the Warm Springs Indian Reservation
- Umatilla County (Special Advisory Group)
- City of Umatilla (Special Advisory Group)
- Oregon Department of Fish and Wildlife
- Oregon Department of Land Conservation and Development

[29] PERAMD1Doc3 Type B Review ADR Evaluation and Response 2018-08-22.
[30] PERAMD1Doc9 ODOE Determination and Request for Additional Information 2018-09-07.
[31] PERAMD1Doc23 Revised pRFA 2018-10-11.
[32] PERAMD1Doc29 ODOE Determination and Request for Additional Information 2018-12-10.
[33] PERAMD1Doc24 Revised pRFA 2019-01-10, PERAMD1Doc25 Revised pRFA 2019-02-22, and PERAMD1Doc27 Revised pRFA 2019-06-19.

II.C. Council Review Process

Draft Proposed Order

The Department issued the draft proposed order for public comment on July 8, 2019. Notice of public hearing was issued on July 8, 2019 and distributed to all persons on the Council's general mailing list, to the special mailing list established for the facility, to a list of reviewing agencies as defined in OAR 345-001-0010(52), and to the property owner list as described in OAR 345-021-0010(1)(f).

The 45-day comment period extended from July 8, 2019 through the close of the draft proposed order public hearing (6:57 p.m.) at the August 22, 2019 Council meeting. In addition to accepting written comments during the comment period, the Council also accepted oral testimony at the public hearing.[34] The Department presented to Council a summary of the draft proposed order prior to the public hearing.

The following day (at the August 23, 2019 Council meeting), the Department presented to the Council a summary of some of the comments received; however, due to the comment volume and complexity of some of the comments, the Council did not conclude its review of the draft proposed order and comments received on the record of the public hearing until its regularly scheduled Council meeting on September 27, 2019.

Over 1,600 written comments were received on the record of the public hearing, all of which have been provided to the Council in their entirety. The Council received oral testimony from six individuals in addition to the certificate holder during the August 22nd public hearing. Attachment C of this order contains an index presenting each commenter's name, organization (if applicable), and the date the Department received the comment. Attachment C also contains a copy of the comments and a table showing where changes were made in the proposed order based on the issues raised.

Issues raised within the Council's jurisdiction and related to the amendment request are addressed under the applicable standards in Section III of this order. Issues raised that are outside the Council's jurisdiction or are not applicable to the Council's decision on this RFA are not further addressed in this order. The September 12, 2019 staff report to the Council provides a summary and analysis of comments received on the record of the draft proposed order public hearing.[35]

[34] OAR 345-027-0367(6).
[35] PERAMD1Doc44 Agenda Item K Perennial DPO – Staff Report 2019-09-12.

Proposed Order and Contested Case Request on Proposed Order

On October 2, 2019, the Department issued the proposed order, taking into consideration Council comments provided during Council's review of the draft proposed order and comments received "on the record of the public hearing" (i.e., oral testimony provided at the public hearing and written comments received by the Department after the date of the notice of the public hearing and before the close of the public hearing), including comments from reviewing agencies, special advisory groups, or tribal governments. Concurrent with the issuance of the proposed order, the Department issued a notice of the opportunity to request a contested case and a public notice of the proposed order.[36] Only those persons who commented in person or in writing on the record of the public hearing were eligible to request a contested case proceeding on the proposed order. Pursuant to the notice of opportunity to request a contested case, the deadline to request a contested case was 5:00 pm on November 1, 2019. The Friends of the Columbia Gorge, Columbia Riverkeeper, and Oregon Wild (collectively, "Requesters") jointly filed a timely request for contested case proceeding on the proposed order by the deadline.

A summary of issues raised in the request for contested case received is provided below. The analysis and Council decision denying the request for a contested case proceeding are provided in the November 2019 Order on Request for Contested Case on the Proposed Order on Request for Amendment 1 to the Perennial Wind Chaser Station Site Certificate (November Order on Request).

Summary of Issues Raised by Requesters

Issue A: Requesters contend that, based on the Supreme Court's August 1, 2019 decision[37] related to the site certificate amendment rules adopted by Council in October 2017, the amendment request was submitted pursuant to invalid rules and, because the construction commencement deadline has passed, the site certificate for the facility has expired. Requesters also contend that the temporary rules are invalid, and therefore contend that these rules cannot be used to review, process, or approve the RFA. Requesters further state that "at a minimum, the Council should stay further action on Perennial's RFA until the Supreme Court has issued a ruling on the validity of the 'temporary' rules."

[36] See OAR 345-027-0371.
[37] As of the date of this final order, the Oregon Supreme Court had not yet entered its judgement.

Issue B: Requesters contend that the Department should "never have accepted the RFA as complete" because "Perennial failed to submit accurate information regarding the status of its DEQ permit" that the Requesters assert was required by the division 21 rules at OAR 345-021-0000(7) and (10) and OAR 345-021-0010(1)(e)(D).

Issue C: Requesters contend that the Department further erred in determining that the RFA was complete "because Perennial's purported explanation for why it needs an extension of the construction deadlines for the Project is legally inadequate." Requesters argue that Perennial's explanation does not meet the requirements of OAR 345-027-0085(1) because the certificate holder did not include additional details (such the steps it has taken to try to obtain a power purchase agreement) or explain why each construction deadline must be extended by a full two years.

Issue D: Requesters contend that the Proposed Order fails to consider potential methane emissions from operation of the Perennial Wind Chaser Station, and assert that the "Council's Carbon Standard specifically requires that methane be considered as part of the carbon emissions analysis. See OAR 345-024-0590(2)."

Issue E: Requesters contend that the additional information that has become available about the impact of "fracked gas" (hydraulic fracturing) on the climate, as well as the effects of climate change itself, since the Council issued the original site certificate is information that the Council should consider in its review of the RFA. Requesters point to the requirement at OAR 345-027-0375(2)(b) that the Council 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 commencement or completion deadlines. The Requesters argue that changes in fact or law that the Council must consider include Oregon's evolving policies with respect to climate change as well as scientific literature published since the site certificate was executed that "demonstrate the cradle-to-grave climate change impacts of fracked gas."

Summary of Council Review of Requests for Contested Case

Council considered whether the above summarized issues warranted a contested case proceeding at its November 21-22, 2019 meeting, held in The Dalles, Oregon. At that meeting, Council found that none of the issues justified a contested case. Based on Council deliberation, Council issued the November Order on Request documenting the reasoning and analysis for denying a contested case proceeding on the issues raised in contested case request received. As provided in the Notice of Appeal in the November Order on Request, persons whose request for a contested case have been denied by the final order may file a petition for reconsideration with the Council within 60 days after the date of service of the order (OAR 345-001-0080). Additionally, persons whose request for a contested case have been denied by the final order may seek judicial review of the order, without first filing a petition for reconsideration with the

Council. Petitions for judicial review shall be filed within 60 days following the date of service of the order, unless a petition for reconsideration has been filed, in which case the petition for judicial review must be filed within 60 days following the date any order denying a petition for reconsideration is served. If the Council does not issue an order in response to a petition for reconsideration, per OAR 345-001-0080(4) and ORS 183.484(2), the petition for reconsideration shall be deemed denied the 60th day following the date the petition was filed, and in such case, a petition for judicial review shall be filed within 60 days only following such date.

Final Order

On November 22, 2019, the Council issued this final order approving the site certificate amendment request based upon the applicable laws and Council standards required under OAR 345-027-0375(2) and in effect on the dates described in OAR 345-027-0375(3). The Council's final order is subject to judicial review by the Oregon Supreme Court as provided in ORS 469.403. A petition for judicial review of the Council's approval of an application for amended site certificate must be filed with the Supreme Court within 60 days after the date of service of the Council's final order (see Notice of Appeal on final page of order for additional details on date of service).[38]

II.D Applicable Division 27 Rule Requirements

On August 22, 2019, the Council adopted temporary rules governing the process for amending site certificates. The temporary rules are in effect through February 17, 2020 (or until superseded). Amongst other changes, the temporary rules replaced the amendment processing rules contained in OAR 345, Division 27. The temporary rules also include renumbering the Division 27 ruleset to govern site certificate amendment processing. The temporary rules include rules numbered in the Division 27, "-0300" series. References in this order reflect the temporary rule numbering. However, rule references in the preliminary and complete requests for amendment, as well as the Department's draft proposed order, all of which were released prior to the August 22, 2019 adoption of temporary rules, include reference to the prior Division 27 ruleset.

As stated in OAR 345-027-0311(1), "The rules in this division apply to all requests for amendment to a site certificate and amendment determination requests for facilities under the Council's jurisdiction that are submitted to, or were already under review by, the Council on or after the effective date of the rules. The Department and Council will continue to process all

[38] ORS 469.403 and OAR 345-027-0371(12).

requests for amendment and amendment determination requests submitted on or after October 24, 2017 for which Council has not made a final decision prior to the effective date of these rules, without requiring the certificate holder to resubmit the request or to repeat any steps taken as part of the request prior to the effective date of these rules." This reference includes the review at hand, the Perennial Wind Chaser Station Request for Amendment 1.[39]

A site certificate amendment is necessary under OAR 345-027-0350(3) because the certificate holder requests to extend the construction beginning and completion deadlines. Additionally, OAR 345-027-0385 imposes specific requirements relating to a request for amendment to extend construction deadlines and OAR 345-027-0375 sets the scope of Council's review. OAR 345-027-0375(2)(b) provides that the Council shall 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 commencement or completion deadlines. The Department interprets OAR 345-027-0375(2)(b) as requiring the review of any change to facility design as well as any change to the existing environment, or changes in law.

The type A amendment review process is the default amendment review process and consists of OARs 345-027-0359, -0360, -0363, -0365, -0367, -0371 and -0375.[40] As previously explained, the Department and Council are reviewing this RFA under the Type A review process based on an evaluation of the factors listed in OAR 345-027-0357(8).[41]

[39] On the record of the draft proposed order, numerous commenters asserted that, based on the Supreme Court's August 1, 2019 decision related to the site certificate amendment rules adopted by Council in October 2017, the amendment request was submitted pursuant to invalid rules and, because the construction commencement deadline has passed, the site certificate for the facility is "expired, void, and cannot be amended." As explained here, the Council adopted temporary rules on August 22, 2019 and is reviewing the RFA under these rules, which are in effect through February 17, 2020 (or until superseded).
[40] OAR 345-027-0351(2).
[41] PERAMD1Doc3 Type B Review ADR Evaluation and Response 2018-08-22.

III. REVIEW OF THE REQUESTED AMENDMENT

Under ORS 469.310, the Council is charged with ensuring that the "siting, construction and operation of energy facilities shall be accomplished in a manner consistent with protection of the public health and safety." ORS 469.401(2) further provides that the Council must include in the amended site certificate "conditions for the protection of the public health and safety, for the time for completion of construction, and to ensure compliance with the standards, statutes and rules described in ORS 469.501 and ORS 469.503." The Council implements this statutory framework by adopting findings of fact, conclusions of law, and conditions of approval concerning the amended facility's compliance with EFSC standards set forth in OAR Chapter 345, Divisions 22 and 24 as well as all other applicable statutes, rules and standards (including those of other state or local agencies).

As discussed at the August 23, 2019 Council meeting in the context of comments received on the record of the draft proposed order public hearing,[42] ORS 469.501(1)(L) explicitly prohibits the Council from adopting a need standard for generating facilities: "The council shall not adopt a standard requiring a showing of need or cost-effectiveness for generating facilities…" Similarly, ORS 469.310 states, "…It is furthermore the policy of this state, notwithstanding ORS 469.010(2)(f) [part of Oregon's energy policy] and the definition of cost- effective in ORS 469.020, that the need for new generating facilities, as defined in ORS 469.503, is sufficiently addressed by reliance on competition in the market rather than by consideration of cost-effectiveness and shall not be a matter requiring determination by the Energy Facility Siting Council in the siting of a generating facility, as defined in ORS 469.503." Accordingly, the Council cannot consider the "need" for the facility in its review of the amendment request.

III.A. General Standard of Review: OAR 345-022-0000

> *(1) To issue a site certificate for a proposed facility or to amend a site certificate, the Council shall determine that the preponderance of evidence on the record supports the following conclusions:*
>
> > *(a) The facility complies with the requirements of the Oregon Energy Facility Siting statutes, ORS 469.300 to ORS 469.570 and 469.590 to 469.619, and the standards adopted by the Council pursuant to ORS 469.501 or the overall public benefits of the facility outweigh the damage to the resources protected by the standards the facility does not meet as described in section (2);*

[42] Some commenters stated that Oregon needs the facility to replace declining coal power in the region and to help balance intermittent resources like wind energy, while other commenters stated that Oregon should forgo future investments in fossil fuel infrastructure in favor of renewable energy resources.

(b) Except as provided in OAR 345-022-0030 for land use compliance and except for 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 facility complies with all other Oregon statutes and administrative rules identified in the project order, as amended, as applicable to the issuance of a site certificate for the proposed facility. If the Council finds that applicable Oregon statutes and rules, other than those involving federally delegated programs, would impose conflicting requirements, the Council shall resolve the conflict consistent with the public interest. In resolving the conflict, the Council cannot waive any applicable state statute.

** * **

(4) In making determinations regarding compliance with statutes, rules and ordinances normally administered by other agencies or compliance with requirement of the Council statutes if other agencies have special expertise, the Department of Energy shall consult such other agencies during the notice of intent, site certificate application and site certificate amendment processes. Nothing in these rules is intended to interfere with the state's implementation of programs delegated to it by the federal government.

Findings of Fact

OAR 345-022-0000 provides the Council's General Standard of Review and requires the Council to find that a preponderance of evidence on the record supports the conclusion that the proposed amendments comply with the requirements of EFSC statutes and the siting standards adopted by the Council and that the proposed amendments comply with all other Oregon statutes and administrative rules applicable to the issuance of an amended site certificate for the facility.

The requirements of OAR 345-022-0000 are discussed in the sections that follow. As discussed above, the Department consulted with other state agencies, Umatilla County, and the City of Umatilla during review of the RFA to aid in the evaluation of the proposed amendments' compliance with statutes, rules and ordinances otherwise administered by other agencies. Additionally, in some circumstances the Department relied upon these reviewing agencies' special expertise in evaluating compliance with the requirements of Council standards.

OAR 345-022-0000(2) and (3) apply to RFAs where a certificate holder has shown that the proposed amendments cannot meet Council standards, or has shown that there is no reasonable way to meet the Council standards through mitigation or avoidance of the damage to protected resources; and, for those instances, establish criteria for the Council to evaluate in making a balancing determination. The certificate holder does not assert that the proposed amendments cannot meet an applicable Council standard. Therefore, OAR 345-022-0000(2) and (3) do not apply to this review.

Appropriateness of Request for Amendment to Extend Construction Deadlines [OAR 345-027-0385]

In accordance with OAR 345-027-0385, for energy facilities with site certificates approved prior to October 24, 2017, there is no specified maximum number of allowable timeline extensions but each extension can only be for up to two years. Perennial Wind Chaser Station was initially approved by EFSC in September 2015. This RFA requests to extend the construction commencement deadline from 2018 to 2020. If the Council grants the request, the construction commencement date would be five years after the issuance of the initial site certificate. The Department notes that while there is no maximum allowable time extension for the Perennial Wind Chaser Station, given that the current RFA would result in a construction commencement deadline extension of a total of two years, the extension request would allow a timeline to construct the facility that remains less than what would be available to a site certificate holder under the OAR 345-027-0385(3) and (4), which applies to energy facilities approved by EFSC after October 24, 2017.

OAR 345-027-0385(5)(c) provides that "when considering whether to grant a request for amendment for a deadline extension made under this section, the Council shall consider how many extensions it has previously granted." This is the first construction deadline extension request for this facility. The certificate holder requests an extension of the construction deadlines to allow it to obtain a power purchase agreement for power generated by the facility.[43] OAR 345-027-0385(1) requires that a certificate holder, in a request for construction timeline extension, must provide an explanation of the need for a timeline extension. The certificate holder has met this obligation.

While the certificate holder must, and did, provide its explanation of the need for an extension to address the requirements of OAR 345-027-0385(1), Council rules include no substantive review criteria for why the extension is needed and requested.[44] Council is not required to find, and rules do not guide a finding, as to what constitutes an "acceptable" need for a timeline extension. If the Department were to determine that the certificate holder failed to meet the OAR 345 Division 27 information requirement to include an explanation of the need for the extension, then it would determine the amendment request to be incomplete and request further information during its completeness review.

[43] RFA Section 1.

[44] On the record of the draft proposed order public hearing, some commenters argued that the certificate holder's explanation of the need for a timeline extension is insufficient because the certificate holder did not include additional details (such the steps it has taken to try to obtain a power purchase agreement) or explain why each construction deadline must be extended by a full two years.

Because the information required under OAR 345-027-0385(1) was provided by the certificate holder, the Department recommends the Council consider the merits of the amendment request and the certificate holder's ability to satisfy the requirements of Council standards and other applicable statutes, rules and ordinances. The stated need for more time to obtain a power purchase agreement does not bear a relationship to the ability of the facility to comply with all applicable laws and Council standards.

Certificate Expiration [OAR 345-027-0313]

Under OAR 345-027-0313, in order to avoid expiration of the site certificate, the certificate holder must begin construction of the facility no later than the construction beginning date specified in the site certificate, unless expiration of the site certificate is suspended pending final action by the Council on a request for amendment to a site certificate pursuant to OAR 345-027-0385(2). The certificate holder submitted the request to extend the construction commencement and completion deadlines before the applicable construction commencement deadline and therefore satisfied the requirements of OAR 345-027-0385(1).

In accordance with the existing site certificate, construction must begin three years after the effective date of the site certificate (that is, before September 23, 2018) and construction must be completed by September 23, 2021. The facility was approved for construction in the site certificate prior to October 24, 2017; therefore, OAR 345-027-0385(5) requires that, if the Council grants the requested deadline extension, the new deadlines can be no more than two years from the deadlines currently in effect.[45] Accordingly, the Council amends site certificate Conditions A.1 and A.2 to align with current OAR 345 Division 27 requirements. In addition, the Council also makes minor administrative adjustments to these conditions to update references to the applicable Oregon Administrative Rule in order to reflect the relocation of the mandatory condition on which Conditions A.1 and A.2 are based from Division 27 to Division 25:[46]

> **Amended Condition A.1:** The certificate holder shall begin construction of the facility by September 23, 2020 ~~within three years after the effective date of the site certificate. Under OAR 345-015-0085(9), the site certificate is effective upon execution by the Council chair and the applicant~~.

[45] OAR 345-027-0385(5)(d) states, "If a request for amendment for a deadline extension made under this section is granted, the Council shall specify new deadlines for beginning or completing construction that are not more than two years from the deadlines in effect before the Council grants the amendment."

[46] Since the time the Council issued the site certificate in 2015, the Council reorganized the OAR 345, Division 27 and Division 25 rules and relocated the mandatory conditions from Division 27 to Division 25.

[Final Order Condition A.1; AMD1; Mandatory Condition 345-02~~7~~5-00~~2~~006(4)]

Amended Condition A.2: The certificate holder shall complete construction of the facility by September 23, 2023 ~~within six years after the effective date of the site certificate~~.

[Final Order Condition A.1; AMD1; Mandatory Condition 345-02~~7~~5-00~~2~~006(4)]

Mandatory Conditions in Site Certificates [OAR 345-025-0006]

OAR 345-025-0006 lists certain conditions that the Council must adopt in every site certificate. Since the time the Council issued the site certificate in 2015, the Council reorganized the OAR 345, Division 27 and Division 25 rules. The Council makes minor administrative adjustments to the following site certificate conditions to update references to Oregon Administrative Rules to reflect the relocation of the mandatory conditions from Division 27 to Division 25: Conditions A.1 through A.9, Condition B.5, Conditions C.5 through C.7, and Conditions G.1 through G.3.

Site Specific Conditions [OAR 345-025-0010][47]

In addition to mandatory conditions imposed on all facilities, the Council rules also include "site specific" conditions at OAR 345-025-0010 that the Council may include in the site certificate to address issues specific to certain facility types or proposed features of facilities. Since the time the Council issued the site certificate in 2015, the Council reorganized the OAR 345, Division 27 and Division 25 rules. The Council makes minor administrative adjustments to site certificate Conditions A.10, A.11, and O.1 to update references to Oregon Administrative Rules to reflect the relocation of the site-specific conditions from Division 27 to Division 25.

[47] Commenters expressed concern on the record of the draft proposed order public hearing about the health and safety risks that could occur if the pipeline ruptured. As described in RFA Attachment 5, there are no known slope hazards along the pipeline route; the topography is a flat agricultural landscape with no mapped landslides. Existing site certificate Condition A.11 requires the certificate holder to design, construct and operate the lateral natural gas pipeline in accordance with the requirements of the U.S. Department of Transportation as set forth in Title 49 Code of Federal Regulations, Part 192. This condition is based on the Site-Specific Condition at OAR 345-025-0010(3). In addition, existing Condition A.10 (which is based on the Site-Specific Condition at OAR 345-025-0010(2)) requires the certificate holder to submit to the Department copies of all incident reports involving the pipeline required under 49 CFR § 191.15. The gas lateral would be owned and operated by Cascade Natural Gas Corporation. Cascade Natural Gas Corporation provides natural gas service to over 260,000 customers in Oregon and Washington (ASC Exhibit D, pp. D-1 and D-2).

Construction and Operation Rules for Facilities [OAR Chapter 345, Division 26]

The Council has adopted rules at OAR Chapter 345, Division 26 to ensure that construction, operation, and retirement of facilities are accomplished in a manner consistent with the protection of the public health, safety, and welfare and protection of the environment. These rules include requirements for compliance plans, inspections, reporting and notification of incidents. The certificate holder must construct the facility substantially as described in the amended site certificate [OAR 345-025-0006(3)] and the certificate holder must construct, operate, and retire the facility in accordance with all applicable rules adopted by the Council in OAR Chapter 345, Division 26.[48]

The Council adopts the following condition to support the Department's review of ongoing site certificate compliance, in accordance with OAR Chapter 345, Division 26:

> **New Condition A.12:** At least 90 days prior to beginning construction (unless otherwise agreed to by the Department), the certificate holder shall submit to the Department a compliance plan documenting and demonstrating actions completed or to be completed to satisfy the requirements of all terms and conditions of the amended site certificate and applicable statutes and rules. The plan shall be provided to the Department for review and compliance determination for each requirement. The Department may request additional information or evaluation deemed necessary to demonstrate compliance.
>
> [AMD1 Condition A.12.]

Conclusions of Law

Based on the foregoing findings of fact and conclusions of law, and subject to compliance with the existing, new, and amended site certificate conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would satisfy the requirements of OAR 345-022-0000.

III.B. Organizational Expertise: OAR 345-022-0010

> *(1) To issue a site certificate, the Council must find that the applicant has the organizational expertise to construct, operate and retire the proposed facility in*

[48] Applicable rule requirements established in OAR Chapter 345, Division 26 include OAR 345-026-0005 to OAR 345-026-0170.

compliance with Council standards and conditions of the site certificate. To conclude that the applicant has this expertise, the Council must find that the applicant has demonstrated the ability to design, construct and operate the proposed facility in compliance with site certificate conditions and in a manner that protects public health and safety and has demonstrated the ability to restore the site to a useful, non-hazardous condition. The Council may consider the applicant's experience, the applicant's access to technical expertise and the applicant's past performance in constructing, operating and retiring other facilities, including, but not limited to, the number and severity of regulatory citations issued to the applicant.

(2) The Council may base its findings under section (1) on a rebuttable presumption that an applicant has organizational, managerial and technical expertise, if the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program.

(3) If the applicant does not itself obtain a state or local government permit or approval for which the Council would ordinarily determine compliance but instead relies on a permit or approval issued to a third party, the Council, to issue a site certificate, must find that the third party has, or has a reasonable likelihood of obtaining, the necessary permit or approval, and that the applicant has, or has a reasonable likelihood of entering into, a contractual or other arrangement with the third party for access to the resource or service secured by that permit or approval.

(4) If the applicant relies on a permit or approval issued to a third party and the third party does not have the necessary permit or approval at the time the Council issues the site certificate, the Council may issue the site certificate subject to the condition that the applicant shall not commence construction or operation as appropriate until the third party has obtained the necessary permit or approval and the applicant has a contract or other arrangement for access to the resource or service secured by that permit or approval.

Findings of Fact

Subsections (1) and (2) of the Council's Organizational Expertise standard require that the certificate holder demonstrate its ability to construct, operate, and retire the facility in compliance with Council standards and all site certificate conditions, as well as its ability to restore the site to a useful, non-hazardous condition. The Council may consider the certificate holder's experience and past performance in constructing, operating and retiring other facilities in determining compliance with the Council's Organizational Expertise standard. Subsections (3) and (4) address the certificate holder's reliance upon third party permits.

To demonstrate compliance with the Council's Organizational Expertise standard, the certificate holder provided evidence regarding the certificate holder's experience and organizational expertise to construct, operate and retire the facility in ASC Exhibit A (Applicant Information); Exhibit D (Organizational Expertise); Exhibit E (Permits); Exhibit M (Financial Capability); and Exhibit W (Facility Retirement). The Council addressed the Organizational Expertise standard in Section IV.B.1 of the *Final Order on the ASC*. The Council concluded that, subject to site certificate conditions B.1 through B.7, the certificate holder had the organizational expertise to design, construct, and operate the facility in a manner that protected public health and safety. These conditions require the certificate holder to select qualified contractors; notify the Department prior to commencing construction; require contractors to comply with all applicable laws, regulations, and site certificate requirements; assume the responsibility for any matter of non-compliance with the site certificate; prevent the development of any conditions on the site that would preclude restoration of the site to a useful, non-hazardous condition; obtain or ensure its contractors obtain all necessary permits or approvals; and provide evidence that its third parties have obtained all necessary permits or approvals and that the certificate holder has access to the resources or services secured by the permits or approvals.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. In the pRFA, the certificate holder provided updated information relevant to its organizational expertise (including staffing changes), the certificate holder's ability to restore the site to a useful-non-hazardous condition, and the three third-party permits on which it intends to rely.

Compliance with Council Standards and Site Certificate Conditions

Perennial-WindChaser LLC is a wholly-owned subsidiary of Perennial Power Holdings, Inc. (PPH), which is a wholly-owned subsidiary of Sumitomo Corporation and Sumitomo Corporation of America. Perennial-WindChaser LLC, is a project-specific LLC and therefore relies upon the organizational expertise and experience of PPH, Sumitomo Corporation, and Sumitomo Corporation of America.[49] The Council previously concluded (in Section IV.B.1 of the *Final Order on the ASC*) that Perennial's parent companies have significant national and international experience. The Council further noted that one of these parent companies, PPH, has experience staffing and operating an EFSC-jurisdictional natural gas power plant in Umatilla County (the Hermiston Generating Plant).

[49] PERAPPDoc1 Complete Application Combined, ASC Exhibit D, Sections D.2 and D.3.

During oral testimony at the draft proposed order public hearing, one individual informed the Council that Perennial Power Holdings, Inc. owns a 40 percent stake in American Bituminous Power Partners (an 80 MW coal waste power plant in West Virginia). The individual referred to a 2018 Associated Press article that reported that American Bituminous Power Partners was at risk of bankruptcy,[50] and to a U.S. Environmental Protection Agency (EPA) finding that the coal waste plant was not fully in compliance with Clean Air Act requirements.

Perennial Power Holdings, Inc. does not operate the West Virginia power plant. Perennial Power Holdings, Inc.'s portfolio includes one existing resource in the west, the Hermiston Generating Plant. The Hermiston Generating Plant operates under a site certificate issued by the Council. The RFA states that Hermiston Generating Plant has had no regulatory compliance issues since the ASC was submitted in 2014.[51] Based on review of the record for the facility, the Department confirms that, to date, no regulatory citations have been issued by the Department for the Hermiston Generating Plant. In addition, Hermiston Generating Plant has had no regulatory citations associated with its DEQ air quality permits since it began operation.[52]

Based upon the qualifications of the certificate holder's parent companies, and based on PPH's (one of the certificate holder's parent companies) ongoing compliance with the site certificate for another EFSC-jurisdictional facility, the Council continues to find that the certificate holder has the ability to design, construct, operate, and retire the facility in compliance with Council standards and site certificate conditions.

Public Health and Safety

The certificate holder's ability to construct and operate the facility in a manner that protects public health and safety is addressed in Section III.C, *Structural Standard*; Section III.M, *Public Services*; and Section III.P, *Siting Standards for Transmission Lines*, of this order. Based on the reasoning and analysis provided in those sections, the Council finds that the requested extension of the construction deadlines would not impact the certificate holder's ability to design, construct, and operate the facility in a manner that protects public health and safety.

Ability to Restore the Site to a Useful, Non-Hazardous Condition

[50] PERAMD1Doc45 AP News_Coal waste plant in fight in struggle to stay open 2018-07-02.
[51] RFA Section 2.5.1.
[52] PERAMD1Doc44 Agenda Item K Perennial DPO - Staff Report 2019-09-12, Attachment 1.

The RFA includes an updated estimate of the cost to restore the site to a useful, non-hazardous condition. In addition, the certificate holder provided a letter from MUFG Bank, Ltd. dated October 5, 2018 stating the bank's willingness to arrange the required letter of credit subject to receipt of further information, the bank's customary due diligence, and internal credit approval.[53] This bank is on the list of pre-approved financial institutions for use in 2019 for bonds and letters of credit which was approved by EFSC at their October 25-26, 2018 Council meeting.[54] As described in Section III.G, *Retirement and Financial Assurance*, the Council finds that the certificate holder would continue to satisfy the requirements of the Retirement and Financial Assurance standard subject to compliance with existing conditions and Amended Condition G.4.[55]

ISO 9000 or ISO 14000 Certified Program

OAR 345-022-0010(2) is not applicable because the certificate holder has not proposed to design, construct or operate the facility according to an ISO 9000 or ISO 14000 certified program.

Third-Party Permits[56]

As described in Section IV.B.1 of the *Final Order on the ASC*, the certificate holder would rely on third party state or local permits for construction and operation of the facility. The certificate holder provided an update on each of these permits in its RFA. The first third party permit is the Port of Umatilla's existing water right permit, upon which Perennial would rely to supply the facility with up to 2,000 gallons of water per minute. The Council previously found that because the Port of Umatilla currently holds the permit and provided a letter to Perennial expressing its ability to supply water to the Station, Perennial has demonstrated a reasonable likelihood of entering into a contractual agreement or other arrangement with the Port for access to the resource. The certificate holder attached an updated (May 30, 2018) letter from the Port of Umatilla as Attachment 3 to the RFA. The letter contains the same information previously evaluated by the Council; therefore, the circumstances supporting the Council's previous findings have not changed.

[53] RFA Attachment 7.

[54] MUFG Union Bank, N.A. is on the Council's list of pre-approved financial institutions. The Department's Project Development Officer from the Department's Loan Development division determined that MUFG Union Bank, N.A. and MUFG Bank, Ltd. are "one and the same;" therefore, additional Council approval of MUFG Bank, Ltd. is not required.

[55] As described in Section III.G, *Retirement and Financial Assurance* of this order, the Council amends existing Condition G.4 to require an initial bond or letter of credit amount that reflects the updated site restoration cost estimate.

[56] RFA Section 2.3.1. and *Final Order on the ASC*, Section IV.B.1, Organizational Expertise.

The other two third party permits on which the certificate holder would rely are the site certificate for the Hermiston Generating Project (HGP) and the Water Pollution Control Facilities (WPCF) permit issued by DEQ and held by Lamb Weston. These permits are relevant because Perennial proposes to send reclaimed water from the facility to the HGP as makeup water for the HGP's cooling tower. The HGP currently discharges its reclaimed water to Lamb Weston. Lamb Weston uses the reclaimed water for wash down or irrigation purposes and operates under the WPCF permit. Perennial explains that it expects that the Station would generate suitable wastewater for re-use as makeup water at the HGP because cooling water at the Station would be used inside the Station's turbine equipment, which requires higher water quality specifications than cooling tower makeup water used at the HGP. Perennial states that, due to the anticipated quality of the wastewater, HGP anticipates no difficulty in continuing to meet the requirements of its site certificate and the parameters of its contract with Lamb Weston if it receives wastewater from the Station. Based on this information, and because the third parties (HGP and Lamb Weston) already hold these permits (site certificate and WPCF, respectively), the Council previously found that, subject to Lamb Weston's ability to consent to receipt of the reclaimed water, the certificate holder appeared to have a reasonable likelihood of entering into a contractual or other arrangement with both parties for access to the services. The certificate holder states that the only circumstance that has changed since the Council's previous evaluation is that DEQ renewed Lamb Weston's WPCF permit.[57] Lamb Weston has not yet indicated that it will accept reclaimed water from the HGP that was provided by the Station, but if that decision is made in the future, the certificate holder states that HGP would issue a letter to Perennial indicating acceptance of the Station's reclaimed water. The Council previously imposed Condition B.7, which requires the certificate holder to provide to the Department, prior to construction, proof of agreements between the certificate holder and the third parties regarding access to the resources or services secured by the permits or approvals. The construction deadline extension request and DEQ's renewal of Lamb Weston's WPCF permit do not change the reasoning behind the Council's previous findings, and the Council does not impose additional conditions.

Conclusions of Law

Based on the evidence in the record, and subject to compliance with the existing and amended conditions of approval, the Council finds that the certificate holder would continue to satisfy the requirements of the Council's Organizational Expertise standard.[58]

[57] RFA Section 2.5.1.
[58] See Amended Condition G.4 in Section III.G of this order.

III.C. Structural Standard: OAR 345-022-0020

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that:

(a) The applicant, through appropriate site-specific study, has adequately characterized the seismic hazard risk of the site;

(b) The applicant can design, engineer, and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site, as identified in subsection (1)(a);

(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility; and

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

(2) The Council may not impose the Structural Standard in section (1) to approve or deny an application for an energy facility that would produce power from wind, solar or geothermal energy. However, the Council may, to the extent it determines appropriate, apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

(3) The Council may not impose the Structural Standard in section (1) to deny an application for a special criteria facility under OAR 345-015-0310. However, the Council may, to the extent it determines appropriate, apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

Findings of Fact

As provided in section (1) above, the Structural Standard generally requires the Council to evaluate whether the certificate holder has adequately characterized the potential seismic, geological and soil hazards of the site, and whether the certificate holder can design, engineer and construct the facility to avoid dangers to human safety and the environment from these hazards. Only the standards in section (1) apply to the facility. OAR 345-022-0020(2) and (3) do not apply to this request for amendment because the facility would not produce power from

wind, solar or geothermal energy and the facility is not a special criteria facility as defined in OAR 345-015-0310.

The certificate holder provided information regarding the geological and soil stability within the analysis area in ASC Exhibit H. The Council addressed the Structural Standard in Section IV.C. of the *Final Order on the ASC*, and found that, subject to site certificate conditions C.1 through C.7, the certificate holder had adequately characterized the potential geological and soil hazards of the site and its vicinity, and that the certificate holder can design, engineer and construct the facility to avoid dangers to human safety presented by the non-seismic hazards identified. The conditions require the certificate holder to perform additional site-specific engineering evaluations; design the facility to resist ground shaking from seismic events; implement soil improvement techniques; and to comply with the mandatory conditions at OAR 345-025-0006(12)-(14).

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The request for amendment does not include changes to the site boundary, facility design, facility layout, or other changes that could impact the certificate holder's ability to design, engineer, and construct the facility to avoid dangers to human safety and the environment from seismic, geological, and soils hazards. While the certificate holder's characterization in ASC Exhibit H of the geological and soil stability within the analysis area remains applicable to Council's review of this amendment request, based on consultation with DOGAMI on the request for amendment, additional review of the risks of ground shaking, fault rupture, landslide, and flooding is considered in this order. Furthermore, since the time the Council issued the Perennial Wind Chaser Station site certificate,[59] the Council approved amended language for OAR 345-021-0010(1)(h) (the Division 21 requirements for Exhibit H), OAR 345-022-0020 (the Council's Structural Standard), OAR 345-027-0020 (select mandatory conditions) and OAR 345-050-0060.[60] The rulemaking included, in part, new requirements for an applicant or certificate holder to discuss the facility's disaster resilience as well as the

[59] The new rules went into effect on October 18, 2017.
[60] OAR 345-050-0060 contains rules applicable to radioactive waste disposal facilities and is therefore not applicable to the Perennial Wind Chaser Station, which does not include such a component.

impacts of future climate conditions on the facility.[61] The Department's assessment is based upon the updated rule language.

The Council's rulemaking directly affects three of the seven site certificate conditions previously imposed by Council to address potential seismic, geological, and soils hazards of the site. Conditions C.5 through C.7 mirrored the language previously found in the mandatory conditions at OAR 345-027-0020(12)-(14). The Council's rulemaking amended the language of those specific mandatory conditions, and the new rules went into effect on October 18, 2017. In addition, based on a Council decision that same month to reorganize the OAR 345, Division 27 and Division 25 rules, the correct reference to the Council's Mandatory Conditions is now to OAR 345, Division 25. Therefore, the Council updates Conditions C.5 through C.7 as follows to reflect the updated rule references and revised mandatory condition language:[62]

> **Amended Condition C.5 [~~OAR 345-027-0020(12)~~OAR 345-025-0020(12)]:** The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule, "seismic hazard" includes ground shaking, ground failure, landslide, liquefaction triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction. ~~tsunami inundation, fault displacement and subsidence.~~
>
> [Final Order Condition C.5; AMD1; Mandatory Condition 345-02~~7~~5-00~~20~~06(12)]
>
> **Amended Condition C.6 [~~OAR 345-027-0020(13)~~OAR 345-025-0020(13)]:** The certificate holder shall notify the department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if site investigations or trenching reveal that conditions in the foundation rocks differ significantly from those described in the application for a site certificate. After the department receives the notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division ~~and~~ to propose and implement corrective or mitigation actions.

[61] OAR 345-021-0010(h)(E) and OAR 345-021-0010(h)(F)(i) require the applicant to discuss the facility's disaster resilience, and OAR 345-021-0010(h)(F)(ii) requires the applicant to discuss the impacts of future climate condition on the facility.

[62] The language of Mandatory Condition 12 is based upon OAR 345-025-0006(12), but was modified to exclude reference to coastal sites because the site boundary is located far from coastal areas.

[Final Order Condition C.6; AMD1; Mandatory Condition 345-027~~7~~5-00~~20~~06(13)]

Amended Condition C.7 [~~OAR 345-027-0020(14)~~OAR 345-025-0020(14)]: The certificate holder shall notify the department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if shear zones, artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.

[Final Order Condition C.7; AMD1; Mandatory Condition 345-027~~7~~5-00~~20~~06(14)]

Seismic Hazards

In the *Final Order on the ASC*, based upon the applicant's assessment of seismic hazards at the site, the Council found that the risks of liquefaction, liquefaction induced lateral spreading, landslides and ground failure/fault displacement at the facility are low.[63] In ASC Exhibit H, Perennial identified ground shaking as a potential seismic hazard at the site, and proposed to implement soil improvement techniques (to address potentially collapsible soils) and to design the facility to resist ground shaking. Based upon the November 14, 2018 consultation with DOGAMI, the certificate holder provided additional information in its RFA related to the risk of ground failure/fault displacement and ground shaking at the facility, as discussed below.

In ASC Exhibit H, the certificate holder used the USGS Quaternary Fault and Fold Database to identify Quaternary crustal faults within a 47-mile (75-km) radius of the Station and the step-up substation. During consultation on this RFA, DOGAMI emphasized the importance of addressing all earthquake faults that could negatively impact the facility, and recommended that the certificate holder also examine LIDAR and the DOGAMI fault database.[64] RFA Attachment 5, Appendix H-1, Figure 5 shows the locations of Quaternary faults mapped by the USGS, active faults mapped by the Washington Department of Natural Resources, and faults mapped by DOGAMI. Figure 3 of the same document shows available LIDAR data near the facility, which includes full coverage of the locations of the Station and step-up substation. The certificate holder's engineering consultants evaluated the LIDAR data and determined that these data did not identify any faults beyond those shown on Figure 5. The consultants noted that an

[63] Final Order on the ASC, Section IV.C. *Structural Standard*, p. 28.
[64] PERAMD1 DOGAMI Consultation Correspondence Part A 2018-11-28 and PERAMD1 DOGAMI Consultation Correspondence Part B 2018-12-01.

unnamed fault located near and to the north of the step-up substation in southern Washington is oriented in a direction indicating that, if the fault were located beyond its known extent, it could potentially continue to the site of the step-up substation. However, the consultants evaluated LIDAR imagery of the step-up substation location and the surrounding area and concluded that there is no surficial evidence to indicate that the fault extends to the site. In addition, there are no faults mapped at or near the Station location; therefore, the risk of fault rupture at the facility is considered negligible.[65]

In ASC Exhibit H, Perennial identified ground shaking as a potential seismic hazard at the site, and committed to designing the proposed facility to conform to the current International Building Code (IBC). The version of the Division 21 requirements for Exhibit H that applied at the time of Council's review of the ASC required the applicant to evaluate ground motion hazards using the 2009 IBC and the 2010 Oregon Structural Specialty Code (OSSC). Perennial explained that, based on the 2009 IBC, the design seismic event would have a 2 percent probability of exceedance in 50 years, an event with a 2,475-year recurrence interval. As a result, the Council imposed Condition C.3 requiring the certificate holder to design the facility to resist ground shaking from an event with a 2,475-year recurrence interval and in accordance with the 2010 OSSC and the 2009 IBC.[66]

As previously explained, since the time the Council issued the site certificate, the Council approved amended language for OAR 345-021-0010(1)(h) (the Division 21 requirements for Exhibit H). These rules require Perennial to consult with DOGAMI regarding (among other items) the appropriate methodology and scope of the seismic hazards assessment. During the November 14, 2018 consultation, DOGAMI informed the certificate holder that the site-specific studies needed to be updated to reflect current codes.[67] The current building code that applies to the seismic performance of structures at those locations is the 2014 OSSC, which incorporates and in some cases modifies the 2012 IBC. DOGAMI informed the Department and the certificate holder that DOGAMI anticipates that the Oregon Building Code Division will adopt the 2018 IBC (with modifications) towards the end of 2019. As a result, RFA Attachment 5 provides updated ground motion design parameters for the locations of the step-up substation and the Station for both the 2012 IBC/2014 OSSC and the 2018 IBC. The certificate holder represents that it would engineer and design the step-up substation and Station to meet the seismic performance requirements of Risk Category III structures as defined by the 2014 OSSC (or the 2019 OSSC, if the 2019 OSSC is adopted prior to issuance of the requested amended site certificate). The Council amends Condition C.3 to reflect changes in the applicable building

[65] RFA Attachment 5, Appendix H-1, Section 6.2.3.4.
[66] ASC Exhibit H, p. H-12.
[67] PERAMD1 DOGAMI Consultation Correspondence Part A 2018-11-28 and PERAMD1 DOGAMI Consultation Correspondence Part B 2018-12-01.

codes:

> **Amended Condition C.3:** The certificate holder shall design, engineer, and construct the facility ~~to resist ground shaking from an event with a 2,475-year recurrence interval. All structures shall be designed~~ in accordance with the versions of the Oregon Structural Special Code, ~~(2010) and the 2009~~ International Building Code, and local building codes in effect at the time of construction.
>
> [Final Order Condition C.3; AMD1]

To provide more information about subsurface conditions, existing Condition C.1 requires the certificate holder to take and analyze borings at the final locations of turbine/generators, access bridge, step-up substation, transmission towers and the buried transmission cable, and to perform a shear wave velocity measurement at the Station and step-up substation sites. Condition C.2 specifies the additional engineering evaluations the certificate holder must perform based on the refined subsurface conditions, including a requirement to refine or upgrade the seismic hazard evaluations.

During consultation, DOGAMI informed the certificate holder that the site-specific seismic evaluation should include evaluation of long-period ground motions from a Cascadia Subduction Zone Event. Site-specific long period ground motions can be high in eastern Oregon and special design considerations of long-period structures may therefore be necessary. In response, the certificate holder represented that it would perform site-specific ground motion study that would capture long-period amplification of large and distant subduction zone events at the site of the Station. The study would follow the guidance in Chapter 21 of the ASCE 7-16, which provides the minimum design loads on buildings and other structures. The Council amends existing Condition C.2 to require a site-specific ground motion study that accounts for long-period ground motion hazards at the site of the Station:

> **Amended Condition C.2:** Prior to beginning construction, the certificate holder shall complete the following additional engineering evaluations:
> (a) Refining the seismic hazard evaluations and develop code-based ground motion design parameters for the step-up substation~~, including design response spectra~~;
> (b) Performing site-specific ground motion study following the guidance in ASCE 7-16, Chapter 21 for the Station. This study shall capture long-period amplification of large and distant subduction zone events;
> (~~b~~c) Estimating soil bearing capacity and settlement for the transformer foundation, transmission tower foundation, and other geotechnical evaluations based upon the final design layout and design loads;
> (~~c~~d) Developing geotechnical recommendations for trench excavation, shoring, and backfill of the buried transmission cable, as well as trenchless excavation techniques, if

necessary to pass below existing railroad tracks;
(~~d~~e) Completing a final geotechnical design report.

[Final Order Condition C.2; AMD1]

Potential Geological and Soils Hazards

In ASC Exhibit H, the applicant evaluated potential non-seismic geological and soil hazards at the site, including landslides, flooding, soil erosion, collapsing soils, and high winds. Based upon the applicant's assessment, and subject to compliance with Conditions C.5 through C.7 requiring the certificate holder to implement soil improvement techniques (to address potentially collapsible soils) and to comply with the mandatory conditions at OAR 345-025-0006(12)-(14), the Council previously found that the applicant could design, engineer and construct the facility to avoid dangers to human safety presented by the non-seismic hazards identified.[68]

The site is flat and above 100-year flood elevations; the applicant therefore previously concluded in ASC Exhibit H that landslides and flooding are not anticipated. As part of its RFA, the certificate holder provided additional assessment of landslide and flooding hazards. Based upon review of the most current version of DOGAMI's Statewide Landslide Information Database for Oregon (Version 3.4, released December 14, 2017), the certificate holder confirmed that neither the Station nor the step-up substation are located within mapped landslide areas. In addition, the certificate holder determined that the Station is located outside of the 500-year floodplain, and the step-up substation appears to be located outside of the 500-year floodplain (see the discussion under the Disaster Resilience and Climate Change Adaptation subsection below). Based upon this additional analysis, the certificate holder concluded that they do not anticipate landslide risk at either the Station or step-up substation sites, and that the risk of flooding appears to be low at both sites.[69]

Disaster Resilience and Climate Change Adaptation

As previously noted, rulemaking conducted since the last Council decision on the Perennial Wind Chaser Station established new informational requirements within OAR Chapter 345, Division 21. Specifically, OAR 345-021-0010(1)(h)(E) and OAR 345-021-0010(1)(h)(F)(i) require the certificate holder to discuss the facility's disaster resilience (in the event of seismic hazards and non-seismic geologic hazards, respectively) and OAR 345-021-0010(1)(h)(F)(ii) requires the

[68] Final Order on the ASC, Section IV.C., *Structural Standard*.
[69] RFA Attachment 5, Section H.7.

certificate holder to discuss the impacts of future climate conditions on the facility.

Disaster Resilience

Based on a review of the record, the Department understands the greatest risks to the structural integrity of the facility to be ground shaking and collapsible soils. As previously discussed, Perennial identified ground shaking as a potential seismic hazard at the site, and commits to designing the facility to resist ground shaking. Condition C.3 (as amended) requires the certificate holder to design, engineer, and construct the facility in accordance with the versions of the OSSC, IBC, and local building codes in effect at the time of construction. The certificate holder also determined that soils at the Station and step-up substation site have the potential to collapse or lose strength during a seismic event. These soils may even collapse under non-seismic conditions: The loess layer for the Station site and the fine-grained alluvium silty sands at the step-up substation site may collapse by wetting, vibrating, or subjecting the soils to higher normal stresses.[70] Therefore, as initially proposed in ASC Exhibit H and as confirmed in RFA Attachment 5, the certificate holder proposes to remove these layers and to backfill the excavated area with structural fill that would better accommodate the weight of heavy, settlement-sensitive structures like the facility turbines, generators, and condenser. For lighter facility components, the certificate holder proposes to remove and backfill the upper three feet of the loess prior to the foundation being laid.[71] The Council previously imposed Condition C.4 requiring the certificate holder to implement soil improvement techniques to address potentially collapsible soils.

In its RFA, the certificate holder represents that it would have an emergency response plan for disasters to ensure that the facility would return to normal operation as quickly as practical after a disaster.[72] The Council agrees that such a plan would render the facility more resilient to disasters, and imposes the following new condition:

> **New Condition C.8:** Prior to construction, the certificate holder shall prepare an Emergency Response Plan. The certificate holder shall submit the plan no less than 30 days prior to beginning construction to the Department for review and approval by the Department, in consultation with the Department of Geology and Mineral Industries. The plan shall describe the procedures the certificate holder would take to recover facility operations after major disasters. The plan shall be maintained onsite and implemented throughout the operational life of the facility.

[70] RFA Attachment 5, Appendix H-1, Appendix A, Section 9.1.
[71] ASC Exhibit H, p. 13 and RFA Attachment 5, Appendix H-1, Section 9.1.
[72] RFA Attachment 5, Section H.6.

[AMD1 Condition C.8]

Climate Change Adaptation

The certificate holder reviewed the Oregon Global Warming Commission's 2018 *Biennial Report to the Legislature* to determine the likely future climate conditions for the expected life span of the facility and the potential impacts of those conditions on the facility. The report indicates that climate change will result in sea level rise and increased temperatures, droughts, wildfires, and flooding in Oregon. The certificate holder explains in RFA Attachment 5 that while increased ambient temperatures and smoke from significant wildfires (which are more likely to occur with an increased frequency in drought conditions) could mildly impact combustion turbine performance, these impacts would not result in catastrophic failure of the Station, nor would the certificate hold need to temporarily cease Station operations during these conditions.

Flooding of either the step-up substation or the Station could cause significant damage to these facility components. The certificate holder referred to a U.S. Geologic Survey study of how future climate conditions may impact the Willamette and Columbia River levees, which states that the Pacific Northwest is projected to experience a decline in spring snowpack, earlier snowmelt, and earlier peaking streams, which may also result in some water basins experiencing higher peak flows.[73] As a result, the Columbia and Umatilla Rivers may experience elevated flood levels.[74] The Station and the step-up substation are both located above the 100-year flood elevations.[75] The Station is also located outside of the 500-year floodplain. The National Flood Insurance Program map produced by the Federal Emergency Management Agency shows the step-up substation in Zone D, indicating that flood hazards are "undetermined, but possible." The certificate holder explains that the step-up substation appears to be located outside of the 500-year floodplain because it is at a similar elevation as the City of Umatilla's downtown area, which is mapped outside of the 500-year floodplain. Therefore, future climate conditions resulting in elevated flood levels in the Columbia and Umatilla Rivers are unlikely to result in flooding at the step-up substation and Station.[76] The Department notes that guidance provided to the certificate holder by DOGAMI during consultation lists "build in lower risk areas and avoid building in higher risk areas, such as in…500 year flood zone" as an example of an action a certificate holder can take to design and build for future climate conditions.[77]

[73] PERAMD1 USGS_Future Climate Effects on Columbia and Willamette River Levees.
[74] RFA Attachment 5, Section H.7.
[75] ASC Exhibit H, H-14.
[76] RFA Attachment 5, Section H.7.
[77] PERAMD1_DOGAMI Scope of Review for EFSC_July 2018.

Based upon the evidence provided, and subject to compliance with existing and amended conditions referenced above, the Council finds that the certificate holder has adequately characterized the potential seismic, geological and soil hazards of the site, and that the certificate holder can design, engineer and construct the facility to avoid dangers to human safety and the environment from these hazards.

Conclusions of Law

Based on the foregoing findings and the evidence in the record, and subject to compliance with the existing, amended, and new site certificate conditions, the Council finds that the facility, with the requested construction deadline extension, complies with the Council's Structural Standard.

III.D. Soil Protection: OAR 345-022-0022

> *To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in a significant adverse impact to soils including, but not limited to, erosion and chemical factors such as salt deposition from cooling towers, land application of liquid effluent, and chemical spills.*

Findings of Fact

The Soil Protection standard requires the Council to find that, taking into account mitigation, the design, construction and operation of a facility are not likely to result in a significant adverse impact to soils.

The certificate holder provided an assessment of potential soil impacts and compliance with the Soil Protection standard in ASC Exhibit I. The Council addressed the Soil Protection standard in Section IV.D. of the *Final Order on the ASC*, and found that, subject to site certificate conditions D.1 through D.9, the facility would comply with the standard. These conditions require the certificate holder to conduct construction work in compliance with an Erosion and Sediment Control Plan and a National Pollutant Discharge Elimination Systems #1200-C Construction Stormwater Discharge General Permit; control dust generated by construction activities; implement an approved Revegetation and Noxious Weed Control Plan; coordinate with landowners before applying herbicides and use a licensed contractor to apply the herbicides; and limit and mitigate for soil compaction.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The soil types and extent in the analysis area have not

substantially changed from the conditions described in ASC Exhibit I.[78] In addition, the request for amendment does not include changes to the site boundary, facility design, facility layout, or other changes that could increase erosion, risks to soils from chemical factors, or otherwise adversely impact soils. However, the Department notes that the Revegetation and Noxious Weed Control Plan (Appendix 1 to the site certificate) does not currently account for temporary impacts at the pulling-tensioning sites. In addition, existing site certificate Condition D.3 does not require that the plan be finalized using information from the pre-construction habitat assessment required by existing site certificate Condition H.1. Therefore, the Council amends existing Condition D.3 as follows:

> **Amended Condition D.3:** No less than 45 days prior to construction, unless otherwise agreed to by the Department, the certificate holder shall submit to the Department a final Revegetation and Noxious Weed Control Plan. The Department will review the plan in consultation with ODFW and the Umatilla County Weed Control Board. The plan must be approved by the Department prior to construction. As part of finalizing the plan, the certificate holder must update Table 1 of the draft plan (related to temporary and permanent impacts to habitat) based upon the pre-construction habitat assessment required by Condition H.1. In addition to the temporary ground disturbance areas described on page 3 of the draft plan, the final plan must consider temporary impacts at the pulling-tensioning sites, and the certificate holder must restore the soil and vegetation in these areas in accordance with the final plan, as approved by the Department. To control the introduction and spread of noxious weeds, the certificate holder must implement the requirements of the approved Revegetation and Noxious Weed Control Plan during all phases of construction and operation of the facility. ~~Amendments to the Revegetation and Noxious Weed Control Plan must be reviewed and approved by the Umatilla County Weed Control Board and submitted to the department no later than 30 days after approval.~~
>
> [Final Order Condition D.3; AMD1]

Subject to compliance with existing and amended site certificate conditions, the Council finds that the design, construction and operation of the facility, with the requested construction deadline extension, would not result in a significant adverse impact to soils.

Conclusions of Law

Based on the foregoing findings of fact and conclusions of law, and subject to compliance with existing and amended site certificate conditions, the Council finds that the facility, with the

[78] RFA Section 2.5.3.

requested extension of the construction deadlines, would comply with the Council's Soil Protection standard.

III.E. Land Use: OAR 345-022-0030

(1) To issue a site certificate, the Council must find that the proposed facility complies with the statewide planning goals adopted by the Land Conservation and Development Commission.

(2) The Council shall find that a proposed facility complies with section (1) if:

(a) The applicant elects to obtain local land use approvals under ORS 469.504(1)(a) and the Council finds that the facility has received local land use approval under the acknowledged comprehensive plan and land use regulations of the affected local government; or

(b) The applicant elects to obtain a Council determination under ORS 469.504(1)(b) and the Council determines that:

(A) The proposed facility complies with applicable substantive criteria as described in section (3) and the facility complies with any Land Conservation and Development Commission administrative rules and goals and any land use statutes directly applicable to the facility under ORS 197.646(3);

(B) For a proposed facility that does not comply with one or more of the applicable substantive criteria as described in section (3), the facility otherwise complies with the statewide planning goals or an exception to any applicable statewide planning goal is justified under section (4); or

(C) For a proposed facility that the Council decides, under sections (3) or (6), to evaluate against the statewide planning goals, the proposed facility complies with the applicable statewide planning goals or that an exception to any applicable statewide planning goal is justified under section (4).
*****

Findings of Fact

The Land Use standard requires the Council to find that the facility, with the requested extension of the construction deadlines, would continue to comply with local applicable

substantive criteria, as well as the statewide planning goals adopted by the Land Conservation and Development Commission (LCDC).[79]

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The following two changes related to the applicable substantive criteria have occurred between the date the pASC was submitted (April 3, 2014) and the date the preliminary RFA (August 2, 2018) was submitted:[80] (1) Umatilla County amended UCDC § 152.617(II)(7) to add standards for a "utility facility necessary for public service" that is an "associated transmission line;" and (2) the City of Umatilla informed the Department that the transmission line reconductoring would be a use permitted outright (instead of a conditional use) within the Neighborhood Commercial (NC), Residential – single family (R1), and Residential – multi-family (R2) zones.[81]

Changes in the Local Applicable Substantive Criteria

Umatilla County confirmed that the County Comprehensive Plan policies applicable to the facility remain the same.[82] The certificate holder contacted the City of Umatilla Planning Department and confirmed that no new goals or policies have been added to the City's Comprehensive Plan since April 3, 2014 (the date the preliminary ASC was filed) that would apply to the facility. Therefore, there are no changes to the applicable substantive criteria from the County and City comprehensive plans.

As discussed in ASC Exhibit K,[83] the facility components would be located within the following zones:

- Natural gas pipeline
    - Umatilla County

[79] The Council must apply the Land Use standard in conformance with the requirements of ORS 469.504.
[80] Under the Council's Land Use standard at OAR 345-022-0030, the "applicable substantive criteria" are criteria from the affected local government's acknowledged comprehensive plan and land use ordinances that are required by the statewide planning goals and that are in effect on the date the applicant submits the application. For Council review of a request for amendment, pursuant to OAR 345-027-0375(3)(a) the Council shall apply the applicable substantive criteria under the Land Use standard in effect on the date the certificate holder submitted the request for amendment.
[81] As discussed below, the Council previously assessed the transmission line reconductoring as a conditional use in the NC, R1, and R2 zones.
[82] PERAMD1Doc11 County determination that zone changes do not apply_Waldher 2018-12-03.
[83] Sections K.5.1, K.5.4, and K.6.1.

- EFU (Exclusive Farm Use)
- Station
  - Umatilla County
    - EFU (Exclusive Farm Use)
- Transmission line
  - Umatilla County
    - EFU (Exclusive Farm Use)
    - LI (Light Industrial)
    - RTC (Rural Tourist Commercial)
  - City of Umatilla Urban Growth Area
    - F-1 (Exclusive Farm Use Zone)
    - F-2 (General Rural Zone)
    - M-2 (Heavy Industrial Zone)
    - R-1 (Agricultural Residential Zone)
  - City of Umatilla
    - NC (Neighborhood Commercial)
    - R1 (Residential, single family)
    - R-2 (Residential, multi-family)
- Step-up substation and underground line
    - City of Umatilla Urban Growth Area
      - F-1 (Exclusive Farm Use Zone)

The certificate holder prepared updated zoning maps using GIS data obtained from the County and City and determined that the zoning within the City of Umatilla and the urban growth area (UGA) has not changed (Attachment D to this order shows the applicable zoning). However, as discussed later in this section, the Department received information from the City clarifying the requirements for transmission line reconductoring within the three zones located within the City of Umatilla and outside of the UGA. In addition, the City of Umatilla informed the Department that, in accordance with the Joint Management Agreement between the County and City that was entered into on January 3, 2017, the City now has authority to process land use permits for lands outside city limits but inside the UGA. In the *Final Order on the ASC*, the Council assessed the portion of the facility that would be located within the UGA against the applicable substantive criteria from the County's 1972 Zoning Ordinance.[84] The City of Umatilla adopted the 1972 Umatilla County Zoning Ordinance for the UGA; therefore, there are no changes to the applicable substantive criteria for the portions of the facility that would be located within the UGA.

[84] *Final Order on the ASC*, Section IV.E.1., Land Use, p. 40.

On July 2, 2014, the Umatilla County Board of Commissioners adopted Ordinance No. 2014-06, which rezoned the Umatilla Military Depot. A portion of the transmission line that would be reconductored is in close proximity to the eastern edge of the areas re-zoned from EFU to Umatilla Depot Refuge and Depot Industrial. However, the County Planning Director determined that the extent of the zone changes does not include the location of the transmission line that would be reconductored.[85] Therefore, the Umatilla Military Depot rezone does not impact the criteria that are applicable to the transmission line that would be reconductored.

On April 28, 2017 the Umatilla County Board of Commissioners adopted Ordinance No. 2017-06, which rezoned a parcel immediately south of the power plant location and immediately west of a portion of the natural gas pipeline route. The parcel extends from Walker Road on the west to Cottonwood Bend Road on the east. The ordinance rezoned the parcel from EFU to Light Industrial with a Limited Use Overlay (LI/LU) to accommodate a planned data center. The natural gas pipeline would be located within the ROW of Cottonwood Bend Road (where the existing Cascade Natural Gas lateral to the Hermiston Generating Plant is located), which was not subject to the rezoning of the adjacent parcel from EFU to LI/LU.[86] Therefore, the rezoning of that parcel does not impact the criteria that are applicable to the facility's natural gas pipeline.

In the *Final Order on the ASC*, the Council listed UCDC § 152.617 (Conditional Uses and Land Use Decisions on EFU and GF Zoned Lands) among the applicable substantive criteria the Council applied to its review of the facility.[87] Since the date the pASC was submitted, the Umatilla County Board of Commissioners amended UCDC § 152.617(II)(7) to add standards for a "utility facility necessary for public service" that is an "associated transmission line," as further discussed below. While the language within UCDC § 152.617 has been changed, the reference to this portion of the UCDC in the list of applicable substantive criteria remains correct.

Changes in UCDC § 152.617 (Conditional Uses and Land Use Decisions on EFU and GF Zoned Lands)

The Council previously assessed the natural gas pipeline and the new transmission structures associated with the new transmission line as "utility facilities necessary for public service." The natural gas line is located entirely on land zoned EFU, and up to three of the six new transmission structures would also be located on land zoned EFU (Attachment D to this order shows the applicable zoning). Pursuant to UCDC Section 152.059(C), a utility facility necessary for public service may be permitted in an EFU zone through a land use decision via

[85] PERAMD1Doc11 County determination that zone changes do not apply_Waldher 2018-12-03.
[86] PERAMD1Doc11 County determination that zone changes do not apply_Waldher 2018-12-03.
[87] *Final Order on the ASC*, Section IV.E.1., Land Use, p. 41.

administrative review and a utility facility necessary for public service may be established as provided in ORS 215.275 and UCDC § 152.617(II)(7). On the date the pASC was submitted, UCDC § 152.617(II)(7) mirrored the statutory requirements provided at ORS 215.275. On July 2, 2014 and March 16, 2016, the Umatilla County Board of Commissioners adopted Ordinance 2014-04 and Ordinance 2016-02, respectively, which amended UCDC § 152.617(II)(7) to add standards for a "utility facility necessary for public service" that is an "associated transmission line." The provisions under UCDC § 152.617(II)(7)(A) largely mirror the statutory requirements provided at ORS 215.275 (utility facilities necessary for public service) and the current provisions under UCDC § 152.617(II)(7)(B) largely mirror the statutory requirements provided at ORS 215.274 (associated transmission line).

The UCDC does not define "associated transmission line," but ORS 215.274 states that "'associated transmission line' has the meaning given that term in ORS 469.300." As defined in ORS 469.300, "associated transmission lines" means "new transmission lines constructed to connect an energy facility to the first point of junction of such transmission line or lines with either a power distribution system or an interconnected primary transmission system or both or to the Northwest Power Grid."

The natural gas pipeline does not meet this definition and is therefore not affected by the changes to UCDC § 152.617. Therefore, the Council's previous findings in the *Final Order on the ASC* related to locating the natural gas pipeline on EFU-zoned land (under the provisions of UCDC § 152.617(II)(7) that mirror ORS 215.275) are not affected.

The Council previously found that, pursuant to UCDC § 152.056(J), reconductoring the existing transmission line is a minor betterment of an existing transmission line and is therefore permitted outright within the EFU zone, without a zoning permit.[88] However, UCDC § 152.056 (uses permitted outright) is only applicable to the reconductored portions of the line and not to the potential six new poles (worst case scenario) proposed as necessary to tie-in to the existing transmission infrastructure. Up to three of the new transmission structures would be located on EFU-zoned land. These structures must be evaluated against the amended UCDC § 152.617(II)(7)(B) requirements for an associated transmission line, because these structures would be necessary to connect the power plant to the reconductored transmission line, and the reconductored transmission line would then connect the power plant to the Northwest Power

[88] *Final Order on the ASC* at 43.

Grid at McNary Substation. Therefore, the certificate holder provided an analysis under UCDC § 152.617(II)(7)(B) of the new transmission structures that would be located on EFU land.[89]

> *(B) An associated transmission line is necessary for public service and shall be approved by the governing body of a county or its designee if an applicant for approval under ORS 215.283(1)(c) demonstrates to the governing body of the county or its designee that the associated transmission line meets either the requirements of paragraph (1) of this subsection or the requirements of paragraph (2) of this subsection.*

The certificate holder must demonstrate that the associated transmission line meets the requirements of either paragraph (1) or paragraph (2) of UCDC § 152.617(II)(7)(B). As discussed below, in the RFA the certificate holder provides evidence that the associated transmission line meets the requirements of paragraph (2).

> *(1) An applicant demonstrates that the entire route of the associated transmission line meets at least one of the following requirements:*
>
> *(a) The associated transmission line is not located on high-value farmland, as defined in ORS 195.300, or on arable land;*
>
> *(b) The associated transmission line is co-located with an existing transmission line;*
>
> *(c) The associated transmission line parallels an existing transmission line corridor with the minimum separation necessary for safety; or*
>
> *(d) The associated transmission line is located within an existing right of way for a linear facility, such as a transmission line, road or railroad that is located above the surface of the ground.*

The new transmission line structures on EFU land would not meet the requirements of criteria (b), (c), or (d) of paragraph (1). The certificate holder elected to assume that the structures would also not meet the requirements of criterion (a), and instead provides evidence that the associated transmission line meets the requirements of paragraph (2).

[89] The Council previously determined that the reconductored portion of the transmission line qualifies as a use permitted outright under UCDC § 152.056(J) (Maintenance or minor betterment of existing transmission lines and facilities of utility companies and agencies). UCDC § 152.056(J) has not changed; therefore, the Council's previous findings related to the portions of the reconductored transmission line that are located on EFU-zoned land are not affected.

(2) After an evaluation of reasonable alternatives, an applicant demonstrates that the entire route of the associated transmission line meets, subject to paragraphs (3) and (4) of this subsection, two or more of the following criteria:

Paragraph (2) first requires an evaluation of reasonable alternatives to siting the associated transmission line on EFU-zoned land. As the certificate holder demonstrates, there is no possible route that would eliminate the need for new transmission structures on land zoned EFU. The September 2012 Amended Notice of Intent (NOI) examined alternatives to the transmission line that was ultimately approved by Council in the *Final Order on the ASC*. In the Amended NOI, the applicant had proposed to select either a 17.9-mile, 230-kV transmission line that would have been routed west and generally parallel to Interstate 84 south of the Umatilla Army Depot, or a 20-mile, 230-kV transmission line that would have been routed along the eastern side of the Umatilla Army Depot before routing west to the north of the Umatilla Army Depot. Both alternatives would have connected the power plant to the BPA Longhorn Substation, and both alternatives would have required constructing new transmission line across areas zoned EFU.

By instead utilizing an existing transmission line (that would be reconductored) that connects to the BPA McNary Substation, the length of new transmission line – and associated impacts to EFU land – that would need to be constructed to connect the power plant to the regional electric grid is greatly reduced. However, up to three new transmission structures would be located on EFU land. The certificate holder explains that because the power plant and its switchyard would be located on EFU-zoned land, new transmission poles must cross EFU land adjacent to the switchyard in order to transmit electricity from the switchyard to the new transmission poles that would be located on non-EFU land, which would in turn connect the facility to the existing transmission line. The existing transmission line would ultimately connect the facility to the regional electric grid at the BPA McNary Substation. Based upon this reasoning, the Council finds that the certificate holder has evaluated reasonable alternatives and has demonstrated that no reasonable alternatives that would avoid EFU land exist.

Under UCDC § 152.617(II)(7)(B)(2), following the evaluation of reasonable alternatives, the certificate holder must demonstrate "*that the entire route of the associated transmission line meets, subject to paragraphs (3) and (4) of this subsection, two or more of the following criteria:*

(a) Technical and engineering feasibility;

(b) The associated transmission line is locationally-dependent because the associated transmission line must cross high-value farmland, as defined in ORS 195.300, or arable land to achieve a reasonably direct route or to meet unique geographical needs that cannot be satisfied on other lands;

(c) Lack of an available existing right of way for a linear facility, such as a transmission line, road or railroad, that is located above the surface of the ground;

(d) Public health and safety; or

(e) Other requirements of state or federal agencies."

The certificate holder argues that the associated transmission line satisfies at least two of the criteria, as required by paragraph (2), and provides an assessment under criteria (b) and (c). The certificate holder did not provide an assessment under criteria (a), (d), or (e).

Criterion (b) requires that the certificate holder demonstrate that the associated transmission line must cross high-value farmland (as defined in ORS 195.300) or arable land to achieve a reasonably direct route or to meet unique geographical needs that cannot be satisfied on other lands.

Based on its location within the Columbia Valley viticultural area, and meeting certain requirements for elevation, slope, and aspect, portions of the power plant site are "high-value farmland" pursuant to ORS 195.300(10)(f)(C). The entire power plant site meets the requirements for elevation and slope; the portions of the power plant site that also have an aspect between 67.5 and 292.5 degrees meet this definition of high-value farmland. Two out of the three new transmission structures that would be located on EFU-zoned land would be located on high-value farmland (see RFA Attachment 6, Figure K-2).

All three new transmission line structures that would be located on land zoned EFU would also be located on arable land. Neither the UCDC, nor the statute on which UCDC § 152.617(II)(7)(B) is based (ORS 215.274), define "arable land." In addition, the Land Conservation and Development (LCDC) rules pertaining to agricultural land define "arable land" with respect to siting wind power and photovoltaic solar power generation facilities on agricultural land, but do not define "arable land" with respect to siting transmission lines on agricultural land.[90] In the absence of a definition for "arable land" with respect to siting transmission lines on agricultural land, the certificate holder's analysis applies the definition of "arable land" with respect to siting wind power generation facilities on agricultural land:[91] "lands that are cultivated or

[90] OAR 660-033-0130(37)(b) defines "arable lands" for the purposes of siting wind energy generation facilities and OAR 660-033-0130(38)(a) defines "arable land" for the purposes of siting photovoltaic solar energy generation facilities.

[91] DLCD stated that the certificate holder's approach sounds reasonable. PERAMD1Doc19 DLCD Tim Murphy arable land definition 2019-05-31.

suitable for cultivation, including high-value farmland soils described at ORS 195.300(10)." ASC Exhibit I, Figure I-1l, shows that the entire power plant site consists of "Quincy loamy fine sand, gravelly substratum, 0 to 5 percent slopes." The certificate holder explains that this soil type is a Class IV soil if irrigated, and Class IV soils are suitable for cultivation and therefore meet the definition at OAR 660-033-0130(37)(b) of arable land.[92]

The certificate holder explains that because the power plant and its switchyard would be located on EFU-zoned land that is entirely arable land (and, in some areas, both arable land and high-value farmland), the new transmission poles must cross arable land adjacent to the switchyard in order to transmit electricity from the switchyard to the new transmission poles that would be located on non-EFU land, which would in turn connect the facility to the existing transmission line.[93] Based upon this reasoning, the Council finds that the associated transmission line is locationally-dependent because the associated transmission line must cross high-value farmland, as defined in ORS 195.300, or arable land to achieve a reasonably direct route. Therefore, the Council finds that the associated transmission line meets criterion (b).

Criterion (c) requires that the certificate holder demonstrate that the associated transmission line must cross EFU-zoned land due to lack of an existing, available, and aboveground linear ROW (such as a transmission line, road, or railroad) in which the associated transmission line could instead be located. A railroad ROW exists outside of, parallel, and adjacent to the northern border of the site boundary for the EFU-zoned power plant and switchyard site. However, no existing ROW extend from the switchyard to any location outside the EFU zone. Therefore, the Council finds that the associated transmission line meets criterion (c).

UCDC § 152.617(II)(7)(B)(2) requires that two of the five listed criteria be met. As previously discussed, the Council finds that the associated transmission line meets criteria (b) and (c). Therefore, the Council also finds that the associated transmission line would comply with the requirements of UCDC § 152.617(II)(7)(B)(2).

> *(3) As pertains to paragraph (2), the applicant shall present findings to the governing body of the county or its designee on how the applicant will mitigate and minimize the impacts, if any, of the associated transmission line on surrounding lands devoted to farm use in order to prevent a significant change in accepted farm practices or a significant increase in the cost of farm practices on the surrounding farmland.*

[92] RFA Section 2.5.4.
[93] RFA Section 2.5.4.

The Council previously found that the transmission line (including the reconductored transmission line and the new transmission structures) would not interfere with the ability to irrigate, fertilize or harvest crops on surrounding center-pivot fields and would not affect the costs of the inputs. The Council also found that the development of the transmission line would not impair the ability of workers to access surrounding farmlands.[94] The three new transmission structures on EFU-zoned land – which are the specific portions of the facility's transmission line that are subject to the assessment under UCDC § 152.617(II)(7)(B) – would be separated from cultivated lands by the power plant to the east and Light Industrial-zoned land to the north (across a railroad ROW), south (the site of a planned data center), and west (across Westland Road).[95] Therefore, the Council finds that the certificate holder would meet the requirements of paragraph (3).

> *(4) The governing body of a county or its designee may consider costs associated with any of the factors listed in paragraph (B) of this subsection, but consideration of cost may not be the only consideration in determining whether the associated transmission line is necessary for public service*

Paragraph (4) provides that cost may be a consideration associated with any of the factors listed in UCDC § 152.617(II)(7)(B), but that cost may not be the only consideration. The Council previously found that the costs of developing the transmission line (including the reconductored transmission line and the new transmission structures) are anticipated to be significantly lower than for any alternative alignment, not because the proposed route crosses EFU-zoned land, but rather because the alignment would be direct and primarily located within an existing ROW. In addition, the Council found that the cost savings of the proposed transmission line route are greater than any other alternative alignment because the facility would primarily utilize existing infrastructure and would primarily utilize an existing alignment.[96] As explained in the RFA, locating up to three new transmission structures on EFU-zoned land at the power plant site would allow for a short interconnection to existing transmission infrastructure, which in turn would preclude the need to develop an entirely new transmission route to interconnect to the electric grid. Based on this assessment, the Council finds that while the selected transmission line route is likely less expensive than other transmission line route options, cost was not the only consideration associated with any of the

[94] *Final Order on the ASC* at p. 48.
[95] See Attachment D of this order.
[96] *Final Order on the ASC* at 47.

paragraph (B) factors, and that therefore the associated transmission line would comply with the requirements of paragraph (4).

Change in the City of Umatilla's Neighborhood Commercial Zone

The transmission line that would be reconductored crosses three zones within the City of Umatilla and outside of the UGA: NC, R1, and R2. The Council previously determined that the reconductored transmission line was permitted as a "Community Service" use, which was a conditional use in these zones.[97] Since the date the pASC was submitted, the City of Umatilla adopted Article 10-4C of the City of Umatilla Zoning Ordinance, which pertains to the NC zone. Article 10-4C does not contain requirements for "Community Service" uses; however, the article permits major utility facilities (as defined in Article 10-1-6) as conditional uses (Section 10-4C-5(MM)) in the NC zone, subject to design criteria and standards.[98] The Department contacted the City of Umatilla on November 5, 2018 to inquire if reconductoring an existing transmission line within the NC zone requires an evaluation of compliance with the property development standards for uses in that zone. The City informed the Department that, instead of a conditional use, reconductoring a transmission line is a use permitted outright within the NC, R1, and R2 zones.[99] Based upon the City's guidance, the Council finds that the transmission line reconductoring is a use permitted outright within the NC, R1, and R2 zones and therefore does not require a zoning permit.

Conclusions of Law

Based on reasons addressed above, and subject to compliance with the existing site certificate conditions, the Council finds that the facility, with the requested extension of the construction deadlines, satisfies the Council's Land Use standard.

III.F. Protected Areas: OAR 345-022-0040

> *(1) Except as provided in sections (2) and (3), the Council shall not issue a site certificate for a proposed facility located in the areas listed below. To issue a site certificate for a*

[97] *Final Order on the ASC*, pp. 109-113.

[98] Section 10-1-6 of the City of Umatilla City Code defines a "major utility facility" as "Any utility facility or structure, as distinguished from local distribution utility facilities, owned or operated by a public, semi-public, private or cooperative electric, fuel, communication, sewage or water company for the generation, transmission, distribution, or processing of its products or for the disposal of cooling water, waste or byproducts and including power transmission lines, major trunk pipelines, power substations, dams, water towers, railroad tracks, sewage lagoons, sanitary landfills, and similar facilities." In accordance with Section 10-4C-5, major utilities facilities are conditionally permitted in the NC zone subject to the decision criteria in Section 10-12-1 and any applicable standards in Section 10-12-2 specific to the use, the property development standards of Section 10-4C-7, and the site plan design review requirements and procedures under Section 10-4C-8.

[99] PERAMD1Doc13 City of Umatilla_Transmission Line Reconductoring Permitted Outright_Mabbott 2018-11-15.

proposed facility located outside the areas listed below, the Council must find that, taking into account mitigation, the design, construction and operation of the facility are not likely to result in significant adverse impact to the areas listed below. References in this rule to protected areas designated under federal or state statutes or regulations are to the designations in effect as of May 11, 2007:

(a) National parks, including but not limited to Crater Lake National Park and Fort Clatsop National Memorial;

(b) National monuments, including but not limited to John Day Fossil Bed National Monument, Newberry National Volcanic Monument and Oregon Caves National Monument;

(c) Wilderness areas established pursuant to The Wilderness Act, 16 U.S.C. 1131 et seq. and areas recommended for designation as wilderness areas pursuant to 43 U.S.C. 1782;

(d) National and state wildlife refuges, including but not limited to Ankeny, Bandon Marsh, Baskett Slough, Bear Valley, Cape Meares, Cold Springs, Deer Flat, Hart Mountain, Julia Butler Hansen, Klamath Forest, Lewis and Clark, Lower Klamath, Malheur, McKay Creek, Oregon Islands, Sheldon, Three Arch Rocks, Umatilla, Upper Klamath, and William L. Finley;

(e) National coordination areas, including but not limited to Government Island, Ochoco and Summer Lake;

(f) National and state fish hatcheries, including but not limited to Eagle Creek and Warm Springs;

(g) National recreation and scenic areas, including but not limited to Oregon Dunes National Recreation Area, Hell's Canyon National Recreation Area, and the Oregon Cascades Recreation Area, and Columbia River Gorge National Scenic Area;

(h) State parks and waysides as listed by the Oregon Department of Parks and Recreation and the Willamette River Greenway;

(i) State natural heritage areas listed in the Oregon Register of Natural Heritage Areas pursuant to ORS 273.581;

(j) State estuarine sanctuaries, including but not limited to South Slough Estuarine Sanctuary, OAR Chapter 142;

(k) Scenic waterways designated pursuant to ORS 390.826, wild or scenic rivers designated pursuant to 16 U.S.C. 1271 et seq., and those waterways and rivers listed as potentials for designation;

(l) Experimental areas established by the Rangeland Resources Program, College of Agriculture, Oregon State University: the Prineville site, the Burns (Squaw Butte) site, the Starkey site and the Union site;

(m) Agricultural experimental stations established by the College of Agriculture, Oregon State University, including but not limited to: Coastal Oregon Marine Experiment Station, Astoria Mid-Columbia Agriculture Research and Extension Center, Hood River Agriculture Research and Extension Center, Hermiston Columbia Basin Agriculture Research Center, Pendleton Columbia Basin Agriculture Research Center, Moro North Willamette Research and Extension Center, Aurora East Oregon Agriculture Research Center, Union Malheur Experiment Station, Ontario Eastern Oregon Agriculture Research Center, Burns Eastern Oregon Agriculture Research Center, Squaw Butte Central Oregon Experiment Station, Madras Central Oregon Experiment Station, Powell Butte Central Oregon Experiment Station, Redmond Central Station, Corvallis Coastal Oregon Marine Experiment Station, Newport Southern Oregon Experiment Station, Medford Klamath Experiment Station, Klamath Falls;

(n) Research forests established by the College of Forestry, Oregon State University, including but not limited to McDonald Forest, Paul M. Dunn Forest, the Blodgett Tract in Columbia County, the Spaulding Tract in the Mary's Peak area and the Marchel Tract;

(o) Bureau of Land Management areas of critical environmental concern, outstanding natural areas and research natural areas;

(p) State wildlife areas and management areas identified in OAR chapter 635, Division 8.

*****

(3) The provisions of section (1) do not apply to transmission lines or natural gas pipelines routed within 500 feet of an existing utility right-of-way containing at least one transmission line with a voltage rating of 115 kilovolts or higher or containing at least one natural gas pipeline of 8 inches or greater diameter that is operated at a pressure of 125 psig.

Findings of Fact

The Protected Areas standard requires the Council to find that, taking into account mitigation, the design, construction and operation of a facility are not likely to result in significant adverse impacts to any protected area as defined by OAR 345-022-0040. OAR 345-022-0040(3) provides that subsection (1) does not apply to transmission lines or natural gas pipeline routes within 500 feet of an existing utility ROW containing at least one transmission line with a voltage rating of 115 kilovolts or higher or containing at least one natural gas pipeline of 8 inches or greater diameter that is operated at a pressure of 125 pounds per square inch gage. The facility's natural gas pipeline and the transmission line that would be reconductored would each be located within an existing utility ROW and, consequently, are not subject to the provisions of OAR 345-022-0040(1).

The certificate holder evaluated the likelihood of significant adverse impacts to protected areas from construction and operation of the facility in ASC Exhibit L. The Council addressed the Protected Areas standard in Section IV.F. of the *Final Order on the ASC* and found that the design, construction and operation of the facility would not result in significant adverse impacts to any protected area in the analysis area. The Council did not impose any specific conditions under the Protected Areas standard.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. No new protected areas have been added within the 20-mile analysis area, and the geographic extent and location of the protected areas described in ASC Exhibit L remains the same.[100] In addition, the request for amendment does not include changes to the site boundary, facility design, facility layout, or other changes that could increase traffic, noise, water use, or wastewater disposal resulting from facility construction or operation. Furthermore, the request for amendment does not include changes to the facility structures, layout, or emissions that would result in new or different visual impacts. The Council's finding in the *Final Order on the ASC* that visual impacts from facility emissions and the facility's plume would not result in significant adverse impacts to protected areas was based, in part, on the fact that the certificate holder would need to obtain a Prevention of Significant Deterioration/Air Contaminant Discharge Permit from DEQ.

DEQ issued a Standard ACDP for the Perennial Wind Chaser Station on January 26, 2016. On July 26, 2017, DEQ issued a permit modification that extended the construction commencement deadline by 18 months (to January 26, 2019). As noted in some comments on

[100] RFA Section 2.5.5.

the record of the draft proposed order public hearing,[101] and as confirmed by DEQ,[102] Perennial has applied for a second construction deadline extension. DEQ is evaluating the application; the permit has not yet been modified and will be subject to the public comment process. If DEQ grants the second extension, the new construction commencement date will be July 26, 2020 – slightly less than two months prior to the new construction commencement date requested by Perennial (September 23, 2020) in its RFA. Should Perennial fail to begin construction by July 26, 2020, the existing facility DEQ-issued ACDP would no longer be valid and Perennial would need to apply for a new ACDP.[103] Commenters argue that, "[s]ince 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."

The Environmental Protection Agency (EPA) has delegated authority to the DEQ to administer air quality under the Clean Air Act. The ACDP program administered by DEQ includes the federally-delegated new source review requirements of the Clean Air Act and the Prevention of Significant Deterioration program. The ACDP is therefore a federally-delegated permit over which the Council does not have jurisdiction.[104]

Although the Council does not have jurisdiction over federally-delegated permits, the Council may rely on the determinations of compliance and the conditions in federally-delegated permits in evaluating an application for compliance with relevant Council standards. The Council did so in Section IV.F. of the *Final Order on the ASC* in its evaluation of facility compliance with the Protected Areas standard.

Perennial's original ACDP application assessed the potential impact of air emissions on two protected areas, the Eagle Cap Wilderness Area and the Columbia River Gorge National Scenic Area. The Eagle Cap Wilderness Area is the closest Class I Prevention of Significant

[101] Commenters expressed concern that air emissions from the generating station – such as carbon monoxide, volatile organic compounds, and nitrogen oxide – could impair air quality in the Columbia River Gorge, result in smog, and cause acid deposition during inversion events. Perennial previously applied for and received an ACDP from DEQ following an evaluation of these potential impacts in its ACDP application, and commenters noted that the ACDP may expire before the new construction commencement date requested in this RFA.
[102] PERAMD1Doc44 Agenda Item K Perennial DPO - Staff Report 2019-09-12, Attachment 1.
[103] 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).
[104] In accordance with ORS 469.503(3), "…except for 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 must find that the] facility complies with all other Oregon statutes and administrative rules..."

Deterioration area to the facility and is located over 133 miles from the generating station. The Columbia River Gorge National Scenic Area is located approximately 121 miles away at its nearest distance. The Council previously found that because of the distance of the facility from Class 1 areas as well as the fact that the facility would need to obtain a Prevention of Significant Deterioration/ACDP from DEQ, the facility would have a negligible impact on Class 1 areas and the Columbia River Gorge National Scenic Area.[105]

At the time the Council made this finding, DEQ had not yet issued the original ACDP for the facility. In other words, the Council's finding was based on the fact that Perennial had not yet obtained, but that it would need to obtain and maintain, a valid ACDP prior to commencing construction. This remains true – even if the Council amends the site certificate to extend the construction commencement date to September 23, 2020, Perennial would not be able to commence facility construction without a valid DEQ permit.

DEQ has informed the Department that DEQ would not issue an ACDP or a modified ACDP for a facility if there would be significant adverse impacts to Class I areas.[106] As DEQ has previously issued an ACDP and a modified ACDP for the facility, information now exists that allows the Council to further evaluate the likelihood of significant adverse impacts to Class I areas and the Columbia River Gorge National Scenic Area. DEQ's review report for the original ACDP concluded, "Based on the air quality analysis, DEQ has determined that the Perennial-WindChaser will not have an adverse impact on air quality in any Class I and Class II areas nor on the Columbia River Gorge National Scenic Area." DEQ has informed the Department that DEQ does not anticipate that the facts underlying this conclusion would change any time before September 23, 2020 (the requested construction commencement deadline in the RFA) for the following reasons:[107]

- Perennial's current request for an ACDP permit modification does not indicate any changes to the configuration or emissions profile of the facility.
- The ambient air quality is not likely to change appreciably before September 23, 2020.
- The relevant air quality standards are not likely to change appreciably before September 23, 2020.
- The relevant air quality models have not recently changed appreciably, and are not likely to change appreciably before September 23, 2020.

[105] *Final Order on the ASC*, Section IV.F., Protected Areas, p. 124.
[106] PERAMD1Doc44 Agenda Item K Perennial DPO - Staff Report 2019-09-12, Attachment 1.
[107] PERAMD1Doc44 Agenda Item K Perennial DPO - Staff Report 2019-09-12, Attachment 1.

The Council therefore continues to find that the facility, with the requested extension of the construction deadlines, would have a negligible visual impact on Class 1 areas and the Columbia River Gorge National Scenic Area.

Conclusions of Law

Based on the foregoing findings of fact, the Council concludes that, taking into account mitigation, the design, construction and operation of the facility, with the requested extension of the construction deadlines, would not be likely to result in significant adverse impacts to any protected areas, in compliance with the Council's Protected Area standard.

III.G. Retirement and Financial Assurance: OAR 345-022-0050

To issue a site certificate, the Council must find that:

(1) The site, taking into account mitigation, can be restored adequately to a useful, non-hazardous condition following permanent cessation of construction or operation of the facility.

(2) The applicant has a reasonable likelihood of obtaining a bond or letter of credit in a form and amount satisfactory to the Council to restore the site to a useful, non-hazardous condition.

Findings of Fact

The Retirement and Financial Assurance standard requires a finding that the facility site can be restored to a useful, non-hazardous condition at the end of the facility's useful life, should the certificate holder either stop construction or cease operation of the facility. In addition, it requires a demonstration that the certificate holder can obtain a bond or letter of credit to restore the site to a useful, non-hazardous condition.[108]

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy

[108] On the record of the draft proposed order public hearing, commenters raised the potential for the facility to be abandoned on the landscape. For the reasons discussed in this section of the order, subject to compliance with the existing and amended conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would comply with the Council's Retirement and Financial Assurance standard.

requirements of the standard. There have been no changes in the certificate holder's corporate structure that would impact the likelihood of the certificate holder obtaining a bond or letter of credit in a form and amount satisfactory to the Council to restore the site to a useful, non-hazardous condition.[109] As part of its RFA, the certificate holder provided the following updated information: 1) an updated site restoration cost estimate and 2) a recent letter from its financial institution to demonstrate its continued ability to receive an adequate bond or letter of credit.[110]

Restoration of the Site Following Cessation of Construction or Operation

OAR 345-022-0050(1) requires the Council to find that the facility site, with proposed changes, can be restored to a useful non-hazardous condition at the end of the facility's useful life, or if construction of the facility were to be halted prior to completion.

Restoring the site to a useful, nonhazardous condition upon permanent cessation of construction or operations would primarily consist of dismantling and removing some equipment and structures and capping and leaving in place other components. Onsite buildings would be demolished following final use of any remaining fuels and chemicals. The onsite 230-kV switchyard, the 500-kV step-up substation, and the underground line connecting the 500-kV step-up substation to the McNary Substation would be dismantled and removed from the site. The structures of the existing Hermiston to McNary transmission line would remain in place; however, the certificate holder would remove the new 230-kV conductor from the existing transmission line and would also remove the five transmission towers that would be constructed between the switchyard and the existing transmission line.[111] The interconnecting water pipelines would be capped and left in place. The natural gas pipeline lateral would be disconnected from the GTN interstate transmission pipeline header, capped, and left in place. The certificate holder would grade decommissioned areas to restore the site to suitable or natural site drainage patterns, and would then reseed these areas to provide suitable ground cover in order to prevent soil erosion. [112]

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[109] RFA Section 2.5.1 and Section III.B., *Organizational Expertise* of this order.
[110] RFA Attachment 7.
[111] The foundations of the new transmission structures would be removed to a depth of four feet below grade. RFA Attachment 7, Exhibit W. As explained in ASC Exhibit B, Section B.4, the first connecting transmission structure of the existing Hermiston to McNary transmission line may need to be replaced with a new structure or otherwise modified. If that structure is replaced, there would be a total of six new transmission structures required for the facility. This transmission structure would remain in place because it is part of the existing transmission line serving the HGP. PERAMD1Doc32 Decommissioning Cost Estimate_Neil 2019-01-03.
[112] RFA Attachment 7, Exhibit W, Sections W.4 and W.5.

The Council previously found that the actions necessary to restore the site to a useful non-hazardous condition (as described in ASC Exhibit W) are feasible. In addition, the Council found that the certificate holder was capable of restoring the site to a useful, non-hazardous condition, subject to Conditions D.6, N.4, N.5, and N.6 (pertaining to the management of hazardous waste) and Conditions B.5, G.1, and G.2 (imposing mandatory conditions pertaining to preventing the development of conditions on the site that would preclude restoration, requiring the certificate holder to retire the facility in accordance with a retirement plan approved by the Council, and requiring the certificate holder to retire the facility upon permanent cessation of construction or operation).[113] While the RFA provides language that clarifies the specific actions and tasks it would take to restore the site to a useful, non-hazardous condition, the RFA does not propose to change the site restoration actions and tasks previously evaluated by Council. Therefore, subject to compliance with the existing site certificate conditions, the Council finds that the certificate holder would continue to be able to adequately restore the site to a useful, non-hazardous condition following permanent cessation of construction or operation.

Estimated Cost of Site Restoration

OAR 345-022-0050(2) requires the Council to find that the certificate holder has a reasonable likelihood of obtaining a bond or letter of credit in a form and amount necessary to restore the facility site to a useful non-hazardous condition. A bond or letter of credit provides a site restoration remedy to protect the state of Oregon and its citizens if the certificate holder fails to perform its obligation to restore the site. The bond or letter of credit must remain in force until the certificate holder has fully restored the site.

As part of its RFA, the certificate holder provided an updated site restoration cost estimate that accounts for the costs of labor, materials and equipment, materials disposal, specialized disposal of hazardous waste, and grading and seeding activities associated with site restoration.[114] Table RF-1 recreates those tables, and shows that the certificate holder's cost estimate, in 2nd Quarter 2018 dollars, totals $6.261 million without a ZLD system and $6.274 million with a ZLD system.[115]

[113] *Final Order on the ASC*, Section IV.G. Retirement and Financial Assurance.
[114] RFA Section 2.5.6 and Attachment 7, Tables W-1 and W-2.
[115] If Lamb Weston is not able to accept reclaimed water from the HGP that has come from the Perennial Wind Chaser Station, the certificate holder proposes to install a ZLD system. See Section I.B. of this order for more information.

Table RF-1: Certificate Holder's Decommissioning and Site Restoration Cost Estimate

Facility Component	Cost Estimate (without ZLD System)[1]	Cost Estimate (ZLD System Option)[1]
Combustion Turbines 1-4		
Turbines & Foundations	$2,047,000	$2,047,000
Generator Step-up Transformers	$39,000	$39,000
On-site Concrete Crushing & Disposal	$34,000	$34,000
Debris	$15,000	$15,000
Combustion Turbines Subtotal	*$2,135,000*	*$2,135,000*
Other Components		
Switchyard & Substation[2]	$128,000	$128,000
Balance of Plant Misc.	$1,065,000	$1,028,000
Roads	$55,000	$55,000
All Balance of Plant Buildings	$14,000	$14,000
Fuel Equipment	$118,000	$118,000
All Other Tanks	$36,000	$36,000
Transformers & Foundation	$341,000	$341,000
Cooling Towers & Basin	$216,000	$216,000
ZLD System	--	$47,000
Hazardous Waste Disposal	$500,000	$500,000
Concrete Removal, Crushing, & Disposal	$66,000	$66,000
Grading & Seeding	$317,000	$317,000
Debris	$18,000	$18,000
Other Components Subtotal	*$2,874,000*	*$2,884,000*
Subtotal	$5,009,000	$5,019,000
Indirect Project Costs (5%)	$250,000	$251,000
Future Developments Contingency (20%)	$1,002,000	$1,004,000
Total Site Restoration Cost (Q2 $2018)	$6,261,000	$6,274,000

Notes:
1. Numbers may not sum to total due to rounding.
2. This item includes the five new transmission structures. PERAMD1Doc32 Decommissioning Cost Estimate_Neil 2019-01-03

RFA Attachment 7, Tables W-1 and W2 show that the certificate holder included indirect project costs totaling five percent of the sum of all line items (cost subtotal). The Department communicated to the certificate holder that this value (five percent of the cost subtotal) is not consistent with the Department's typical practices and experience. Specifically, the Department typically increases the cost subtotal by ten percent (10%) for the demolition contractor's

overhead charges. It then increases the new subtotal (cost subtotal plus overhead) by ten percent (10%) to account for the demolition contractor's profit expectation and increases the resulting subtotal (cost subtotal + overhead + profit) by three percent (3%) to account for the contractor's insurance costs. The certificate holder explained that the consulting team that prepared the cost estimate evaluated historical data within its files on actual decommissioning projects, and it was the consultant's position that the five percent figure was more appropriate.[116] However, in the absence of additional detail supporting that position, the Council applies the methodology presented here to increase the cost subtotal to account for the demolition contractor's overhead costs, profit, and insurance costs, as shown in Table RF-2.

In addition, the Council increases the resulting subtotal (inclusive of the cost subtotal, overhead costs, profit, and insurance cost) by one percent (1%) to account for the cost of a performance bond that would be posted by the contractor as assurance that the work would be completed as agreed. Furthermore, the Council adds a contingency for administrative and management expenses of 10 percent to the cost estimate. These are the anticipated direct costs borne by the State in the course of managing site restoration and would include the preparation and approval of a final retirement plan; obtaining legal permission to proceed with the demolition of the facility; legal expenses for protecting the State's interests; preparing specifications, bid documents, and contracts for demolition work; and managing the bidding process, the negotiation of contracts, and other tasks.

If it becomes necessary for the State to draw upon the bond, it might be many years in the future. Other factors contribute to uncertainty; for example, different environmental standards or other legal requirements might be in place in the future, new disposal sites might need to be found for demolition debris, and the cost of labor and equipment available might increase at a rate exceeding the standard inflation adjustment. The certificate holder's decommissioning and site restoration cost estimate applied a 20 percent (20%) future developments contingency to account for such uncertainty.

Table RF-2 provides a summary of the Department's site restoration cost estimate.

[116] PERAMD1Doc32 Decommissioning Cost Estimate_Neil 2019-01-03.

Table RF-2: Department's Decommissioning and Site Restoration Cost Estimate

Facility Component	Cost Estimate (without ZLD System)[1]	Cost Estimate (ZLD System Option)[1]
Combustion Turbines 1-4		
Turbines & Foundations	$2,047,000	$2,047,000
Generator Step-up Transformers	$39,000	$39,000
On-site Concrete Crushing & Disposal	$34,000	$34,000
Debris	$15,000	$15,000
Combustion Turbines Subtotal	*$2,135,000*	*$2,135,000*
Other Components		
Switchyard & Substation[2]	$128,000	$128,000
Balance of Plant Misc.	$1,065,000	$1,028,000
Roads	$55,000	$55,000
All Balance of Plant Buildings	$14,000	$14,000
Fuel Equipment	$118,000	$118,000
All Other Tanks	$36,000	$36,000
Transformers & Foundation	$341,000	$341,000
Cooling Towers & Basin	$216,000	$216,000
ZLD System	--	$47,000
Hazardous Waste Disposal	$500,000	$500,000
Concrete Removal, Crushing, & Disposal	$66,000	$66,000
Grading & Seeding	$317,000	$317,000
Debris	$18,000	$18,000
Other Components Subtotal	*$2,874,000*	*$2,884,000*
Subtotal	$5,009,000	$5,019,000
Overhead (10%)	$500,900	$501,900
Profit (10%)	$550,990	$552,090
Insurance (3%)	$181,827	$182,190
Subtotal	$6,242,717	$6,255,180
Performance Bond (1%)	$62,427	$62,552
Gross Cost	$6,305,144	$6,317,731
Administration & Project Management (10%)	$630,514	$631,773
Future Developments Contingency (20%)	$1,261,029	$1,263,546
Total Site Restoration Cost (Q2 $2018)	$8,196,687	$8,213,051
Total Site Restoration Cost (rounded to nearest $1,000)	$8,197,000	$8,213,000

Table RF-2: Department's Decommissioning and Site Restoration Cost Estimate

Facility Component	Cost Estimate (without ZLD System)[1]	Cost Estimate (ZLD System Option)[1]
Notes: 1. Numbers may not sum to total due to rounding. 2. This item includes the five new transmission structures. PERAMD1Doc32 Decommissioning Cost Estimate_Neil 2019-01-03.		

Based upon the preceding analysis, and as shown in Table RF-2, the Council finds that the following amounts are reasonable estimates of the cost to restore the site to a useful, nonhazardous condition: $8.197 million (2nd Quarter 2018 dollars) without the ZLD system and $8.213 million (2nd Quarter 2018 dollars) with the ZLD system. As discussed below, the Council amends Condition G.4 to reflect the updated site restoration cost estimate.

Ability of the Certificate holder to Obtain a Bond or Letter of Credit

OAR 345-022-0050(2) requires the Council to find that the certificate holder continues to have a reasonable likelihood of obtaining a bond or letter of credit in a form satisfactory to the Council to restore the site to a useful, non-hazardous condition. A bond or letter of credit provides a site restoration remedy to protect the state of Oregon and its citizens if the certificate holder fails to perform its obligation to restore the site. The bond or letter of credit must remain in force until the certificate holder has fully restored the site. OAR 345-025-0006(8) establishes a mandatory condition, included as Condition G.3, which ensures compliance with this requirement. In addition, the Council previously imposed Condition G.4, which specifies the initial bond or letter of credit amount for the facility.

The Council amends existing Condition G.4 as follows to require an initial bond or letter of credit amount that reflects the updated site restoration cost estimate. The Council also amends the condition so that any revision to the restoration costs (beyond whether or not the facility would use a zero liquid discharge system) would need to be reviewed and approved by the Council through a site certificate amendment.

> **Amended Condition G.4:** Before beginning construction of the facility, the certificate holder shall submit to the State of Oregon, through the Council a bond or letter of credit naming the State of Oregon, acting by and through the Council, as beneficiary or payee. The initial bond or letter of credit amount for the facility is ~~$4.560~~ $8.197 million, without a zero liquid discharge system or ~~$4.61~~ $8.213 million with a zero liquid discharge system, depending upon the final design configuration, to be adjusted to the date of issuance, and adjusted on an annual basis thereafter, as described in sub-paragraph (b) of this condition:

(a) The certificate holder may adjust the amount of the initial bond or letter of credit based on the final design configuration of the facility. However, ~~A~~any revision to the restoration costs ~~should~~must be adjusted to the date of issuance as described in (b) and would need to be ~~subject to~~ reviewed and approv~~al~~ed by the ~~department~~Council through a site certificate amendment.

(b) The certificate holder shall adjust the amount of the bond or letter of credit using the following calculation:

i. Adjust the amount of the bond or letter of credit (expressed in second quarter ~~2013~~ 2018 dollars) to present value, using the U.S. Gross Domestic Product Implicit Price Deflator, Chain-Weight, as published in the Oregon Department of Administrative Services' "Oregon Economic and Revenue Forecast" or by any successor agency and using the second quarter ~~2013~~ 2018 index value and the quarterly index value for the date of issuance of the new bond or letter of credit. If at any time the index is no longer published, the Council shall select a comparable calculation to adjust second quarter ~~2013~~ 2018 dollars to present value.

ii. Round the result total to the nearest $1,000 to determine the financial assurance amount.

(a) The certificate holder shall use an issuer of the bond or letter of credit approved by the Council

(b) The certificate holder shall use a form of bond or letter of credit approved by the Council. The certificate holder shall describe the status of the bond or letter of credit in the annual report submitted to the Council under OAR 345-026-0080. The bond or letter of credit shall not be subject to revocation or reduction before retirement of the facility site.

[Final Order Condition G.4; AMD1]

As part of this request for amendment, the certificate holder provided a letter from MUFG Bank, Ltd. dated October 5, 2018 stating that the bank understood that the certificate holder would need to obtain a letter of credit in the amount of $6.5 million. The letter further expressed the bank's willingness to arrange the required letter of credit, subject to receipt of further information, the bank's customary due diligence, and internal credit approval.[117]

MUFG Union Bank, N.A. is on the Council's list of pre-approved financial institutions. The Department's Project Development Officer from the Department's Loan Development division

[117] RFA Attachment 7.

determined that MUFG Union Bank, N.A. and MUFG Bank, Ltd. are "one and the same;" therefore, additional Council approval of MUFG Bank, Ltd. is not required.[118]

The updated site restoration cost estimate ($8.197 million in 2nd Quarter 2018 dollars without the ZLD system and $8.213 million in 2nd Quarter 2018 dollars with the ZLD system) is greater than $6.5 million. However, based on Condition G.4, construction of the facility cannot begin until the certificate holder submits a sufficient bond or letter of credit to the Department. As such, there is no risk that construction of the facility would begin without financial assurance protection for the state. Additionally, the certificate holder's parent company is a multi-national energy facility developer and operator and it is reasonable to conclude that it will be able to secure a bond or letter of credit as required by Condition G.4. Based on the evidence in the record, the Council finds that the certificate holder continues to have a reasonable likelihood of obtaining a bond or letter of credit in a form and amount satisfactory to the Council to restore the site to a useful, non-hazardous condition.

Conclusions of Law

Based on the foregoing findings of fact, and subject to compliance with the existing and amended conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would comply with the Council's Retirement and Financial Assurance standard.

III.H. Fish and Wildlife Habitat: OAR 345-022-0060

> *To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are consistent with the fish and wildlife habitat mitigation goals and standards of OAR 635-415-0025 in effect as of September 1, 2000.*

Findings of Fact

The EFSC Fish and Wildlife Habitat standard requires the Council to find that the design, construction and operation of a facility is consistent with the Oregon Department of Fish and Wildlife's (ODFW) habitat mitigation goals and standards, as set forth in OAR 635-415-0025. This rule creates requirements for mitigating impacts to fish and wildlife habitat, based on the functional quantity and quality of the habitat impacted as well as the nature, extent, and duration of the impact. The rule also establishes a habitat classification system based on the function and value of the habitat it would provide to a species or group of species likely to use

[118] MUFG Union Bank, N.A. is a wholly-owned subsidiary of MUFG Bank, Ltd.

it. There are six habitat categories, with Category 1 being the most valuable, and Category 6 the least valuable.

The certificate holder provided information about the anticipated facility impact on fish and wildlife habitat in ASC Exhibit P. The Council addressed the Fish and Wildlife Habitat standard in Section IV.H. of the *Final Order on the ASC* and found that, subject to conditions H.1 through H.13, the facility would comply with the standard. These conditions prohibit disturbance of Category 1 habitat, and require pre-construction verification of the acres of impacted habitat by habitat category and subtype as well as mitigation in accordance with the final acreage determination. In addition, the conditions require the certificate holder to: restore temporarily impacted areas to preconstruction conditions or better; prepare and implement monitoring plans; train personnel in environmental protection; design the transmission line to minimize risk of avian mortality; and to minimize the impacts of vehicular traffic on surrounding areas. The conditions also: restrict construction activities within specified buffers of raptor nests within the raptor breeding season if active nests are located during pre-construction raptor surveys; require coordination with ODFW about appropriate avoidance and/or mitigation measures if construction activities occur during the migratory bird breeding season and have the potential to impact the nests of native, non-raptor species; and require coordination with ODFW on appropriate avoidance or mitigation measure if a California myotis (a state-sensitive bat species) roost is observed during pre-construction biological surveys. Finally, the conditions require: consultation with ODFW about appropriate avoidance or minimization measures if construction activities occur during native non-raptor migrations; a report containing results of all preconstruction surveys; and clear delineation of boundaries of environmentally sensitive areas during construction.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The request for amendment does not include any changes to the facility design or layout that would create new or different impacts to fish and wildlife habitat. In addition, as explained in more detail below, through a combination of desktop analysis, on-site reconnaissance, and field surveys, the certificate holder determined that the fish and wildlife habitat descriptions in ASC Exhibit P remain applicable because the location and geographic extent of waters, habitats, and other natural resources identified in the ASC have not changed.[119] Additional surveys conducted as part of this RFA provide a greater level of detail than the ASC about fish and wildlife habitat at the pulling-tensioning sites along the transmission line to be reconductored, as on-the-ground field surveys were not previously

[119] RFA Section 2.5.7 and RFA Attachment 8 (Sections 3.1, 3.3, and 3.4.2).

conducted at these locations. Furthermore, because the 2012 Washington ground squirrel (WGS) surveys were conducted more than three years ago and some areas were not surveyed to protocol,[120] the certificate holder re-surveyed previously surveyed areas for WGS as part of this RFA.

Desktop Analysis, Site Reconnaissance, and Field Surveys

As part of this RFA, the certificate holder reviewed desktop wetlands and soils data (National Wetlands Inventory, National Hydrography Dataset, and the Soil Survey Geographic Database) as well as aerial imagery. To confirm the results of the desktop analysis, ecologists conducted on-site reconnaissance on June 11 and 12, 2018 to assess current conditions of fish and wildlife habitat, including waters and wetlands. Based upon the desktop analysis and site reconnaissance, the certificate holder concluded that no changes to fish and wildlife habitat have occurred. While the certificate holder's preliminary RFA initially relied upon the previous habitat surveys conducted in support of the ASC, the certificate holder performed additional field surveys in response to requests by the Department and ODFW.[121]

Prior to performing the surveys, one of the certificate holder's consultant teams (Ecology and Environment, Inc.; E & E) conducted a search of updated Oregon Biodiversity Information Center (ORBIC) data, which provided new information about two state-sensitive species (Pacific lamprey and western burrowing owl) and WGS habitat. Based on the 2018 ORBIC data, areas potentially occupied by Pacific lamprey have expanded since E & E searched the database in 2012. However, because construction and operation of the facility would not involve in-water work, the certificate holder states that there would be no impact to this species. While a pair of western burrowing owls were detected, the pair were documented at a distance (2.5 miles) from the facility. In addition, existing Condition H.8 requires the certificate holder to conduct raptor nest surveys, including surveys of burrowing owl burrows, for each year of construction. If nests are present, the certificate holder must notify the Department and ODFW and construction-related activities must be restricted 0.25 miles of burrowing owl burrows until the nests have failed or chicks have fledged. The 2018 ORBIC search also shows that WGS areas have increased in size since the 2012 ORBIC search. Additional WGS surveys were performed in support of this RFA.

E & E conducted surveys on April 22, April 23, and May 10, 2019 to identify vegetation communities, verify the presence or lack of wetlands/waters, and evaluate WGS presence. In addition, the biologists recorded sightings of special status and common wildlife species

[120] PERAMD1DOC20 ODFW Comment Letter and Follow up Email December 2018.
[121] PERAMD1Doc29 ODOE Determination and Request for Additional Information 2018-12-10 and PERAMD1Doc20 ODFW Comment Letter and Follow up Email December 2018.

observed during the course of WGS surveys, and searched for raptor nests using high-powered binoculars.

With the exception of the survey area for raptor nests (which includes areas up to 0.25 miles from the site boundary), the survey area included all areas subject to ground disturbance from construction and operation of the facility, including the following:

- 50-foot-wide natural gas pipeline ROW
- Generating station site and associated temporary construction areas
- Two new transmission structure sites located outside of the generating station site
- Eleven pulling-tensioning sites/staging areas (each 50 feet by 100 feet) along the transmission line that would be reconductored
- Step-up substation site and underground interconnection corridor adjacent to the McNary Substation

Section III.I., *Threatened and Endangered Species* of this order provides more details about the WGS survey methodology.

Results

Vegetation communities and habitat types mapped in the previously surveyed area remain the same as reported in ASC Exhibit P.[122] In support of this RFA, E & E biologists supplemented desktop review of the Oregon National Gap Analysis Program spatial land cover dataset with field surveys in order to map vegetation communities and habitat types within the survey area. As previously explained, the newly surveyed areas include each of the pulling-tensioning sites along the transmission line to be reconductored. Habitat types observed at the transmission line pulling-tensioning sites (the areas along the transmission line to be reconductored where ground disturbance would occur) include weedy grassland, agriculture, and developed land. While shrub-steppe habitat is present in the northern part of one of the pulling-tensioning sites, ground-disturbing activities would be located in weedy grasslands to the south to avoid the shrub-steppe habitat.[123] No designated noxious weeds were observed in the pulling-tensioning sites.[124] E & E concluded, and ODFW concurred, that habitat at the pulling-tensioning sites

[122] RFA Attachment 8, Section 2.1.
[123] PERAMD1Doc20 ODFW Comment Letter and Follow up Email December 2018 and RFA Attachment 8, Table 3.
[124] Designated noxious weeds are a group of weed species selected for priority prevention and control by the Oregon Department of Agriculture's Noxious Weed Control Program. PERAMD1Doc21 ODA Noxious Weed Policy Classification System 2019.

would be appropriately categorized as Categories 5 and 6.[125] Conditions H.1 and H.2 require pre-construction verification of the acres of impacted habitat by habitat category and subtype as well as mitigation in accordance with the final acreage determination; therefore, temporary disturbance impacts at the pulling-tensioning sites must be considered as part of the final acreage determination required by these conditions.

Existing Condition H.2 requires a Habitat Mitigation Plan "if determined necessary." Mitigation for impacts to fish and wildlife habitat, including compensatory mitigation, is required by the Council's standard and by ODFW Fish and Wildlife Habitat Mitigation Policy. Based on the ASC and this request for amendment, the proposed facility is anticipated to permanently impact approximately 19.03 acres of Category 5 habitat and 4.45 acres of Category 6 habitat, and to temporarily impact 2.03 acres of Category 3 habitat and 36.01 acres of Categories 5 and 6 habitat.[126] Impacts to Category 6 do not require mitigation. Temporary impacts to grassland habitat also do not require compensatory mitigation, but impacts to some habitats with a slow recovery time (e.g., shrub-steppe with a sage or bitterbrush component, like the Category 3 habitat that would be temporarily impacted by construction of the natural gas pipeline) do require compensatory mitigation. Existing site certificate Condition H.2 requires that, based on the results of the pre-construction habitat survey, the certificate holder consult with ODFW and determine the final acreage of mitigation that is required. The condition further requires that if mitigation is determined necessary, a Habitat Mitigation Plan is developed and implemented. However, based on the Department's assessment as presented here, mitigation is expected to be required. Therefore, to remove the uncertainty associated with the way the existing condition is phrased, the Council amends existing site certificate Condition H.2 as follows:

> **Amended Condition H.2:** Prior to commencement of construction, following completion of Condition PRE-FW-01 (Final Order Condition H.1), the certificate holder shall consult with the Oregon Department of Fish and Wildlife (ODFW) to determine the final acreage of habitat mitigation required. Mitigation shall be provided in accordance with the final acreage determinations provided in response to Condition PRE-FW-01 (Final Order Condition H.1) and consistent with a Habitat Mitigation Plan, ~~if determined necessary,~~ as approved by the department and ODFW.

[125] RFA Attachment 8, Table 3; and PERAMD1Doc30 ODFW Rimbach comment on habitat categorization 2019-06-25.

[126] The pulling-tensioning activities would temporarily disturb Categories 5 and 6 habitat. Each pulling-tensioning site would be contained within the existing transmission ROW and would measure approximately 50 x 100 feet, for a total of 60,000 square feet (approximately 1.38 acres) of temporary disturbance. As described in the ASC, construction of other facility components would impact an additional 34.63 acres of Category 5 and 6 habitat. ASC Appendix P, p. P-19 and Table P-2; and RFA Attachment 8, Table 3.

(a) A final Habitat Mitigation Plan~~, if determined necessary,~~ and ODFW's concurrence of that plan shall be submitted to the department no less than 30 days prior to the beginning of construction.
(b) The final Habitat Mitigation Plan~~, if necessary,~~ may be amended from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council. Such amendments may be made without amendment of the site certificate. The Council authorizes the department to agree to amendments to this plan. The department shall notify the Council of the Final Habitat Mitigation Plan and all amendments to the plan. The Council retains the authority to approve, reject or modify any amendments of this plan agreed to by the department.

[Final Order Condition H.2; AMD1]

The presence and character of wetlands and waters within the previously surveyed areas remains the same as reported in ASC Exhibit J.[127] No wetlands or waterbodies are located within the newly surveyed pulling-tensioning sites, and the two waters located near pulling-tensioning sites would not be impacted by construction and operation of the facility (see Section III.Q.2, *Removal-Fill*, of this order).

The long-billed curlew is the only state sensitive species observed during the 2013 surveys conducted in support of the ASC.[128] During the 2019 surveys conducted in support of this RFA, the biologists did not observe suitable habitat for special status plant species, the presence of special status plants themselves, evidence of WGS, or other special status wildlife during the field surveys.[129] One active red-tailed hawk nest was reported in the same location (near the western edge of the generation site) identified during the 2013 surveys, and two adult red-tailed hawks were observed in the vicinity of the nest;[130] however, red-tailed hawks are not sensitive or listed species. If facility construction activities would occur during the raptor breeding season, existing site certificate Condition H.8 requires the certificate holder to conduct pre-construction surveys for raptor nests and to restrict construction activities within specified distances of active raptor nests until the nests have failed or the chicks have fledged. Existing Condition H.11 requires the certificate holder to consult with ODFW to determine appropriate avoidance or minimization measures if active nests are located during pre-

[127] RFA Attachment 8, Section 3.3.
[128] ASC Exhibit P, Section P.6, p. P-16.
[129] RFA Attachment 8, Section 3.0.
[130] RFA Attachment 8, Section 3.4.2.

construction raptor surveys. Condition H.13 requires the certificate holder to clearly demarcate raptor nests during construction to increase visibility to construction crews.

The 2013 surveys conducted in support of the ASC did not detect WGS within the surveyed area, which included the locations for the generating station, 50-foot-wide gas pipeline ROW, and step-up substation and its associated underground transmission line. Neither WGS nor signs of them (e.g., burrows, scat, alarm calls) were detected during the 2019 surveys within suitable habitat in the site boundary or observed within 1,000 feet of proposed ground disturbance areas. Most of the available habitat in the site boundary appears to be of low value for WGS due to the types of vegetation cover present and proximity to human disturbances.[131] E & E stated that the habitat and vegetation communities within 1,000 feet of the natural gas pipeline ROW have not changed since the 2013 surveys and are not suitable habitat for WGS. Three pulling-tensioning are located adjacent to potential habitat for WGS, and two of those sites have direct connectivity to large areas of shrub-steppe (potentially suitable habitat) on the Umatilla Army Depot.[132] Amended Condition D.3 (see Section III.D. of this order) would require the certificate holder to restore soil and vegetation at the pulling-tensioning sites in accordance with the final Revegetation and Noxious Weed Control Plan.

Based upon the evidence provided, and subject to compliance with existing and amended conditions referenced above, the Council finds that the design, construction, and operation of the facility, taking into account mitigation and the requested extension of the construction deadlines, are consistent with the fish and wildlife habitat mitigation goals and standards of OAR 345-415-0025.

Conclusions of Law

Based on the foregoing findings of fact, and subject to compliance with the existing and amended site certificate conditions referenced above, the Council finds that the facility, with the requested extension of the construction deadlines, complies with the Council's Fish and Wildlife Habitat standard.

III.I. Threatened and Endangered Species: OAR 345-022-0070

To issue a site certificate, the Council, after consultation with appropriate state agencies, must find that:

[131] RFA Attachment 8, Section 3.4.1.
[132] RFA Attachment 8, Section 3.4.1.

(1) For plant species that the Oregon Department of Agriculture has listed as threatened or endangered under ORS 564.105(2), the design, construction and operation of the proposed facility, taking into account mitigation:

(a) Are consistent with the protection and conservation program, if any, that the Oregon Department of Agriculture has adopted under ORS 564.105(3); or

(b) If the Oregon Department of Agriculture has not adopted a protection and conservation program, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species; and

(2) For wildlife species that the Oregon Fish and Wildlife Commission has listed as threatened or endangered under ORS 496.172(2), the design, construction and operation of the proposed facility, taking into account mitigation, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species.

Findings of Fact

The Threatened and Endangered Species standard requires the Council to find that the design, construction, and operation of the proposed facility are not likely to cause a significant reduction in the likelihood of survival or recovery of a fish, wildlife, or plant species listed as threatened or endangered by ODFW or Oregon Department of Agriculture (ODA). For threatened and endangered plant species, the Council must also find that the proposed facility is consistent with an adopted protection and conservation program from ODA. Threatened and endangered species are those listed under ORS 564.105(2) for plant species and ORS 496.172(2) for fish and wildlife species. For the purposes of this standard, threatened and endangered species are those identified as such by either the ODA or the Oregon Fish and Wildlife Commission.[133]

The certificate holder provided information about threatened and endangered species in the original ASC Exhibit Q. The Council addressed the Threatened and Endangered Species standard in Section IV.I of the *Final Order on the ASC* and found that, subject to conditions I.1 through I.5 (as well as Fish and Wildlife Habitat conditions H.4 and H.8), the facility would comply with the standard. The conditions imposed under the Threatened and Endangered Species standard require the certificate holder to conduct pre-construction surveys (and to consult with the Department and ODFW about any necessary avoidance or impact minimization measures based

[133] Although the Council's standard does not address federally-listed threatened or endangered species, certificate holders must comply with all applicable federal laws, including laws protecting those species, independent of the site certificate.

on those survey results) for northern sagebrush lizard (where shrubby habitat may be impacted), bat roosts, and WGS. These conditions also require the certificate holder to minimize low-lying vegetation removal within streamside management zones and to conduct pre-construction surveys (and to consult with the Department and ODA about appropriate avoidance or impact minimization measures based on those survey results) for the Robinson's onion and Laurence's milkvetch. Fish and Wildlife Habitat conditions H.4 and H.8 require the certificate holder to prepare and implement monitoring plans and to restrict construction activities within specified buffers of raptor nests within the raptor breeding season if active nests are located during pre-construction raptor surveys.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The request for amendment does not include any changes to the facility design or layout that would create new or different impacts to threatened or endangered species. Additional surveys conducted as part of this RFA provide a greater level of detail than the ASC about threatened and endangered species presence at the pulling-tensioning sites along the transmission line to be reconductored, as on-the-ground field surveys were not previously conducted at these locations. Furthermore, because the 2012 WGS surveys were conducted more than three years ago and some areas were not surveyed to protocol,[134] the certificate holder re-surveyed previously surveyed areas for WGS as part of this RFA. The certificate holder elected to re-survey previously surveyed areas for rare plants at the same time.

Desktop Analysis, Site Reconnaissance, and Rare Plants Field Surveys

As explained in Section 2.5.8 of the RFA, the certificate holder's consultant, E & E, reviewed the most current threatened and endangered species lists maintained by ODFW and ODA to determine if any new species have been listed since those datasets were reviewed as part of the ASC. One additional state-listed plant species, the northern wormwood, occurs in Umatilla County. The certificate holder explains that the site boundary does not contain suitable habitat for this species – which is restricted to basalt, compacted cobble, and sand on the banks of the Columbia River – and that construction and operation of the facility would therefore not impact this species.

State-listed species with the potential to occur in the site boundary include Laurence's

[134] PERAMD1DOC20 ODFW Comment Letter and Follow up Email December 2018.

milkvetch (a plant species listed by the ODA as threatened) and WGS (listed by ODFW as endangered). Based upon the original desktop analysis and survey work conducted in support of the ASC, the certificate holder previously concluded that it did not anticipate any adverse impacts to listed species because of the lack of the species in the site boundary or the lack of impacts to the species' habitat.[135] As part of this RFA, the certificate holder conducted surveys for listed species.[136]

Neither the 2013 surveys conducted in support of the ASC nor the 2019 surveys conducted in support of the RFA found any Laurence's milkvetch plants or any suitable habitat for this species.[137] Existing Condition I.5 requires the certificate holder to conduct pre-construction surveys (and to consult with the Department and ODA about appropriate avoidance or impact minimization measures based on those survey results) for Laurence's milkvetch.

Washington Ground Squirrel Surveys

ODFW submitted comments in December 2018 addressing the need for additional WGS surveys.[138] ODFW stated that habitat conditions at and near the proposed locations of most facility components are highly isolated and fragmented by the Umatilla River and man-made features, such as several highways, two railroad grades, smaller paved roads, cement-lined irrigation ditches, livestock feedlots, and center-pivot irrigated agricultural fields. ODFW normally categorizes WGS-occupied habitat as Category 1 habitat and recommends no impact to this habitat in accordance with ODFW's Fish and Wildlife Habitat Mitigation Policy. However, the agency explained that even if the surveys identified WGS presence at the locations of the step-up substation and underground transmission line, generation site, temporary construction area, new transmission structures, or the natural gas pipeline, any remaining habitat at these locations would be small and too isolated and fragmented to be sustainable WGS habitat over time. Individual WGS lack potential to immigrate into or emigrate out these isolated patches because of the identified habitat breaks (i.e., the Umatilla River and the man-made features listed above), rendering these sites permanently disconnected from a larger population. ODFW therefore concluded that these patches would not meet the 'essential' definition of Habitat

[135] Final Order on the ASC, Section IV.I, *Threatened and Endangered Species*, p. 154.
[136] The certificate holder also conducted surveys for Robinson's onion (listed by the U.S. Fish and Wildlife as a species of concern) and the Columbia cress (listed by the ODA as a candidate species); however, the Council's Threatened and Endangered Species standard only pertains to state-listed threatened or endangered species. The biologists did not observe suitable habitat for or individuals of either of these species within the site boundary.
[137] ASC Exhibit P, Section Q.3, p. Q-12 and RFA Attachment 8, Section 3.2.
[138] PERAMD1Doc20 ODFW Comment Letter and Follow up Email December 2018.

Category 1 and should be categorized as Habitat Category 4.[139]

Although ODFW would not consider these isolated and fragmented patches Category 1 habitat, Oregon state law and regulations (ORS 496.172; OAR 635-100-0125) prohibit take of state endangered species, including WGS.[140] ODFW recommended that the certificate holder perform WGS surveys within the site boundary for the following facility components to evaluate the potential for WGS take: step-up substation and underground transmission line, generation site, and the new transmission structures. The agency also recommended that the certificate holder perform WGS surveys within the site boundary for the natural gas pipeline, but recommended that those surveys extend 1,000 feet from the pipeline ROW in suitable WGS habitat (and where there is no habitat break[141]) to ensure survey coverage of several areas adjacent to the ROW. For areas outside of the ROW where private property access is denied, ODFW stated that a desktop analysis with an on-the-ground visual survey from the ROW would be appropriate.[142]

In contrast with the other facility component locations, ODFW stated that if WGS colonies are located within the pulling-tensioning areas for the reconductored transmission line, the agency would consider those areas to be Category 1 habitat because there is existing connectivity with suitable WGS habitat.[143]

ODFW recommended WGS surveys at and within a 1,000 foot buffer of the pulling-tensioning sites.[144] E & E reported that it was unable to obtain landowner approval to access areas outside of the site boundary. The biologists therefore combined aerial imagery review with field observations to evaluate habitat within 1,000 feet of the pulling-tensioning sites.[145]

The 2013 surveys conducted in support of the ASC did not detect WGS within the surveyed area, which included the locations for the generating station, 50-foot-wide gas pipeline ROW,

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[139] The Fish and Wildlife Habitat Mitigation Policy (OAR 635-415-0025) defines essential habitat as "Any habitat condition or set of habitat conditions which, if diminished in quality or quantity, would result in depletion of a fish or wildlife species."
[140] "Take" means to kill or obtain possession or control of any species on the state list; OAR 635-100-0001(14).
[141] A habitat break is a barrier, such as a paved road, that a WGS would have substantial difficulty crossing.
[142] PERAMD1Doc20 ODFW Comment Letter and Follow up Email December 2018.
[143] The Department notes that suitable habitat within 1,500 meters of Category 1 WGS habitat is considered Category 2 habitat if there are no habitat breaks. Personal communication with Greg Rimbach, Umatilla District Wildlife Biologist, ODFW, on June 25, 2019.
[144] PERAMD1Doc20 ODFW Comment Letter and Follow up Email December 2018.
[145] RFA Attachment 8, Section 3.1.

and step-up substation and its associated underground transmission line. Neither WGS nor signs of them (e.g., burrows, scat, alarm calls) were detected during the 2019 surveys within suitable habitat in the site boundary or observed within 1,000 feet of proposed ground disturbance areas. Most of the available habitat in the site boundary appears to be of low value for WGS due to the types of vegetation cover present and proximity to human disturbances.[146] E & E stated that the habitat and vegetation communities within 1,000 feet of the natural gas pipeline ROW have not changed since the 2013 surveys and are not suitable habitat for WGS. Three pulling-tensioning sites are located adjacent to potential habitat for WGS, and two of those sites have direct connectivity to large areas of shrub-steppe (potentially suitable habitat) on the Umatilla Army Depot.[147] Amended Condition D.3 (see Section III.D. of this order) requires the certificate holder to restore soil and vegetation at the pulling-tensioning sites to pre-construction condition or better.

Existing Condition I.4 requires the certificate holder to conduct pre-construction surveys for WGS in any areas with suitable habitat. The Department considers the April and May 2019 WGS surveys conducted in support of this RFA to constitute the pre-construction WGS surveys if the certificate holder begins construction by the construction commencement deadline requested by the RFA. ODFW generally considers WGS surveys valid for three years, and the requested new construction commencement deadline (September 23, 2020) is less than three years from the date of the most recent WGS surveys.[148]

Based upon the results of the surveys and the other information in the record, and subject to compliance with the existing and amended conditions, the Council finds that the design, construction, and operation of the facility, with the requested extension of the construction deadlines, are not likely to cause a significant reduction in the likelihood of survival or recovery of threatened or endangered plant or wildlife species.

Conclusions of Law

Based on the foregoing findings of fact, and subject to compliance with the existing and amended site certificate conditions referenced above, the Council finds that the facility, with

[146] RFA Attachment 8, Section 3.4.1.
[147] RFA Attachment 8, Section 3.4.1.
[148] If in the future the certificate holder requests another extension to the construction commencement deadline, WGS surveys may be required again if beyond the three-year valid period.

the requested extension of the construction deadlines, complies with the Council's Threatened and Endangered Species standard.

III.J. Scenic Resources: OAR 345-022-0080

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic resources and values identified as significant or important in local land use plans, tribal land management plans and federal land management plans for any lands located within the analysis area described in the project order.

Findings of Fact

The Scenic Resources standard requires the Council to find that the facility would not cause a significant adverse impact to identified scenic resources and values. To be considered under the standard, scenic resources and values must be identified as significant or important in local land use plans, tribal land management plans, and/or federal land management plans.

The certificate holder evaluated the likelihood of significant adverse impacts to scenic resources and values from construction and operation of the facility in ASC Exhibit R. The Council addressed the Scenic Resources standard in Section IV.J. of the *Final Order on the ASC* and found that, subject to conditions J.1 through J.3, the facility would comply with the standard. These conditions require the certificate holder to paint or otherwise finish the facility in neutral colors with a low reflectivity and to design the new transmission line poles to be similar in height and appearance to the existing poles within the transmission line ROW. In addition, the conditions prohibit the certificate holder from using exterior nighttime lighting except for safety, security, repair, or emergency purposes.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. Two of the applicable land management plans in effect within the analysis area have been updated since the ASC was submitted to EFSC in October 2014 and since the site certificate was issued in September 2015; however, as the certificate holder explains in RFA Section 2.5.9, these updates do not add to or otherwise modify the scenic resources and values previously identified. While portions of the Morrow County Comprehensive Plan have been amended, the Natural Resource Element of the Plan (dated October 1, 2013), which addresses scenic resources, remains the same. The Umatilla County Comprehensive Plan was revised on June 7, 2017, but the portion of Chapter 8 ("Open Space,

Scenic and Historic Areas, and Natural Resources") relevant to scenic resources has not changed. In addition, the request for amendment does not include changes to the facility design, layout, or emissions that would result in new or different visual impacts. Therefore, based upon compliance with existing site certificate conditions, the Council finds that the design, construction and operation of the facility, with the requested extension of the construction deadlines, would not result in a significant adverse impact to scenic resources and values identified as significant or important in local land use plans, tribal land management plans, and/or federal land management plans.

Conclusion of Law

Based on the foregoing findings of fact and conclusions of law, and subject to compliance with existing site certificate conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would comply with the Council's Scenic Resources standard.

III.K. Historic, Cultural, and Archaeological Resources: OAR 345-022-0090

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impacts to:

(a) Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;

(b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and

(c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).

(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

** * **

Findings of Fact

Section (1) of the Historic, Cultural and Archaeological Resources standard generally requires the Council to find that the proposed amended facility is not likely to result in significant

adverse impacts to identified historic, cultural, or archaeological resources. Only the standards in section (1) apply to the facility. OAR 345-022-0090(2) and (3) do not apply to this request for amendment because the facility would not produce power from wind, solar or geothermal energy and the facility is not a special criteria facility as defined in OAR 345-015-0310.

The certificate holder provided information about historic, cultural and archaeological resources in ASC Exhibit S. The Council addressed the Historic, Cultural and Archaeological Resources standard in Section IV.K. of the *Final Order on the ASC*, and found that, subject to site certificate conditions K.1 through K.4, the facility would comply with the Historic, Cultural and Archaeological Resources standard.

On August 30, 2018, the Department received an email from the Confederated Tribes of the Warm Springs Indian Reservation requesting the status of the certificate holder's compliance with the site certificate conditions the Council imposed under the state's Historic, Cultural and Archaeological Resources Standard. The Department provided the requested information. The Confederated Tribes of the Warm Springs Indian Reservation responded with a request to be kept informed about the project, and provided no additional comments on the RFA.[149]

In a comment on the record of the draft proposed order public hearing, The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) requested that a cultural resource monitor be present during ground-disturbing activities, and explained why portions of the site boundary have a high potential for buried cultural resources: Tribal member oral histories on file with the CTUIR and a publication on the CTUIR's traditional lands[150] describe how the CTUIR used the area for fishing, camping, and gathering. The 1861 General Land Office maps show that a trail used by the CTUIR for hundreds of years bisects the site boundary, and tribal member oral histories describe that when necessary a deceased person would be buried along a travel route. In addition, the cultural resource surveys conducted in 2012 and 2013 in support of the ASC documented a precontact archaeological isolated find within the site boundary, and the CTUIR notes that an undocumented Indian burial was inadvertently encountered during shallow excavations in the area in 2008.[151]

[149] PERAMD1Doc12 Response to Warm Springs question 2018-08-31.

[150] Hunn, Eugene S., E. Thomas Morning Owl, Philip E. Cash Cash, and Jennifer Karson Engum. 2015. Čáw Pawá Láakni - They are Not Forgotten: Sahaptian Place Names Atlas of the Cayuse, Umatilla, and Walla Walla. Tamástslikt Cultural Institute, Pendleton, Oregon.

[151] PERAMD1Doc47 CTUIR Comments on Request Amendment 1 and Draft Proposed Order 2019-08-12. In addition to the comments received from the CTUIR on August 12, 2019, CTUIR staff provided additional justification on August 20, 2019 to support the CTUIR's request for a cultural resources monitor. A written copy of the additional information was handed to Council members at the August 22, 2019 Council meeting.

Existing conditions imposed by Council under the Historic, Cultural and Archaeological Resources standard do not require that a cultural resources monitor be present during construction. Condition K.1 requires that a qualified archaeologist instruct construction personnel in the identification and avoidance of accidental damage to identified resources. If any archaeological or cultural resources are found during construction, Condition K.3 requires ground-disturbing activities to cease until a qualified archaeologist has evaluated the significance of the find and appropriate mitigation measures have been implemented.

Based upon the information provided by the CTUIR, the Council adopts the following condition to require that a cultural resources monitor be present during construction to monitor ground-disturbing activities:

> **New Condition K.5:** A cultural resources monitor must be present to monitor ground-disturbing construction activities. The qualifications of the selected cultural resources monitor shall be reviewed and approved by the Department, in consultation with the CTUIR Cultural Resources Protection Program. Cultural monitors shall be prioritized for selection based on demonstrated experience with CTUIR tribal resources.
>
> [AMD1 Condition K.5]

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The certificate holder states that no new historic, cultural, or archaeological resources have been recorded in the analysis area and therefore the nature and location of historic, cultural, and archaeological resources in the analysis area (as described in ASC Exhibit S) have not changed.[152] In addition, the RFA does not include changes to the site boundary, facility design, facility layout, or other changes that could result in potential impacts to historic, cultural, or archaeological resources not previously evaluated by the Council. Furthermore, the RFA maintains that the measures the certificate holder committed to in ASC Exhibit S to avoid physical damage to the alignment, construction materials, and design of the five historic-period resources considered eligible for listing with the National Register of Historic Places remain the same.[153] Therefore, based upon compliance with existing and new site certificate conditions, the Council finds that the design, construction and operation of the facility, with the requested extension of the construction deadline, would not result in a significant adverse impact to identified historic, cultural, or archaeological resources.

[152] RFA Section 2.5.10.
[153] RFA Section 2.5.10 and ASC Exhibit S, Section S.5.3.

Conclusions of Law

Based on the foregoing findings of fact and conclusions of law, and subject to compliance with existing and new site certificate conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would comply with the Council's Historic, Cultural and Archaeological Resources standard.

III.L. Recreation: OAR 345-022-0100

> *(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity:*
>
> *(a) Any special designation or management of the location;*
> *(b) The degree of demand;*
> *(c) Outstanding or unusual qualities;*
> *(d) Availability or rareness;*
> *(e) Irreplaceability or irretrievability of the opportunity.*
> ****[154]*

Findings of Fact

The Recreation standard requires the Council to find that the design, construction, and operation of a facility are not likely to result in significant adverse impacts to "important" recreational opportunities. Therefore, the Council's Recreation standard applies to only those recreational opportunities that the Council finds "important" using the factors listed in the sub-paragraphs of section (1) of the standard.

The certificate holder provided information about important recreational opportunities in ASC Exhibit T. The Council addressed the Recreation standard in Section IV.L. of the *Final Order on the ASC* and found that the facility would comply with the standard. The Council did not apply any specific conditions related to the Recreation standard.

[154] The facility is not a special criteria facility under OAR 345-0015-0310; therefore, OAR 345-022-0100(2) is not applicable.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The geographic extent and location of the important recreational opportunities described in ASC Exhibit T remains the same.[155] The request for amendment does not include changes to the site boundary, facility design, facility layout, or other changes that could reduce public access to recreational opportunities or increase noise or traffic resulting from facility construction or operation. Furthermore, the request for amendment does not include changes to the facility structures, layout, or emissions that would result in new or different visual impacts.

As such, the Council finds that the facility, with the requested extension of the construction deadlines, would not result in a significant adverse impact to any important recreational opportunity.

Conclusions of Law

Based on the foregoing findings of fact and conclusions, the Council finds that the facility, with the requested extension of the construction deadlines, would comply with the Council's Recreation standard.

III.M. Public Services: OAR 345-022-0110

> *(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area described in the project order to provide: sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, police and fire protection, health care and schools.*
>
> ** * *[156]*

The Council's Public Services standard requires the Council to find that the facility is not likely to result in significant adverse impacts on the ability of public and private service providers to supply sewer and sewage treatment, water, stormwater drainage, solid waste management, housing, traffic safety, police and fire protection, health care, and schools.

[155] RFA Section 2.5.11.

[156] Sections (2) and (3) of the rule are not applicable because the facility is not a special criteria facility or a facility that would produce power from wind, solar, or geothermal energy.

Findings of Fact

The certificate holder addressed potential impacts to public services from construction and operation of the facility in ASC Exhibit U. The Council addressed the Public Services standard in Section IV.M. of the *Final Order on the ASC* and found that, subject to Conditions M.1 through M.8, the facility would comply with the standard. These conditions require the certificate holder to implement traffic safety measures; obtain all required transportation permits from Umatilla County; restore public roads to pre-construction conditions or better upon completion of construction; and to enter into a development agreement with Umatilla County to undertake roadway or access improvements (and to pay its proportionate share of the cost for those improvements). These conditions also require the certificate holder to submit Notice(s) of Proposed Construction or Alteration to the Federal Aviation Administration and the Oregon Department of Aviation prior to commencing construction; fence and secure the Station site; develop and implement a fire protection system; provide a site plan to the Hermiston Fire & Emergency Services District; and ensure that appropriate fire protection agency personnel have an up-to-date list of the names and telephone numbers of facility personnel available to respond on a 24-hour basis in case of an emergency at the facility site during facility operation.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The request for amendment does not include changes to the site boundary, facility design, facility layout, or other changes that could increase traffic or water use resulting from facility construction or operation. In addition, because the request for amendment does not include changes to the design of the facility, the certificate holder does not expect the generation, management, or disposal of solid waste, stormwater, or wastewater to change. Furthermore, the request for amendment does not propose to use different service providers from those identified in ASC Exhibit U.

The certificate holder provided an updated (May 30, 2018) letter from the Port of Umatilla (RFA Attachment 3) confirming that it continues to have the capacity and permits to supply process water to the Perennial Wind Chaser Station during construction and operation. As discussed in Section III.B., *Organizational Expertise* of this order, DEQ has renewed Lamb Weston's WPCF

permit; therefore, the certificate holder continues to explore sending reclaimed water from the facility to the HGP as makeup water for the HGP's cooling tower.[157]

Construction and operation of the facility, with the requested extension of the construction deadlines, would result in the presence of temporary and permanent employees within the analysis area; the increase in size of the local workforce could affect public and private providers of housing, police and fire protection, health care, and schools. As described in the RFA, however, the amendment would not change the previously estimated sizes of the construction and operations workforces.[158] In addition, the certificate holder asserts that, due to an increase in the Umatilla County population of only 1.44 percent between 2014 and 2017, demand for public services in the facility's vicinity has not changed since the ASC was submitted in 2014.[159]

The Hermiston Police Department Communications Center previously managed 911 calls for the City of Hermiston. The center closed in 2014 and this service is now provided by the Umatilla County Public Safety Answering Point. The Hermiston Figure and Emergency Services District acquired an additional medical unit (which provides emergency medical transportation) since 2014.

As explained in ASC Exhibit U, the Hermiston Fire and Emergency Services District's Assistant Chief informed the certificate holder in 2013 that the facility would pose no significant impact on the district's ability to provide service within the district.[160] In July 2016 the Hermiston Fire and Emergency Services District merged with the Stanfield Fire District to create the Umatilla Fire District 1. The new fire district includes all fire stations from the previous Stanfield Fire and Hermiston Fire and Emergency Services districts, including the station (Station 23) located approximately two miles from the facility.[161] As part of the RFA, the certificate holder contacted

[157] The HGP currently discharges its reclaimed water to Lamb Weston. Lamb Weston uses the reclaimed water for wash down or irrigation purposes and operates under the WPCF permit. As described in ASC Exhibit U, if Lamb Weston does not consent to receipt of the Perennial Wind Chaser Station's reclaimed water (via the HGP), the certificate holder would use a ZLD system, such that the only wastewaters produced during operation would be sewage (treated and disposed of through an onsite septic system, as discussed in ASC Exhibit U, Section U.3.1) and combustion turbine water wash wastes (which would be trucked offsite for processing and disposal).
[158] RFA Section 2.5.12.
[159] RFA Section 2.5.12.
[160] ASC Exhibit U, Section U.4.5.
[161] RFA Section 2.5.12 and Attachment 9.

Umatilla County Fire District 1, and Fire Marshal Scott Goff confirmed that the new district does not anticipate any change in its ability to provide services to the facility.[162]

The greatest potential for school services to be impacted is during facility construction, when construction workers may relocate to the analysis area with children of school age.[163] While enrollment at the Hermiston School District is nearing capacity, Interim Superintendent of Schools Tricia Mooney indicated on July 16, 2018 that she does not anticipate any adverse impact from an increase in student population associated with facility construction.[164]

Based upon the preceding assessment and subject to compliance with existing site certificate conditions, the Council finds that construction and operation of the facility, with the requested extension of the construction deadlines, are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area to provide sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, police and fire protection, health care and schools.

Conclusions of Law

Based on the foregoing findings and the evidence in the record, and subject to compliance with existing site certificate conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would comply with the Council's Public Services Standard.

III.N. Waste Minimization: OAR 345-022-0120

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that, to the extent reasonably practicable:

(a) The applicant's solid waste and wastewater plans are likely to minimize generation of solid waste and wastewater in the construction and operation of the facility, and when solid waste or wastewater is generated, to result in recycling and reuse of such wastes;

[162] Attachment 9.
[163] ASC Exhibit U, Section U.4.7.
[164] RFA Section 2.5.12.

(b) The applicant's plans to manage the accumulation, storage, disposal and transportation of waste generated by the construction and operation of the facility are likely to result in minimal adverse impact on surrounding and adjacent areas.

****165*

Findings of Fact

The Waste Minimization Standard requires the Council to find that the certificate holder would minimize the generation of solid waste and wastewater, and that the waste generated would be managed to result in minimal adverse impacts on surrounding and adjacent areas.

The certificate holder provided an inventory of materials that would be used during construction and operation of the facility in ASC Exhibit G, and described its plan to manage solid waste and wastewater in ASC Exhibit V. In Section IV.N.2 of the *Final Order on the ASC*, the Council found that, subject to site certificate conditions N.1 through N.6, the facility would comply with the Waste Minimization standard.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The request for amendment does not include changes to the design of the facility; therefore, the certificate holder does not expect the generation, management, or disposal of solid waste and wastewater to differ from the description in ASC Exhibit V.[166] Based on this reasoning, the Council finds that the extension of the construction deadlines would not impact the certificate holder's ability to minimize the generation of solid waste and wastewater, and that the waste generated would be managed to result in minimal adverse impacts on surrounding and adjacent areas.

Conclusions of Law

Based on the foregoing analysis and subject to existing site certificate conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would comply with the Waste Minimization Standard.

[165] Sections (2) and (3) of the rule are not applicable because the facility is not a special criteria facility or a facility that would produce power from wind, solar, or geothermal energy.
[166] RFA Section 2.5.13.

III.O. Division 23 Standards

The Division 23 standards apply only to "nongenerating facilities" as defined in ORS 469.503(2)(e)(K), except nongenerating facilities that are related or supporting facilities. The facility, with proposed changes, would not be a nongenerating facility as defined in statute and therefore Division 23 is inapplicable to the facility.

III.P. Division 24 Standards

The Council's Division 24 standards include specific standards for siting facilities including wind, underground gas storage reservoirs, transmission lines, and facilities that emit carbon dioxide. The Division 24 standards applicable to the Perennial Wind Chaser Station are the Siting Standards for Transmission Lines (OAR 345-024-0090) and the Standards for Energy Facilities that Emit Carbon Dioxide (OAR 345-024-0500 through OAR 345-024-0720).

III.P.1. Siting Standards for Transmission Lines: OAR 345-024-0090

To issue a site certificate for a facility that includes any transmission line under Council jurisdiction, the Council must find that the applicant:

(1) Can design, construct and operate the proposed transmission line so that alternating current electric fields do not exceed 9 kV per meter at one meter above the ground surface in areas accessible to the public;

(2) Can design, construct and operate the proposed transmission line so that induced currents resulting from the transmission line and related or supporting facilities will be as low as reasonably achievable.

Findings of Fact

The Siting Standards for Transmission Lines address issues associated with alternating current electric fields and induced currents generated by high-voltage transmission lines. OAR 345-024-0090(1) sets a limit for electric fields from transmission lines of not more than 9 kV per meter at one meter above the ground surface in areas that are accessible to the public. Section (2) requires that the certificate holder design, construct, and operate the line in a manner that reduces the risk posed by induced current.

The certificate holder provided information related to the Siting Standards for Transmission Lines in ASC Exhibit AA, including an assessment of the electric fields that would be generated by the reconductored transmission line after replacing the 115-kV conductor on the existing

double circuit transmission line with a 230-kV conductor. Exhibit AA identified occupied structures within 200 feet on each side of the center line of the transmission line, and calculated the maximum strength of electric fields at these structures (ASC Exhibit AA, Table AA-1). The analysis showed that at every point within the ROW (including the ROW centerline and the edge of the ROW), as well as within 200 feet of the ROW centerline, the electric fields produced by the reconductored transmission line would remain well below the 9 kV per meter (at one meter above ground) limit set by OAR 345-024-0090(1).[167] The Council addressed the Siting Standards for Transmission Lines in Section IV.O.1 of the *Final Order on the ASC*, and found that, subject to Condition O.1 requiring compliance with the National Electric Safety Code (NESC) and implementation of a program to reduce potential induced current impacts, the facility would comply with the Council's Siting Standards for Transmission Lines.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The request for amendment does not include changes to the design or location of the Perennial Wind Chaser Station transmission line. However, the certificate holder identified one new residence within 200 feet of the transmission line which was not previously assessed in ASC Exhibit AA.[168] Because ASC Exhibit AA demonstrated that the reconductored transmission line would comply with the electric fields limit set by OAR 345-024-0090(1) at any and every distance from the ROW centerline, the presence of the new occupied structure would not impact the ability of the facility to comply with the electric fields limit.

The Department notes that existing Condition O.1 requires the certificate holder to design, construct, and operate the transmission line in accordance with an outdated version of the NESC (the 1997 edition of the code).[169] Therefore, designing, constructing, and operating the facility in compliance with the most up-to-date version of the NESC may create a compliance issue with existing Condition O.1. The Council amends existing Condition O.1 to align the condition with the most current version of the NESC:

[167] The maximum electric field strength at one meter above ground would occur approximately 20 feet from the reconductored transmission line's ROW centerline. At a value of 1.34 kV per meter, the maximum electric field strength produced by the transmission line would be well below the 9 kV per meter threshold established by OAR 345-024-0090(1). ASC Exhibit AA, Figure AA-4.
[168] RFA Section 2.6.1.
[169] Condition O.1 was imposed by the Council based on the site-specific condition at OAR 345-025-0010(4), which at the time of issuance of the site certificate provided reference to the 1997 edition of the NESC.

Amended Condition O.1:

(a) The certificate holder shall design, construct and operate the transmission line in accordance with the requirements of the version of the National Electrical Safety Code that is most current at the time that final engineering of each facility component is completed ~~(American National Standards Institute, Section C2, 1997 Edition)~~; and

(b) The certificate holder shall develop and implement a program that provides reasonable assurance that all fences, gates, cattle guards, trailers, or other objects or structures of a permanent nature that could become inadvertently charged with electricity are grounded or bonded throughout the life of the line.

[Final Order Condition O.1; AMD1; Site Specific Condition 345-027-0023(4)]

Conclusions of Law

Based on the foregoing findings of fact and conclusions, and subject to compliance with the amended condition, the Council finds that the facility, with the requested extension of the construction deadlines, would continue to comply with the Council's Siting Standards for Transmission Lines.

III.P.2. Standards for Energy Facilities that Emit Carbon Dioxide (OAR 345-024-0500 through OAR 345-024-0720)

345-024-0500
General
To issue a site certificate, the Council must find that the energy facility complies with any applicable carbon dioxide emissions standard adopted by the Council or enacted by statute. The Council shall adopt standards for fossil-fueled power plants and may adopt carbon dioxide emission standards for other energy facilities that emit carbon dioxide.

345-024-0580
Monetary Offset Rate
The monetary offset rate is $1.90 per ton of carbon dioxide emissions. After two years from October 23, 2017, the Council may by rule increase or decrease the monetary offset rate, subject to the requirements of ORS 469.503.

345-024-0590
Standard for Non-Base Load Power Plants

To issue a site certificate for a non-base load power plant, the Council must find that the net carbon dioxide emissions rate of the proposed facility does not exceed 0.614 pounds

of carbon dioxide per kilowatt-hour of net electric power output, with carbon dioxide emissions and net electric power output measured on a new and clean basis. For a base load gas plant designed with power augmentation technology as defined in OAR 345-001-0010, the Council shall apply this standard to the incremental carbon dioxide emissions from the designed operation of the power augmentation technology. The Council shall determine whether the carbon dioxide emissions standard is met as follows:

(1) The Council shall determine the gross carbon dioxide emissions that are reasonably likely to result from the operation of the proposed energy facility. The Council shall base such determination on the proposed design of the energy facility, the limitation on the hours of generation for each fuel type and the average temperature, barometric pressure and relative humidity at the site during the times of the year when the facility is intended to operate. For a base load gas plant designed with power augmentation technology, the Council shall base its determination of the incremental carbon dioxide emissions on the proposed design of the facility, the proposed limitation on the hours of generation using the power augmentation technology and the average temperature, barometric pressure and relative humidity at the site during the times of the year when the facility is intended to operate with power augmentation technology. The Council shall adopt site certificate conditions to ensure that the predicted carbon dioxide emissions are not exceeded on a new and clean basis; however, the Council may modify the parameters of the new and clean basis to accommodate average conditions at the times when the facility is intended to operate and technical limitations, including operational considerations, of a non-base load power plant or power augmentation technology or for other cause.

(2) For any remaining emissions reduction necessary to meet the applicable standard, the applicant may elect to use any of the means described in OAR 345-024-0600 or any combination thereof. The Council shall determine the amount of carbon dioxide or other greenhouse gas emissions reduction that is reasonably likely to result from the applicant's offsets and whether the resulting net carbon dioxide emissions meet the applicable carbon dioxide emissions standard. The amount of greenhouse gas emissions means the pounds of carbon dioxide and the carbon dioxide equivalent of other greenhouse gases. For methane, one pound of methane is equivalent to 25 pounds of carbon dioxide. For nitrous oxide, one pound of nitrous oxide is equivalent to 298 pounds of carbon dioxide.

(3) If the applicant elects to comply with the standard using the means described in OAR 345-024-0600(2), the Council shall determine the amount of greenhouse gas emissions reduction that is reasonably likely to result from each of the proposed offsets. In making this determination, the Council shall not allow credit for offsets that have already been allocated or awarded credit for greenhouse gas emissions reduction in another

regulatory setting. The fact that an applicant or other parties involved with an offset may derive benefits from the offset other than the reduction of greenhouse gas emissions is not, by itself, a basis for withholding credit for an offset. The Council shall base its determination of the amount of greenhouse gas emission reduction on the following criteria and as provided in OAR 345-024-0680:

(a) The degree of certainty that the predicted quantity of greenhouse gas emissions reduction will be achieved by the offset.

(b) The ability of the Council to determine the actual quantity of greenhouse gas emissions reduction resulting from the offset, taking into consideration any proposed measurement, monitoring and evaluation of mitigation measure performance.

(c) The extent to which the reduction of greenhouse gas emissions would occur in the absence of the offsets.

(4) Before beginning construction, the certificate holder shall notify the Department of Energy in writing of its final selection of an equipment vendor and shall submit a written design information report to the Department sufficient to verify the facility's designed new and clean heat rate and its nominal electric generating capacity at average annual site conditions for each fuel type. For a base load gas plant designed with power augmentation technology, the certificate holder shall include in the report information sufficient to verify the facility's designed new and clean heat rate, tested under parameters the Council orders pursuant to section (1), and the nominal electric generating capacity at average site conditions during the intended use for each fuel type from the operation of the proposed facility using the power augmentation technology. The certificate holder shall include the proposed limit on the annual average number of hours for each fuel used, if applicable. The certificate holder shall include the proposed total number of hours of operation for all fuels, subject to the limitation that the total annual average number of hours of operation per year is not more than 6,600 hours. In the site certificate, the Council may specify other information to be included in the report. The Department shall use the information the certificate holder provides in the report as the basis for calculating, according to the site certificate, the gross carbon dioxide emissions from the facility and the amount of greenhouse gas emissions reductions the certificate holder must provide under OAR 345-024-0600.

(5)(a) Every five years after commencing commercial operation, the certificate holder shall report to the Council the facility's actual gross carbon dioxide emissions. The certificate holder shall calculate actual gross carbon dioxide emissions using the new and clean heat rate and the actual hours of operation on each fuel during the five-year period or shall report to the Council the actual measured or calculated carbon dioxide

emissions as reported to either the Oregon Department of Environmental Quality or the U.S. Environmental Protection Agency pursuant to a mandatory carbon dioxide emissions reporting requirement.

(b) The certificate holder shall specify its election of method used to measure or calculate carbon dioxide emissions in the notification report described at section (4) of this rule. That election, once made, shall apply for each five year period unless the site certificate is amended to allow a different election. If the certificate holder calculates actual carbon dioxide emissions using the new and clean heat rate and the actual hours of operation, the certificate holder shall also report to the Council the facility's actual annual hours of operation by fuel type. If the actual gross carbon dioxide emissions exceed the projected gross carbon dioxide emissions for the five-year period calculated under section (4), the certificate holder shall offset any excess emissions for that period and shall offset estimated future excess carbon dioxide emissions using the monetary path as described in OAR 345-024-0600(3) and (4) or as approved by the Council.

(6) For a base load gas plant designed with power augmentation technology, every five years after commencing commercial operation, the certificate holder shall report to the Council the facility's actual hours of operation using the power augmentations technology for each fuel type. If the actual gross carbon dioxide emissions, calculated using the new and clean heat rate, tested under parameters the Council orders pursuant to section (1), and the actual hours of operation using the power augmentation technology on each fuel during the five-year period exceed the projected gross carbon dioxide emissions for the five-year period calculated under section (4), the certificate holder shall offset any excess emissions for that period and shall offset estimated future excess carbon dioxide emissions using the monetary path as described in OAR 345-024-0600(3) and (4) or as approved by the Council.

345-024-0600
Means of Compliance for Non-Base Load Power Plants
The applicant may elect to use any of the following means, or any combination thereof, to comply with the carbon dioxide emissions standard for non-base load power plants or for the incremental carbon dioxide emissions from the operation of a base load gas plant with power augmentation technology:

(1) Designing and operating the facility to produce electrical and thermal energy sequentially from the same fuel source and using the thermal energy to displace another source of carbon dioxide emissions from fossil fuels that would have otherwise continued to occur. The Council shall adopt site certificate conditions ensuring that the carbon dioxide emissions reduction will be achieved.

(2) Implementing offset projects directly or through a third party, pursuant to OAR 345-024-0680. The Council may adopt site certificate conditions ensuring that the proposed offset projects are implemented by the date specified in the site certificate, but shall not require that predicted levels of avoidance, displacement or sequestration of greenhouse gas emissions be achieved.

(3) Providing offset funds, directly or through a third party, in an amount deemed sufficient to produce the reduction in greenhouse gas emissions necessary to meet the applicable carbon dioxide emissions standard. The applicant or third party shall use the funds as specified in OAR 345-024-0710. The Council shall deem the payment of the monetary offset rate, pursuant to OAR 345-024-0580, to result in a reduction of one ton of carbon dioxide emissions. The Council shall determine the offset funds using the monetary offset rate and the level of emissions reduction required to meet the applicable standard. If the Council issues a site certificate based on this section, the Council may not adjust the amount of the offset funds based on the actual performance of offsets.

(4) Notwithstanding sections (1), (2) or (3), if the certificate holder exceeds the projected gross carbon dioxide emissions calculated under OAR 345-024-0590(4) during any five-year reporting period described in 345-024-0590(5) and (6), the certificate holder shall offset excess emissions for the specific reporting period according to subsection (a) and shall offset the estimated future excess emissions according to subsection (b). The certificate holder shall offset excess emissions using the monetary path as described in subsection (c) and OAR 345-024-0710 or as approved by the Council.

(a) In determining the excess carbon dioxide emissions that the certificate holder must offset for a five-year period, the Council shall credit the certificate holder with offsets equal to the difference between the carbon dioxide emissions allowed by the site certificate in previous periods and actual emissions, if actual emissions were lower than allowed. Once a certificate holder has used a credit, the certificate holder shall not use it again.

(b) The Council shall specify in the site certificate a methodology for estimating future excess carbon dioxide emissions. The Department of Energy shall calculate estimated future excess emissions. To estimate excess emissions for the remaining period of the deemed life of the facility, the Department shall use the annual average number of hours of operation during the five-year period in which the certificate holder exceeded the estimated gross carbon dioxide emissions described in OAR 345-024-0590(5) and the new and clean heat rate and capacity for the facility, adjusted for the average temperature, barometric pressure and relative humidity at the site during the times of the year when the facility is intended to operate. If the annual average hours exceed

6,600, the Department shall estimate emissions at 100 percent capacity for the remaining period of a deemed 30-year life of the facility. At the request of the certificate holder, the Council may, by amendment of the site certificate, use an alternative methodology to estimate future excess carbon dioxide emissions.

(c) The certificate holder shall pay for the net excess carbon dioxide emissions calculated pursuant to subsections (a) and (b) at the monetary path offset rate in real dollars for the quarter and year in which the Council issued the final order that applied the carbon dioxide standard. The Council shall specify in the site certificate the methodology for calculating the real dollar value of the monetary offset rate. The Department shall calculate the net excess carbon dioxide emissions and notify the certificate holder of the amount of the monetary path payment required to offset them. The certificate holder shall pay fully the required amount to the qualified organization within 60 days of notification by the Department of the amount. The certificate holder shall not be eligible for a refund of any monetary path payments due to the calculations in this rule.

(5) Any other means that the Council adopts by rule for demonstrating compliance with the carbon dioxide emissions standard.

(6) If the Council or a court on judicial review concludes that the applicant has not demonstrated compliance with the applicable carbon dioxide emissions standard under sections (1), (2) or (5) of this rule, or any combination thereof, and the applicant agrees to meet the requirements of sections (3) and (4) for any deficiency, the Council or a court shall find compliance based on such agreement.

345-024-0610
Modification of the Standard for Non-Base Load Power Plants
The Council may by rule modify the carbon dioxide emissions standard for non-base load power plants in OAR 345-024-0590 so that the standard remains equivalent to the standard for the net carbon dioxide emissions rate of a base load gas plant, subject to the principles described in OAR 345-024-0510.

345-024-0710
Monetary Path Payment Requirement
(1) If the applicant elects to meet the applicable carbon dioxide emissions standard in whole or in part under OAR 345-024-0560(3), 345-024-0600(3) or 345-024-0630(2), (4) and (5), the applicant shall provide a bond or letter of credit in a form reasonably acceptable to the Council to ensure the payment of the offset funds and the additional funds required under section (4) of this rule. The applicant shall provide such security by the date specified in the site certificate. In the site certificate, the Council shall specify a date no later than the commencement of construction of the facility for base load gas

plants and non-base load power plants. For nongenerating facilities, the Council shall specify a date no later than the commencement of construction of the facility for providing the initial bond or letter of credit, and the Council shall specify conditions for providing subsequent incremental payments to meeting the monetary path payment requirement. The certificate holder for a nongenerating facility must meet its incremental monetary path payment requirements before exhausting its offset credit account, as described in OAR 345-024-0630(4). In no case shall the applicant diminish the bond or letter of credit or receive a refund from a qualified organization based on the calculations of the facility's emissions on a new and clean basis for a fossil-fueled power plant or any other measure for a nongenerating energy facility. A qualified organization shall not refund any offset funds to a certificate holder based on the operation or performance of a non-base load power plant during any five-year period reported under OAR 345-024-0590(5) or, for a nongenerating facility, on any offset credits the certificate holder provided under 345-024-0620(5).

(2) In the site certificate, the Council shall require the certificate holder to disburse the offset funds and other funds required as specified in sections (3) and (4), unless the Council finds that no qualified organization exists, in which case the Council shall require the certificate holder to disburse the offset funds as specified in 345-024-0720(2).

(3) When the certificate holder receives written notice from the qualified organization certifying that the qualified organization is contractually obligated to pay any funds to implement offsets using the offset funds, the certificate holder shall make the requested amount available to the qualified organization unless the total of the amount requested and any amounts previously requested exceeds the offset funds, in which case the certificate holder shall make available only the remaining amount of the offset funds. The qualified organization shall use at least 80 percent of the offset funds for contracts to implement offsets. The qualified organization shall assess offsets for their potential to qualify in, generate credits in or reduce obligations in other regulatory settings. The qualified organization may use up to 20 percent of the offset funds for monitoring, evaluation, administration and enforcement of contracts to implement offsets.

(4) At the request of the qualified organization and in addition to the offset funds, the certificate holder shall pay the qualified organization an amount equal to 10 percent of the first $500,000 of the offset funds and 4.286 percent of any offset funds in excess of $500,000. The certificate holder for a base load gas plant shall pay not less than $50,000, unless the Council specifies a lesser amount in the site certificate. In the site certificate, the Council may specify a minimum amount that other fossil-fueled power plants or nongenerating energy facilities must pay. This payment compensates the qualified organization for its costs of selecting offsets and contracting for the implementation of offsets.

(5) Notwithstanding any provision to the contrary, a certificate holder subject to this rule has no obligation with regard to offsets, the offset funds or the funds required by section (4) other than to make available to the qualified organization the total amount required under OAR 345-024-0560(3), 345-024-0600(3) and (4), 345-024-0630(2), (4) and (5), and section (4) of this rule. The Council shall not base a revocation of the site certificate or any other enforcement action with respect to the certificate holder on any nonperformance, negligence or misconduct by the qualified organization.

(6) For monetary path payments a certificate holder must make before beginning construction, the certificate holder shall make all offset fund payments and all payments required by section (4) to the qualifying organization in real dollars of the year in which the Council issues a final order applying the carbon dioxide emissions standard to the energy facility. In the site certificate, the Council shall specify an appropriate inflation index for calculating real dollars. For a non-base load power plant, if a certificate holder must make a payment as described in OAR 345-024-0600(4), the certificate holder shall make a payment that has the same present value per ton of carbon dioxide as the monetary path offset rate of the year in which the Council issued the final order applying the carbon dioxide standard. In the site certificate, the Council shall specify the methodology for calculating present value. If the certificate holder of a nongenerating facility must make payments as described in OAR 345-024-0630(4) and (5), the Council shall specify in the site certificate the method for calculating the rate for the dollar value per ton of carbon dioxide required according to subsection (a) or (b) below:

(a) Unless the applicant and the Council agree to the methodology in subsection (b), the certificate holder shall make payments that have the same present value per ton of carbon dioxide as the monetary path offset rate of the year in which the Council issued the final order applying the carbon dioxide standard. The Council shall set an appropriate discount rate for calculating the present value, using the cost of capital most recently approved by a state utility regulatory commission for that utility or a similar utility as a guide; or

(b) If the applicant requests and the Council agrees, the certificate holder shall make payments at the monetary path offset rate in effect on the date the certificate holder makes the payment.

345-024-0720
Qualified Organization

(1) If the applicant elects to meet the applicable carbon dioxide emissions standard in whole or in part under OAR 345-024-0560(3), 345-024-0600(3) and (4), or 345-024-0630(2), (4) and (5), the applicant shall identify the qualified organization. The applicant

may identify an organization that has applied for, but has not received, an exemption from federal income taxation, but the Council may not find that the organization is a qualified organization unless the organization is exempt from federal taxation under section 501(c)(3) of the Internal Revenue Code as amended and in effect on September 18, 2015.

(2) If the Council finds there is no qualified organization, the certificate holder shall disburse the offset funds according to one or more contracts for implementation of offsets as determined by the following process:

(a) The Council shall establish criteria for selection of offsets, based on the reduction of net carbon dioxide emissions and the criteria set forth in OAR 345-024-0550(3) for base load plants, 345-024-0590(3) for non-base load power plants and 345-024-0620(3) for nongenerating facilities. The Council may consider the costs of particular types of offsets in relation to the expected benefits of such offsets. In establishing criteria, the Council shall not require the certificate holder to select particular offsets and shall allow the certificate holder a reasonable range of choices in selecting offsets.

(b) Based on the criteria established by the Council, the certificate holder shall select one or more offsets. The certificate holder shall give written notice of its selections to the Council and to any person requesting notice. For the purposes of this rule, the date of notice is the date the certificate holder places the notice in the United States mail, with first-class postage prepaid.

(c) On petition by the Department of Energy or by any person adversely affected or aggrieved by the certificate holder's selection of offsets, or on the Council's own motion, the Council may review the selection. The petition must be received by the Council within 30 days of the date of notice.

(d) The Council shall approve the certificate holder's selection unless it finds that the selection is not consistent with criteria established under subsection (a).

(e) The certificate holder shall execute one or more contracts to implement the selected offsets within 18 months after commencing construction of the facility unless the Council allows additional time based on a showing of good cause by the certificate holder. If a certificate holder would have made a payment to a qualified organization as described in OAR 345-024-0600(4) or 345-024-0630(4) or (5), the certificate holder shall instead execute one or more contracts to implement the selected offsets, by a method acceptable to the Council, within 18 months after reporting to the Council as described in 345-024-0590(5) or within 18 months after the Department notifies the certificate holder that the certificate holder must replenish the offset credit account as described in 345-

024-0630(4). The certificate holder shall, under such contracts, obligate the expenditure of at least 85 percent of the offset funds for the implementation of offsets. The certificate holder may spend no more than 15 percent of the offset funds on monitoring, evaluation and enforcement of such contracts.

(f) The certificate holder's financial liability for implementation, monitoring, evaluation and enforcement of offsets under this subsection (2) is limited to the amount of any offset funds not already contractually obligated. The Council shall not base a revocation of the site certificate or any other enforcement action with respect to the certificate holder on any nonperformance, negligence or misconduct by the entity or entities implementing, monitoring or evaluating the selected offsets.

(3) Every qualified organization that has received funds under this rule shall, at five-year intervals beginning on the date of receipt of such funds, provide the Council with the information the Council requests about the qualified organization's performance. The Council shall evaluate the information requested and, based on such information, shall make recommendations to the Legislative Assembly that the Council deems appropriate.

Findings of Fact

The certificate holder provided information about compliance with the Council's Standards for Energy Facilities that Emit Carbon Dioxide (hereafter, "Carbon Dioxide Standard") in ASC Exhibit Y. As explained in that exhibit, the power plant would be classified as a "non-base load power plant" as defined in OAR 345-001-0010(40) because it is a fossil-fueled generating facility that is limited by the site certificate to an average number of hours per year of not more than 6,600 hours. To issue a site certificate for a non-base load power plant, the Council must find that the net carbon dioxide emissions rate of the facility does not exceed 0.614 pounds of carbon dioxide per kilowatt-hour (lb. CO_2/kWh) of net electric power output, with CO_2 emissions and net electric power output measured on a new and clean basis. Energy facilities subject to the Carbon Dioxide standard may emit CO_2 at a net rate up to 0.614 lb. CO_2/kWh without needing to offset those CO_2 emissions, and any emissions above the net rate of 0.614 lb. CO_2/kWh must be offset via one of the compliance pathway options outlined in the standard. The certificate holder elected to comply with the Carbon Dioxide standard by providing offset funds to a qualified organization as allowed by OAR 345-024-0600(3) and in compliance with the monetary path payment requirement of OAR 345-024-0710 to offset the facility's excess CO_2 emissions.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy

requirements of the standard.[170] As part of its RFA, the certificate holder does not propose to change the qualified organization previously approved by Council (the Climate Trust), nor does the certificate holder propose facility design changes that would impact the type or amount of CO_2 emissions that would be emitted from the facility. The RFA does, however, assume fewer annual hours (3,000 instead of the 4,400 hours assumed in ASC Exhibit Y) of power plant operations for the purposes of calculating excess tons of CO_2 expected to result from operation of the facility.[171]

As the Council previously found in Section IV.S.1. of the *Final Order on the ASC*, the estimates of CO_2 emission calculations for the facility do not necessarily reflect the actual emissions, offsets, or monetary path payments to be required. OAR 345-024-0590(4) allows the certificate holder flexibility in its choice of equipment vendor and facility design, within parameters allowed pursuant to OAR 345-027-0350. Pursuant to OAR 345-024-0590(4), before beginning construction of the facility, the certificate holder must notify the Department in writing of its final selection of an equipment vendor and must submit a written design information report to the Department sufficient to verify the facility's new and clean heat rate and its nominal electric generating capacity at average annual site conditions. The Department must thereafter use this information as the basis for calculating the gross CO_2 emissions from the facility and the amount of greenhouse gas emissions reduction the certificate holder must provide under OAR 345-024-0600. Existing site certificate Condition S.1 includes the notification requirements of OAR 345-024-0590(4), including the requirement that the certificate holder provide the Department with the proposed total number of hours of operation, subject to the limitation that the total annual average number of hours of operation per year is not more than 6,600 hours.

[170] On the record of the draft proposed order public hearing, many commenters expressed concern about the climate impacts of fossil fuel infrastructure and hydraulic fracturing. Commenters additionally pointed to the requirement that the Council 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 commencement or completion deadlines. The commenters argue that changes in fact or law that the Council must consider include Oregon's evolving policies with respect to climate change as well as scientific literature published since the site certificate was executed that "demonstrate the cradle-to-grave climate change impacts of fracked gas." Based upon the language of OAR 345-027-0375(2)(b), changes in fact or law must be considered in the context of the facility's compliance with laws and standards applicable to the Council's review. The one Council standard directly related to climate change is the Carbon Standard. Upstream carbon emissions, such as methane released during the production and transportation of natural gas, are not within the scope of the Council's Carbon Standard.

[171] RFA Attachment 11.

Despite the reduced operational hours estimate, the monetary path payment estimated in this RFA ($16.36 million without a ZLD system and $16.55 million with a ZLD system) exceeds the monetary path payment estimated in ASC Exhibit Y ($13.83 without a ZLD system and $14.02 with a ZLD system) due to recent Council rulemakings. Since the time the Council evaluated the facility in its *Final Order in the ASC* in 2015, the Council has modified the Carbon Dioxide Standard. At its September 21-22, 2017 meeting and its June 29, 2018 meeting, the Council approved amended language for portions of the Carbon Dioxide Standard (specifically, language in OARs 345-024-0550, -0570, -0580, -0590, and -0620). The changes relevant to the Perennial Wind Chaser Station include:

- The Council updated the monetary offset rate from $1.27 to $1.90 per ton of CO_2.
- The Council reset the benchmark heat rate from 6,955 Btu (British thermal units) per kWh higher heating value (adjusted to standardized conditions) to 6,321 Btu per kWh higher heating value (adjusted to standardized conditions).[172]
- The Council reset the net CO_2 emissions rate threshold for both base load and non-base load power plants from 0.675 lb. CO_2/kWh of net electric power output to 0.614 lb. CO_2/kWh of net electric power output. The net CO_2 emissions rate for both base load and non-base load power plants is based on the benchmark heat rate established at OAR 345-024-0570 and is determined by converting the amount of natural gas fuel combusted per kWh to the amount of CO_2 released per kWh.

These rulemakings affect both the total amount of excess CO_2 emissions from the facility and the amount of monetary path payment required for the Perennial Wind Chaser Station, as discussed below.

<u>CO_2 Emissions</u>

The certificate holder provided CO_2 emissions estimates under two operational scenarios. The following operational scenarios have not changed since the time of original EFSC review and approval of the site certificate:[173]

1) Wastewater from the facility would be sent to the HGP as makeup water for HGP's cooling tower, and then discharged as reclaimed water to Lamb Weston. This scenario is dependent upon Lamb Weston's ability to consent to receipt of the reclaimed water (see Section III.B., *Organizational Expertise* of this order). Under this scenario, the

[172] A heat rate is a measure of how efficient a thermal power plant is. It considers how much fuel energy, measured in Btus, is used to produce 1 kilowatt-hour of electricity.

[173] While these operational scenarios have not changed, as previously discussed the RFA assumes fewer annual hours (3,000 instead of the 4,400 hours assumed in ASC Exhibit Y) of power plant operations for the purposes of calculating excess tons of CO_2 expected to result from operation of the facility.

Perennial Wind Chaser Station's electrical output would be approximately 415.3 MW (with the actual output dependent upon the technology selected).

2) If Lamb Weston is not able to accept reclaimed water from the HGP that has come from the Perennial Wind Chaser Station, the certificate holder proposes to install a Zero Liquid Discharge (ZLD) system. Under this scenario, Perennial Wind Chaser Station's net electrical output would be approximately 411.9 MW (with the actual output dependent upon the technology selected).

Table CD-1 summarizes the Perennial Wind Chaser Station's CO_2 emissions under each of these two scenarios.

Table CD-1: Carbon Dioxide Emissions Calculations and Monetary Path Requirement

A. CO_2 Standard	**415 MW of Combustion Turbines**	**411.9 MW of Combustion Turbines (ZLD System Option)**
CO_2 Standard (lbs CO_2/kWh)	0.614	0.614
B. Parameters for Non-Base Load Gas Plant		
Net Power Output (kW)	415,312	411,882
New and Clean Gross Heat Rate (Btu/kWh) HHV	8,781	8,781
Annual Hours of Operation	3,000	3,000
C. Parameters for Power Augmentation		
Net Power Output (kW)	NA	NA
New and Clean Gross Heat Rate (Btu/kWh) HHV	NA	NA
Annual Hours of Operation	NA	NA
D. Calculations		
New Power Output (kW)	415,312	411,882
Annual Hours of Operation	3,000	3,000
Percent Time on Non-Base Load	34.2%	34.2%
Net Annual Generation (million kWh/yr)	1,245.9	1235.6
Deemed Life of Plant (years) by Statute or Rule	30	30
Total Gross Plant Output (million kWh for 30 years)	38,334	38,334
Total Net Plant Output (million kWh for 30 years)	37,378	37,069
Gross Heat Rate (Btu/kWh) HHV	8,781	8,781
CO_2 Emissions Rate (lbs CO_2/Btu)	0.00011715	0.00011715
Total Gross CO_2 Emissions (million lbs for 30 years)	39,434	39,434
E. Total Operations		

Combined Net Output (million kWh for 30 years)	37,378	37,069
Combined CO_2 Emissions (million lbs for 30 years)	39,434	39,434
Net CO_2 Emissions Rate (lbs CO_2/kWh)	1.055	1.064
CO_2 Standard (lbs CO_2/kWh)	0.614	0.614
Excess CO_2 Emissions Rate (lbs CO_2/kWh)	0.441	0.450
Excess Tons CO_2 (million tons over 30 years)	8.24	8.34
F. Monetary Path		
Offset Fund Rate ($/ton CO_2)	$1.90	$1.90
Offset Funds Required ($ million)[174]	$15.66	$15.85
Contracting and Selection Funds ($ million)[175]	$0.70	$0.71
Monetary Path Requirement ($ million)	$16.36	$16.55
Key: Btu/kWh = British thermal units per kilowatt hour; CO2 carbon dioxide; HHV = higher heating value; kW = kilowatt; kWh/yr; kilowatts-hours per year; lbs = pounds; lbs CO2/kWh = pounds of carbon dioxide per kilowatt hour; NA = not applicable		

According to RFA Attachment 11, the gross CO_2 emissions over a 30 year operational period, based upon average site conditions[176] and with the facility operating for 3,000 hours per year, were estimated to be approximately 39,434 million pounds of CO_2 with or without a ZLD system. The net CO_2 emissions rate (lbs CO_2/kwh) was estimated to be 1.055 lbs CO_2/kwh without a ZLD system and 1.064 lbs CO_2/kwh with a ZLD system. As previously stated, energy facilities subject to the Carbon Dioxide standard may emit CO_2 at a net rate up to 0.614 lb. CO_2/kWh without needing to offset those CO_2 emissions. Therefore, the excess CO_2 emissions rate for the facility would be 0.441 lbs CO_2/kwh without a ZLD system and 0.450 lbs CO_2/kwh with a ZLD system. The total excess CO_2 emissions for 30 years, at average site conditions and operating at 3,000 hours per year, are estimated to be approximately 8.24 million tons of CO_2 without a ZLD system and 8.34 million tons of CO_2 with a ZLD system. The certificate holder is responsible for offsetting the facility's excess CO_2 emissions.

[174] To arrive at offset funds required, the certificate holder multiplied the excess tons of CO_2 for the facility by the offset fund rate ($1.90 per ton of CO_2).
[175] Selection and contracting funds are determined by applying the formula in OAR 345-024-0710(4).
[176] The RFA uses the same annual average site conditions for temperature, barometric pressure, and relative humidity as ASC Exhibit Y.

Monetary Path Payment

The certificate holder elected to comply with the Carbon Dioxide Standard by providing offset funds and funds for the cost of selecting and contracting for offsets to a qualified organization (in this case, the Climate Trust)[177] as allowed by OAR 345-024-0600(3) and in compliance with the monetary path payment requirement of OAR 345-024-0710 to offset the facility's excess CO_2 emissions. OAR 345-024-0710(4) requires that, at the request of the qualified organization and in addition to the offset funds, the certificate holder also provide the qualified organization with funds for the cost of selecting and contracting for offsets.

The combination of offset funds and contracting and selection funds constitutes the monetary path payment requirement. Using the parameters in the RFA, the table above provides the excess tons of CO_2 expected to result from operation of the facility multiplied by the offset fund rate of $1.90 per ton of CO_2, which would result in a monetary path payment requirement of $16.36 million without a ZLD system and $16.55 million with a ZLD system. Contracting and selection funds represent $0.70 million and $0.71 million of those amounts, respectively.

The Council adopted conditions in Section IV.S.1. of the *Final Order on the ASC* for the purposes of compliance with the requirements in OAR 345-024-0590 through 345-024-0710 and to provide the mechanism for calculating the excess CO_2 emissions and the actual monetary path payment. Based upon the Council's September 2017 decision to amend the Carbon Dioxide Standard to increase the monetary offset rate from $1.27 to $1.90 per ton of CO_2, the Council amends site certificate Conditions S.2, S.10, and S.11 to align with the current standard:

> **Amended Condition S.2:** For the purposes of this site certificate, "monetary path payment requirement" means the amount of offset funds determined pursuant to OAR 345-024-0590 and -600 and the amount of the selection and contracting funds that the certificate holder must disburse to the Climate Trust, as the qualified organization, pursuant to OAR 345-024-0710 and the site certificate. The certificate holder shall calculate the monetary path payment using an offset fund rate of ~~$1.27~~ $1.90 per ton of carbon dioxide in ~~2015~~ 2019 dollars as follows:
>
> (c) The certificate holder shall calculate the ~~2015~~ 2019 dollars using the index described in subsection (c) below.
> (d) The certificate holder shall increase the amount of the bond or letter of credit described in Condition S.6 by the percentage increase in the index. The

[177] The Council has previously found that the Climate Trust is a "qualified organization." Section IV.S.1. of the *Final Order on the ASC*.

certificate holder shall index the funds from the date of the Council's approval of the site certificate to the date of disbursement of funds to The Climate Trust.

(e) The calculation of ~~2015~~ 2019 dollars shall be made using the same index described in Condition G.4. The amount of the bond or letter of credit shall increase annually by the percentage increase in the Index and shall be pro-rated within the year to the date of disbursement to The Climate Trust from the date of Council approval of the site certificate. If at any time the Index is no longer published, the Council shall select a comparable calculation of ~~2015~~ 2019 dollars without an amendment of the site certificate.

[Final Order Condition S.2; AMD1]

Amended Condition S.10: Based on the data from the Year One Tests described in Condition S.8, or actual measured emissions described in Condition S.9, the certificate holder shall calculate an adjusted monetary path payment. The certificate holder shall submit its calculations to the department for verification. If the adjusted amount exceeds the amount of the bond or letter of credit provided according to Condition S.7 before beginning construction, the certificate holder shall fully disburse the excess amount directly to The Climate Trust within 30 days of the department's verification of the calculations.

a. The certificate holder shall include the appropriate calculations of the adjusted monetary path payment with its reports of the results of the Year One Tests required under Condition S.8 or actual measured emissions required under Condition S.9.
b. For calculating the adjusted monetary path payment, the certificate holder shall use an offset fund rate of ~~$1.27~~ $1.90 per ton of carbon dioxide (in ~~2015~~ 2019 dollars) and shall calculate contracting and selecting funds based on 10 percent of the first $500,000 in offset funds and 4.286 percent of any offset funds in excess of $500,000 (in ~~2015~~ 2019 dollars).
c. In no case shall the certificate holder diminish the value of the bond or letter of credit it provided before beginning construction or receive a refund from The Climate Trust based on the calculations made using the results of the Year One Test required under Condition S.8 or actual measured emissions required under Condition S.9.

[Final Order Condition S.10; AMD1]

Amended Condition S.11: Every 5 years after commencing commercial operation of the facility (5-year reporting period), the certificate holder shall report to the Council the information required by either subsection (a) or (b), below. The certificate holder shall

submit five-year reports to the Council within 30 days of the anniversary date of beginning commercial operation of the facility.

a. If the certificate holder has elected to calculate any excess emissions using annual average hours of operation and new and clean heat rates, the certificate holder shall report the annual average hours of operation of each generating unit within the facility during that five-year reporting period. The certificate holder shall use the Year One Capacity and Year One Heat Rate that it reports for the corresponding generating units pursuant to Condition S.8 to calculate whether it owes supplemental monetary path payments.

b. If the certificate holder has elected to calculate any excess emissions using actual or measured carbon dioxide emissions reported to either the Oregon Department of Environmental Quality or the U.S. Environmental Protection Agency pursuant to a mandatory carbon dioxide reporting requirement, the certificate holder shall submit to the Council the carbon dioxide reporting data and net kWh generation for that five-year reporting period and shall use that data to determine whether it owes supplemental monetary path payments.

c. If the department determines that the facility exceeds the projected net total carbon dioxide emissions calculated pursuant to Condition S.3 and either Condition S.8 or S.9, prorated for five years, during any five-year reporting period, the certificate holder shall offset excess emissions for the specific reporting period according to subsection (c)(1) and shall offset the estimated future excess emissions according to subsection (c)(2). The certificate holder shall offset excess emissions using the monetary path described under Condition S.2. The certificate holder shall disburse funds to The Climate Trust within 30 days after notification by the department of the amount that the certificate holder owes.

    1. In determining the excess carbon dioxide emissions that the certificate holder must offset for a five-year period, the department shall apply OAR 345-024-0600(4)(a), unless the certificate holder has elected under OAR 345-024-0590(5) to utilize actual or measured carbon dioxide emissions as reported to either the Oregon Department of Environmental Quality or the U.S. Environmental Protection Agency pursuant to a mandatory carbon dioxide reporting requirement. The certificate holder shall pay for the excess emissions at ~~$1.27~~ $1.90 per ton of carbon dioxide emissions (in ~~2015~~ 2019 dollars). The department shall notify the certificate holder and The Climate Trust of the amount of the payment required, using the monetary path, to offset excess emissions.
    2. The department shall calculate estimated future excess emissions and notify the certificate holder of the amount of payment required, using the monetary path, to offset them. To estimate excess emissions for the remaining period of the deemed 30-year life of the facility, the department

shall use the parameters specified in OAR 345 024-0600(4)(b). The certificate holder shall pay for the estimated excess emissions at ~~$1.27~~ $1.90 per ton of carbon dioxide (in ~~2015~~ 2019 dollars). The department shall notify the certificate holder of the amount of payment required, using the monetary path, to offset future excess emissions.

[Final Order Condition S.11; AMD1]

In addition, based upon the Council's June 2018 decision to amend the Carbon Dioxide Standard to reset the net CO_2 emissions rate threshold for both base load and non-base load power plants from 0.675 lb. CO_2/kWh of net electric power output to 0.614 lb. CO_2/kWh of net electric power output, the Council amends site certificate Condition S.4 to align with the current standard:

Amended Condition S.4: The certificate holder shall submit all monetary path payment requirement calculations to the department for verification in a timely manner before submitting a bond or letter of credit for Council approval, before entering into a Memorandum of Understanding with The Climate Trust as required by Condition S.5, and before making disbursement to The Climate Trust. The net carbon dioxide emissions rate of the facility shall not exceed ~~0.675~~ 0.614 pounds of carbon dioxide per kilowatt-hour of net electric power output measured on a new and clean basis, as the department may modify such basis pursuant to Condition S.8(c).

[Final Order Condition S.4; AMD1]

Subject to compliance with existing and amended site certificate conditions, Council finds that the construction and operation of the facility would continue to meet the standards and means of compliance for non-base load power plants required in OAR 345-024-0590 and OAR 345-024-0600, and the monetary path payment requirements of OAR 345-024-0710.

Conclusions of Law

Based on the foregoing findings of fact and conclusions of law, and subject to compliance with the existing and amended site certificate conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would satisfy the Council's Carbon Dioxide Standard.

III.Q. Other Applicable Regulatory Requirements Under Council Jurisdiction

Under ORS 469.503(3) and under the Council's General Standard of Review (OAR 345-022-0000), the Council must determine whether the facility complies with "all other Oregon statutes

and administrative rules…as applicable to the issuance of a site certificate for the proposed facility." This section addresses the applicable Oregon statutes and administrative rules that are not otherwise addressed in Council standards, including noise control regulations, regulations for removal or fill of material affecting waters of the state, and regulations for appropriating ground water.

III.Q.1. Noise Control Regulations: OAR 340-035-0035

(1) Standards and Regulations:

*****

(b) New Noise Sources:

(A) New Sources Located on Previously Used Sites. No person owning or controlling a new industrial or commercial noise source located on a previously used industrial or commercial site shall cause or permit the operation of that noise source if the statistical noise levels generated by that new source and measured at an appropriate measurement point, specified in subsection (3)(b) of this rule, exceed the levels specified in Table 8, except as otherwise provided in these rules. For noise levels generated by a wind energy facility including wind turbines of any size and any associated equipment or machinery, subparagraph (1)(b)(B)(iii) applies.

(B) New Sources Located on Previously Unused Site:

(i) No person owning or controlling a new industrial or commercial noise source located on a previously unused industrial or commercial site shall cause or permit the operation of that noise source if the noise levels generated or indirectly caused by that noise source increase the ambient statistical noise levels, L10 or L50, by more than 10 dBA in any one hour, or exceed the levels specified in Table 8, as measured at an appropriate measurement point, as specified in subsection (3)(b) of this rule, except as specified in subparagraph (1)(b)(B)(iii).

(ii) The ambient statistical noise level of a new industrial or commercial noise source on a previously unused industrial or commercial site shall include all noises generated or indirectly caused by or attributable to that source including all of its related activities. Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement.

*****

Findings of Fact

The noise control regulations at OAR 340-035-0035 have been adopted by Council as the

compliance requirements for EFSC-jurisdiction energy facilities.

The certificate holder provided an assessment of compliance with the noise control regulations in ASC Exhibit X. The Council addressed the noise control regulations in Section IV.P. of the *Final Order on the ASC*, and found that, subject to site certificate conditions P.1 through P.4, the facility would comply with the noise control regulations. These conditions require the certificate holder to conduct additional noise modelling prior to commencing construction; monitor and record the actual statistical noise levels during facility operation if so directed by the Department; maintain a complaint response system and notify the Department if a complaint about facility noise is received; and implement measures to reduce construction noise impacts at nearby residences.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The RFA requests to extend the construction commencement and completion deadlines; the certificate holder does not request to change the facility design or layout or to otherwise modify the facility in a way that could affect the Council's previous findings under the noise control regulations. However, the certificate holder identified new noise sensitive receptors within one mile of the site boundary.[178]

OAR 340-035-0035(5)(g) specifically exempts noise caused by construction activities from the noise control regulations in OAR Chapter 340. The noise control regulations set noise limits for operation of new industrial or commercial noise sources based upon whether those sources would be developed on a previously used or previously unused site.[179] As explained in the Section IV.P. of the *Final Order on the ASC*, the power plant site and step-up substation site qualify as "previously unused" sites and are therefore subject to OAR 340-035-0035(1)(b)(B). In contrast, because the related transmission line is a proposed reconductoring of an existing line and the ROW currently contains 230/115-kV transmission infrastructure, it would be considered a previously used industrial or commercial site and subject to OAR 340-035-0035(1)(b)(A).

As part of the RFA, the certificate holder compared 2018 Google Earth aerial imagery and parcel data to the 2013 Google Earth aerial imagery and parcel data originally used to identify noise sensitive receptors in ASC Exhibit X. Twenty-five new noise sensitive receptors, all of which are residences, are located within one mile of the site boundary. As shown in Figures 1 and 2 of RFA

[178] RFA Section 2.3.6 and Attachment 4.

[179] A "previously unused industrial or commercial site" is defined in OAR 340-035-0015(47) as property which has not been used by any industrial or commercial noise source during the 20 years immediately preceding commencement of construction of a new industrial or commercial source on that property.

Attachment 4, these new noise sensitive receptors are located within 1 mile of the site boundary of the step-up substation, northern portion of the reconductored transmission line, or both. No new noise sensitive receptors would be located within one mile of the Station.

The closest new noise sensitive receptors to the transmission line are two residences that would both be located at a distance of approximately 0.2 miles from the reconductored transmission line. These residences are located on the east side of Powerline Road and the transmission line ROW is located to the west of Powerline Road. As previously discussed, the applicable noise control regulations for the transmission line that would be reconductored are found at OAR 340-035-0035(1)(b)(A), which establishes operational noise limits for new industrial and commercial noise sources, as specified in Table 8 of the regulations. Based on Table 8, the noise radiating from or attributable to operation of the reconductored transmission line must not exceed a maximum hourly L_{50} noise level of 50 dBA at any noise sensitive receptor.[180] As discussed in Section IV.P. of the *Final Order on the ASC*, the maximum transmission line ROW audible noise level (at 200 feet from the ROW centerline) was 39.3 dBA and would therefore comply with the limits established in Table 8 under OAR 340-035-0035(1)(b)(A). All new noise sensitive receptors are located at a greater distance from the transmission line ROW and would therefore experience lower noise levels; therefore, the Council finds that the presence of the new noise sensitive receptors does not change the Council's previous finding that operation of the reconductored transmission line would comply with the noise control regulations at OAR 340-035-0035(1)(b)(A).

The closest new noise sensitive receptor to the step-up substation is located at a distance of 0.42 miles from the step-up substation site. As previously discussed, the step-up substation site qualifies as "previously unused" sites and is therefore subject to OAR 340-035-0035(1)(b)(B). Under OAR 340-035-0035(1)(b)(B), new sources on previously unused sites shall not increase ambient statistical noise levels (L_{10} or L_{50}) by more than 10 dBA in any single hour or exceed the levels specified in Table 8. As described in ASC Exhibit X, the model-predicted sound level (resulting from the operation of the step-up substation) at a noise-sensitive property located 958 feet (approximately 0.18 miles) to the east of the step-up substation would be 38.3 dBA, which is below the thresholds established in Table 8. Operation of the step-up substation would increase ambient statistical noise levels at the closest noise sensitive receptor by approximately 2.3 dBA, which is below the threshold established by OAR 340-035-0035(1)(b)(B) of 10 dBA in any single hour.[181] All new noise sensitive receptors are located at a greater distance (approximately 0.42 miles or more) from the step-up substation and would therefore

[180] As explained in Section IV.P. of the *Final Order on the ASC*, the reconductored transmission line would operate on a 24-hour basis, so the noise generated by the facility must not exceed the more restrictive maximum permissible hourly statistical noise level for the nighttime hours shown in Table 8 of the noise control regulations.
[181] ASC Exhibit X, Section X.3.3.2 and X.4.2.2.

experience lower noise levels; therefore, the Council finds that the presence of the new noise sensitive receptors does not change the Council's previous finding that operation of the step-up substation would comply with the noise control regulations at OAR 340-035-0035(1)(b)(B).

Conclusions of Law

Based on the foregoing findings of fact and conclusions of law, and subject to compliance with existing site certificate conditions, the Council finds that the facility, with the requested extension of the construction deadlines, would comply with the Noise Control Regulations in OAR 340-035-0035.

III.Q.2. Removal-Fill

The Oregon Removal-Fill Law (ORS 196.795 through 196.990) and Department of State Lands (DSL) regulations (OAR 141-085-0500 through 141-085-0785) require a removal-fill permit if 50 cubic yards or more of material is removed, filled, or altered within any "waters of the state."[182] The Council, in consultation with DSL, must determine whether a removal-fill permit is needed and if so, whether a removal-fill permit should be issued. The analysis area for wetlands and other waters of the state is the area within the site boundary.

Findings of Fact

The certificate holder identified and described waters of the state within the analysis area in ASC Exhibit J. The Council addressed the Removal-Fill Law in Section IV.Q. of the *Final Order on the ASC* and found that a state removal-fill permit is not required because there are no wetlands in the analysis area and the waterbodies within the analysis area are not jurisdictional.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been "changes in fact or law" since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The request for amendment does not include any changes to the facility design or layout that would create new or different impacts to waters of the state, and does not otherwise propose any activities that would require a removal-fill permit. Additional desktop analysis and field surveys conducted as part of this RFA provide a greater level of detail than the ASC about waters of the state near the pulling-tensioning sites along the transmission line to be reconductored, as on-the-ground field surveys were not previously conducted at these locations. For those portions of the analysis area where the certificate holder team

[182] ORS 196.800(15) defines "Waters of this state." The term includes wetlands and certain other waterbodies.

previously (in 2013) mapped wetlands and waterbodies, the certificate holder conducted on-site verification to determine if the waters of the state described in ASC Exhibit J have appreciably changed.[183]

As part of this RFA, the certificate holder reviewed desktop wetlands and soils data (National Wetlands Inventory, National Hydrography Dataset, and the Soil Survey Geographic Database) as well as aerial imagery. To confirm the results of the desktop analysis, E & E biologists conducted on-site reconnaissance on June 11 and 12, 2018. In addition, on April 22-23 and May 10, 2019, the biologists surveyed the pulling-tensioning sites for waters of the state and conducted on-site verification of previously mapped wetlands and waters within the remainder of the site boundary.

The presence and character of wetlands and waters within the previously surveyed areas remains the same as reported in ASC Exhibit J. No wetlands or waterbodies are located within the newly surveyed pulling-tensioning sites, and the two waters (a man-made agricultural pond and a man-made irrigation canal) located near pulling-tensioning sites would not be impacted by construction and operation of the facility. The certificate holder explains that pulling-tensioning activities would not impact the canal because the canal and the closest pulling tensioning site are separated by a 35-foot-wide gravel access road. In addition, the facility would not impact the agricultural pond, which would be separated from the closest pulling-tensioning site by a 25-foot-wide gravel road and a levee. [184]

Based upon the information in the record, the Council finds that the facility, with the requested extension of the construction deadlines, maintains compliance with the Removal-Fill Law and the certificate holder is not currently required to obtain a removal-fill permit.

Conclusions of Law

Based on the foregoing findings of fact, the Council finds that the facility, with the requested extension of the construction deadlines, does not need a removal-fill permit.

III.Q.3. Water Rights

Under ORS Chapters 537 and 540 and OAR Chapter 690, the Oregon Water Resources Department (OWRD) administers water rights for appropriation and use of the water resources of the state. Under OAR 345-022-0000(1)(b), the Council must determine whether the facility would comply with the statutes and administrative rules identified in the project order. The

[183] RFA Attachment 8, Section 2.3.
[184] RFA Attachment 8, Section 3.3.

Department identifies OAR 690, Divisions 310 and 380 (Water Resources Department permitting requirements) as the administrative rules governing use of water resources and water rights as applicable to the facility. The Department notes that OAR 345-021-0010(1)(o) applies to the proposed amendment. OAR 345-021-0010(1)(o)(F) requires that if a facility needs a groundwater permit, surface water permit, or water right transfer, that a decision on authorizing such a permit rests with the Council.

Findings of Fact

OAR 690 establishes the procedures and standards which shall be applied by the OWRD in the evaluation of applications for a permit to appropriate surface water, ground water, to construct a reservoir and store water, to use reserved water, or to use water stored in a reservoir.

The certificate holder provided information about anticipated water use during construction and operation of the facility in ASC Exhibit O, and explained that the certificate holder was not requesting a groundwater permit, a surface water permit, or a water rights transfer during the construction and operation of the facility. As explained in that exhibit, potable water would be obtained from an onsite well, and all non-potable water for construction and operation of the facility would be obtained from the Port of Umatilla. ASC Attachment O-1 contains an April 30, 2013 letter from the Port of Umatilla stating that it had the capacity and permits to supply process water to the Perennial Wind Chaser Station during construction and operation.

The Council found in Section IV.R.1 of the *Final Order on the ASC* that the facility would comply with the Ground Water Act of 1955 and Water Resources Department administrative rules. The Council imposed Conditions R.1 and R.2 in response to comments from the City of Hermiston and the Port of Umatilla (co-owners of the Regional Water System) and a subsequent certificate holder commitment. Condition R.1 requires the certificate holder to enter into an agreement with the owners of the Regional Water System that ensures completion of the water system improvements necessary to provide water to the Perennial Wind Chaser Station. Condition R.2 limits the amount of water the certificate holder would obtain from the Port of Umatilla to no more than 2,000 gallons per minute and to amounts found to be within the scope of the water rights held by the Port of Umatilla.

For amendments requesting to extend construction deadlines, the Department and Council evaluate whether there have been “changes in fact or law” since the site certificate was issued to determine whether, based on changes in fact or law, the facility would continue to satisfy requirements of the standard. The certificate holder does not request any changes to the facility layout, design, or site boundary, nor does the certificate holder request a water permit. Water usage and water loss estimates for construction and operation of the facility remain approximately the same as the estimates provided in ASC Exhibit O, and the certificate holder

does not propose to change the sources of the facility's water supply.[185] The certificate holder attached an updated (May 30, 2018) letter from the Port of Umatilla as Attachment 3 to the RFA. The letter contains the same information previously evaluated by the Council; therefore, the circumstances supporting the Council's previous findings have not changed. As such, the Council finds that the certificate holder can continue to provide adequate water for construction and operation of the facility and does not need a groundwater permit, surface water permit, or water right transfer. If such a permit is required by the certificate holder at a later time, a site certificate amendment would be required to review and consider such a permit application.

Conclusions of Law

Based on the foregoing findings of fact, the Council concludes that the facility, with the requested extension of the construction deadlines, does not require a groundwater permit, surface water permit, or water right transfer.

[185] RFA Section 2.3.5.

IV. GENERAL CONCLUSIONS AND FINAL ORDER

Based upon the conditions of compliance and conclusions presented in this order, the Council makes the following findings:

1. The facility (with the requested extension of the construction deadlines) included in Request for Amendment 1 complies with the requirements of the Oregon Energy Facility Siting Statutes, ORS 469.300 to 469.520.

2. The facility (with the requested extension of the construction deadlines) included in Request for Amendment 1 complies with the standards adopted by the Council pursuant to ORS 469.501.

3. The facility (with the requested extension of the construction deadlines) included in Request for Amendment 1 complies with all other Oregon statutes and administrative rules identified in the project order as applicable to the issuance of a site certificate for the facility.

Accordingly, the Council finds that the facility (with the requested extension of the construction deadlines) included in Request for Amendment 1 of the Perennial Wind Chaser Station site certificate complies with the General Standard of Review (OAR 345-022-0000). The Council finds, based on a preponderance of the evidence on the record, that the site certificate may be amended as requested. The Council therefore approves Amendment 1 of the Perennial Wind Chaser Station site certificate.

Issued this 22nd day of November, 2019

The OREGON ENERGY FACILITY SITING COUNCIL

By: _____
Hanley Jenkins II, Chair

Attachments:
Attachment A: First Amended Site Certificate
Attachment B: Reviewing Agency Comments on preliminary Request for Amendment
Attachment C: Draft Proposed Order Comments and Index
Attachment D: Zoning Figures

Notice of the Right to Appeal

The right to judicial review of this final order approving an amendment to the site certificate is governed by ORS 469.403 and OAR 345-027-0371(12). Pursuant to ORS 469.403(3), the Oregon Supreme Court has jurisdiction for review of the Council's approval of an application for an amended site certificate. To appeal you must file a petition for judicial review with the Supreme Court within 60 days from the day this final order approving an amendment to the site certificate was served.

If this order was e-mailed or mailed to you, the date of service is the date it was e-mailed or mailed, not the date you received it. The date of service for any persons to whom this final order was not e-mailed or mailed is the date it was posted to the Oregon Department of Energy Siting webpage. If you do not file a petition for judicial review within the applicable time period noted above, you lose your right to appeal.

Attachment A: Amended Site Certificate

ENERGY FACILITY SITING COUNCIL

OF THE

STATE OF OREGON

First Amended Site Certificate for the Perennial Wind Chaser Station

ISSUANCE DATES

Site Certificate	September 18, 2015
First Amended Site Certificate	November 22, 2019

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PERENNIAL WIND CHASER STATION SITE CERTIFICATE

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Appendix

Appendix 1	Revegetation and Noxious Weed Control Plan
Appendix 2	Restoration Monitoring Plan
Appendix 3	Biological Monitoring Plan

Acronyms and Abbreviations

ASC	Application for Site Certificate
Council	Oregon Energy Facility Siting Council
CTG	Combustion Turbine Generator
Department	Oregon Department of Energy
DOGAMI	Oregon Department of Geology and Mineral Industries
DPO	Draft Proposed Order
ESCP	Erosion and Sediment Control Plan
MOU	Memorandum of Understanding
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O&M	Operations and Maintenance
OAR	Oregon Administrative Rule
ODFW	Oregon Department of Fish and Wildlife
ORS	Oregon Revised Statute
RFA	Request for Amendment
WGS	Washington Ground Squirrels

1.0 Introduction and Site Certification

This site certificate is a binding agreement between the State of Oregon (State), acting through the Energy Facility Siting Council (Council), and Perennial-WindChaser, LLC (certificate holder). As authorized under Oregon Revised Statue (ORS) Chapter 469, the Council issues this site certificate authorizing certificate holder to construct, operate and retire the Perennial Wind Chaser Station (facility) at the below described site in Umatilla County, Oregon, subject to the conditions set forth herein.

Both the State and certificate holder must abide by local ordinances, state law and the rules of the Council in effect on the date this site certificate is executed. However, upon a clear showing of a significant threat to public health, safety, or the environment that requires application of later-adopted laws or rules, the Council may require compliance with such later-adopted laws or rules (ORS 469.401(2)).

Subject to the conditions herein, this site certificate binds the State and all counties, cities and political subdivisions in Oregon as to the approval of the site and the construction, operation, and retirement of the facility as to matters that are addressed in and governed by this site certificate (ORS 469.401(3)). This site certificate does not address, and is not binding with respect to, matters that are not included in and governed by this site certificate, and such matters include, but are not limited to: employee health and safety; building code compliance; wage and hour or other labor regulations; local government fees and charges; other design or operational issues that do not relate to siting the facility (ORS 469.401(4)); and permits issued under statutes and rules for which the decision on compliance has been delegated by the federal government to a state agency other than the Council (ORS 469.503(3)).

Each affected state agency, county, city, and political subdivision in Oregon with authority to issue a permit, license, or other approval addressed in or governed by this site certificate, shall upon submission of the proper application and payment of the proper fees, but without hearings or other proceedings, issue such permit, license or other approval subject only to conditions set forth in this site certificate. In addition, each state agency or local government agency that issues a permit, license or other approval for this facility shall continue to exercise enforcement authority over such permit, license or other approval (ORS 469.401(3)). For those permits, licenses, or other approvals addressed in and governed by this site certificate, the certificate holder shall comply with applicable state and federal laws adopted in the future to the extent that such compliance is required under the respective state agency statutes and rules. (ORS 469.401(2)).

The certificate holder must construct, operate and retire the facility in accordance with all applicable rules as provided for in Oregon Administrative Rule (OAR) Chapter 345, Division 26. After issuance of this site certificate, the Council shall have continuing authority over the site and may inspect, or direct the Oregon Department of Energy (department) to inspect, or request another state agency or local government to inspect, the site at any time in order to ensure that the facility is being operated consistently with the terms and conditions of this site certificate ([ORS 469.430)].

The obligation of the certificate holder to report information to the department or the Council under the conditions listed in this site certificate is subject to the provisions of ORS 192.502 *et seq.* and ORS 469.560. To the extent permitted by law, the department and the Council will not publicly disclose information that may be exempt from public disclosure if the certificate holder has clearly labeled such

information and stated the basis for the exemption at the time of submitting the information to the department or the Council. If the Council or the department receives a request for the disclosure of the information, the Council or the department, as appropriate, will make a reasonable attempt to notify the certificate holder and will refer the matter to the Attorney General for a determination of whether the exemption is applicable, pursuant to ORS 192.450.

The Council recognizes that many specific tasks related to the design, construction, operation and retirement of the facility will be undertaken by the certificate holder's agents or contractors. Nevertheless, the certificate holder is responsible for ensuring compliance with all provisions of the site certificate.

The definitions in ORS 469.300 and OAR 345-001-0010 apply to the terms used in this site certificate, except where otherwise stated, or where the context clearly indicates otherwise. The findings of fact, reasoning, and conclusions of law underlying the terms and conditions of this site certificate are set forth in the Council's Final Order in the Matter of the Application for a Site Certificate for the Perennial Wind Chaser Station (Final Order on the ASC) issued on September 18, 2015 and the Council's Final Order in the Matter of Request for Amendment 1 to the Perennial Wind Chaser Station Site Certificate (Final Order on Amendment 1) issued on November 22, 2019, and incorporated herein by this reference. In interpreting this site certificate, any ambiguity is to be clarified by reference to the following, in order of priority: the record of the proceedings that led to (1) this amended Site Certificate, (2) the Final Order on Amendment 1, and (3) the Final Order on the ASC.

The duration of this site certificate shall be the life of the facility, subject to termination pursuant to OAR 345-027-0110 or the rules in effect on the date that termination is sought, or revocation under ORS 469.440 and OAR 345-029-0100 or the statutes and rules in effect on the date that revocation is ordered. The Council shall not change the conditions of this site certificate except as provided for in OAR Chapter 345, Division 27.

2.0 Facility Location

The Perennial Wind Chaser Station and related and supporting facilities are located in Umatilla County, Oregon. The site boundary, as defined in OAR 345-001-0010, encompasses 60 acres and includes the perimeter of the Station, its related and supporting facilities, rights of way of the lateral natural gas pipeline and transmission line, and all temporary staging areas. The energy facility site is located in the Northwest Quarter of Section 30, Township 4 North, Range 28 East, and Willamette Meridian. The energy facility is located approximately 5 miles southwest of Hermiston, Oregon, adjacent to the existing Hermiston Generating Plant. The facility's supporting transmission line and natural gas pipeline lateral are both located in Umatilla County, with the transmission line extending north to the facility's step-up substation that is located adjacent to Bonneville Power Administration's McNary Substation, and the natural gas pipeline lateral, extending south of the Station 4.63 miles.

3.0 Facility Description

3.1 Energy Facility

The energy facility is a natural gas-fueled simple-cycle power generating plant, producing up to 415 megawatts (MW) of electric power. The energy facility is a non-base load plant, limited to an average

number of hours of operation per year of not more than 6,600 hours. The energy facility includes up to four generating units, each consisting of one GE LMS100 (or equivalent) combustion turbine, intercooler heat exchanger, electrical generator, selective catalytic reduction unit, catalytic oxidation unit, and stack. Each generating unit is connected to a common cooling tower. The energy facility burns only natural gas, with the natural gas combusted in the combustion turbine generator, then expanded to drive the turbine generator, producing electric power. Each combustion turbine generator consists of a stationary combustion turbine-generator and associated auxiliary equipment and systems, which include: evaporative coolers, inlet air filters, nitrogen oxide control water injection system, gas turbine enclosure, gas turbine compartment ventilation system, fuel gas conditioning system, synthetic lubrication oil system, mineral lubrication oil system, automatic water wash system, fire detection and protection system, intercooler system, hydraulic starting system, and vibration monitoring system.

The energy facility is accessed from Westland Road via Interstate Highway 82 or 84. A paved loop road, approximately 24 feet wide, provides for normal truck and operator vehicle traffic and connects to Westland Road. The loop road is 3,000 feet in length.

The facility also includes the following related and supporting facilities. Exhibit B of the ASC includes additional information regarding facility components.

Natural-gas Pipeline Lateral

The energy facility receives natural gas from the natural gas pipeline lateral that extends south from the energy facility approximately 4.63 miles. The pipeline lateral is located within an established 50-foot natural gas right of way (ROW).

Transmission Line

Power generated at the energy facility is transmitted to the Bonneville Power Administration's McNary Substation, utilizing primarily preexisting transmission infrastructure that runs from Hermiston to McNary. A new 230-kV line replaces the 115-kV line on the preexisting infrastructure, plus an additional six poles connect the energy facility to the preexisting infrastructure. Four new poles run from the onsite switchyard in the southwest corner of the site to the northwestern corner of the site. From the northwest corner, the transmission line crosses Westland Road to a new pole on the western side. This fifth pole connects the energy facility to the preexisting infrastructure. The certificate holder may also replace the first connecting pole of the existing infrastructure, for a total of six new poles.

500-kV Step-up Substation

A 500-kV step-up substation steps up the voltage of the energy facility's 230-kV line to 500-kV in order to tie in to the open bay at the McNary Substation. The 500-kV transformer yard is open-air, of alternating current, and on a leveled and graveled area, approximately 3 acres in size and surrounded by a security fence. An underground line connects the 500-kV step-up substation to the McNary Substation tie-in location. The underground line is 477 feet in length and installed in a concrete-encased duct bank approximately 2 feet wide by 2 feet high, with approximately 3 feet of cover.

Zero Liquid Discharge System (Alternative Scenario)

Lamb Weston's Water Pollution Control Facilities Permit allows Lamb Weston's facility to manage and dispose of the Hermiston Generating Project's (HGP) waste water, among other wastewaters, by land application. It is the certificate holder's preference to send the energy facility's reclaimed water to HGP, which would then be delivered to Lamb Weston. As of the issue date of the first amended site certificate, Lamb Weston had not yet indicated that it would accept reclaimed water from the HGP that was provided by the Perennial Wind Chaser Station. If Lamb Weston is not able to accept reclaimed water from the HGP that has come from the Perennial Wind Chaser Station, the certificate holder will install a zero liquid discharge system (ZLD). If necessary, the ZLD system will consist of a clarifier, a high efficiency reverse osmosis system and a crystallizer. The system will be sized to accept an approximate 140 gallons per minute of blowdown from the cooling tower and miscellaneous plant wastewaters. A 200,000 gallon tank will be installed to handle potential fluctuations in the operation of the ZLD system. Effluent form the ZLD system would be returned to the cooling tower basin as makeup water, and the solids would be transported offsite for disposal in a landfill.

Utility Lines and Interconnecting Water Pipelines

Two telecommunication lines connect the energy facility telephone and data highway system into the City of Hermiston system. An interconnecting water pipeline connects the energy facility to the Port of Umatilla water system. The pipeline is located below grade with a trench under the railroad tracks and is approximately 208 feet. Additionally, as discussed above, should HGP, and in turn Lamb Weston, accept the certificate holder's reclaimed wastewater, an additional wastewater pipeline will connect the energy facility to the HGP for purposes of delivering the facility's reclaimed water to HGP.

Temporary Construction Areas

Additional areas, approximately 5.11 acres, are included for five construction offices, construction parking, construction laydown and the temporary storage of soil displaced during the construction process.

Buildings

A single pre-engineered building serves as a control room and administration building and also houses the water treatment equipment. Additionally, separate enclosures house the chemical feed equipment, electrical equipment, and alternative zero liquid discharge system, should this system be necessary.

4.0 Site Certificate Conditions

4.1 General Conditions: Design, Construction and Operations (GEN)

Condition Number	General Conditions
STANDARD: GENERAL STANDARD OF REVIEW (GS) (OAR 345-022-0000)	
GEN-GS-01	The certificate holder shall begin and complete construction of the facility by the dates specified in the site certificate. [Final Order Condition A.5; Mandatory Condition 345-025-0006(4)]
GEN-GS-02	The certificate holder shall begin construction of the facility by September 23, 2020. [Final Order Condition A.1; AMD1; Mandatory Condition 345-025-0006(4)]
GEN-GS-03	The certificate holder shall complete construction of the facility by September 23, 2023. [Final Order Condition A.2; AMD1; Mandatory Condition 345-025-0006(4)]
GEN-GS-04	The certificate holder shall design, construct, operate, and retire the facility: (a) Substantially as described in the site certificate (b) In compliance with the requirements of ORS Chapter 469, applicable Council rules, and applicable state and local laws, rules and ordinances in effect at the time the site certificate is issued; and (c) In compliance with all applicable permit requirements of other state agencies [Final Order Condition A.4; Mandatory Condition 345-025-0006(3)]
GEN-GS-05	Before any transfer of ownership of the facility or ownership of the site certificate holder, the certificate holder shall inform the department of the proposed new owners. The requirements of OAR 345-027-0400 [previously OAR 345-027-0100] apply to any transfer of ownership that requires a transfer of the site certificate. [Final Order Condition A.9; Mandatory Condition 345-025-0006(15)]
GEN-GS-06	Any matter of non-compliance under the site certificate is the responsibility of the certificate holder. Any notice of violation issued under the site certificate shall be levied on the certificate holder. [Final Order Condition B.4]
GEN-GS-07	Except as necessary for the initial survey or as otherwise allowed for wind energy facilities, transmission lines or pipelines under this section, the certificate holder shall not begin construction, as defined in OAR 345-001-0010, or create a clearing on any part of the site until the certificate holder has construction rights on all parts of the site. For the purpose of this rule, "construction rights" means the legal right to engage in construction activities. For wind energy facilities, transmission lines or pipelines, if the certificate holder does not have construction rights on all parts of the site, the certificate holder may nevertheless begin construction, as defined in OAR 345-001-0010, or create a clearing on a part of the site if the certificate holder has construction rights on that part of the site and the certificate holder would construct and operate part of the facility on that part of the site even if a change in the planned

Condition Number	General Conditions
	route of a transmission line or pipeline occurs during the certificate holder's negotiations to acquire construction rights on another part of the site. [Final Order Condition A.6; Mandatory Condition 345-025-0006(5)]
GEN-GS-08	If the certificate holder becomes aware of a significant environmental change or impact attributable to the facility, the certificate holder shall, as soon as possible, submit a written report to the department describing the impact on the facility and any affected site certificate conditions. [Final Order Condition A.7; Mandatory Condition 345-025-0006(6)]
GEN-GS-09	(a)The certificate holder shall design, construct and operate the lateral natural gas pipeline in accordance with the requirements of the U.S. Department of Transportation as set forth in Title 49 Code of Federal Regulations, Part 192, in effect as of the date of this rule; and (b)The certificate holder shall develop and implement a program using the best available practicable technology to monitor the proposed lateral natural gas pipeline to ensure protection of public health and safety. [Final Order Condition A.11; Site Specific Condition 345-025-0010(3)]
STANDARD: ORGANIZATIONAL EXPERTISE (OE) (OAR 345-022-0010)	
GEN-OE-01	The certificate holder shall prevent the development of any conditions on the site that would preclude restoration of the site to a useful, non- hazardous condition to the extent that prevention of such site conditions is within the control of the certificate holder. [Final Order Condition B.5; Mandatory Condition 345-025-0006(7)]
GEN-OE-02	The certificate holder shall obtain all necessary federal, state and local permits or approvals required for construction, operation and retirement of the facility or ensure that its contractors obtain the necessary federal, state and local permits or approvals. [Final Order Condition B.6]
STANDARD: STRUCTURAL (SS) (OAR 345-022-0020)	
GEN-SS-01	The certificate holder shall design, engineer, and construct the facility in accordance with the versions of the Oregon Structural Special Code, International Building Code, and local building codes in effect at the time of construction. [Final Order Condition C.3; AMD1]
GEN-SS-02	The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule, "seismic hazard" includes ground shaking, landslide, liquefaction triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction. [Final Order Condition C.5; AMD1; Mandatory Condition 345-025-0006(12)]

Condition Number	General Conditions
GEN-SS-03	The certificate holder shall notify the department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if site investigations or trenching reveal that conditions in the foundation rocks differ significantly from those described in the application for a site certificate. After the department receives the notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions. [Final Order Condition C.6; AMD1; Mandatory Condition 345-025-0006(13)]
GEN-SS-04	The certificate holder shall notify the department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if shear zones, artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions. [Final Order Condition C.7; AMD1; Mandatory Condition 345-025-0006(14)]
STANDARD: SOIL PROTECTION (SP) (OAR 345-022-0022)	
GEN-SP-01	No less than 45 days prior to construction, unless otherwise agreed to by the Department, the certificate holder shall submit to the Department a final Revegetation and Noxious Weed Control Plan. The Department will review the plan in consultation with ODFW and the Umatilla County Weed Control Board. The plan must be approved by the Department prior to construction. As part of finalizing the plan, the certificate holder must update Table 1 of the draft plan (related to temporary and permanent impacts to habitat) based upon the pre-construction habitat assessment required by Condition H.1. In addition to the temporary ground disturbance areas described on page 3 of the draft plan, the final plan must consider temporary impacts at the pulling-tensioning sites, and the certificate holder must restore the soil and vegetation in these areas in accordance with the final plan, as approved by the Department. To control the introduction and spread of noxious weeds, the certificate holder must implement the requirements of the approved Revegetation and Noxious Weed Control Plan during all phases of construction and operation of the facility. [Final Order Condition D.3; AMD1]
GEN-SP-02	If herbicides are determined necessary, the certificate holder shall contract with a licensed contractor to prescribe and apply the proper treatments. Additionally, the certificate holder shall coordinate with each individual landowner prior to the application of specific herbicides. The certificate holder shall submit to the department evidence of consultation with the landowners prior to application of the herbicides and evidence of a contract with a licensed contractor. [Final Order Condition D.4]
GEN-SP-03	If a reportable release of hazardous material occurs during construction or operation of the facility, the certificate holder shall notify the department within 72 hours of the occurrence, clean up the release, and dispose of any contaminated soil or other materials according to applicable regulations. The certificate holder shall make spill control and containment kits readily available in areas containing fuel oil, lubricating oil, hydraulic oil, and chemicals, as well as chemical unloading areas. The spill kits shall be equipped with sorbent pads, diatomaceous earth, shovels and appropriate hand tools, curtain

Condition Number	General Conditions
	booms if working near open water, personal protection equipment, and temporary waste disposal containers. [Final Order Condition D.8]
STANDARD: LAND USE (LU) (OAR 345-022-0030)	
GEN-LU-01	The certificate holder shall design and construct all facility structures and buildings in compliance with the setback requirements of Umatilla County Development Ordinance Section 152.063(B), (C), (E) in effect as of April 03, 2014. [Final Order Condition E.2]
STANDARD: FISH AND WILDLIFE (FW) (OAR 345-022-0060)	
GEN-FW-01	The certificate holder shall design, construct, maintain and operate the reconductored transmission line following the current Avian Power Line Interaction Committee guidelines to minimize risk of avian mortality. [Final Order Condition H.6]
GEN-FW-02	The certificate holder shall restrict vehicular travel along the transmission line and pipeline to the right of way (ROW) and other established areas within the construction, access or maintenance easements. Additionally, the certificate holder shall impose speed limits during construction for access roads to reduce dust emissions, maintains safety and protect wildlife. [Final Order Condition H.7]
STANDARD: SCENIC RESOURCES (SR) (OAR 345-022-0080)	
GEN-SR-01	The certificate holder shall paint or otherwise finish the facility structures in neutral colors with a low reflectivity finish to provide visual integration with the surrounding landscape. [Final Order Condition J.1]
GEN-SR-02	For the new poles required for the transmission infrastructure, the certificate holder shall use poles similar in height and appearance to the existing poles within the transmission line right-of-way. [Final Order Condition J.3]
STANDARD: PUBLIC SERVICES (PS) (OAR 345-022-0110)	
GEN-PS-01	The site certificate holder shall fence the Station site and include a monitored gated entrance, security lighting and a closed circuit television camera shall be installed. [Final Order Condition M.6]
GEN-PS-02	Prior to beginning operation of the facility, the certificate holder shall provide a site plan to the Hermiston Fire & Emergency Services District. The certificate holder shall indicate the actual location of all facility structures on the site plan. During operation, the certificate holder shall ensure that appropriate fire protection agency personnel have an up-to- date list of the names and telephone

Condition Number	General Conditions
	numbers of facility personnel available to respond on a 24-hour basis in case of an emergency on the facility site. [Final Order Condition M.8]
STANDARD: SITING STANDARDS FOR TRANSMISSION LINES (TL) (OAR 345-024-0090)	
GEN-TL-01	(a) The certificate holder shall design, construct and operate the transmission line in accordance with the requirements of the version of the National Electrical Safety Code that is most current at the time that final engineering of each facility component is completed; and (b) The certificate holder shall develop and implement a program that provides reasonable assurance that all fences, gates, cattle guards, trailers, or other objects or structures of a permanent nature that could become inadvertently charged with electricity are grounded or bonded throughout the life of the line. [Final Order Condition O.1; AMD1; Site Specific Condition 345-025-0010(4)]
STANDARD: GROUNDWATER (GW) (OAR 345-022-0000)	
GEN-GW-01	During construction and operation of the facility, the certificate holder shall limit use of water obtained from the Port of Umatilla to no more than 2,000 gallons per minute and to amounts found to be within the scope of the water rights held by the Port. [Final Order Condition R.2]

4.2 Pre-construction Conditions (PRE)

Condition Number	Pre-construction Condition
STANDARD: GENERAL STANDARD OF REVIEW (GS) (OAR 345-022-0000)	
PRE-GS-01	At least 90 days prior to beginning construction (unless otherwise agreed to by the Department), the certificate holder shall submit to the Department a compliance plan documenting and demonstrating actions completed or to be completed to satisfy the requirements of all terms and conditions of the amended site certificate and applicable statutes and rules. The plan shall be provided to the Department for review and compliance determination for each requirement. The Department may request additional information or evaluation deemed necessary to demonstrate compliance. [AMD1 Condition A.12]
STANDARD: ORGANIZATIONAL EXPERTISE (OE) (OAR 345-022-0010)	
PRE-OE-01	Before beginning construction, the certificate holder shall provide the department with the identity and qualifications of the design, engineering and construction contractor(s) for the facility. The certificate holder shall select contractors that have substantial experience in the design, engineering and construction of similar facilities. The certificate holder shall report to the department any change in contractors during the design and construction of the facility.

Condition Number	Pre-construction Condition
	[Final Order Condition B.1]
PRE-OE-02	The certificate holder must notify the department before conducting any work on the site that does not qualify as surveying, exploration, or other activities to define or characterize the site. The notice must include a description of the work and evidence that its value is less than $250,000 or evidence that the applicant has satisfied all conditions that are required prior to beginning construction. [Final Order Condition B.2]
PRE-OE-03	Before beginning construction, the certificate holder shall provide confirmation in writing to the department that the third parties have obtained all necessary permits or approvals and shall provide to the department proof of agreements between the certificate holder and the third parties regarding access to the resources or services secured by the permits or approvals. [Final Order Condition B.7]
STANDARD: STRUCTURAL STANDARD (SS) (OAR 345-022-0020)	
PRE-SS-01	Prior to beginning construction, the certificate holder shall complete additional geotechnical investigations, including field explorations and laboratory testing. The field explorations shall include additional borings for the final locations of the turbine/generators, access bridge, step-up substation, transmission towers and the buried transmission cable. Further, the site certificate holder shall perform a shear wave velocity measurement at the station and step-up substation sites. [Final Order Condition C.1]
PRE-SS-02	Prior to beginning construction, the certificate holder shall complete the following additional engineering evaluations: (a) Refining the seismic hazard evaluations and develop code-based ground motion design parameters for the step-up substation; (b) Performing site-specific ground motion study following the guidance in ASCE 7-16, Chapter 21 for the Station. This study shall capture long-period amplification of large and distant subduction zone events; (c) Estimating soil bearing capacity and settlement for the transformer foundation, transmission tower foundation, and other geotechnical evaluations based upon the final design layout and design loads; (d) Developing geotechnical recommendations for trench excavation, shoring, and backfill of the buried transmission cable, as well as trenchless excavation techniques, if necessary to pass below existing railroad tracks; (e) Completing a final geotechnical design report. [Final Order Condition C.2; AMD1]
PRE-SS-03	Prior to beginning construction, the certificate holder shall submit a written plan, subject to approval by the department, for implementing soil improvement techniques identified in the geotechnical evaluation. [Final Order Condition C.4]
PRE-SS-04	Prior to construction, the certificate holder shall prepare an Emergency Response Plan. The certificate holder shall submit the plan no less than 30 days prior to beginning construction to the Department for review and approval by the Department, in consultation with the Department of Geology and Mineral

Condition Number	Pre-construction Condition
	Industries. The plan shall describe the procedures the certificate holder would take to recover facility operations after major disasters. The plan shall be maintained onsite and implemented throughout the operational life of the facility. [AMD 1 Condition C.8]
STANDARD: SOIL PROTECTION (SP) (OAR 345-022-0022)	
PRE-SP-01	The certificate holder shall develop and implement a Hazardous Materials Management and Monitoring Plan (the Plan), which shall include and maintain a Materials Safety Data sheet for all hazardous chemicals stored onsite. The Plan shall contain best management practices and hazardous waste training for construction and operation personnel. The certificate holder shall submit a copy of this plan to the department for review and approval prior to the commencement of construction of the facility. [Final Order Condition D.6]
STANDARD: LAND USE (LU) (OAR 345-022-0030)	
PRE-LU-01	Prior to beginning construction, the certificate holder shall obtain all required land use approvals from Umatilla county as listed in the letter from the Umatilla County Board of Commissioners dated May 14, 2015, and shall submit all associated applications and pay all associated application fees. [Final Order Condition E.5]
STANDARD: RETIREMENT AND FINANCIAL ASSURANCE (RT) (OAR 345-022-0050)	
PRE-RT-01	Before beginning construction of the facility, the certificate holder shall submit to the State of Oregon, through the Council, a bond or letter of credit in a form and amount satisfactory to the Council to restore the site to a useful, non- hazardous condition. The certificate holder shall maintain a bond or letter of credit in effect at all times until the facility has been retired. The Council may specify different amounts for the bond or letter of credit during construction and during operation of the facility. [Final Order Condition G.3] [Mandatory Condition 345-025-0006(8)]
PRE-RT-02	Before beginning construction of the facility, the certificate holder shall submit to the State of Oregon, through the Council a bond or letter of credit naming the State of Oregon, acting by and through the Council, as beneficiary or payee. The initial bond or letter of credit amount for the facility is $8.197 million, without a zero liquid discharge system or $ $8.213 million with a zero liquid discharge system, depending upon the final design configuration, to be adjusted to the date of issuance, and adjusted on an annual basis thereafter, as described in sub-paragraph (b) of this condition: (a) The certificate holder may adjust the amount of the initial bond or letter of credit based on the final design configuration of the facility. However, any revision to the restoration costs must be adjusted to the date of issuance as described in (b) and would need to be reviewed and approved by the Council through a site certificate amendment. (b) The certificate holder shall adjust the amount of the bond or letter of credit using the following calculation: i. Adjust the amount of the bond or letter of credit (expressed in second quarter 2018 dollars) to present value, using the U.S. Gross Domestic Product Implicit Price Deflator, Chain-Weight, as published in the Oregon Department of Administrative Services' "Oregon Economic and Revenue Forecast" or by any successor agency and using the second quarter 2018 index value

Condition Number	Pre-construction Condition
	and the quarterly index value for the date of issuance of the new bond or letter of credit. If at any time the index is no longer published, the Council shall select a comparable calculation to adjust second quarter 2018 dollars to present value. ii. Round the result total to the nearest $1,000 to determine the financial assurance amount. (a) The certificate holder shall use an issuer of the bond or letter of credit approved by the Council (b) The certificate holder shall use a form of bond or letter of credit approved by the Council. The certificate holder shall describe the status of the bond or letter of credit in the annual report submitted to the Council under OAR 345-026-0080. The bond or letter of credit shall not be subject to revocation or reduction before retirement of the facility site. [Final Order Condition G.4; AMD1]
STANDARD: FISH AND WILDLIFE (FW) (OAR 345-022-0060)	
PRE-FW-01	Before beginning construction, the certificate holder shall provide the department and Oregon Department of Fish and Wildlife (ODFW) a detailed map of the facility site showing all project components, and a table showing the acres of temporary habitat impacted by habitat category and subtype, and the acres of permanent habitat impacted by habitat category and subtype. The maps of the facility site shall indicate the habitat categories of all areas that will be affected during construction. In classifying the affected habitat into habitat categories, the certificate holder shall consult with ODFW. The certificate holder shall not begin ground disturbance in an affected area until the habitat assessment has been approved by the department, in consultation with ODFW. The certificate holder shall not construct any facility components within areas of Category 1 habitat and shall avoid temporary disturbance of Category 1 habitat. [Final Order Condition H.1]
PRE-FW-02	Prior to commencement of construction, following completion of Condition PRE-FW-01 (Final Order Condition H.1), the certificate holder shall consult with the Oregon Department of Fish and Wildlife (ODFW) to determine the final acreage of habitat mitigation required. Mitigation shall be provided in accordance with the final acreage determinations provided in response to Condition PRE-FW-01 (Final Order Condition H.1) and consistent with a Habitat Mitigation Plan, as approved by the department and ODFW. (a) A final Habitat Mitigation Plan and ODFW's concurrence of that plan shall be submitted to the department no less than 30 days prior to the beginning of construction. (b) The final Habitat Mitigation Plan may be amended from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council. Such amendments may be made without amendment of the site certificate. The Council authorizes the department to agree to amendments to this plan. The department shall notify the Council of the Final Habitat Mitigation Plan and all amendments to the plan. The Council retains the authority to approve, reject or modify any amendments of this plan agreed to by the department. [Final Order Condition H.2; AMD1]
PRE-FW-03	Before beginning construction, the certificate holder shall prepare a final Project Restoration Monitoring Plan and Project Biological Monitoring Plan in consultation with the department and Oregon Department of Fish and Wildlife (ODFW).

Condition Number	Pre-construction Condition
	(a) The final plans and ODFW's concurrence must be submitted to the department no less than 30 days prior to the beginning of construction. The certificate holder shall implement the requirements of the approved plan during all phases of construction and operation of the facility, as applicable. (b) The plans may be amended from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council. Such amendments may be made without amendment to the site certificate. The Council authorizes the department to agree to amendments of this plan; however, the Council retains the authority to approve, reject or modify any amendment of this plan agreed to by the department. [Final Order Condition H.4]
PRE-FW-04	Prior to commencing construction, all project personnel shall attend an environmental training session conducted by the certificate holder. The training shall include, but not be limited to, the following topics: identification of approved project boundaries and access roads; identification of sensitive wetland and waterbody resources; identification of special status-plant and wildlife species; techniques regarding avoidance and minimization measures the certificate holder will implement; the role of the onsite biologist; the notification process to be followed if new sensitive resources are identified. [Final Order Condition H.5]
PRE-FW-05	The certificate holder shall provide the department and the Oregon Department of Fish and Wildlife (ODFW) with a written summary of all results of biological preconstruction surveys, including nest surveys, within 10 days of survey completion. [Final Order Condition H.12]
PRE-FW-06	If construction is to occur during important times (breeding season for Ferruginous Hawks and other raptors or migration for all native non-raptors), or at close distances to environmentally sensitive areas (nests of the above), prior to any construction activities, the certificate holder must consult with Oregon Department of Fish and Wildlife (ODFW) to determine appropriate measures to take and guidance on seasonal and/or spatial restrictions to avoid or minimize impact. [Final Order Condition H.11]
STANDARD: THREATENED AND ENDANGERED SPECIES (TE) (OAR 345-022-0070)	
PRE-TE-01	The certificate holder shall establish streamside management zones within 50 feet of both sides of intermittent and perennial streams and along margins of bodies of open water where removal of low-lying vegetation is minimized. [Final Order Condition I.1]
PRE-TE-02	Prior to beginning construction, the site certificate holder shall survey for northern sagebrush lizard in areas of sagebrush and other shrubby habitat to be impacted by ground disturbing activities. If northern sagebrush lizards are discovered, the site certificate holder shall contact and consult Oregon Department of Fish and Wildlife (ODFW) and the department to determine appropriate measures to avoid or minimize adverse effects, including spatial restrictions. Construction activities shall be restricted until consultation with ODFW has occurred.

Condition Number	Pre-construction Condition
	[Final Order Condition I.2]
PRE-TE-03	Prior to beginning construction, the site certificate holder shall examine any structures within the construction corridor for bat roosts. If any bat roosts are discovered, construction shall be restricted and the site certificate holder shall consult with Oregon Department of Fish and Wildlife and the department to determine appropriate measures to avoid and/or minimize adverse effects. [Final Order Condition I.3]
PRE-TE-04	Prior to beginning construction, the site certificate holder shall conduct pre-construction surveys for Washington Ground Squirrels (WGS) in any areas with suitable habitat, using a qualified professional biologist that has experience in detection of WGS. The certificate holder shall provide written reports of the surveys to the department and the Oregon Department of Fish and Wildlife (ODFW). If any project components that require ground disturbance are located within 1,000 feet of potential WGS habitat (excluding tilled agricultural land or developed areas as it is not suitable for WGS foraging or burrowing), the site certificate holder shall conduct transect surveys to determine if squirrels are present. If WGS are present within the 1,000 foot-buffer, the certificate holder shall identify the boundaries of the Category 1 WGS habitat in the report to the department and ODFW and construction shall be restricted until appropriate measures are determined, which shall include but not be limited to WGS habitat marking with high visibility flagging or makers. [Final Order Condition I.4]
PRE-TE-05	The site certificate holder shall conduct pre-construction surveys for Robinson's onion and Laurence's milkvetch prior to conducting any ground-disturbing activities in areas with suitable habitat. If any plants are discovered, the site certificate holder shall consult with the Oregon Department of Agriculture and the department for guidance on appropriate measures to avoid or minimize adverse effects. [Final Order Condition I.5]
STANDARD: HISTORIC, CULTURAL, AND ARCHAEOLOGICAL RESOURCES (HC) (OAR 345-022-0090)	
PRE-HC-01	Prior to construction, the certificate holder shall contact and coordinate with each owner/operator of the identified NRHP eligible historic period resources to obtain any necessary easements or approvals. The certificate holder shall ensure that a qualified archaeologist, as defined in OAR 736-051-0070, instructs construction personnel in the identification and avoidance of accidental damage to identified resources. Records of such training shall be maintained at the administration/control building and made available to authorized representatives of the department upon request. [Final Order Condition K.1]
PRE-HC-02	Before beginning construction, the certificate holder shall provide to the department a map showing the final design locations of all components of the facility, the areas that would be temporarily disturbed during construction and the areas that were surveyed in 2013. [Final Order Condition K.2]
PRE-HC-03	The certificate holder must employ qualified personnel to conduct field investigations of the section of the project's natural gas pipeline right of way not previously surveyed, prior to construction in that area. The

Condition Number	Pre-construction Condition
	certificate holder shall provide a written report of the field investigation to the department and Oregon State Historic Preservation Office (SHPO). If potentially significant historic, cultural or archaeological sites are found during the field investigations, the certificate holder must instruct all construction personnel to avoid the identified sites and must implement appropriate measures to protect the site, including the measures described in Condition CON-HC-01 (Final Order Condition K.3). [Final Order Condition K.4]
STANDARD: PUBLIC SERVICES (PS) (OAR 345-022-0110)	
PRE-PS-01	Before beginning construction of any new road approaches or utility crossings, the certificate holder shall obtain all required permits from Umatilla County. [Final Order Condition M.2]
PRE-PS-02	Prior to beginning construction, the certificate holder shall enter into a development agreement with Umatilla County to provide roadway and access improvements recommended by the Umatilla County Public Works Director in conjunction with construction and operation of the energy facility and to pay the certificate holder's proportionate share of Umatilla County's costs of implementing measures to address fogging and icing on County roads potentially impacted by the operation of the energy facility. [Final Order Condition M.4]
PRE-PS-03	Before beginning construction, the certificate holder shall submit Notice(s) of Proposed Construction or Alteration to the Federal Aviation Administration and the Oregon Department of Aviation. The certificate holder shall promptly notify the department of the responses from the FAA and the Oregon Department of Aviation. [Final Order Condition M.5]
PRE-PS-04	Prior to beginning construction, the certificate holder shall develop and implement a fire protection system, which shall include a fire water system, portable fire extinguishers, a smoke detection system and a carbon dioxide extinguishing system provided with the combustion turbine generators (CTG). [Final Order Condition M.7]
STANDARD: NOISE CONTROL REGULATION (NC) (OAR 345-035-0035)	
PRE-NC-01	Prior to beginning construction of the facility, the certificate holder shall re-run the noise model using the noise characteristics of the equipment that has been selected to ensure compliance with the noise regulations. [Final Order Condition P.1]
STANDARD: GROUNDWATER (GW) (OAR 345-022-0000)	
PRE-GW-01	The certificate holder shall enter into a contract with the owners of the Regional Water System to ensure completion of system improvements needed in order to provide water to the facility. [Final Order Condition R.1]

Condition Number	Pre-construction Condition
STANDARD: ENERGY FACILITIES THAT EMIT CARBON DIOXIDE (CD) (OAR 345-024-0500)	
PRE-CD-01	Before beginning construction, the certificate holder shall notify the department in writing of its final selection of an equipment vendor and shall submit a written design information report to the department sufficient to verify the facility's designed new and clean heat rate and its nominal electric generating capacity at average annual site conditions. The certificate holder shall include the proposed total number of hours of operation, subject to the limitation that the total annual average number of hours of operation per year is not more than 6,600 hours. At the time the certificate holder submits the information required by this condition, the certificate holder shall also specify its election of the method used to measure or calculate carbon dioxide emissions. The election shall apply for the initial reporting required pursuant to Condition OPR-CD-01 (Final Order Condition S.8) or Condition OPR-CD-02 (Final Order Condition S.9), as applicable, and to each reporting period required pursuant to Condition OPR-CD-03 (Final Order Condition S.10). [Final Order Condition S.1]
PRE-CD-02	For the purposes of this site certificate, "monetary path payment requirement" means the amount of offset funds determined pursuant to OAR 345-024-0590 and -600 and the amount of the selection and contracting funds that the certificate holder must disburse to the Climate Trust, as the qualified organization, pursuant to OAR 345-024-0710 and the site certificate. The certificate holder shall calculate the monetary path payment using an offset fund rate of $1.90 per ton of carbon dioxide in 2019 dollars as follows: (a) The certificate holder shall calculate the 2019 dollars using the index described in subsection (c) below. (b) The certificate holder shall increase the amount of the bond or letter of credit described in Condition PRE-CD-06 (Final Order Condition S.6) by the percentage increase in the index. The certificate holder shall index the funds from the date of the Council's approval of the site certificate to the date of disbursement of funds to The Climate Trust (c) The calculation of 2019 dollars shall be made using the same index described in Condition PRE-RT-02 (Final Order Condition G.4). The amount of the bond or letter of credit shall increase annually by the percentage increase in the Index and shall be pro-rated within the year to the date of disbursement to The Climate Trust from the date of Council approval of the site certificate. If at any time the Index is no longer published, the Council shall select a comparable calculation of 2019 dollars without an amendment of the site certificate. [Final Order Condition S.2; AMD1]
PRE-CD-03	To calculate the initial monetary path payment requirement, the certificate holder shall use the contracted design parameters for capacities and heat rates submitted under Condition PRE-CD-01 (Final Order Condition S.1). [Final Order Condition S.3]
PRE-CD-04	The certificate holder shall submit all monetary path payment requirement calculations to the department for verification in a timely manner before submitting a bond or letter of credit for Council approval, before entering into a Memorandum of Understanding with The Climate Trust as required by Condition PRE-CD-05 (Final Order Condition S.5), and before making disbursement to The Climate Trust. The net carbon dioxide emissions rate of the facility shall not exceed 0.614 pounds of carbon dioxide per kilowatt-hour of

Condition Number	Pre-construction Condition
	net electric power output measured on a new and clean basis, as the department may modify such basis pursuant to Condition OPR-CD-01(c). (Final Order Condition S.8(c)). [Final Order Condition S.4; AMD1]
PRE-CD-05	Before beginning construction of the facility, the certificate holder must enter into a Memorandum of Understanding (MOU) with The Climate Trust that establishes the disbursement mechanism to transfer selection and contracting funds and offset funds to The Climate Trust. (a) The MOU must be substantially in the form of Appendix E to the Final Order on the Application. At the request of the certificate holder, the Council may approve a different form of a bond or letter of credit and concurrent MOU without an amendment of the site certificate. (b) Either the certificate holder or The Climate Trust may submit to the Council for the Council's resolution any dispute between the certificate holder and The Climate Trust concerning the terms of the bond or letter of credit, the MOU or any other issues related to the monetary path payment requirement. The Council's decision shall be binding on all parties. [Final Order Condition S.5]
PRE-CD-06	Before beginning construction of the facility, the certificate holder shall submit to the Climate Trust a bond or letter of credit in the amount of the offset funds of the monetary path payment requirement as determined under Condition PRE-CD-02 (Final Order Condition S.2). (a) The certificate holder shall use a form of bond or letter of credit that is substantially in the form of Attachment B to the MOU described in Condition PRE-CD-05 (Final Order Condition S.5). At the request of the certificate holder, the Council may approve a different form of a bond or letter of credit without an amendment of the site certificate. (b) The certificate holder shall use an issuer of the bond or letter of credit approved by the Council (c)The certificate holder shall maintain the bond or letter of credit in effect until the certificate holder has disbursed the full amount of the offset funds to The Climate Trust. The certificate holder may reduce the amount of the bond or letter of credit commensurate with payments it makes to The Climate Trust. The bond or letter of credit must not be subject to revocation before disbursement of the full amount of the offset funds. [Final Order Condition S.6]
PRE-CD-07	The certificate holder shall disburse to The Climate Trust offset funds and selection and contracting funds when requested by The Climate Trust in accordance with Conditions OPR-CD-02 and OPR-CD-03 (Final Order Conditions S.9 and S.10) and the following requirements: (a) The certificate holder shall disburse selection and contracting funds to The Climate Trust before beginning construction and as appropriate when additional offset funds are required under Conditions OPR-CD-02 and OPR-CD-03 (Final Order Conditions S.9 and S.10) (b) Upon notice pursuant to subsection (c), The Climate Trust may request from the issuer of the bond or letter of credit the full amount of all offset funds available or it may request partial payment of offset funds at its sole discretion. Notwithstanding the specific amount of any contract to implement an offset project, The Climate Trust may request up to the full amount of offset funds the certificate holder is required to provide to meet the monetary path payment requirement. (c) The Climate Trust may request disbursement of offset funds pursuant to paragraph (b) by providing notice to the issuer of the bond or letter of credit that The Climate Trust has executed a

Condition Number	Pre-construction Condition
	bond or letter of intent to acquire an offset project. The certificate holder shall require that the issuer of the bond or letter of credit disburse offset funds to The Climate Trust within three business days of a request by The Climate Trust for the offset funds in accordance with the terms of the bond or letter of credit. [Final Order Condition S.7]

4.3 Construction Conditions (CON)

Condition Number	Construction Conditions
STANDARD: GENERAL STANDARD OF REVIEW (GS) (OAR 345-022-0000)	
CON-GS-01	Upon completion of construction, the certificate holder shall restore vegetation to the extent practicable and shall landscape all areas disturbed by construction in a manner compatible with the surroundings and proposed use. Upon completion of construction, the certificate holder shall remove all temporary structures not required for facility operation and dispose of all timber, brush, refuse and flammable or combustible material resulting from clearing of land and construction of the facility. [Final Order Condition A.8] [Mandatory Condition 345-025-0006(11)]
STANDARD: ORGANIZATIONAL EXPERTISE(OE) (OAR 345-022-0010)	
CON-OE-01	The certificate holder shall contractually require all construction contractors and subcontractors involved in the construction of the facility to comply with all applicable laws and regulations and with the terms and conditions of the site certificate. Such contractual provisions shall not relieve the certificate holder of responsibility under the site certificate. [Final Order Condition B.3]
STANDARD: SOIL PROTECTION (SP) (OAR 345-022-0022)	
CON-SP-01	The certificate holder shall conduct all construction work in compliance with an Erosion and Sediment Control Plan (ESCP) satisfactory to the Oregon Department of Environmental Quality and as required under the National Pollutant Discharge Elimination Systems (NPDES) #1200-C Construction Stormwater Discharge General Permit. The certificate holder shall include in the ESCP any measures necessary to meet local erosion and sediment control requirements or stormwater management requirements. [Final Order Condition D.1]
CON-SP-02	During construction, the certificate holder must implement best management practices to control dust generated by construction activities, such as applying water to roads and disturbed soil areas. [Final Order Condition D.2]

Condition Number	Construction Conditions
CON-SP-03	During construction, the certificate holder shall limit truck traffic to improved road surfaces. Within 60 days of completing construction, the applicant shall mitigate any areas of soil compaction by measures to include scarification and reseeding. [Final Order Condition D.5]
CON-SP-04	During construction of the facility, the certificate holder must complete the following monitoring to ensure that there are no significant potential adverse impacts to soils: (a) During construction, the certificate holder shall monitor disturbed area erosion and sediment control measures at the active construction areas on a weekly basis and every two weeks on inactive areas. Inspection of both active and inactive areas must occur at least daily during periods when 0.5 inches or more rain has fallen in a 24-hour period. (b) The certificate holder must remove trapped sediment when storage capacity has been reduced by 50 percent. Sediments shall be placed in an upland area certified by a qualified wetlands specialist. (c) If the erosion and sediment control measures are deemed ineffective, different strategies and/or measures shall be implemented, maintained and monitored after consultation with the department. (d) After completing construction in an area, the certificate holder must monitor the area until soils are stabilized and evaluate whether construction-related impacts to soils are being adequately addressed by the mitigation procedures described in the Erosion and Sediment Control Plan and the Revegetation and Noxious Weed Control Plan. As necessary, the certificate holder must implement follow-up restoration measures such as scarification and reseeding to address those remaining impacts. [Final Order Condition D.9]
CON-SP-05	Prior to operation, the certificate holder shall develop a Spill Prevention Control and Countermeasure Plan for implementation during the facility's operation. The certificate holder shall submit a copy of this plan to the department prior to commencement of operation of the Station. [Final Order Condition D.7]
STANDARD: LAND USE (LU) (OAR 345-022-0030)	
CON-LU-01	The certificate holder shall consult with the Oregon Department of Fish and Wildlife and the local Soil and Water Conservation District for any minor drainage improvements necessary to ensure effective drainage on surrounding agricultural lands. [Final Order Condition E.3]
STANDARD: FISH AND WILDLIFE HABITAT (FW) (OAR 345-022-0060)	
CON-FW-01	The certificate holder shall restore all areas temporarily impacted due to construction to pre-construction condition or better after construction has been completed. [Final Order Condition H.3]
CON-FW-02	During all years in which construction occurs, if construction related activities occur during the raptor breeding season (February 1 through August 31), the certificate holder must conduct pre-construction surveys within 0.5 miles of all proposed project features for Ferruginous Hawk nests, and within 0.25

Condition Number	Construction Conditions
	miles for all other raptor species nests, including burrowing owl burrows. If active nests are located, the certificate holder shall notify the department and the Oregon Department of Fish and Wildlife (ODFW), and construction-related activities must be restricted within 0.5 miles of Ferruginous Hawk nests and 0.25 miles of all other raptor nests until the nests have failed or chicks have fledged. A biologist shall monitor the status of the active nests daily during nearby active construction and document potential adverse interactions with the project. [Final Order Condition H.8]
CON-FW-03	During all years in which construction occurs, if construction-related activities occur during the migratory bird breeding season (March 15 through April 15), pre-construction surveys must be conducted within 20 feet of all proposed project features for nests of all native, non-raptor species. Pre-construction nest surveys for non-raptors shall be valid for only two weeks. If active nests are located, the certificate holder must notify the department and consult with Oregon Department of Fish and Wildlife (ODFW) to determine appropriate avoidance and/or mitigation measures necessary. A biologist must monitor the status of active nests daily during nearby active construction and document potential adverse interactions with the project. [Final Order Condition H.9]
CON-FW-04	If a California myotis roost is observed during other biological surveys, the certificate holder must notify the department and consult with Oregon Department of Fish and Wildlife (ODFW) to determine any appropriate avoidance or mitigation measures necessary. [Final Order Condition H.10]
CON-FW-05	The certificate holder shall clearly demarcate boundaries of environmentally sensitive areas (nests referred to in Condition PRE-FW-06 (Final Order Condition H.11)) during construction to increase visibility to construction crews. [Final Order Condition H.13]
STANDARD: HISTORIC, CULTURAL, AND ARCHAEOLOGICAL RESOURCES (HC) (OAR 345-022-0090)	
CON-HC-01	The certificate holder shall cease all ground disturbing activities in the immediate area if any archaeological or cultural resources are found during construction of the facility. The certificate holder shall flag or mark the area and shall notify the department and the Oregon State Historic Preservation Office (SHPO) of the find. A qualified archaeologist shall evaluate the significance of the find. If SHPO determines that the resource is significant, the certificate holder shall make recommendations to the Council for mitigation, including avoidance, field documentation, and data recovery, in consultation with the department, SHPO, interested tribes and other impacted parties. The certificate holder shall not restart work in the affected area until the certificate holder has demonstrated to the Council that it has complied with the archaeological resource protection regulations. [Final Order Condition K.3]
CON-HC-02	A cultural resources monitor must be present to monitor ground-disturbing construction activities. The qualifications of the selected cultural resources monitor shall be reviewed and approved by the

Condition Number	Construction Conditions
	Department, in consultation with the CTUIR Cultural Resources Protection Program. Cultural monitors shall be prioritized for selection based on demonstrated experience with CTUIR tribal resources. [AMD1 Condition K.5]
STANDARD: PUBLIC SERVICES (PS) (OAR 345-022-0110)	
CON-PS-01	During construction of the facility, the certificate holder shall implement the following measures: (a) The certificate holder shall mount a right-turn prohibition sign with a supplemental "TRUCKS" rider plaque facing the westbound (driveway) approach; (b) The certificate holder shall mount a left-turn prohibition sign with a supplemental "TRUCKS" rider plaque facing the southbound (Westland Road) approach; (c) Prior to truck delivery of any oversize loads, a formal routing and delivery plan shall be developed by the certificate holder in conjunction with the department, in consultation with the Oregon Department of Transportation and Umatilla County; and (d) The certificate holder shall locate and maintain landscaping, and signing around aboveground utilities so that adequate sight distance is maintained. [Final Order Condition M.1]
CON-PS-02	Upon completion of construction, the certificate holder shall restore public roads to pre-construction conditions or better to the satisfaction of the Umatilla County Public Works Department. [Final Order Condition M.3]
STANDARD: WASTE MINIMIZATION (WM) (OAR 345-022-0120)	
CON-WM-01	The certificate holder shall implement a waste management plan during construction that includes but is not limited to the following measures: (a) Recycling steel, other metal scrap; and paper and cardboard waste; (b) Recycling wood waste to the maximum extent possible; (c) Collecting nonrecyclable waste for transport to a permitted solid waste disposal facility by a licensed waste hauler; and (d) Segregating all hazardous waste such as used oil, oily rags and oil-absorbent materials, mercury-containing lights and lead-acid and nickel-cadmium batteries for recycling or disposal by a licensed firm qualified in the proper recycling or disposal of hazardous waste. [Final Order Condition N.1]
CON-WM-02	The certificate holder shall provide portable toilets for on-site sewage handling during construction and shall ensure that they are pumped and cleaned regularly by a licensed contractor who is qualified to pump and clean portable toilet facilities. [Final Order Condition N.3]
STANDARD: NOISE CONTROL REGULATION (NC) (OAR 345-035-0035)	
CON-NC-01	To reduce construction noise impacts at nearby residences, the certificate holder shall: (a) Confine the noisiest operation of heavy construction equipment to the daylight hours to the extent practicable;

Condition Number	Construction Conditions
	(b) Require contractors to install and maintain exhaust mufflers on all combustion engine-powered equipment; and (c) Establish a complaint response system at the construction manager's office to address noise complaints. Records of noise complaints during construction must be made available to authorized representatives of the Department of Energy upon request. [Final Order Condition P.4]

4.4 Operational Conditions (OPR)

Condition Number	Operational Conditions
STANDARD: GENERAL STANDARD OF REVIEW (GS) (OAR 345-022-0000)	
OPR-GS-01	The certificate holder shall submit a legal description of the site to the Oregon Department of Energy within 90 days after beginning operation of the facility. The legal description required by this rule means a description of metes and bounds or a description of the site by reference to a map and geographic data that clearly and specifically identify the outer boundaries that contain all parts of the facility. [Final Order Condition A.3; Mandatory Condition 345-025-0006(2)]
OPR-GS-02	The certificate holder shall submit to the department copies of all incident reports involving the pipeline required under 49 CFR § 191.15. [Final Order Condition A.10; Site Specific Condition 345-025-0010(2)]
STANDARD: LAND USE (LU) (OAR 345-022-0030)	
OPR-LU-01	The certificate holder shall utilize fire retardant treated or non-combustible materials for all structures and fencing at the facility. In addition, the site shall be maintained clear of combustible materials within 20 feet of structures, except as necessary for Station operation. The certificate holder shall ensure that trees and other vegetation do not grow to become a fire hazard. [Final Order Condition E.1]
OPR-LU-02	To reduce the visual impacts of the facility, the certificate holder shall: (a) Not allow any advertising to be used on any part of the facility; (b) Use only those signs required for facility safety, required by law or otherwise required by this site certificate, except that the certificate holder may erect directional signage for deliveries and site circulation; (c) Design signs in accordance with Umatilla County design requirements for signs as described in UCDC Section 152.545; and (d) Maintain any signs allowed under this condition in good repair. [Final Order Condition E.4]

Condition Number	Operational Conditions
STANDARD: SCENIC RESOURCES (SR) (OAR 345-022-0080)	
OPR-SR-01	The certificate holder shall not use exterior nighttime lighting except: (1) The minimum exhaust stack lighting required or recommended by the Federal Aviation Administration; (2) Safety and security lighting at the Station and step-up substation, provided that such lighting is shielded or downward directed to reduce offsite glare; and (3) Minimum lighting necessary for repairs or emergencies. [Final Order Condition J.2]
STANDARD: WASTE MINIMIZATION (WM) (OAR 345-022-0120)	
OPR-WM-01	The site certificate holder shall implement a waste management plan during operation that includes but is not limited to the following measures: (a) Training employees to minimize and recycle solid waste; (b) Recycling paper products, metals, glass, and plastics; (c) Recycling used oil and hydraulic fluid; (d) Collecting nonrecyclable waste for transport to a permitted solid waste disposal facility by a licensed waste hauler; and (e) Segregating all hazardous waste such as used oil, oily rags and oil absorbent materials, mercury-containing lights and lead-acid and nickel-cadmium batteries for recycling or disposal by a licensed firm qualified in the proper recycling or disposal of hazardous waste. [Final Order Condition N.2]
OPR-WM-02	The certificate holder shall use hazardous materials in a manner that protects public health, safety and the environment and shall comply with all applicable local, state, and federal environmental laws and regulations. [Final Order Condition N.4]
OPR-WM-03	The certificate holder shall collect all hazardous solid waste, including oily waste, used filters, and oily rags or absorbents in sealable drums. The certificate holder shall collect used oils, solvents, and cleaning materials in tanks or barrels supplied by material vendors. [Final Order Condition N.5]
OPR-WM-04	The certificate holder shall store hazardous chemicals in aboveground containers or tanks located within secondary containment areas. Other chemicals and lubricants needed for facility maintenance and operation shall be stored in the facility buildings. [Final Order Condition N.6]
STANDARD: NOISE CONTROL REGULATION (NC) (OAR 345-035-0035)	
OPR-NC-01	Upon written notification from the department, the certificate holder shall monitor and record the actual statistical noise levels during operations to verify that the certificate holder is operating the facility in compliance with the noise control regulations. The monitoring plan must be reviewed and approved by

Condition Number	Operational Conditions
	the department prior to implementation. The cost of such monitoring, if required, will be borne by the certificate holder. [Final Order Condition P.2]
OPR-NC-02	During operation, the certificate holder shall maintain a complaint response system to address noise complaints. The certificate holder shall notify the department within 15 days of receiving a complaint about noise from the facility. The notification should include the date the complaint was received, the nature of the complaint, the complainant's contact information, the location of the affected property, and any actions taken, or planned to be taken, by the certificate holder to address the complaint. [Final Order Condition P.3]
STANDARD: ENERGY FACILITIES THAT EMIT CARBON DIOXIDE (CD) (OAR 345-024-0500)	
OPR-CD-01	Except as provided in Condition OPR-CD-01 (Final Order Condition S.9), within the first 12 months of commercial operation of the facility, the certificate holder shall conduct a 100-hour test (Year One Test). Tests performed for purposes of the certificate holder's commercial acceptance of the facility may suffice to satisfy this condition in lieu of testing after beginning commercial operation. (a) The certificate holder shall conduct the Year One Test to determine the actual heat rate (Year One Heat Rate) and the net electric power output (Year One Capacity) on a new and clean basis, without degradation, for each generating unit, with the results adjusted for the average annual site condition for temperature, barometric pressure, relative humidity, and operating hours per year. The certificate holder shall use a rate of 117 pounds of carbon dioxide per million Btu of natural gas fuel. (b) The certificate holder shall notify the department at least 60 days before conducting the tests required in subsection (a) unless the certificate holder and the department have mutually agreed that less notice will suffice. (c) Before conducting the tests required in subsection (a), the certificate holder shall, in a timely manner, provide to the department for its approval a copy of the protocol for conducting the tests. The department may approve modified parameters for testing on a new and clean basis pursuant to OAR 345-024-0590(1) without a site certificate amendment. The certificate holder shall not conduct the tests required in subsections (a) until the department has approved the testing protocols. (d) Within 60 days after completing the Year One Tests, the certificate holder shall provide to the Council reports of the results of the Year One Tests. [Final Order Condition S.8]
OPR-CD-02	If the certificate holder has elected to calculate excess carbon dioxide emissions based on direct measurements then the Year One Test described in Condition OPR-CD-01 (Final Order Condition S.8) is not required. (a) If the Year One Test is not performed, the certificate holder must report carbon dioxide emissions using actual measured emissions as reported to the Department of Environmental Quality or the U.S. Environmental Protection Agency for all subsequent five year periods over the life of the facility and may not change its election to report based on new and clean heat rate in any subsequent five year period. (b) If the Year One Test is not performed pursuant to Condition OPR-CD-01 (Final Order Condition S.8), then the certificate holder shall report the facility's net kWh generation and actual measured carbon dioxide emissions for the 12 month period following start of commercial operation. The

Condition Number	Operational Conditions
	certificate holder shall report the net kWh generation and actual carbon dioxide emissions for this period to the department within two months of the end of the first 12 month period. The certificate holder shall use the net kWh generation and measured carbon dioxide emissions to perform the calculations to determine if a supplemental monetary path payment is needed as set forth in Condition OPR-CD-03 (Final Order Condition S.10). The certificate holder shall submit these calculations to the department for verification. [Final Order Condition S.9]
OPR-CD-03	Based on the data from the Year One Tests described in Condition OPR-CD-01 (Final Order Condition S.8), or actual measured emissions described in Condition OPR-CD-02 (Final Order Condition S.9), the certificate holder shall calculate an adjusted monetary path payment. The certificate holder shall submit its calculations to the department for verification. If the adjusted amount exceeds the amount of the bond or letter of credit provided according to Condition PRE-CD-07 (Final Order Condition S.7) before beginning construction, the certificate holder shall fully disburse the excess amount directly to The Climate Trust within 30 days of the department's verification of the calculations. (a) The certificate holder shall include the appropriate calculations of the adjusted monetary path payment with its reports of the results of the Year One Tests required under Condition OPR-CD-01 (Final Order Condition S.8) or actual measured emissions required under Condition OPR-CD-02 (Final Order Condition S.9). (b) For calculating the adjusted monetary path payment, the certificate holder shall use an offset fund rate of $1.90 per ton of carbon dioxide (in 2019 dollars) and shall calculate contracting and selecting funds based on 10 percent of the first $500,000 in offset funds and 4.286 percent of any offset funds in excess of $500,000 (in 2019 dollars). (c) In no case shall the certificate holder diminish the value of the bond or letter of credit it provided before beginning construction or receive a refund from The Climate Trust based on the calculations made using the results of the Year One Test required under Condition OPR-CD-01 (Final Order Condition S.8) or actual measured emissions required under Condition OPR-CD-01 (Final Order Condition S.9). [Final Order Condition S.10; AMD1]
OPR-CD-04	Every 5 years after commencing commercial operation of the facility (5-year reporting period), the certificate holder shall report to the Council the information required by either subsection (a) or (b), below. The certificate holder shall submit five-year reports to the Council within 30 days of the anniversary date of beginning commercial operation of the facility. (a) If the certificate holder has elected to calculate any excess emissions using annual average hours of operation and new and clean heat rates, the certificate holder shall report the annual average hours of operation of each generating unit within the facility during that five-year reporting period. The certificate holder shall use the Year One Capacity and Year One Heat Rate that it reports for the corresponding generating units pursuant to Condition OPR-CD-01 (Final Order Condition S.8) to calculate whether it owes supplemental monetary path payments. (b) If the certificate holder has elected to calculate any excess emissions using actual or measured carbon dioxide emissions reported to either the Oregon Department of Environmental Quality or the U.S. Environmental Protection Agency pursuant to a mandatory carbon dioxide reporting requirement, the certificate holder shall submit to the Council the carbon dioxide reporting data and

Condition Number	Operational Conditions
	net kWh generation for that five-year reporting period and shall use that data to determine whether it owes supplemental monetary path payments. (c) If the department determines that the facility exceeds the projected net total carbon dioxide emissions calculated pursuant to Condition PRE-CD-03 (Final Order Condition S.3) and either Condition OPR-CD-01 (Final Order Condition S.8) or Condition OPR-CD-02 (Final Order Condition S.9), prorated for five years, during any five-year reporting period, the certificate holder shall offset excess emissions for the specific reporting period according to subsection (c)(1) and shall offset the estimated future excess emissions according to subsection (c)(2). The certificate holder shall offset excess emissions using the monetary path described under Condition PRE-CD-02 (Final Order Condition S.2). The certificate holder shall disburse funds to The Climate Trust within 30 days after notification by the department of the amount that the certificate holder owes. (1) In determining the excess carbon dioxide emissions that the certificate holder must offset for a five-year period, the department shall apply OAR 345-024-0600(4)(a), unless the certificate holder has elected under OAR 345-024-0590(5) to utilize actual or measured carbon dioxide emissions as reported to either the Oregon Department of Environmental Quality or the U.S. Environmental Protection Agency pursuant to a mandatory carbon dioxide reporting requirement. The certificate holder shall pay for the excess emissions at $1.90 per ton of carbon dioxide emissions (in 2019 dollars). The department shall notify the certificate holder and The Climate Trust of the amount of the payment required, using the monetary path, to offset excess emissions. (2) The department shall calculate estimated future excess emissions and notify the certificate holder of the amount of payment required, using the monetary path, to offset them. To estimate excess emissions for the remaining period of the deemed 30- year life of the facility, the department shall use the parameters specified in OAR 345 024-0600(4)(b). The certificate holder shall pay for the estimated excess emissions at $1.90 per ton of carbon dioxide (in 2019 dollars). The department shall notify the certificate holder of the amount of payment required, using the monetary path, to offset future excess emissions. [Final Order Condition S.11; AMD1]
OPR-CD-05	After the certificate holder has complied with the conditions relating to the carbon dioxide standard before beginning construction, incremental increases in capacity and heat rate that otherwise fall within the limits specified in OAR 345-027-0353(1) [previously OAR 345-027-0050(2)] do not require an amendment of the site certificate if the certificate holder complies substantially with Conditions PRE-CD-01; PRE-CD-02; PRE-CD-03; PRE-CD-04; PRE-CD-05; PRE-CD-06; PRE-CD-07; OPR-CD-01; OPR-CD-02; OPR-CD-03; OPR-CD-04. (Final Order Conditions S.1 through S.11), except as modified below, and if: (a) The department or the Council determines, as described in OAR 345-027-0357(2) [previously OAR 345-027-0050(5)], that the proposed change in the facility does not otherwise require an amendment; and (b) The certificate holder complies with the appropriate carbon dioxide emissions standard and monetary offset rate in effect at the time the department or the Council makes its determination under this condition. [Final Order Condition S.12]

4.5 Facility Retirement Conditions (RET)

Condition Number	Facility Retirement Conditions
STANDARD: RETIREMENT AND FINANCIAL ASSURANCE (RT) (OAR 345-022-0050)	
RET-RT-01	The certificate holder shall retire the facility if the certificate holder permanently ceases construction or operation of the facility. The certificate holder shall retire the facility according to a final retirement plan approved by the Council, as described in OAR 345-027-0110. The certificate holder shall pay the actual cost to restore the site to a useful, non-hazardous condition at the time of retirement, notwithstanding the Council's approval in the site certificate of an estimated amount required to restore the site. [Final Order Condition G.1; Mandatory Condition 345-025-0006(9)]
RET-RT-02	If the Council finds that the certificate holder has permanently ceased construction or operation of the facility without retiring the facility according to a final retirement plan approved by the Council, as described in OAR 345-027-0110, the Council shall notify the certificate holder and request that the certificate holder submit a proposed final retirement plan to the department within a reasonable time not to exceed 90 days. If the certificate holder does not submit a proposed final retirement plan by the specified date, the Council may direct the department to prepare a proposed final retirement plan for the Council's approval. Upon the Council's approval of the final retirement plan, the Council may draw on the bond or letter of credit described in OAR 345-025-0006(8) [previously OAR 345-027-0020(8)], and Condition PRE-RT-02 (Final Order Condition G.4), to restore the site to a useful, non-hazardous condition according to the final retirement plan, in addition to any penalties the Council may impose under OAR Chapter 345, Division 29. If the amount of the bond or letter of credit is insufficient to pay the actual cost of retirement, the certificate holder shall pay any additional cost necessary to restore the site to a useful, non-hazardous condition. After completion of site restoration, the Council shall issue an order to terminate the site certificate if the Council finds that the facility has been retired according to the approved final retirement plan. [Final Order Condition G.2; Mandatory Condition 345-025-0006(16)]

5.0 Successors and Assigns

To transfer this site certificate or any portion thereof or to assign or dispose of it in any other manner, directly or indirectly, the certificate holder shall comply with OAR 345-027-0400 [previously OAR 345-027-0100].

6.0 Severability and Construction

If any provision of this agreement and certificate is declared by a court to be illegal or in conflict with any law, the validity of the remaining terms and conditions shall not be affected, and the rights and obligations of the parties shall be construed and enforced as if the agreement and certificate did not contain the particular provision held to be invalid.

7.0 Execution

This site certificate may be executed in counterparts and will become effective upon signature by the Chair of the Energy Facility Siting Council and the authorized representative of the certificate holder.

IN WITNESS THEREOF, this site certificate has been executed by the State of Oregon, acting by and through the Energy Facility Siting Council, and by Perennial-WindChaser, LLC.

ENERGY FACILITY SITING COUNCIL

By: _____

Hanley Jenkins II, Chair
Oregon Energy Facility Siting Council

Date: Nov. 22, 2019

PERENNIAL-WINDCHASER, LLC

By: _____

Hisashi Hasegawa, President
Perennial Power Holdings, Inc.

Date: _____

Attachment B: Reviewing Agency Comments on preliminary Request for Amendment

CLIFFORD Katie * ODOE

From: Christian Nauer <christian.nauer@ctwsbnr.org>
Sent: Friday, August 31, 2018 10:27 AM
To: CLIFFORD Katie * ODOE
Subject: Re: Perennial Wind Chaser Station site certificate: Request for amendment
Attachments: PastedGraphic-1.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Hi Katie,

Thank you very much for your prompt response, it is very much appreciated. Please keep us in the loop on this Project.

I hope you have a great long weekend!

Cheers and Best Regards,

Christian

Christian Nauer, MS

Archaeologist
Confederated Tribes of the Warm Springs Reservation of Oregon
Branch of Natural Resources

christian.nauer@ctwsbnr.org
Office 541.553.2026
Cell 541.460.8448

*The Confederated Tribes of the Warm Springs Reservation of Oregon have reserved treaty rights in Ceded Lands, as well as Usual and Accustomed and Aboriginal Areas, as set forth through the Treaty with the Middle Tribes of Oregon, June 25, 1855.

*Please know that review by the Tribal Historic Preservation Office does not constitute Government-to-Government consultation. Please ensure that appropriate Government-to-Government consultation is made with the Confederated Tribes of the Warm Springs Tribal Council.

> On Aug 31, 2018, at 10:19 AM, CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov> wrote:
>
> Hi Christian,
>
> Thank you for your comment. I checked with our compliance officer, Duane Kilsdonk, and he said he hasn't received any information from the certificate holder yet about Conditions K.1 through K.4. However, because construction has not yet begun, and they are asking to delay the construction start

date, this is not surprising. Three of the conditions are pre-construction requirements and one condition applies during construction.

The first major compliance document we would receive is the construction progress report, which is due six months after construction begins (and every six months thereafter during construction of the facility). That report would contain a compliance report describing the certificate holder's compliance with all site certificate conditions that are applicable during the reporting period. With the exception of Condition K.2, which requires that they provide us documentation prior to beginning construction, we wouldn't expect to receive information about these conditions until we receive the first construction report.

At this point the project moving forward is dependent upon Council approval of their request for amendment to extend the construction deadlines. ODOE is currently assisting the Council in review of that request, and evaluating whether there have been any changes in rules, statutes, or circumstances since the date the current Perennial Wind Chaser Station site certificate was executed (September 23, 2015) that would impact previous Council findings from the Final Order.

If there is any additional information or clarification I can provide, please do not hesitate to ask.

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy
O: (503) 373-0076
C: (503) 302-0267

From: Christian Nauer [mailto:christian.nauer@ctwsbnr.org]
Sent: Thursday, August 30, 2018 10:24 AM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Cc: Robert Brunoe <robert.brunoe@ctwsbnr.org>
Subject: Re: Perennial Wind Chaser Station site certificate: Request for amendment

Dear Katie,

Thank you for the opportunity to comment on the Perennial Wind Chaser Station (Umatilla County) site certificate: Request for amendment.

As the technical reviewer for NHPA Section 106 and other cultural resource issues for the Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO), the CTWSRO Tribal Historic Preservation Office (THPO) has concerns with potential effects to historic properties within the Project Area of Potential Effects (APE). The APE is within the areas of concern for the CTWSRO.

We would like to humbly request additional information about the status of the Project with regard to the protection of historic properties. At this point, have the Project proponents met (or are they on schedule to meet) the conditions (K1-K4) set forth on pp. 163-166 of the Final Order on Site Certificate?

Thanks again for your consideration,

Best Regards,

Christian

Christian Nauer, MS

Archaeologist
Confederated Tribes of the Warm Springs Reservation of Oregon
Branch of Natural Resources

christian.nauer@ctwsbnr.org
Office 541.553.2026
Cell 541.460.8448

*The Confederated Tribes of the Warm Springs Reservation of Oregon have reserved treaty rights in Ceded Lands, as well as Usual and Accustomed and Aboriginal Areas, as set forth through the Treaty with the Middle Tribes of Oregon, June 25, 1855.

*Please know that review by the Tribal Historic Preservation Office does not constitute Government-to-Government consultation. Please ensure that appropriate Government-to-Government consultation is made with the Confederated Tribes of the Warm Springs Tribal Council.

> On Aug 27, 2018, at 11:14 AM, CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov> wrote:
>
> On August 2, 2018 the Oregon Department of Energy received a preliminary Request for Amendment (pRFA) #1 to the Perennial Wind Chaser Station site certificate. The Perennial Wind Chaser Station is an approved, but not yet constructed, natural gas facility comprised of up to four turbines with a maximum capacity of 415 megawatts. The facility would be built near Hermiston in Umatilla County. In accordance with the existing site certificate, construction must begin three years after the effective date of the site certificate (that is, before September 23, 2018) and construction must be completed by September 23, 2021. The pRFA requests to extend each of these construction deadlines.
>
> OAR 345-027-0085 contains rules specific to a request for amendment to extend construction deadlines. The requirements of section (5) apply to the Perennial Wind Chaser Station because the facility is not yet in construction, but has been approved for construction in the site certificate prior to October 24, 2017. If a request for amendment for a deadline extension made under this section is granted, the Energy Facility Siting Council shall specify new deadlines for beginning or completing construction that are not more than two years from the deadlines in effect before the Council grants the amendment.
>
> The pRFA is available on our website at the following link: https://www.oregon.gov/energy/facilities-safety/facilities/Pages/PER.aspx
>
> This email primarily serves to inform your Government of the pRFA. If your Government is aware of any applicable changes in rules, statutes, or circumstances since the date the current Perennial Wind Chaser Station site certificate was executed (September 23, 2015), or if you have any questions or concerns, please contact us for further discussion. We may also contact your Government directly with questions as we review the pRFA. After issuance of the draft proposed order, the Department shall notify your

Government and shall solicit comments on the request for amendment and the draft proposed order.

If you have any questions or comments, please let me know.

Katie



Katie Clifford
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Energy Facility Siting Division
Oregon Department of Energy
katie.clifford@oregon.gov
(o) 503.373.0076
(m) 503.302.0267

CLIFFORD Katie * ODOE

From: CLIFFORD Katie * ODOE
Sent: Monday, December 3, 2018 4:57 PM
To: 'Robert Waldher'
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Thank you, Bob. Yes, that makes sense to me. I appreciate you giving this such a thorough look. I will let the certificate holder know, and we will reflect this information in the Draft Proposed Order.

Like for other EFSC projects, the County's time working on this is cost-reimbursable through our interagency agreement.

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy
(503) 302-0267

From: Robert Waldher [mailto:robert.waldher@umatillacounty.net]
Sent: Monday, December 3, 2018 4:42 PM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Subject: Re: Perennial Wind Chaser Station site certificate: Request for amendment

Hi Katie - After further review it does not appear that the Depot zoning would apply to the transmission line. I zoomed in on the google imagery to see the transmission line that would be reconductored. It is located entirely on the eastern side of the gravel road. The Ordinance did not include a legal description of the rezoned portion, but I feel safe saying that we would not have extend the depot zoning to the east side of the road. It is likely that it actually follows the centerline of the road. Therefore, I would say the applicant does not need to address the zoning criteria for the two Depot zones. They should be covered by the EFU zoning.

Does this make sense?

On Mon, Dec 3, 2018 at 9:52 AM CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov> wrote:

> Thanks Bob. That area near I-84 and I-82 does not appear to overlap with the facility, so it's possible these zone changes do not apply. I've attached the relevant portion of the zoning maps provided by the certificate holder, which pairs with my questions in the email below about where the zone change ends. It might be easiest to sort this out over the phone, so I can give you call.
>
> **Katie Clifford**
> Senior Siting Analyst
> Oregon Department of Energy
>
> O: (503) 373-0076
> C: (503) 302-0267

From: Robert Waldher [mailto:robert.waldher@umatillacounty.net]
Sent: Monday, December 3, 2018 9:32 AM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Subject: Re: Perennial Wind Chaser Station site certificate: Request for amendment

Only in one very small area near I-84 and I-82. See the zoning map here:

http://www.co.umatilla.or.us/planning/GIS%20maps/WestCounty_Zoning.pdf

On Mon, Dec 3, 2018 at 9:29 AM CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov> wrote:

> Thank you very much, Bob. Based on the letter, I assume the zone changes do, in fact, extend a bit to the east of I-82 and County Road 1204.
>
> Katie
>
> **Katie Clifford**
> Senior Siting Analyst
> Oregon Department of Energy
>
> O: (503) 373-0076
> C: (503) 302-0267
>
> **From:** Robert Waldher [mailto:robert.waldher@umatillacounty.net]
> **Sent:** Thursday, November 29, 2018 3:52 PM
> **To:** CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
> **Subject:** Re: Perennial Wind Chaser Station site certificate: Request for amendment
>
> Katie - Please see the attached letter from the Board. Please let me know if you have additional questions. Thanks!
>
> Bob
>
> On Tue, Nov 20, 2018 at 12:25 PM CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov> wrote:

Thanks Bob. Hope you have a great Thanksgiving as well!

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy

O: (503) 373-0076
C: (503) 302-0267

From: Robert Waldher [mailto:robert.waldher@umatillacounty.net]
Sent: Monday, November 19, 2018 2:49 PM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Subject: Re: Perennial Wind Chaser Station site certificate: Request for amendment

Hi Katie - Our Board meets again on the 28th due to the Thanksgiving holiday. I will work on getting a signed letter then and send it your way.

Have a great Thanksgiving!

Bob

On Tue, Nov 6, 2018 at 3:08 PM CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov> wrote:

> Hi Bob,
>
> We previously discussed the relevant applicable substantive criteria to the existing transmission line that would be reconductored, based on Ordinance No. 2014-06, which rezoned the Umatilla Military Depot. As we discussed, the certificate holder indicated that a portion of the transmission line that would be reconductored now follows the eastern edge of areas re-zoned from EFU to Umatilla Depot Refuge (UDR) and Depot Industrial (DI).

After looking closely at aerial imagery of the area, however, I am seeking confirmation that the existing transmission line does, in fact, cross UDR and DI zoned land. Please find attached the relevant portion of the zoning maps provided by the certificate holder. My questions are:

1. The southern portion of the existing line is located on the east side of Interstate 82. Does the DI zone extend to the east side of I-82, or is the zoning EFU at that point?

2. Where the transmission line first crosses to the west of the interstate as it heads north, there is a transmission structure located between County Road 1204 and the interstate. Does the DI zone extend east of County Road 1204, or is the zoning EFU at that point?

3. The existing transmission line heads north and appears to be located at the boundary between the UDR and EFU zones. There, the transmission line is located to the east of County Road 1204. Does the UDR zone extend east of County Road 1204, or is the zoning EFU at that point?

I appreciate all of the help you've provided as we try to make sure we have the accurate list of applicable Umatilla County requirements.

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy

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From: CLIFFORD Katie * ODOE
Sent: Friday, October 26, 2018 2:58 PM
To: 'Robert Waldher' <robert.waldher@umatillacounty.net>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Great; thank you, Bob. That answers my questions. I appreciate your guidance on the County's requirements.

This doesn't affect our previous discussions because we assumed this for the purposes of our correspondence, but I wanted to let you know that the certificate holder confirmed with UEC that the ROW for the transmission line to be reconductored would not need to be expanded:

> *We contacted UEC and they stated: "The transmission line was designed for double circuit 230kV and the easement widths would have been acquired for that. No additional ROW will need to be acquired to convert the 115kV to 230kV."*

Would it be possible to provide a letter within the next month or so from the Board of Commissioners confirming what we discussed about the applicable substantive criteria? That is, that the criteria listed below for the UDR and DI zones should now be added to the list of applicable substantive criteria the County originally provided in the attached letter (which we received on the original application)?

Alternatively, if the Board is willing to provide a letter (similar to the attached letter) authorizing the County Planning Director to act on behalf of the Board of Commissioners for the purposes of this review, that would also work well.

Hope you have a good weekend!

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy

O: (503) 373-0076
C: (503) 302-0267

From: Robert Waldher [mailto:robert.waldher@umatillacounty.net]
Sent: Friday, October 26, 2018 10:09 AM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Subject: Re: Perennial Wind Chaser Station site certificate: Request for amendment

Hi Katie -

I reviewed your October 12th email and agree with your summary of our conversation. I also concur with you regarding Item #3. It does not appear that the rezone included the right-of-way of Cottonwood Bend. I also reviewed the criteria that the certificate holder addressed for the Depot Industrial and Refuge. It appears adequate and I do not believe there are other sections that need to be addressed. Hope this helps...Please let me know if you have additional questions. Thanks!

Bob

On Tue, Oct 23, 2018 at 3:35 PM CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov> wrote:

> Hi Bob,
>
> Based on reviewing the certificate holder's revised Land Use assessment, I have another question I am hoping you would help me with.
>
> The applicable zoning within the county has changed since April 3, 2014 and affects a portion of the reconductored transmission line. On July 2, 2014, the County Board of Commissioners adopted Ordinance No. 2014-06, which rezoned the Umatilla Military Depot. A portion of the transmission line that would be reconductored now follows the eastern edge of areas re-zoned from EFU to Umatilla Depot Refuge (UDR) and Depot Industrial (DI).
>
> Due to the zoning change, the certificate holder provided an evaluation under the following additional criteria:
>
> UDR
>
> UCDC § 152.537
>
> UCDC § 152.538
>
> DI zone (The transmission corridor is within Subarea 1 of the DI zone)
>
> UCDC § 152.238
>
> UCDC § 152.239
>
> UCDC § 152.241

UCDC § 152.615

UCDC § 152.616(CCC)

Are there any criteria besides the ones listed above that apply to the reconductored transmission line due to the zone change? I see that the UCDC contains a few additional criteria under the UDR and DI zones that the certificate holder did not discuss – presumably they believe those criteria would not apply.

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy

O: (503) 373-0076
C: (503) 302-0267

From: CLIFFORD Katie * ODOE
Sent: Friday, October 12, 2018 1:59 PM
To: 'Robert Waldher' <robert.waldher@umatillacounty.net>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Hi Bob,

Thank you for our conversation on Tuesday and the helpful information you provided. I've written down my understanding of what we discussed – *would you let me know if you agree or if the notes should be modified to more accurately capture the conversation*? We discussed four main topics:

1) You indicated that the Umatilla County Comprehensive Plan Policies applicable to the facility remain the same – meaning, no policies that may have been added to the comprehensive plan (if any) since April 3, 2014 (the date we received the preliminary application) would apply to the facility.

2) You stated that the City of Umatilla adopted the 1972 Umatilla County Zoning Ordinance for the urban growth area (UGA), so the County's zoning ordinance remains applicable to the portion of the facility that would be located within the UGA. You recommended checking with the City to ensure that

they haven't made any changes to requirements within the UGA from what the County zoning ordinance requires. The City, instead of the County, now processes permits within the UGA.

3) We discussed the re-zoning of the property (for the data center) to the south of the energy facility site from EFU to LI/LU. You indicated that it appeared that the natural gas line would remain on EFU land. The certificate holder provided the zoning map overlaid with the facility components yesterday, which I've attached to this email. The certificate holder now states that, "the pipeline will be located in the right-of-way of Cottonwood Bend Road (where the existing Cascade Natural Gas lateral to the Hermiston Generating Plant is located). The road right-of-way was not part of the rezoning from EFU to LI/LU." *Does the County agree that the right-of-way of Cottonwood Bend Road was not part of the rezoning from EFU to LI/LU?*

4) I am waiting to receive confirmation from the certificate holder that the right-of-way for the reconductored transmission line would not be expanded as part of increasing the voltage of the conductor on the UEC side of the structures from 115 kV to 230 kV. You confirmed that, assuming the ROW would not be expanded, the reconductored transmission line is a use permitted outright under UCDC 152.056(J) ("Maintenance or minor betterment of existing transmission lines and facilities of utility companies and agencies") and therefore the portions of the reconductored line that are located on EFU land would not also need to be evaluated under revised UCDC 152.617(II)(7), which mirrors the ORS 215.274 requirements for "an associated transmission line…necessary for public service."

Please let me know your thoughts on my question under point #3, and if you agree with the summary of our discussion contained in this email. We may request a formal letter from the County regarding the applicable substantive criteria after we get a bit farther into the revised application materials we received yesterday.

Thanks again for your help! Hope you have a good conference this coming week.

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy

O: (503) 373-0076
C: (503) 302-0267

From: CLIFFORD Katie * ODOE
Sent: Thursday, September 13, 2018 4:22 PM
To: 'Robert Waldher' <robert.waldher@umatillacounty.net>
Subject: FW: Perennial Wind Chaser Station site certificate: Request for amendment

Hi Bob,

We are reviewing Perennial-WindChaser LLC's request for amendment to the Perennial Wind Chaser Station site certificate. As you are aware, the request is to extend the construction deadlines. We are trying to determine if any applicable substantive criteria have changed since the original (preliminary application for site certificate) Exhibit K was received on April 3, 2014.

Last week we sent the certificate holder requests for additional information (RAIs). I've attached the RAIs related to land use (as well as the GIS shapefile for the facility, in case that's useful). The first RAI recommends that the certificate holder contact Umatilla County to determine whether or not any new goals and/or policies that may have been added to the Umatilla County Comprehensive Plan since April 3, 2014 apply to the facility. As you can see from the second RAI and the below email thread with Tamra Mabbott, we're also trying to determine if the portion of the facility within the urban growth area that was previously assessed against the county's zoning should now be evaluated in light of the City of Umatilla's zoning.

In an area outside of the UGA where county zoning applies, it appears there may have been a zone change that could apply to the natural gas line. In the third RAI we ask them to provide an analysis of the impact of that zone change.

Certainly, if you have any thoughts at this time on these three items, we would be interested in hearing them. Otherwise, we expect the certificate holder to reach out to you and for them to provide additional information in their request for amendment. We do have one question right now, though. The transmission line would include up to six new transmission poles. The remainder of the transmission line would consist of replacing (reconductoring) almost 12 miles of UEC's 115-kV line on existing structures with a new 230-kV single circuit transmission line. In their request for amendment, the certificate holder evaluated the new transmission poles only (and not also the portion of the line that would be reconductored) under the UCDC 152.617(II)(7) analysis, because they state that UCDC 152.056(J) permits the reconductored portion of the line outright. Do you agree that this is the appropriate way to break out the analysis?

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy

O: (503) 373-0076
C: (503) 302-0267

From: CLIFFORD Katie * ODOE
Sent: Tuesday, August 28, 2018 4:08 PM
To: 'Tamra Mabbott' <Tamra@umatilla-city.org>
Cc: Brandon Seitz <Brandon@umatilla-city.org>; Carla McLane <cmclane@co.morrow.or.us>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Thank you very much, Tamra. Great to hear that you are already familiar with the project. I've added both you and Brandon Seitz to the distribution list.

Your preliminary comment about the City's authority within the UGA is helpful. Both the original Application for Site Certificate Exhibit K (from 2014) and the current preliminary Request for Amendment (on page 19) state that areas within the UGA of the City of Umatilla are subject to the 1972 Umatilla County Zoning Ordinance. We would be interested in learning if the applicable substantive criteria for that portion of the facility should now instead come from the City of Umatilla Zoning Ordinance. The zones the developer indicated apply to the portions of the facility within the UGA and the City boundaries are:

- Transmission Line
  - County
    - EFU
    - LI (Light Industrial)
    - RTC (Rural Tourist Commercial)
  - Urban Growth Area
    - F-1 (Exclusive Farm Use Zone)
    - F-2 (General Rural Zone)
    - M-2 (Heavy Industrial Zone)
    - R-1 (Agricultural Residential Zone)

- City
    - NC (Neighborhood Commercial)
    - R1 (Residential, single family)
    - R-2 (Residential, multi-family)
- Step-up substation and underground line
    - Urban Growth Area
        - F-1 (Exclusive Farm Use Zone)

For ease of reference, please find attached figures extracted from the original Exhibit K. We are requesting that the certificate holder revise their Zoning Classification map for clarity, as it is challenging for us to tell by looking at their maps what zoning designations apply. In case it is helpful, I've attached the project shapefiles to this email. Please also find attached descriptions of the facility components that would be located within the City boundaries (a portion of the transmission line) and the UGA (the step-up substation and the underground line).

I hope this information is helpful. Please let me know if there is any additional information I can provide that would be helpful.

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy

O: (503) 373-0076
C: (503) 302-0267

From: Tamra Mabbott [mailto:Tamra@umatilla-city.org]
Sent: Tuesday, August 28, 2018 1:43 PM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Cc: Brandon Seitz <Brandon@umatilla-city.org>; Carla McLane <cmclane@co.morrow.or.us>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Hello Katie – thank you, and thank you to Carla as well. I am familiar with the project since I reviewed the project when I was Planning Director at Umatilla County. However, I am not as familiar with the components that will be located within Umatilla urban growth area. Would you be able to provide a map or description of that part of the project?

Also, if you add city to the list myself and Brandon Seitz, City Planner, we can provide an agency response to the request for an amendment. City of Umatilla has authority to process land use permits for lands outside city limits but inside UGA. That agreement with County was adopted about 1.5 years so that aspect of the local permitting has changed since the original Perennial Wind Chaser project was reviewed.

Please send the information to city and we will return comments.

Thank you again.

Cordially, Tamra

From: CLIFFORD Katie * ODOE [mailto:Katie.Clifford@oregon.gov]
Sent: Tuesday, August 28, 2018 10:33 AM
To: Tamra Mabbott <Tamra@umatilla-city.org>
Subject: FW: Perennial Wind Chaser Station site certificate: Request for amendment

Hi Tamra,

Carla McLane kindly pointed out that we needed to update the information for the City of Umatilla in the Perennial Wind Chaser Station contact list. This previously approved, but not yet constructed, facility would have an interconnection transmission line that would cross the City of Umatilla en route to the McNary Substation. The facility's step-up substation and the underground line

would be located entirely within unincorporated Umatilla County, within the City of Umatilla's Urban Growth Area, but outside the city limits. The power plant itself and the natural gas pipeline would be located entirely in unincorporated Umatilla County. We are currently evaluating the certificate holder's request for a site certificate amendment to extend the construction deadlines (an extension of up to two years is permitted for this particular request). It's possible we may have some questions for the City of Umatilla as we perform the review, particularly if it appears that any land use changes have occurred since the project was originally approved, but in any case we welcome any comments the city may have.

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy

O: (503) 373-0076
C: (503) 302-0267

From: CLIFFORD Katie * ODOE
Sent: Monday, August 27, 2018 9:50 AM
To: 'robert.waldher@umatillacounty.net' <robert.waldher@umatillacounty.net>; 'cmclane@co.morrow.or.us' <cmclane@co.morrow.or.us>; 'manager@ci.irrigon.or.us' <manager@ci.irrigon.or.us>; 'kpettigrew@cityofboardman.com' <kpettigrew@cityofboardman.com>; 'russell@umatilla-city.org' <russell@umatilla-city.org>; 'ecpl@centurytel.net' <ecpl@centurytel.net>; 'bsmith@hermiston.or.us' <bsmith@hermiston.or.us>; 'citymanager@cityofstanfield.com' <citymanager@cityofstanfield.com>; BLEAKNEY Leann <lbleakney@nwcouncil.org>; 'Kristen.SHEERAN@oregon.gov' <Kristen.SHEERAN@oregon.gov>; CANE Jason <jason.cane@state.or.us>; MILLS David <david.mills@state.or.us>; JOHNSON Jim <jjohnson@oda.state.or.us>; 'jeff.caines@aviation.state.or.us' <jeff.caines@aviation.state.or.us>; 'svelund.greg@deq.state.or.us' <svelund.greg@deq.state.or.us>; RIMBACH Gregory P <Gregory.P.Rimbach@state.or.us>; REIF Sarah J <Sarah.J.Reif@state.or.us>; 'Jtokarczyk@odf.state.or.us' <Jtokarczyk@odf.state.or.us>; 'yumei.wang@oregon.gov' <yumei.wang@oregon.gov>; EDELMAN Scott <scott.edelman@state.or.us>; JININGS Jon <jon.jinings@state.or.us>; MURPHY Tim <timothy.murphy@state.or.us>; 'bethany.harrington@dsl.state.or.us' <bethany.harrington@dsl.state.or.us>; BROWN Lauren <Lauren.BROWN@state.or.us>; 'Thomas.Lapp@odot.state.or.us' <Thomas.Lapp@odot.state.or.us>; BEALS Alice * OPRD <Alice.Beals@oregon.gov>; MULDOON Matt <matt.muldoon@state.or.us>; 'LGKOHO@puc.state.or.us' <LGKOHO@puc.state.or.us>; CLEARANCE ORSHPO * OPRD <ORSHPO.Clearance@oregon.gov>; SAUTER Jerry K <Jerry.K.SAUTER@state.or.us>; 'jrmiller@bpa.gov' <jrmiller@bpa.gov>; 'Paul.S.Shampine@usace.army.mil' <Paul.S.Shampine@usace.army.mil>
Cc: 'Rowe Patrick G' <Patrick.G.ROWE@state.or.us>
Subject: Perennial Wind Chaser Station site certificate: Request for amendment

This email serves to inform your agency that on August 2, 2018 the Oregon Department of Energy received a preliminary Request for Amendment (pRFA) #1 to the Perennial Wind Chaser Station site certificate. The Perennial Wind Chaser Station is an approved, but not yet constructed, natural gas facility comprised of up to four turbines with a maximum capacity of 415 megawatts. In accordance with the existing site certificate, construction must begin three years after the effective date of the site certificate (that is, before September 23, 2018) and construction must be completed by September 23, 2021. The pRFA requests to extend each of these construction deadlines.

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The pRFA is available on our website at the following link: https://www.oregon.gov/energy/facilities-safety/facilities/Pages/PER.aspx

This email primarily serves to inform your agency of the pRFA. If your agency is aware of any applicable changes in rules, statutes, or circumstances since the date the current Perennial Wind Chaser Station site certificate was executed (September 23, 2015), or if you have any questions or concerns, please contact us for further discussion. We may also contact your agency directly with questions as we review the pRFA. After issuance of the draft proposed order, the Department shall notify your agency and shall solicit comments on the request for amendment and the draft proposed order.

If you have any questions or comments, please let me know.

Katie

Katie Clifford

Senior Siting Analyst

Energy Facility Siting Division

Oregon Department of Energy

katie.clifford@oregon.gov

(o) 503.373.0076
(m) 503.302.0267

--

Bob Waldher, RLA

Director

Umatilla County Department of Land Use Planning

216 SE 4th ST | Pendleton, OR 97801

Phone: 541-278-6251 | Fax: 541-278-5480

http://www.umatillacounty.net/planning - Visit our website for copies of planning documents, permit applications and other helpful information.

Please Be Aware - Documents such as emails, letters, maps, reports, etc. sent from or received by the Umatilla County Department of Land Use Planning are subject to Oregon Public Records law and are NOT CONFIDENTIAL. All such documents are available to the public upon request; costs for copies may be collected. This includes materials that may contain sensitive data or other information, and Umatilla County will not be held liable for its distribution.

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CLIFFORD Katie * ODOE

From: Tamra Mabbott <Tamra@umatilla-city.org>
Sent: Thursday, November 15, 2018 10:43 AM
To: CLIFFORD Katie * ODOE
Cc: Brandon Seitz
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Hello Katie – Yes.
Let us know if you need more.
Cordially, Tamra

From: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Sent: Thursday, November 15, 2018 9:51 AM
To: Tamra Mabbott <Tamra@umatilla-city.org>
Cc: Brandon Seitz <Brandon@umatilla-city.org>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Hi Tamra,

Thank you for looking into this. That's correct – the certificate holder would be replacing the existing conductor with a higher voltage conductor, but would use existing poles (no pole replacement). The existing transmission line that would be reconductored also passes through the R1 (Residential, single family) and R2 (Residential, multi-family) zones. Would the conductor replacement be permitted outright in those zones as well?

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy
O: (503) 373-0076
C: (503) 302-0267

From: Tamra Mabbott [mailto:Tamra@umatilla-city.org]
Sent: Friday, November 9, 2018 1:49 PM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Cc: Brandon Seitz <Brandon@umatilla-city.org>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Hello Katie – Brandon and I looked at this and as long as you are just replacing on existing poles you do not need a permit.

Cordially, Tamra

From: CLIFFORD Katie * ODOE [mailto:Katie.Clifford@oregon.gov]
Sent: Monday, November 05, 2018 10:07 AM
To: Tamra Mabbott <Tamra@umatilla-city.org>
Cc: Brandon Seitz <Brandon@umatilla-city.org>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

Hi Tamra,

Do the property development standards under Section 10-4C-7 of the City Code apply to reconductoring an existing transmission line? The certificate holder for the Perennial Wind Chaser Station would remove the conductor (wire) from one side of an existing UEC transmission line and replace that conductor with a higher voltage conductor. One of the existing transmission poles is located in the Neighborhood Commercial zone, so we are trying to determine if the certificate holder needs to evaluate compliance with the property development standards for uses in the NC zone if the use involves reconductoring an existing transmission pole.

The certificate holder's current response to that requirement is:

> *The re-conductored transmission line, however, will simply replace an existing 115 kV line with a 230 kV line on existing poles. There will be no new structures and no new "on the ground" impacts. Therefore, the property development standards do not apply.*

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy
O: (503) 373-0076
C: (503) 302-0267

From: CLIFFORD Katie * ODOE
Sent: Tuesday, August 28, 2018 4:08 PM
To: 'Tamra Mabbott' <Tamra@umatilla-city.org>
Cc: Brandon Seitz <Brandon@umatilla-city.org>; Carla McLane <cmclane@co.morrow.or.us>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

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I hope this information is helpful. Please let me know if there is any additional information I can provide that would be helpful.

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Oregon Department of Energy
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To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Cc: Brandon Seitz <Brandon@umatilla-city.org>; Carla McLane <cmclane@co.morrow.or.us>
Subject: RE: Perennial Wind Chaser Station site certificate: Request for amendment

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Please send the information to city and we will return comments.
Thank you again.
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Sent: Tuesday, August 28, 2018 10:33 AM
To: Tamra Mabbott <Tamra@umatilla-city.org>
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Oregon Department of Energy
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C: (503) 302-0267

From: CLIFFORD Katie * ODOE
Sent: Monday, August 27, 2018 9:50 AM
To: 'robert.waldher@umatillacounty.net' <robert.waldher@umatillacounty.net>; 'cmclane@co.morrow.or.us' <cmclane@co.morrow.or.us>; 'manager@ci.irrigon.or.us' <manager@ci.irrigon.or.us>; 'kpettigrew@cityofboardman.com' <kpettigrew@cityofboardman.com>; 'russell@umatilla-city.org' <russell@umatilla-city.org>; 'ecpl@centurytel.net' <ecpl@centurytel.net>; 'bsmith@hermiston.or.us' <bsmith@hermiston.or.us>; 'citymanager@cityofstanfield.com' <citymanager@cityofstanfield.com>; BLEAKNEY Leann <lbleakney@nwcouncil.org>; 'Kristen.SHEERAN@oregon.gov' <Kristen.SHEERAN@oregon.gov>; CANE Jason <jason.cane@state.or.us>; MILLS David <david.mills@state.or.us>; JOHNSON Jim <jjohnson@oda.state.or.us>; 'jeff.caines@aviation.state.or.us' <jeff.caines@aviation.state.or.us>; 'svelund.greg@deq.state.or.us' <svelund.greg@deq.state.or.us>; RIMBACH Gregory P <Gregory.P.Rimbach@state.or.us>; REIF Sarah J <Sarah.J.Reif@state.or.us>; 'Jtokarczyk@odf.state.or.us' <Jtokarczyk@odf.state.or.us>; 'yumei.wang@oregon.gov' <yumei.wang@oregon.gov>; EDELMAN Scott <scott.edelman@state.or.us>; JININGS Jon <jon.jinings@state.or.us>; MURPHY Tim <timothy.murphy@state.or.us>; 'bethany.harrington@dsl.state.or.us' <bethany.harrington@dsl.state.or.us>; BROWN Lauren <Lauren.BROWN@state.or.us>; 'Thomas.Lapp@odot.state.or.us' <Thomas.Lapp@odot.state.or.us>; BEALS Alice * OPRD <Alice.Beals@oregon.gov>; MULDOON Matt <matt.muldoon@state.or.us>; 'LGKOHO@puc.state.or.us' <LGKOHO@puc.state.or.us>; CLEARANCE ORSHPO * OPRD <ORSHPO.Clearance@oregon.gov>; SAUTER Jerry K <Jerry.K.SAUTER@state.or.us>; 'jrmiller@bpa.gov' <jrmiller@bpa.gov>; 'Paul.S.Shampine@usace.army.mil' <Paul.S.Shampine@usace.army.mil>
Cc: 'Rowe Patrick G' <Patrick.G.ROWE@state.or.us>
Subject: Perennial Wind Chaser Station site certificate: Request for amendment

This email serves to inform your agency that on August 2, 2018 the Oregon Department of Energy received a preliminary Request for Amendment (pRFA) #1 to the Perennial Wind Chaser Station site certificate. The Perennial Wind Chaser Station is an approved, but not yet constructed, natural gas facility comprised of up to four turbines with a maximum capacity of 415 megawatts. In accordance with the existing site certificate, construction must begin three years after the effective date of the site certificate (that is, before September 23, 2018) and construction must be completed by September 23, 2021. The pRFA requests to extend each of these construction deadlines.

OAR 345-027-0085 contains rules specific to a request for amendment to extend construction deadlines. The requirements of section (5) apply to the Perennial Wind Chaser Station because the facility is not yet in construction, but has been approved for construction in the site certificate prior to October 24, 2017. If a request for amendment for a deadline extension made under this section is granted, the Energy Facility Siting Council shall specify new deadlines for

beginning or completing construction that are not more than two years from the deadlines in effect before the Council grants the amendment.

The pRFA is available on our website at the following link: https://www.oregon.gov/energy/facilities-safety/facilities/Pages/PER.aspx

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If you have any questions or comments, please let me know.

Katie

OREGON DEPARTMENT OF ENERGY

Katie Clifford
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Energy Facility Siting Division
Oregon Department of Energy
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Oregon
Kate Brown, Governor

Department of Fish and Wildlife
John Day Watershed
East Region
73471 Mytinger Lane
Pendleton, Oregon 97801
(541) 276-2344
FAX (541)276-4414

December 6, 2018

Katie Clifford
Senior Siting Analyst
Oregon Dept. of Energy
550 Capitol St. NE
Salem OR, 97301

Re: Perennial Wind Chaser Station

Dear Katie:

Thank you for contacting the Oregon Department of Fish and Wildlife (ODFW) and providing us the opportunity to comment and make recommendations on the Perennial Wind Chaser Station (PWCS). It is ODFW's understanding that the Oregon Department of Energy (ODOE) has received a preliminary Request for Amendment (pRFA) #1 to the PWCS site certificate for a yet not constructed natural gas facility comprised of up to four turbines with a maximum capacity of 415 megawatts. Also, that in accordance with the existing site certificate, construction must begin three years after the effective date of the site certificate (that is, before September 23, 2018) and construction must be completed by September 23, 2021 and that the pRFA requests to extend each of these construction deadlines.

The proposed location for the PWCS and its components fall within historic habitat for Washington ground squirrels (WGS). Current habitat conditions in most of the proposed facility components (the transmission line corridor being the one exception) are highly isolated and fragmented by a number of man-made features. The presence of two railroad grades, several state and federal highways, smaller paved roads, center-pivot irrigated agricultural fields, cement-lined irrigation ditches, livestock feedlots, and the Umatilla River renders the small remaining patches of habitat in a very isolated and fragmented condition. When ODFW evaluates Habitat Categories according to its Fish and Wildlife Habitat Mitigation Policy (OAR

436-615), normally WGS occupied habitat would be considered Category 1 and ODFW would recommend no impact. However, in this particular case, ODFW believes the small patches of remaining habitat within portions of the site boundaries are too isolated, and fragmented to be sustainable as WGS habitat over time. Individual WGS lack potential to immigrate into or emigrate out of these isolated patches because of the barriers described above, rendering these sites permanently disconnected from a larger population, and therefore these patches would not meet the 'essential' definition of Habitat Category 1. For this reason, ODFW will not be considering WGS occupied patches for PWCS as Category 1 within the McNary step-up substation, the area of new power poles, and the power plant.

However, because WGS are an Oregon State Endangered Species (ORS 496.172; OAR 635-100-0125), the applicant cannot take any individual WGS ("take" means to kill or obtain possession or control of any species on the state list; OAR 635-100-0001(14)). To address the potential for take of a state-listed species, ODFW recommends that surveys be performed during the appropriate season, which is February 15-May 30, prior to any ground disturbance or construction activities (see below for more detail on survey recommendations). In the event WGS are detected, ODFW recommends the applicant work with ODOE and ODFW to develop the appropriate response that may include development of an Incidental Take Permit (OAR 635-100-0170) and associated mitigation measures.

On October 11, 2018 ODFW conducted an on-site field evaluation of all project components relating to PWCS, which included the McNary step-up sub-station, portions of the transmission line corridor, area of new power poles connecting the existing transmission line to the PWCS power plant, the proposed power plant location, and a limited area of the gas interconnection line. After careful evaluation of all 5 of these project areas, even though fragmented and isolated, ODFW found some potential for WGS presence. Therefore ODFW recommends WGS surveys of the project sites and would include a 1,000 foot buffer at the transmission line pulling/tensioning sites where there is no habitat breaks. Also there are many habitat breaks along the gas interconnection line but several small areas would still need to be surveyed that are adjacent to the easement. ODFW recommends the 5 facility components be surveyed for WGS in the following manner:

McNary step-up sub-station and underground transmission line: This area was surveyed for WGS in August of 2013 with no evidence of WGS found. Since this survey was conducted well outside of the established protocol for WGS, it is ODFW's recommendation that a WGS survey be conducted within the project site only.

Transmission line corridor: Since approximately 12, 50'x100' line pulling/tensioning areas will need to be established, ODFW recommends that these "yet to be identified areas" would need to be surveyed with an additional 1,000 foot buffer in suitable WGS habitat and where there is no habitat break during the appropriate WGS survey window. In the event WGS colonies are found, this is the one area of the project where ODFW would consider those areas to be Category 1 habitat because there is existing connectivity with suitable WGS habitat. In this event, ODFW would recommend avoidance through the use of existing power poles for the new transmission line (as proposed by the applicant) and through appropriate siting of tensioning/pulling sites outside of occupied WGS colonies.

New power poles connecting the existing transmission line corridor to the PWCS power plant: To our knowledge, this area has not been surveyed within the last 3 years. It is ODFW's recommended that a WGS be conducted in the project site only.

PWCS power plant: Due to this area being surveyed longer than 3 years ago, it is ODFW's recommends that a new WGS survey be conducted in the project site only.

Gas interconnection line: Due to this area being surveyed longer than 3 years ago, ODFW recommends a WGS survey along the 50 foot gas pipeline easement with an additional 1,000 foot buffer of the easement in suitable WGS habitat and where there is no habitat break. If access is denied due to private property issues, a desk top analysis with an on the ground visual survey from the 50 foot easement would be appropriate.

Again, ODFW appreciates the opportunity to make comments and recommendations on the PWCS pRFA #1 and look forward to working with you and others in the future on this project. If I can be of any further assistance, please feel free to contact me by phone (541-276-2344) or by email (gregory.p.rimbach@state.or.us).

Sincerely,



Greg Rimbach
Umatilla Dist. Wildlife Biologist
Oregon Department of Fish and Wildlife

c: Sarah Reif, ODFW

CLIFFORD Katie * ODOE

From: Gregory Rimbach <Gregory.P.Rimbach@state.or.us>
Sent: Monday, December 10, 2018 4:23 PM
To: CLIFFORD Katie * ODOE
Subject: RE: PWC

Katie:

This letter is in response to the questions that you had regarding the PWCS project. In my letter to you dated December 6, 2018, I wrote that "Current habitat conditions in most of the proposed facility components (the transmission line corridor being the one exception) are highly isolated and fragmented by a number of man-made features. The presence of two railroad grades, several state and federal highways, smaller paved roads, center-pivot irrigated agricultural fields, cement-lined irrigation ditches, livestock feedlots, and the Umatilla River renders the small remaining patches of habitat in a very isolated and fragmented condition. When ODFW evaluates Habitat Categories according to its Fish and Wildlife Habitat Mitigation Policy (OAR 436-615), normally WGS occupied habitat would be considered Category 1 and ODFW would recommend no impact. However, in this particular case, ODFW believes the small patches of remaining habitat within portions of the site boundaries are too isolated, and fragmented to be sustainable as WGS habitat over time. Individual WGS lack potential to immigrate into or emigrate out of these isolated patches because of the barriers described above, rendering these sites permanently disconnected from a larger population, and therefore these patches would not meet the 'essential' definition of Habitat Category 1". I would like to emphasize and reiterate that ODFW is considering the McNary step-up, area of new power poles, temporary laydown area, power station, and natural gas pipeline as the highly isolated and fragmented areas (not the transmission line) and if WGS are identified in these areas, they would be considered Category 4. Since these areas do not meet the "essential" definition in Category 1-3, it is reasonable to consider these areas as Cat 4. If no WGS are detected in these areas, Category 5 may be appropriate.

If you have any questions, please feel free to contact me.

Thanks Katie.

Greg Rimbach
Umatilla District Wildlife Biologist
Oregon Department of Fish & Wildlife
73471 Mytinger Lane
Pendleton, OR 97801
gregory.p.rimbach@state.or.us
541.276.2344

From: CLIFFORD Katie * ODOE [mailto:Katie.Clifford@oregon.gov]
Sent: Thursday, December 06, 2018 4:06 PM
To: RIMBACH Gregory P <Gregory.P.Rimbach@state.or.us>
Cc: REIF Sarah J <Sarah.J.Reif@state.or.us>
Subject: RE: PWC

Greg,

We really appreciate all the thought that you, Sarah, and others at ODFW have put in to ODFW's response. We have a few questions:

- The letter states, "For this reason, ODFW will not be considering WGS occupied patches for PWCS as Category 1 within the McNary step-up substation, the area of new power poles, and the power plant." If the surveys identify WGS-occupied patches within those areas, what category of habitat might ODFW consider those patches?
- If the surveys identify WGS-occupied patches within the natural gas pipeline survey area, what category of habitat might ODFW consider those patches?
- Would ODFW have the same recommendations for the temporary laydown area as for the power plant site?

Katie

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy
(503) 302-0267

From: Gregory Rimbach [mailto:Gregory.P.Rimbach@state.or.us]
Sent: Thursday, December 6, 2018 1:52 PM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Cc: REIF Sarah J <Sarah.J.Reif@state.or.us>
Subject: RE: PWC

Katie:

Here is ODFW's comment and recommendation letter for Perennial Wind Chaser Station's pRFA #1. I certainly appreciate all the information that you and your team have provided ODFW in order for us to generate this letter. If you have any questions, please don't hesitate to contact me.

Greg Rimbach
Umatilla District Wildlife Biologist
Oregon Department of Fish & Wildlife
73471 Mytinger Lane
Pendleton, OR 97801
gregory.p.rimbach@state.or.us
541.276.2344

CLIFFORD Katie * ODOE

From: Gregory Rimbach <Gregory.P.Rimbach@state.or.us>
Sent: Tuesday, June 25, 2019 2:18 PM
To: CLIFFORD Katie * ODOE
Subject: RE: Revised Biological Resources Report

Just reviewing some things and noticed that you had a question about cat types associated with the pulling/tensioning areas. Yes, they all look to be appropriately classified as to the habitat category. Will call you in about 10 minutes

Greg Rimbach
Umatilla District Wildlife Biologist
Oregon Department of Fish & Wildlife
73471 Mytinger Lane
Pendleton, OR 97801
gregory.p.rimbach@state.or.us
541.276.2344

From: CLIFFORD Katie * ODOE [mailto:Katie.Clifford@oregon.gov]
Sent: Tuesday, June 18, 2019 8:29 PM
To: RIMBACH Gregory P <Gregory.P.Rimbach@state.or.us>
Subject: RE: Revised Biological Resources Report

Hi Greg,

It looks like there are three existing conditions relevant to raptor nests:

> **Condition H.8:** During all years in which construction occurs, if construction related activities occur during the raptor breeding season (February 1 through August 31), the certificate holder must conduct pre-construction surveys within 0.5 miles of all proposed project features for Ferruginous Hawk nests, and within 0.25 miles for all other raptor species nests, including burrowing owl burrows. If active nests are located, the certificate holder shall notify the department and the Oregon Department of Fish and Wildlife (ODFW), and construction-related activities must be restricted within 0.5 miles of Ferruginous Hawk nests and 0.25 miles of all other raptor nests until the nests have failed or chicks have fledged. A biologist shall monitor the status of the active nests daily during nearby active construction and document potential adverse interactions with the project.
>
> **Condition H.11:** If construction is to occur during important times (breeding season for Ferrunginous Hawks and other raptors or migration for all native non-raptors), or at close distances to environmentally sensitive areas (nests of the above), prior to any construction activities, the certificate holder must consult with Oregon Department of Fish and Wildlife (ODFW) to determine appropriate measures to take and guidance on seasonal and/or spatial restrictions to avoid or minimize impact.
>
> **Condition H.13:** The certificate holder shall clearly demarcate boundaries of environmentally sensitive areas (nests referred to in Condition H.11) during construction to increase visibility to construction crews.

Here is a bit more information from the Final Order on the ASC about the pulling-tensioning activities: "As explained in the ASC, major equipment required for reconductoring may include reel stands, tensioner, puller reel winder, pilot line winder, splicing cart and pulling vehicle." As part of the original application, E & E prepared a Revegetation and Noxious Weed Control Plan. It appears, however, that this plan did not account for temporary disturbance at the pulling-tensioning sites (the list of components associated with temporary disturbance does not include the pulling-tensioning sites). Part of their plan states, "Areas of temporary disturbance will be restored to original grade and soil condition as soon as possible after the final construction ground disturbance and will generally be re-contoured and de-compacted, if necessary. These areas will then be evaluated to determine whether reseeding or other revegetation techniques are required to return the area to preconstruction vegetation conditions. Re-seeding may not be necessary or appropriate in some areas, including places where vegetation has been flattened but not crushed and those where little or no vegetation was present prior to construction."

We talked about this on the phone, but just to confirm for the record: Do the habitat categories assigned by E & E biologists to the pulling/tensioning sites appear reasonable to you?

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy
Desk: 503-373-0076
Mobile: 503-302-0267

From: Gregory Rimbach [mailto:Gregory.P.Rimbach@state.or.us]
Sent: Tuesday, June 18, 2019 2:15 PM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Subject: RE: Revised Biological Resources Report

Talk to you then!

Greg Rimbach
Umatilla District Wildlife Biologist
Oregon Department of Fish & Wildlife
73471 Mytinger Lane
Pendleton, OR 97801
gregory.p.rimbach@state.or.us
541.276.2344

From: CLIFFORD Katie * ODOE [mailto:Katie.Clifford@oregon.gov]
Sent: Tuesday, June 18, 2019 2:14 PM
To: RIMBACH Gregory P <Gregory.P.Rimbach@state.or.us>
Subject: RE: Revised Biological Resources Report

That sounds great, thanks!

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy
Desk: 503-373-0076

Mobile: 503-302-0267

From: Gregory Rimbach [mailto:Gregory.P.Rimbach@state.or.us]
Sent: Tuesday, June 18, 2019 2:14 PM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>
Subject: RE: Revised Biological Resources Report

Can I call you at 3p today?

Greg Rimbach
Umatilla District Wildlife Biologist
Oregon Department of Fish & Wildlife
73471 Mytinger Lane
Pendleton, OR 97801
gregory.p.rimbach@state.or.us
541.276.2344

From: CLIFFORD Katie * ODOE [mailto:Katie.Clifford@oregon.gov]
Sent: Tuesday, June 18, 2019 10:08 AM
To: RIMBACH Gregory P <Gregory.P.Rimbach@state.or.us>
Subject: FW: Revised Biological Resources Report

Hi Greg,

I'm going through their revised report now. Would you have time to touch base today sometime after 11 am? Hope your Salem trip went well.

Katie Clifford
Senior Siting Analyst
Oregon Department of Energy
Desk: 503-373-0076
Mobile: 503-302-0267

From: Thornton, James M. [mailto:JThornton@ene.com]
Sent: Monday, June 17, 2019 3:26 PM
To: CLIFFORD Katie * ODOE <Katie.Clifford@oregon.gov>; RIMBACH Gregory P <Gregory.P.Rimbach@state.or.us>
Cc: Paul Neil (pneil@rtpenv.com) <pneil@rtpenv.com>; Yetter, Beth <CYetter@ene.com>
Subject: Revised Biological Resources Report

Revisions include a table showing habitat type at the pulling/tensioning sites and observed ground squirrel habitat within 1,000 feet of the pulling/tensioning sites, revised text to clarify the habitat, and two figures showing the habitat adjacent to the natural gas pipeline right of way.

Jim Thornton, Project Director
Ecology and Environment, Inc.
720 3rd Avenue, Suite 1700, Seattle, WA 98104
t: (206) 624-9537 ext. 4615 | m: 503-866-2807

CLIFFORD Katie * ODOE

From: Murphy, Tim <timothy.murphy@state.or.us>
Sent: Friday, May 31, 2019 9:01 AM
To: JININGS Jon; CLIFFORD Katie * ODOE
Subject: RE: Definitions of arable land

Follow Up Flag: Follow up
Flag Status: Completed

Hi Katie,

Good question. That sounds like a reasonable approach to me. I checked case law on this issue but was unable to find anything. I'm copying Jon in case he's dealt with this before.

Have a great weekend!

Tim Murphy
Farm and Forest Lands Specialist | Community Services Division
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
Direct: 503-934-0048 | Main: 503-373-0050
timothy.murphy@state.or.us | www.oregon.gov/LCD

From: CLIFFORD Katie * ODOE [mailto:Katie.Clifford@oregon.gov]
Sent: Wednesday, May 29, 2019 4:35 PM
To: Murphy, Tim <tmurphy@dlcd.state.or.us>
Subject: Definitions of arable land

Hi Tim,

Good connecting with you at the Tribal Cultural Items Training! You're right – it has been a long time since I sent a question your way, but it turns out that we do have a question about the definition of arable land.

We are reviewing the Perennial Wind Chaser Station Request for Amendment #1 to the Perennial Wind Chaser Station site certificate. The Perennial Wind Chaser
Station is an approved, but not yet constructed, natural gas facility, and the certificate holder is requesting a 2-year extension to the construction deadlines. Their request includes an evaluation under Umatilla County Development Code (UCDC) § 152.617(II)(7)(B), which is based on ORS 215.274. The certificate holder notes that there does not appear to be a definition of "arable land" with respect to siting transmission lines on agricultural land, so they applied the definition of arable land with respect to siting wind power generation facilities on agricultural land. We have drafted a summary of their reasoning and proposed approach:

> All three new transmission line structures that would be located on land zoned EFU would also be located on arable land. Neither the UCDC, nor the statute on which UCDC § 152.617(II)(7)(B) is based (ORS 215.274), define "arable land." In addition, the Land Conservation and Development (LCDC) rules pertaining to agricultural land define "arable land" with respect to siting wind power and photovoltaic solar power generation facilities on agricultural land, but do not define "arable land" with respect to siting transmission lines on agricultural land.[1] In the absence of a definition for "arable land" with respect to siting transmission lines on agricultural land, the certificate holder's analysis applies the definition of "arable land" with respect to siting wind power generation

facilities on agricultural land: "lands that are cultivated or suitable for cultivation, including high-value farmland soils described at ORS 195.300(10)." ASC Exhibit I, Figure I-1l, shows that the entire power plant site consists of "Quincy loamy fine sand, gravelly substratum, 0 to 5 percent slopes." The certificate holder explains that this soil type is a Class IV soil if irrigated, and Class IV soils are suitable for cultivation and therefore meet the definition at OAR 660-033-0130(37)(b) of arable land.

[1] OAR 660-033-0130(37)(b) defines "arable lands" for the purposes of siting wind energy generation facilities and OAR 660-033-0130(38)(a) defines "arable land" for the purposes of siting photovoltaic solar energy generation facilities.

Does this approach sound reasonable to you?

Hope you enjoyed the long weekend.

Katie

OREGON DEPARTMENT OF ENERGY

Katie Clifford
Senior Siting Analyst
Energy Facility Siting Division
Oregon Department of Energy
Desk: 503.373.0076
Mobile: 503.302.0267

[1] OAR 660-033-0130(37)(b) defines "arable lands" for the purposes of siting wind energy generation facilities and OAR 660-033-0130(38)(a) defines "arable land" for the purposes of siting photovoltaic solar energy generation facilities.

Attachment C: Draft Proposed Order **Comments** and **Index**

Draft Proposed Order Comment Issue Index

Issue Raised	DPO Section/Applicable Rule or Standard	Type of Change
Request for a cultural resources monitor	III.K. Historic, Cultural, and Archaeological Resources	Recommended new condition; substantive
General statements of support or opposition, and general appeals to the Governor and the Council to approve or deny the facility	Does not pertain to applicable laws or Council standards	Not applicable
Impacts to property values	Does not pertain to applicable laws or Council standards	Not applicable
Appropriateness of facility name	Does not pertain to applicable laws or Council standards	Not applicable
References to other facilities	Does not pertain to applicable laws or Council standards	Not applicable
Validity of rules under which the RFA is being processed	Section II.D. Applicable Division 27 Rule Requirements	Clarification/non-substantive
Environmental and health impacts of hydraulic fracturing	I.B. Description of the Approved Facility; III.P.2. Standards for Energy Facilities that Emit Carbon Dioxide	Clarification/non-substantive
Climate impacts of fossil fuel infrastructure and hydraulic fracturing	I.B. Description of Approved Facility; III.P.2. Standards for Energy Facilities that Emit Carbon Dioxide	Clarification/non-substantive
Consistency with state policy and actions by the Governor's Office	III. Review of the Requested Amendment	Clarification/non-substantive
Need for the facility	III. Review of the Requested Amendment	Clarification/non-substantive

Draft Proposed Order Comment Issue Index

Issue Raised	DPO Section/Applicable Rule or Standard	Type of Change
Need for an extension	III. Review of the Requested Amendment; III.A. General Standard of Review	Clarification/non-substantive
Air emissions from the generating station	III.F. Protected Areas	Recommended changes to findings; substantive
Air Contaminant Discharge Permit validity	III.F. Protected Areas	Recommended changes to findings; substantive
Other certificate holder investments	III.B. Organizational Expertise	Recommended changes to findings; substantive
Pipeline safety	III.A. General Standard of Review	Clarification/non-substantive
Potential for the facility to be left on the landscape	III.G. Retirement and Financial Assurance	Clarification/non-substantive

DPO Comment Tracking Table

Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/21/2019	Linda Hanson		8/22/2019	Eva Kronen
8/21/2019	Carolyn Williams		8/22/2019	Ronlyn Schwartz
8/21/2019	Patricia Mizutani		8/22/2019	Hal White
8/21/2019	Paul Moyer		8/22/2019	Pat Pearson
8/21/2019	Matt Morrissey		8/22/2019	Douglas Peterson
8/21/2019	Phil Pizanelli		8/22/2019	Ann Watters RPE,BCP
8/21/2019	Claudia Sanzone		8/22/2019	Glenn Hufnagel
8/20/2019	Mark Darienzo		8/22/2019	Miriam Perez
8/20/2019	Laura Morello		8/22/2019	Ian Shelley
8/20/2019	Susan McLaughlin		8/22/2019	Jenny Kastner
8/20/2019	Debra Rehn		8/22/2019	Janet H.
8/20/2019	Diane Kondrat		8/22/2019	Jill James
8/20/2019	Christine TOLOTTI		8/22/2019	Sylvia Black
8/20/2019	Marv Binegar		8/22/2019	Ellen Atkinson
8/20/2019	Virginia White		8/22/2019	Barbara colleran
8/20/2019	Jean Butcher		8/22/2019	Thomas Giblin
8/20/2019	Tim Sherry		8/22/2019	Julianne Ramaker
8/20/2019	Jeremy Benjamin		8/22/2019	Carol Gerl
8/20/2019	Sarah Hafer		8/22/2019	Joan Smith
8/20/2019	David Richmond		8/22/2019	Laura Allen
8/20/2019	Laurie Turner		8/22/2019	Tom Keys
8/20/2019	Stephen Bachhuber		8/22/2019	Jeanne Crowley
8/20/2019	Donna Murphy		8/22/2019	Elaine Bettzig
8/20/2019	Anna Shook		8/22/2019	Charlie Graham
8/20/2019	Barbara Waxman		8/22/2019	Peter Sanchez
8/20/2019	Brian Gibson		8/22/2019	John Cruz
8/20/2019	Roy Moulton		8/22/2019	Tim Holbert
8/20/2019	Kim Kosa		8/22/2019	Rosemary Forester
8/20/2019	Mary Twombly		8/22/2019	Harold Watson
8/20/2019	Adina Parsley		8/22/2019	David Hedges
8/20/2019	Lin Reedijk		8/22/2019	Ilene Le Vee
8/20/2019	Lyndee Cunningham		8/22/2019	Tom Schwegler
8/20/2019	Marceline Gearry		8/22/2019	Michael Schumann
8/20/2019	Earl Redding		8/22/2019	Jodie Zupancic
8/20/2019	Jay Maxwell		8/22/2019	Jeff Reynolds
8/20/2019	Lailah Hamblin		8/22/2019	bob e devereux
8/20/2019	John Koenig		8/22/2019	Brian Yanke
8/20/2019	Michael Stathatos		8/22/2019	June Elliott-Cattell

DPO Comment Tracking Table

Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/20/2019	Carolyn Boatsman		8/22/2019	Dana Allen
8/20/2019	Cory Buckley		8/22/2019	Miranda Lovelong
8/20/2019	Vicki Kolberg		8/22/2019	Katherine Jesch
8/20/2019	Laurie Kerr		8/22/2019	Emily Boliver
8/20/2019	Chad Lehn		8/22/2019	Mark Darienzo
8/20/2019	Emilia Brasier		8/22/2019	Alain Gauthier
8/20/2019	John Nelson		8/22/2019	Susan Hathaway
8/20/2019	JL Angell		8/22/2019	les roberts
8/20/2019	Ken Zeman		8/22/2019	Steve Wozniak
8/20/2019	Kim Kovalik		8/22/2019	Harry Kershner
8/20/2019	Jeff Forbes		8/22/2019	Jennifer Smoose
8/20/2019	Merle Clifton		8/22/2019	Susan Wechsler
8/20/2019	Christopher Hansen		8/22/2019	Phyllis Cordero
8/20/2019	Cynthia Clements		8/22/2019	Juli Kring
8/20/2019	Todd Simmler		8/22/2019	Keith D,ÄôAlessandro
8/20/2019	Richard Kolber		8/22/2019	George Keefe
8/20/2019	Robert Thinnes		8/22/2019	Aubrey Pullman
8/20/2019	Eric Lubell		8/22/2019	Carl Dominey
8/20/2019	Martin Velez		8/22/2019	Janet Melton
8/20/2019	Lois Bancroft		8/22/2019	Marco Pardi
8/20/2019	Steve Erickson		8/22/2019	Cleo Chappell
8/20/2019	Antoinette Peterson		8/22/2019	fay forman
8/20/2019	Richard Osmun		8/22/2019	annick baud
8/20/2019	Eric Brentlinger		8/22/2019	Gail Atkins
8/20/2019	Craig Heverly		8/22/2019	S Smith
8/20/2019	Roger Kofler		8/22/2019	Georganne BENDALL
8/20/2019	Peter Zurcher		8/22/2019	Steve Erickson
8/20/2019	Erica Risberg		8/22/2019	Dennis Pennell
8/20/2019	RICHARDWEIGEL		8/22/2019	Rosalie Sable
8/20/2019	Roland Begin		8/22/2019	Debora Tramposh
8/20/2019	Andrea Almeida		8/22/2019	Colleen McMullen
8/20/2019	Bebe Chiarito		8/22/2019	Chris Guillory
8/20/2019	Stephen Hulick		8/22/2019	Linda Studley
8/20/2019	Peggy Leslie		8/22/2019	Genevieve Raymond
8/20/2019	SUSAN HAYNES		8/22/2019	Sarah Prowell
8/20/2019	Roberta Munger		8/22/2019	Guadalupe Yanez
8/20/2019	Brittany Saeman		8/22/2019	Axel Vogt
8/20/2019	April Atwood		8/22/2019	Rosemarie Kozdron

DPO Comment Tracking Table

Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/20/2019	Shireen Press		8/22/2019	Tim Murphy
8/20/2019	Janie Cohen		8/22/2019	Angeline Johnson
8/20/2019	Chaz Smith		8/22/2019	Julie Anderson
8/20/2019	Carolyn Stewart		8/22/2019	Barbara Pikus
8/20/2019	Paul Wilcox		8/22/2019	Linda Browning
8/20/2019	Carmen Sanchez		8/22/2019	Judy Wyeth
8/20/2019	Kalama Reuter		8/22/2019	Diane Daiute
8/20/2019	Janet Johnson		8/22/2019	Annette Keen
8/20/2019	TAMMIE MURRAY		8/22/2019	Lynn Stiglich
8/20/2019	Sally Stevens		8/22/2019	Eddie Tucker
8/20/2019	Nicole Calvert		8/22/2019	Iris Rochkind
8/20/2019	Collyn Baldwin		8/22/2019	Ari Divine
8/20/2019	Mary Grout		8/22/2019	ArdisAnn Szala
8/20/2019	Stephanie Heisler		8/22/2019	EDWARD KOLBE
8/20/2019	Sherry Wolfson		8/22/2019	Helen Stuehler
8/20/2019	Robert Kimbro		8/22/2019	Valentine Clark
8/20/2019	ANDREW WADE		8/22/2019	Joan Cole
8/20/2019	Elaine Nelson		8/22/2019	Mark Canright
8/20/2019	George Cummings		8/22/2019	Alicia Liang
8/20/2019	Denise Jacobson		8/22/2019	Larry Weymouth
8/20/2019	Joe Worth		8/22/2019	AuTumn Davidson
8/20/2019	David Milholland		8/22/2019	Dena Turner
8/20/2019	Amber Armstrong		8/22/2019	Kathryn Sundermann
8/20/2019	Ed Moye		8/22/2019	Randall Webb
8/20/2019	Christie Bradley		8/22/2019	Todd Clark
8/20/2019	Irene Svete		8/22/2019	Steven Bruckner
8/20/2019	Christopher Kralik		8/22/2019	Yola Hesser
8/20/2019	Ryan Murtfeldt		8/22/2019	Eldon Haines
8/20/2019	Judy Henderson		8/22/2019	John AND Jean Fleming
8/20/2019	Shayna Snyder		8/22/2019	Dirk Rogers
8/20/2019	Carole Beauclerk		8/22/2019	Clayton Burford
8/20/2019	Lloyd Vivola		8/22/2019	Sally Gillette
8/20/2019	Logen Williams		8/22/2019	Sherry Perkins
8/20/2019	Kathy Cain		8/22/2019	Elizabeth Johnson
8/20/2019	Daniel McGuire		8/22/2019	Sue Van Loon
8/20/2019	Erica Maranowski		8/22/2019	Ed Lee
8/20/2019	Polly Wood		8/22/2019	Kimberly Maun
8/20/2019	Tom Hopkins		8/22/2019	NANCY OBERSCHMIDT

DPO Comment Tracking Table

Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/20/2019	Jacqueline Abel		8/22/2019	Nancy Loeb
8/20/2019	Colleen Bonin		8/22/2019	Amy Hansen
8/20/2019	Laurie Fisher		8/22/2019	Susan Donohoe
8/20/2019	Laura Anderson		8/22/2019	Joell Ellis
8/20/2019	Mary Bailey		8/22/2019	Barry LeBeau
8/20/2019	Peter Christ		8/22/2019	Phyllis Richardson
8/20/2019	Norma Reich		8/22/2019	Natalie Van Leekwijck
8/20/2019	Sharlane Blaise		8/22/2019	Ken Humke
8/20/2019	Timothy Sherburne		8/22/2019	Brian Ainsley
8/20/2019	T Hennessy		8/22/2019	Richard Olson
8/20/2019	Roy Sendek		8/22/2019	Sally Stevens
8/20/2019	Gary McCuen		8/22/2019	William Crawford
8/20/2019	Tom Whittaker		8/22/2019	Mark Wheeler
8/20/2019	Ellen Stearns		8/22/2019	MARCELLA CRANE
8/20/2019	Richard Johnson		8/22/2019	Phillip Callaway
8/20/2019	Darryl Lloyd		8/22/2019	Lela Perkins
8/20/2019	Barbara Manildi		8/22/2019	Gregory Ellsworth
8/20/2019	Tammy Hodgson		8/22/2019	Dan Sherwood
8/20/2019	Rob Karnuth		8/22/2019	Tracy Farwell
8/20/2019	Susan Tracy		8/22/2019	Leigh Hood
8/20/2019	Wendy Bartlett		8/22/2019	Judy Shively
8/20/2019	Helen Jaskoski		8/22/2019	Carol Becker
8/20/2019	Matthew Barmann		8/22/2019	Steven Woolpert
8/20/2019	Derek Gendvil		8/22/2019	Ellen Saunders
8/20/2019	Haris Wolfgang		8/22/2019	Jorge De Cecco
8/20/2019	Steven Bruckner		8/22/2019	Kevin Gallagher
8/20/2019	Debrah Miles		8/22/2019	JB Jensen
8/20/2019	Keith Brown		8/22/2019	Liz Amsden
8/20/2019	Aleita Hass-Holcombe		8/22/2019	Kelly Jensvold
8/21/2019	Fayette Krause		8/22/2019	Randall Koch
8/21/2019	Kathleen Jones		8/22/2019	ken gunther
8/21/2019	Adina Parsley		8/22/2019	Ellen Yarnell
8/21/2019	Maura Schotter		8/22/2019	Jeanne Raymond
8/21/2019	marguery zucker		8/22/2019	Brent Maynard
8/21/2019	Jean Wyman		8/22/2019	Jean Butcher
8/21/2019	Gary Bushman		8/22/2019	Jessica Kelley
8/21/2019	Charles Gadway		8/22/2019	Jeff Kulp
8/21/2019	Rabecca Whalen		8/22/2019	hillary bryan

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/21/2019	Abigail Corbet		8/22/2019	Tracy Ouellette
8/21/2019	John Silvertooth		8/22/2019	PETER CURIA
8/21/2019	Richard Faith		8/22/2019	Kristin Siess
8/21/2019	Mary Wilson		8/22/2019	Rick Ray
8/21/2019	Kyle Haines		8/22/2019	Deborah Brown
8/21/2019	Fredrick Seil		8/22/2019	Debra McGee
8/21/2019	Mark Weinsoft		8/22/2019	Noreen Arnold
8/21/2019	Michael Young		8/22/2019	Ute Saito
8/21/2019	Steve miesen		8/22/2019	Suzanne Geraci
8/21/2019	Mona McNeil		8/22/2019	L. Fielder
8/21/2019	DavidTvedt		8/22/2019	Debra Rehn
8/21/2019	Linda Avinger		8/22/2019	Cale Christi
8/21/2019	Cliff Lehman		8/22/2019	Tracie Hornung
8/14/2019	Ansula Press		8/22/2019	Mark Koritz
8/14/2019	Paulette Lichatowich		8/22/2019	Dorothy Maxwell
8/14/2019	Gary McCuen		8/22/2019	Genevieve Weber
8/14/2019	Maggie Stock		8/22/2019	Philip Ratcliff
8/14/2019	Peter Sergienko		8/22/2019	William Hoffer
8/14/2019	Joyce Sherman		8/22/2019	John Steppert
8/14/2019	Lawrence Nagel		8/22/2019	Doris Potter
8/14/2019	Fuji Kreider		8/22/2019	Diane Rose
8/14/2019	Patricia Schafer		8/22/2019	Carol Masuda
8/14/2019	David Coffin		8/22/2019	Juan Calvillo
8/14/2019	Amy Roberts		8/22/2019	Rick Nunno
8/14/2019	Matt Glidden		8/22/2019	Maurine Canarsky
8/14/2019	Karen Drescher		8/22/2019	Michelle Mayfield
8/14/2019	Sky Yeager		8/22/2019	Kelsey Anderson
8/14/2019	A Michael Dianich		8/22/2019	Karlyn Gedrose
8/14/2019	Ann Watters RPE,BCPP		8/22/2019	J C Bettencourt
8/14/2019	Paul Spindel		8/22/2019	Anita Melbo
8/14/2019	Dan Sherwood		8/22/2019	Russell Novkov
8/14/2019	Pepper Trail		8/22/2019	Rev. Gordon Hills
8/14/2019	Marvin Higgins		8/22/2019	Jay Humphrey
8/14/2019	Jan Monical		8/22/2019	Brooke Siskey
8/14/2019	Mark Darienzo		8/22/2019	Dustin Kearns
8/14/2019	Marilyn Costamagna		8/22/2019	Anne Elkins
8/14/2019	Annie McCuen		8/22/2019	Quyen Le
8/14/2019	Frances Parson		8/22/2019	Dennis Ledden

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/14/2019	John Gasperoni		8/22/2019	kathy e
8/14/2019	Anthony Albert		8/22/2019	Michael Burmester
8/14/2019	Steve Rauworth		8/22/2019	Kristine Karnezis
8/14/2019	Alice Shapiro		8/22/2019	Sharon Miller
8/14/2019	Arthur Noble		8/22/2019	Isadora Roth
8/14/2019	Sarah Deumling		8/22/2019	Louise Quigley
8/14/2019	Charlie Graham		8/22/2019	Sabolch Horvat
8/14/2019	Allan Peterson		8/22/2019	Beth Levin
8/14/2019	Tom Bender		8/22/2019	Pamela Mattson McDon
8/14/2019	Theron Brayman		8/22/2019	Mirco Dinelli
8/14/2019	Donlon McGovern		8/22/2019	Arrin Schoedinger
8/14/2019	Ian Shelley		8/22/2019	Richard Johnson
8/14/2019	Don Jacobson		8/22/2019	justine cooper
8/14/2019	Bob Thomas		8/22/2019	Deborah Crohn
8/14/2019	Michael Herbert		8/22/2019	p bryer
8/14/2019	Peter Luciano		8/22/2019	Wendy Bowman
8/14/2019	Linda Covert		8/22/2019	Richard Stern
8/14/2019	Lauren Thompson		8/22/2019	Ann Marie Colucci
8/14/2019	Brad Bush		8/22/2019	Thomas Lewis
8/14/2019	CJ James		8/22/2019	Barbara Krupnik Goldman
8/14/2019	Troy Horton		8/22/2019	Frances J Kievet
8/14/2019	Michael Halloran		8/22/2019	Bruce Cox
8/14/2019	Joseph Micketti		8/22/2019	Eva Coombs
8/14/2019	Maggie Underwood		8/22/2019	Ruth Harmon
8/14/2019	Anne Ryland		8/22/2019	Deborah Gardner
8/14/2019	Joan Viers		8/22/2019	Katie Obriot
8/14/2019	Dean Sigler		8/22/2019	Tim Fleischer
8/14/2019	Angelita Surmon		8/22/2019	Michael Heumann
8/14/2019	BERKLEE ROBINS		8/22/2019	Marge Dakouzlian
8/14/2019	Courtney Neubauer		8/22/2019	Pam Larsen
8/14/2019	Robert Rineer		8/22/2019	Toni Mills
8/14/2019	Sharon Holford		8/22/2019	Usha Honeyman
8/22/2019	Ruth Flemming		8/22/2019	Alice trexler
8/22/2019	Nancy Vanderpool		8/22/2019	Pamela Yates
8/22/2019	Joshua Bickley		8/22/2019	Nancy James
8/22/2019	Monica Maxa		8/22/2019	Deborah ODonnell
8/22/2019	John Rogers		8/22/2019	Craig Heverly
8/22/2019	Celina McClaren		8/22/2019	Luca Dinelli

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Therese LIVELLA		8/22/2019	Bev Hedin
8/22/2019	John Worsley		8/22/2019	Grace Neff
8/22/2019	Paul Spindel		8/22/2019	Mary Warren
8/22/2019	Jo Landefeld		8/22/2019	judith lienhard
8/22/2019	Mark Leed		8/22/2019	Dave Potts
8/22/2019	Gina Fuller		8/22/2019	Paula Morgan
8/22/2019	Stephanie Smith		8/22/2019	Kristeen Davis
8/22/2019	Brook Kirklin		8/22/2019	David Edwards
8/22/2019	Marie McKim		8/22/2019	Marceline Gearry
8/22/2019	Michelle Baggio		8/22/2019	Ineke Deruyter
8/22/2019	David Kelley		8/22/2019	R. Zierikzee
8/21/2019	Jane Camero		8/22/2019	Susan Thurairatnam
8/21/2019	Patricia Always		8/22/2019	Nate Hildebrand
8/21/2019	Theresa Gevurtz		8/22/2019	Mary Peterson
8/21/2019	Kris Alman		8/22/2019	Anne-Marie Claire
8/21/2019	Jon Gramstad		8/22/2019	Daniel Jaffee
8/21/2019	KRISTINE Beam		8/22/2019	Barbara and George Rofkar
8/21/2019	MichaelWolf		8/22/2019	Brenda Morrison
8/21/2019	Martha Wright		8/22/2019	Jewel Hall
8/21/2019	Joe Wiederhold		8/22/2019	Lucy Corbett
8/21/2019	mary n		8/22/2019	Jessica Czereszka
8/21/2019	Delores Porch		8/22/2019	Joe Giordano
8/22/2019	Sarah Duvall		8/22/2019	Beatriz Sunderland
8/22/2019	Cheri Ceridwen		8/22/2019	Thomasin Kellermann
8/21/2019	Linda Curry		8/22/2019	Jo Hebberger
8/21/2019	Cindy Kimball		8/22/2019	Richard Bergner
8/21/2019	Angie Holwege		8/22/2019	Elke Hoppenbrouwer
8/21/2019	Robert Connor		8/22/2019	Erin Marshall
8/21/2019	Susan Miller		8/22/2019	Jean Bryant
8/21/2019	Lizbeth Hermansen		8/22/2019	benjamin gipson
8/21/2019	Rachael Pappano		8/22/2019	Dr. Ralph Hollingsworth
8/21/2019	Mauria McClay		8/22/2019	Carla Morin
8/21/2019	Scott McKnight		8/22/2019	joan viers
8/21/2019	CAO'Donnell		8/22/2019	Joseph Start
8/21/2019	Cody Traweek		8/22/2019	William Bennett
8/21/2019	Jan Polychronis		8/22/2019	jules moritz
8/21/2019	Tod Johnston		8/22/2019	Patricia Janesh
8/21/2019	Dana Hardwick		8/22/2019	John Comella

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/21/2019	Colleen Wright		8/22/2019	John Nettleton
8/21/2019	James Soares		8/22/2019	Lynne Campbell
8/21/2019	William Fulton		8/22/2019	Jenet Johnsen
8/21/2019	Carolyn Caldwell		8/22/2019	Jeffrey Watson
8/21/2019	Joel Hildebrandt		8/22/2019	Bruce Cratty
8/21/2019	Tracy Hardwick		8/22/2019	Sandi Cornez
8/21/2019	Mary Hill		8/22/2019	Tracy Ellison
8/21/2019	Eileen Kennedy		8/22/2019	Linda Bolduan
8/21/2019	Janiece Staton		8/22/2019	Patricia Blackwell-March
8/21/2019	Jack West		8/22/2019	Helen Jones
8/20/2019	Judith Walker		8/22/2019	John Springer
8/20/2019	John Ghormley		8/22/2019	David Hermanns
8/20/2019	Scott Hayes		8/22/2019	Judy Arielle Fiestal
8/20/2019	Ryan Rittenhouse		8/22/2019	Jean & John Culp
8/20/2019	Virginia Tarango		8/22/2019	Teresa Mcfarland
8/20/2019	Mark McCormick		8/22/2019	James Bates
8/20/2019	Sherry Salomon		8/22/2019	Claudia Devinney
8/20/2019	John Nettleton		8/22/2019	Christopher Kralik
8/20/2019	Linda Hart		8/22/2019	Cynthia Taylor
8/20/2019	Wesley Kempfer		8/22/2019	Diane Craig
8/20/2019	Martha Neuringer		8/22/2019	JANE MARA
8/20/2019	Shira Fogel		8/22/2019	Peter Sergienko
8/20/2019	Michele Class		8/22/2019	Robert and Dolores Scheelen
8/20/2019	Susanna Cicerone		8/22/2019	Willem Adriaen van Rees
8/20/2019	Jef Gunn		8/22/2019	Cathy Davis
8/20/2019	Camilo Marquez		8/22/2019	Jay Roelof
8/20/2019	Dermot Noonan		8/22/2019	Betty Abadia
8/20/2019	John Harris		8/22/2019	Lori Kunkel
8/20/2019	Todd Corbett		8/22/2019	William Schoene
8/20/2019	Sharon Rickman		8/22/2019	Susan Heath
8/20/2019	Richard Beam		8/22/2019	Dean Sigler
8/20/2019	Brian Anderson		8/22/2019	Ann Littlewood
8/20/2019	Gina Cox		8/22/2019	Aloysius Wald
8/20/2019	Cathy Sampson-Kruse		8/22/2019	Sarah Thomas
8/20/2019	Elizabeth Laskey		8/22/2019	Mary Duvall
8/20/2019	Gloria Fisher		8/22/2019	Diane Kent
8/20/2019	DONALD GARNER		8/22/2019	Rick Brodner
8/20/2019	Virginia White		8/22/2019	Linda A. Heath

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/20/2019	Ineke Deruyter		8/22/2019	Kevin Chiu
8/20/2019	Sheila Dooley		8/22/2019	Janet Wynne
8/20/2019	Darise Weller		8/22/2019	Dana Sewall
8/20/2019	Ken Long		8/22/2019	Matthew Genaze
8/20/2019	Lori Hood		8/22/2019	Carol Bosworth
8/20/2019	Solea Kabako		8/22/2019	David Milholland
8/20/2019	Sarah Collmer		8/22/2019	Jackie Cole
8/20/2019	Deborah Buckley		8/22/2019	stephen wolfe
8/20/2019	Maliea Yakymi		8/22/2019	Susan Miller
8/20/2019	Tika Bordelon		8/22/2019	Maureen Belle
8/20/2019	Meredith Long		8/22/2019	Kent Sugnet
8/20/2019	Jan Aszman		8/22/2019	Emily Frank 1
8/20/2019	Eric Weeks		8/22/2019	Kathie E Takush
8/20/2019	Kathleen Barta		8/22/2019	Steve Robey
8/20/2019	Michael Spence		8/22/2019	Lynn Shoemaker
8/20/2019	James Marquard		8/22/2019	John Bremer
8/20/2019	Jay Humphrey		8/22/2019	Cristy Murray
8/20/2019	Monica Gilman		8/22/2019	JANET HEINLE
8/20/2019	Marshall Goldberg		8/22/2019	Priscilla Martinez
8/20/2019	Peter Aron		8/22/2019	Annalee Dammann
8/20/2019	Rachel Heath		8/22/2019	Heidi Welte
8/20/2019	Sandra Siegner		8/22/2019	Susan Haywood
8/20/2019	Nadine Morris		8/22/2019	Maggie Knapp
8/20/2019	Janet Kimball		8/22/2019	Teresa Van Haalen
8/20/2019	Jane Heisler		8/22/2019	Holly Marczak
8/20/2019	Kelly OHanley		8/22/2019	Robin Miller
8/20/2019	Gayle Weatherson		8/22/2019	Charles Townsend
8/20/2019	DELTON YOUNG		8/22/2019	Liz Trojan
8/20/2019	Paula Wood		8/22/2019	Charissa Clifford
8/20/2019	Jon Nystrom		8/22/2019	Sandra Armstrong
8/20/2019	Joel Kay		8/22/2019	Cynthia Marrs
8/20/2019	Patricia Pauly		8/22/2019	Charlotte Walker
8/20/2019	Chris Sokol		8/22/2019	Mike Conlan
8/20/2019	Mary Marsiglio		8/22/2019	Jennifer Brace
8/20/2019	Gary McCuen		8/22/2019	BEPPIE SHAPIRO
8/20/2019	Sarah Cook		8/22/2019	Lehman Holder
8/20/2019	Ben Asher		8/22/2019	Annie Christensen
8/20/2019	kathy seabrook		8/22/2019	James Roane

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/20/2019	Jane Williams-Grube		8/22/2019	Diane Colcord
8/20/2019	Nora Polk		8/22/2019	Jaime Ramirez
8/20/2019	Jim Jarzabek		8/22/2019	Sam Hackney
8/20/2019	Alice Shapiro		8/22/2019	Margaret Hammitt-McDon
8/20/2019	Abigail Burns		8/22/2019	Rebecca Clark
8/20/2019	Sinu Cletus		8/22/2019	Susan Atwood
8/20/2019	Dani Maron-Oliver		8/22/2019	Ellen Halbert
8/20/2019	Theodor Marshall		8/22/2019	Jonathan Gottlieb
8/20/2019	Luan Pinson		8/22/2019	Bea Ogden
8/20/2019	Mana-Jean Wagnon		8/22/2019	Nancy Robinson
8/20/2019	Bryan Mullaney		8/22/2019	Adonai Booth
8/20/2019	Marianne Larkins-Strawn		8/22/2019	Stephanie Bourdelle
8/20/2019	Linda Bahr		8/22/2019	Wallace Iimura
8/20/2019	Nancy Cushwa		8/22/2019	Donald Lahti
8/20/2019	Penny Greenwood		8/22/2019	Robert Oberdorfer
8/20/2019	Betty Sinnett		8/22/2019	Tami Lukachy
8/20/2019	William Neuhauser		8/22/2019	Mary Davis
8/20/2019	Duane Ray		8/22/2019	Nancy Stamm
8/20/2019	Cynthia Bentley		8/22/2019	mr.g. west
8/20/2019	Ellen Thayer		8/22/2019	Marshall Sanders
8/20/2019	Robin Anderson		8/22/2019	Kathy Oppenhuizen
8/20/2019	Tom Briggs		8/22/2019	Nancy Hedrick
8/20/2019	Lynne Oulman		8/22/2019	Larry Siglin
8/20/2019	MARILEEHENRY		8/22/2019	Betsy McCarthy
8/20/2019	Connie Butler		8/22/2019	Paul Blackburn
8/20/2019	Mary Bennett		8/22/2019	Emilia Ponti
8/20/2019	jack amon		8/22/2019	Lorraine Hersey
8/20/2019	Blaine Ackley		8/22/2019	Diana Talcott
8/20/2019	Karen Pickering		8/22/2019	Pam Chestnut
8/20/2019	Shelley Ries		8/22/2019	Hugh Cochran
8/21/2019	James Milling		8/22/2019	Debra Slater
8/21/2019	Maureen Lauran		8/22/2019	Tracy Landboe
8/21/2019	Michael Robertson		8/22/2019	Jean Naples
8/21/2019	Carol Randell		8/22/2019	Dolly and Roy Sutherland
8/20/2019	William Prothero		8/22/2019	Joann Macey
8/20/2019	Tom McCue		8/22/2019	Laura Goldberg
8/20/2019	Stephanie E.		8/22/2019	Kaitlin Grammer
8/20/2019	Sissy Aron		8/22/2019	Jeri Renner

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/20/2019	Sheila Baraga		8/22/2019	Hillary Tiefer
8/20/2019	Samuel Urko		8/22/2019	michele mcferran
8/21/2019	Robbie Moller		8/22/2019	Maureen Bigler
8/20/2019	Patrick Mulcahey		8/22/2019	Christopher Warren
8/20/2019	Patricia Rau		8/22/2019	Michael Terry
8/22/2019	Mimi Maduro		8/22/2019	Abigail Houghton
8/20/2019	Michael Wilson		8/22/2019	patricia reynolds
8/21/2019	Michael Dianich		8/22/2019	J. Woodworth
8/20/2019	maxine sheets-johnstone		8/22/2019	G Rowe
8/14/2019	mary daily		8/22/2019	Denise Tschann
8/21/2019	Maija Schaefer		8/22/2019	Jan Castle
8/14/2019	Linda Browning		8/22/2019	Laurie And Dave King
8/14/2019	Leigh Hood		8/22/2019	Jessica Rojas
8/22/2019	Lara Gardner		8/22/2019	Anne Y
8/20/2019	Kenneth Fine		8/22/2019	Betsy Pendergast
8/21/2019	Karen Stark		8/22/2019	BC Shelby
8/20/2019	Julie DeSmith		8/22/2019	SJ van Rees
8/22/2019	Julie Chapman		8/22/2019	Stephen Dutschke
8/21/2019	Jenny Holmes		8/22/2019	Richard Freeman
8/20/2019	Janet Trygstad		8/22/2019	Stephen Craig Rolston
8/20/2019	Janet Kavanagh		8/22/2019	Vernon Batty
8/20/2019	James Lanz		8/22/2019	Donna Wehrley
8/20/2019	JACKIE NIGH		8/22/2019	EILEEN MASSEY
8/8/2019	Irene Gilbert		8/22/2019	Henry Berkwitz
8/21/2019	George Milne		8/22/2019	Dennis Higgins
8/20/2019	FREDERICK TOLMIE		8/22/2019	Peter Luciano
8/22/2019	Frank Payne		8/22/2019	Joene Pike
8/20/2019	Emilie Marlinghaus		8/22/2019	Mauria McClay
8/20/2019	Edward Cleary		8/22/2019	Ruba Leech
8/21/2019	Donna Steadman		8/22/2019	Amy Roberts
8/14/2019	david westerlund		8/22/2019	Marguery Lee Zucker
8/20/2019	Dave King		8/22/2019	satya vayu
8/20/2019	Daryl Grenz		8/22/2019	Joan Spiering
8/21/2019	DanielFrye		8/22/2019	Roger Kofler
8/21/2019	Daivati Bharadvaj		8/22/2019	Judith Mackenzie
8/20/2019	CRYSTAL TOLMIE		8/22/2019	Jane Heisler
8/20/2019	Connie Coleman		8/22/2019	Gloria Rhyne
8/14/2019	Chris Baker		8/22/2019	Christi Dillon

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/14/2019	Carla Wise		8/22/2019	Paul Borcherding
8/14/2019	BrockRoberts		8/22/2019	Michael Robertson
8/22/2019	Bonnie McKinlay		8/22/2019	Bobbee Murr
8/14/2019	Bernadette Rodgers		8/22/2019	Cathy Bledsoe
8/20/2019	Andreas Kyriacou		8/22/2019	Michael Wilson
8/21/2019	Alexander Miller		8/22/2019	Jon Hager
8/20/2019	Alex Prentiss		8/22/2019	Rita Heinz
8/20/2019	Alan Amoth		8/22/2019	Fred Mallery
8/16/2019	Daniel Serres, Power Past Fracked Gas Coalition		8/22/2019	Tiffany Spahn
8/16/2019	Stephanie Hillman, Power Past Fracked Gas Coalition		8/22/2019	Wendy McGowan
8/16/2019	Lauren Goldberg, Columbia Riverkeeper		8/22/2019	Sue Craig
8/16/2019	Damon Motz-Storey, Oregon Physicians for Social Respnsibility		8/22/2019	Susan Parks
8/16/2019	Laura Ackerman, The Lands Council		8/22/2019	Mary Neuendorf
8/16/2019	Nick Caleb, Center for Sustainable Economy		8/22/2019	Setsuko Maruki-Fox
8/16/2019	Hannah Sohl, Rogue Climate		8/22/2019	Linda Alstad
8/16/2019	Thomas Meyer, Food & Water Watch		8/22/2019	Maryellen Redish
8/16/2019	Dineen O'Rourke, 350 PDX		8/22/2019	Kathryn TenHoopen
8/16/2019	Jess Wallach, 350 Seattle		8/22/2019	David Scheer
8/16/2019	Meredith Connolly, Climate Solutions		8/22/2019	Fredrick Seil
8/16/2019	Rhett Lawrence, Oregon Chapter Sierra Club		8/22/2019	John Goeckermann
8/16/2019	Nathan Baker, Friends of the Columbia Gorge		8/22/2019	Michelle Sewald
8/16/2019	Climate Action Coalition		8/22/2019	Virginia Davis
8/8/2019	Gary K. Kahn, Reeves, Kahn, Hennessy & Elkins		8/22/2019	Terry Lopata
8/12/2019	Teara Farrow-Ferman, Confederated Tribes of the Umatilla Indian Reservation		8/22/2019	Judy Sibelman
8/22/2019	Susanna Askins		8/22/2019	Juanita Hull
8/22/2019	Joan Balfour		8/22/2019	Vaughn Zeitzwolfe
8/22/2019	Georgeann Courts		8/22/2019	Don Stephens
8/22/2019	Michael Lombardi		8/22/2019	Katherine Howard
8/22/2019	Lenny Dee		8/22/2019	Sarah Stewart
8/22/2019	Sandra Siegner		8/22/2019	Joan Lawson
8/22/2019	Edward del Val		8/22/2019	Mr. Shelley Dahlgren, PhD
8/22/2019	Virginia Feldman		8/22/2019	P Scoville
8/22/2019	Steven Vogel		8/22/2019	Richard Benner
8/22/2019	Kathryn Ellis		8/22/2019	Joe Worth
8/22/2019	Tabitha Thomasson		8/22/2019	Shelley Z. Klappholz

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Diana Pope		8/22/2019	Nancy Harger
8/22/2019	P Anna Johnson		8/22/2019	Tom Bender
8/22/2019	Kate Skolnick		8/22/2019	Gloria Fisher
8/22/2019	JL Angell		8/22/2019	Barbara Branham
8/22/2019	Philip Shook		8/22/2019	Meg Ruby
8/22/2019	Nick Szumlas		8/22/2019	dale riehart
8/22/2019	Steve Sheehy		8/22/2019	Emil Gerth
8/22/2019	Denise Lytle		8/22/2019	David Filer
8/22/2019	Jocelyn Jones		8/22/2019	Kathy Kleczek
8/22/2019	Michael O,ÄôBrien		8/22/2019	Shelly Cash
8/22/2019	Kelly McConnell		8/22/2019	Bill O'Brien
8/22/2019	John Tyler		8/22/2019	Ken Wheeler
8/22/2019	Anne Marie Benjamin		8/22/2019	Jennifer Logan
8/22/2019	Nancy Pfeiler		8/22/2019	Janice Karpenick
8/22/2019	Lauren Fenenbock		8/22/2019	Kay Ross
8/22/2019	Meya Law		8/22/2019	Don Worley
8/22/2019	Moraima Suarez		8/22/2019	Amanda Feaver
8/22/2019	Christine Mayou		8/22/2019	Veronica Poklemba
8/22/2019	A.L. Steiner		8/22/2019	Mary Ann Jasper
8/22/2019	Kristin Lee		8/22/2019	Anne Ryland
8/22/2019	Sherry Williams		8/22/2019	Scott Species
8/22/2019	Jane Butler		8/22/2019	Jamie Fillmore
8/22/2019	Joyce Peck		8/22/2019	Terry Tedesco
8/22/2019	Ed Fiedler		8/22/2019	Jennifer Nitz
8/22/2019	Mike Litt		8/22/2019	Cindy Stein
8/22/2019	karol dietrich		8/22/2019	Don Jacobson
8/22/2019	Walter Burkhardt		8/22/2019	Eileen Hufana
8/22/2019	Rebecca Picton		8/22/2019	Gregory Whiting
8/22/2019	Tania Malven		8/22/2019	James Marquard
8/22/2019	Douglas Cooke		8/22/2019	Rick Rappaport
8/22/2019	Stephen La Serra		8/22/2019	Cheryl Speer
8/22/2019	Connor DeVane		8/22/2019	Sue Lyon-Myrick
8/22/2019	Robert Granger		8/22/2019	Christine Weber-Kearney
8/22/2019	Melba Dlugonski		8/22/2019	Diana Rempe
8/22/2019	Kirsten Oliver		8/22/2019	Sammy Low
8/22/2019	Marian Rauch		8/22/2019	Nancy Anderson
8/22/2019	Ellen Mickle		8/22/2019	Nancy Hartman
8/22/2019	Andrew Friedman		8/22/2019	TERESA OBARR

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Gill Fahrenwald		8/22/2019	Jack Stansfield
8/22/2019	Jessica Greenleaf		8/22/2019	Jean Aslakson i
8/22/2019	myra lighthart		8/22/2019	Rebecca Wolfe
8/22/2019	Kathryn Yearsley		8/22/2019	Jerald Boger
8/22/2019	Anthony Buch		8/22/2019	Dakora Schee
8/22/2019	Abigail Gindele		8/22/2019	Donna Pedroza
8/22/2019	Andrea Milano		8/22/2019	Alice Warner
8/22/2019	Elizabeth Kelly		8/22/2019	Camille Jackson
8/22/2019	Ken Jackson		8/22/2019	Anna Fritz
8/22/2019	Laura Saunders		8/22/2019	Lori Triggs
8/22/2019	Chris Hazynski		8/22/2019	Jean Rosenbalm
8/22/2019	Kathleen Findlay		8/22/2019	John McSwigan
8/22/2019	Phyl Morello		8/22/2019	Dr. Dorothy Black Crow
8/22/2019	Cl K		8/22/2019	William Sharfman
8/22/2019	Steve Rauworth		8/22/2019	Javier Rivera
8/22/2019	Jean Hoene		8/22/2019	William Ryerson
8/22/2019	Becky Andrews		8/22/2019	Erik Henriksen
8/22/2019	Ruthanne Cox-Carothers		8/22/2019	Theodore Cooper
8/22/2019	Kathleen Butt		8/22/2019	BrontV´ McKinnis
8/22/2019	Paul Palla		8/22/2019	Dave Bean
8/22/2019	Jerry Smith		8/22/2019	Eleanor Dowson
8/22/2019	Robert Stabbert		8/22/2019	Harry Mozen
8/22/2019	Phil Ritter		8/22/2019	Bonnie Mitchell
8/22/2019	Lyle Larson		8/22/2019	Bettina Anter
8/22/2019	Nancy Ellingham		8/22/2019	Kimetha Stallings
8/22/2019	Virgene Link-New		8/22/2019	Lori Erbs
8/22/2019	Judith Eda		8/22/2019	Chuck Gehling
8/22/2019	Jorge J Tamargo		8/22/2019	Bill Hinman
8/22/2019	Elaine Powrie		8/22/2019	Jef Gunn
8/22/2019	Mary Lou Soscia		8/22/2019	Arthur Noble
8/22/2019	Richard Weinhold		8/22/2019	John Kus
8/22/2019	Heide Coppotelli		8/22/2019	Daniel Goldberg
8/22/2019	Heather Carver		8/22/2019	Mary Steele
8/22/2019	nancy johnson		8/22/2019	Linda Cramer
8/22/2019	jeff kipilman		8/22/2019	Kim Beck
8/22/2019	Jared Cornelia		8/22/2019	Jen Messina
8/22/2019	Dorothy Louis		8/22/2019	Howard Wade
8/22/2019	John S		8/22/2019	Duane Tucker

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Robin Weage		8/22/2019	Kathy Bradley
8/22/2019	Chris Lima		8/22/2019	Jay Russo
8/22/2019	Jean Toles		8/22/2019	Letitia Tarver
8/22/2019	Pat Bognar		8/22/2019	Karen Alexander-Brow
8/22/2019	Ila Newman		8/22/2019	Carole Onasch
8/22/2019	Ellen Bailey		8/22/2019	Kristin Conrad-Antoville
8/22/2019	Diana Saxon		8/22/2019	Alan Bartl
8/22/2019	Michael and Barbara Hill		8/22/2019	David Ringle
8/22/2019	Taylor Smith		8/22/2019	Sandra Pongracz
8/22/2019	Sandra Smith		8/22/2019	JIM Fletcher
8/22/2019	Donna Harris		8/22/2019	Pamela McDonald
8/22/2019	Ja Vranka		8/22/2019	Gregory Monahan
8/22/2019	Linda Chapman		8/22/2019	Bonnie New
8/22/2019	Winston Anderson		8/22/2019	Mathias Quackenbush
8/22/2019	Rachael Pappano		8/22/2019	Bob Shippee
8/22/2019	Karla Van Dyke		8/22/2019	Elena perez
8/22/2019	Kay Reinfried		8/22/2019	Tom Bugas
8/22/2019	Ana Day		8/22/2019	Ellen McCann
8/22/2019	Jamie Green		8/22/2019	kurt france
8/22/2019	Michele Paxson		8/22/2019	A. Todd
8/22/2019	Theodora Tsongas		8/22/2019	Robert Bresky
8/22/2019	Lloyd Vivola		8/22/2019	Jerry Rosenkoetter
8/22/2019	R Weiss		8/22/2019	Karen Pickering
8/22/2019	Adrienne Fong		8/22/2019	Jill Wyatt
8/22/2019	Monica Gilman		8/22/2019	Vanessa Hartman
8/22/2019	Esther Weaver		8/22/2019	Margaret Comfort
8/22/2019	Jane Kwiatkowski		8/22/2019	Diane Luck
8/22/2019	Karol Bryan		8/22/2019	James Plunkett
8/22/2019	Katrin Sippel		8/22/2019	Don Thompson
8/22/2019	David Ibbotson		8/22/2019	Christine Taylor
8/22/2019	Jill Taylor		8/22/2019	Rob Bradley
8/22/2019	Jennifer Moore		8/22/2019	Gail Roberts
8/22/2019	Katherine Silva		8/22/2019	Esther Garvett
8/22/2019	David Burns		8/22/2019	Lisa Caine
8/22/2019	Alan Winter Yehudah		8/22/2019	Alain Millar
8/22/2019	Jan Turpin		8/22/2019	Teresa DeLorenzo
8/22/2019	Gary Hull		8/22/2019	Helen Wald
8/22/2019	Cynthia Bayne-Davison		8/22/2019	Joseph Wythe

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Dana Leftwich		8/22/2019	Elizabeth Roberts
8/22/2019	Donna Marchetti		8/22/2019	Barbara Harper
8/22/2019	Michael Manzulli		8/22/2019	r c
8/22/2019	Bob Steininger		8/22/2019	Nancy Cushwa
8/22/2019	George Latta, M.D., MBA		8/22/2019	Bob Gendron
8/22/2019	Debbie Krapf		8/22/2019	David Medford
8/22/2019	Harold Robinson		8/22/2019	Grady Goodenough
8/22/2019	Laura Hanks		8/22/2019	karen Heinemann
8/22/2019	Teresa Iovino		8/22/2019	Michael Bordenave
8/22/2019	Michelle Avdek		8/22/2019	Jeff Wells
8/22/2019	Cathie Bell		8/22/2019	Kathy Divens
8/22/2019	Natalie Ranker		8/22/2019	Dan Jensen
8/22/2019	Brian Garrison		8/22/2019	Ron Ennis
8/22/2019	Cody Taylor		8/22/2019	Philip Colvard
8/22/2019	Donna Leavitt		8/22/2019	Blaine Ackley
8/22/2019	Joe Schott		8/22/2019	Hugh O'Haire
8/22/2019	Tui Mullein		8/22/2019	Paulette Meyer
8/22/2019	Dinah Urell		8/22/2019	Sandra Henderson
8/22/2019	Sheila Ford Richmond		8/22/2019	Meryl Pinque
8/22/2019	susan dickerson		8/22/2019	Carolyn Buhl
8/22/2019	Caroline Skinner		8/22/2019	Emily van Alyne
8/22/2019	Elaine Becker		8/22/2019	Michelle Barber
8/22/2019	Bruce Cantwell		8/22/2019	Daphne Wysham
8/22/2019	Alice Levey		8/22/2019	Dan Clapsadle
8/22/2019	Randy Harrison		8/22/2019	Neilia Pierson
8/22/2019	Denise Day		8/22/2019	K F
8/22/2019	Nancy Carey		8/22/2019	Aleeza Nussbaum
8/22/2019	Mary Lou Bennington		8/22/2019	Richard Shepard
8/22/2019	Jeanne Poirier		8/22/2019	Charlotte Sines
8/22/2019	Amy van Saun		8/22/2019	John Schenck
8/22/2019	Gregory Penchoen		8/22/2019	diane marks
8/22/2019	James Pritchard		8/22/2019	Patti Brandt
8/22/2019	Brad Nahill		8/22/2019	Phyllis Oster
8/22/2019	Diane Meisenhelter		8/22/2019	Bryan Doss
8/22/2019	Faye Bennett		8/22/2019	Bryan Branson
8/22/2019	Lorenz Steininger		8/22/2019	Alice West
8/22/2019	Mary McGaughey		8/22/2019	Jennifer Scott
8/22/2019	Jaromir Guzinski		8/22/2019	Anthony Albert

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	MaryAnna Foskett		8/22/2019	Julia Cranmer
8/22/2019	Victoria Holzendorf		8/22/2019	Andrea Pellicani
8/22/2019	Jan Monical		8/22/2019	Berklee Robins
8/22/2019	Benton Elliott		8/22/2019	Don Steinke
8/22/2019	Allison Ciancibelli		8/22/2019	Ronald Hubert
8/22/2019	Steven Schafer		8/22/2019	George Pantely
8/22/2019	Juliana Cyman		8/22/2019	Tiffany Baker
8/22/2019	Judith Dunn		8/22/2019	Carol Newman
8/22/2019	Evelyn Pietrowski-Ciullo		8/22/2019	Suzanne Hamer
8/22/2019	Paulette Lichatowich		8/22/2019	Yvonne Wright
8/22/2019	Patty Bonney		8/22/2019	Tonya Morrison
8/22/2019	Steve Prince		8/22/2019	Ansula Press
8/22/2019	Linda McGavin		8/22/2019	Georgia Mattingly
8/22/2019	Angela Zehava		8/22/2019	Mari Dominguez
8/22/2019	Glenna Hayes		8/22/2019	Corinne Sherton
8/22/2019	Morgan Clark		8/22/2019	Janet Falcone
8/22/2019	John Swaner		8/22/2019	Michael Coulson
8/22/2019	Linore Blackstone		8/22/2019	jan nelson
8/22/2019	Lesli Bair		8/22/2019	Maye Thompson
8/22/2019	Lynn Miller		8/22/2019	A Bigelow
8/22/2019	Margaret Mogg		8/22/2019	Celia Davis
8/22/2019	Eric Lambart		8/22/2019	Vince Mendieta
8/22/2019	Kerrin Moeller		8/22/2019	Timothy Beitel
8/22/2019	Linda Firestone		8/22/2019	Jan Stone
8/22/2019	Richard Craig		8/22/2019	Melody Shapiro
8/22/2019	Debi Holt		8/22/2019	Susan McFarlane
8/22/2019	Francis Henninger		8/22/2019	Maureen O'Reilly
8/22/2019	Steven Cooper		8/22/2019	Janet Ehrenfreund
8/22/2019	Shemayim Elohim		8/22/2019	Stephanie Clark
8/22/2019	Doug Kruse		8/22/2019	Shaun Hubbard
8/22/2019	Karen Stansbery		8/22/2019	Charles Carroux
8/22/2019	Sylvia Gray		8/22/2019	Patty Larsen
8/22/2019	Adam D'Onofrio		8/22/2019	Susan Chandler
8/22/2019	Aleks Kosowicz		8/22/2019	susan janelle
8/22/2019	Meryle A. Korn		8/22/2019	Lawrence Nagel
8/22/2019	Heidi Perry		8/22/2019	Casey Cunningham
8/22/2019	Karen Dindia		8/22/2019	Maureen Lauran
8/22/2019	DREW BRADBURY		8/22/2019	Mark Wirth

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Tika Bordelon		8/22/2019	Aileen Taylor
8/22/2019	Sandra Middour		8/22/2019	Dana Regan
8/22/2019	Nancy Winn		8/22/2019	Cindi Lund
8/22/2019	Rachel Slocum		8/22/2019	miriam israel
8/22/2019	Gail, Smiley		8/22/2019	Wanda Ballentine
8/22/2019	Jan Kuhl-Urbach		8/22/2019	Michael Halloran
8/22/2019	mary n		8/22/2019	Fred Coppotelli
8/22/2019	John Gastineau		8/22/2019	Shannon Nelson-Deighan
8/22/2019	p perron		8/22/2019	Claudia Gray
8/22/2019	Naomi Bishop		8/22/2019	Alex Mach
8/22/2019	Phillip Norman		8/22/2019	Debra Lutje
8/22/2019	Teresa Sullivan		8/22/2019	Linda Hart
8/22/2019	Dennis Gray		8/22/2019	Susan DeWitt
8/22/2019	Norm Enfield		8/22/2019	Julia Skelton
8/22/2019	Carol Colleran		8/22/2019	Neil Shargel
8/22/2019	Pat Copenhaver		8/22/2019	Robert Helm
8/22/2019	Georgiana Gordon		8/22/2019	Nancy Spaan
8/22/2019	Barbara Roberts		8/22/2019	Mira Wiegmann
8/22/2019	Sydney Brahmavar		8/22/2019	Ivan Russell
8/22/2019	George Davidson		8/22/2019	Valerie Blackmore
8/22/2019	Maxine Clark		8/22/2019	Alexander Gardner
8/22/2019	Christie Bradley		8/22/2019	Billy Angus
8/22/2019	Mona McNeil		8/22/2019	Holly Holly
8/22/2019	Terry McClain		8/22/2019	Frances Davis
8/22/2019	Avril Harville		8/22/2019	Karen May
8/22/2019	Carol Scherer		8/22/2019	Susan Allen
8/22/2019	Richard Lamb		8/22/2019	Howard Shapiro
8/22/2019	Greg Jacob		8/22/2019	David Hunt
8/22/2019	Kevin Hughes		8/22/2019	Angie Dixon
8/22/2019	Beth Darlington		8/22/2019	Mary Guard
8/22/2019	Don Abing		8/22/2019	Dennis Paul
8/22/2019	michelle plochere		8/22/2019	Cheryl Erb
8/22/2019	George Feldman		8/22/2019	Ted Gleichman
8/22/2019	Ann Luft		8/22/2019	A Bonvouloir
8/22/2019	Nancy Melton		8/22/2019	Sally Riley
8/22/2019	Stephen Bachhuber		8/22/2019	Ted Dreier
8/22/2019	Olivia Marshall		8/22/2019	Sarah Sercombe
8/22/2019	jeremiah jenkins		8/22/2019	Melissa Hathaway

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Isaac Ehrlich		8/22/2019	Josie Peper
8/22/2019	Katherine Anne Stansbury		8/22/2019	Sa Re
8/22/2019	Rebecca Berlant		8/22/2019	Jeffrey Monroe Edwin Without Prejudice ucc 1-207
8/22/2019	Hailey Gurung		8/22/2019	Bill Kucha
8/22/2019	Nina Rollow		8/22/2019	Laurie Caplan
8/22/2019	Noel Barnes		8/22/2019	Donna Murphy
8/22/2019	susan rankin		8/22/2019	Milan Mehta
8/22/2019	David Bly		8/22/2019	Steve Berman
8/22/2019	Marcel Liberge		8/22/2019	John Villaume
8/22/2019	Scott Anderson		8/22/2019	Deborah Honthaner
8/22/2019	Bob Thomas		8/22/2019	M Leszczynski
8/22/2019	Erika Kane		8/22/2019	Elizabeth Graser-Lindsey
8/22/2019	Sherry Monie		8/22/2019	Valerie Pflug
8/22/2019	bert corley		8/22/2019	Sandra Joos
8/22/2019	joyce schwartz		8/22/2019	Susan Tarjan
8/22/2019	Arlene Burns		8/22/2019	Ellen Maddex
8/22/2019	Erica Johanson		8/22/2019	JOHN SINGISER
8/22/2019	Anne Doane		8/22/2019	Melinda Messore
8/22/2019	Marilyn Britton		8/22/2019	Michael Snouffer
8/22/2019	Ron Erz		8/22/2019	John Dunkum
8/22/2019	Robert Posch		8/22/2019	Lloyd Johnston
8/22/2019	Liz Terhaar		8/22/2019	Jerry Kessinger
8/22/2019	Kathy Durrum		8/22/2019	Duane Ray
8/22/2019	toni syring		8/22/2019	Nancy Mogielnicki
8/22/2019	Lois White		8/22/2019	Gail Ohara
8/22/2019	Michael Essex		8/22/2019	Erin Chipps
8/22/2019	Paul Landau		8/22/2019	stephen couche
8/22/2019	Sharon Parshall		8/22/2019	Carolyn Eckel
8/22/2019	Diana Bohn		8/22/2019	DK Bolen
8/22/2019	Janiece Staton Retired R		8/22/2019	Tracy Hollister
8/22/2019	Fredericka Hoeveler		8/22/2019	D Stirpe
8/22/2019	Amanda Eastman		8/22/2019	Deb Lawless
8/22/2019	Kacey Donston		8/22/2019	Tracey Katsouros
8/22/2019	Candace LaPorte		8/22/2019	Kate Miller
8/22/2019	Maureen O'Neal		8/22/2019	Ms Zentura
8/22/2019	Linda Gillaspy		8/22/2019	Melanie Plaut
8/22/2019	David Frias		8/22/2019	Alice Shapiro

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Ellen Koivisto		8/22/2019	Mary Lou Emerson
8/22/2019	Judith Schwab		8/22/2019	Deena T. Grossman
8/22/2019	Pat McAleer		8/22/2019	Norman Traum
8/22/2019	Lynn Kush		8/22/2019	Laurie Fisher
8/22/2019	Larry Morningstar		8/22/2019	Sandra Whitmore
8/22/2019	Alison Derum		8/22/2019	Gavin Bornholtz
8/22/2019	Matthew A Weaver		8/22/2019	Jack West
8/22/2019	Steve Graff		8/22/2019	Jeffrey White
8/22/2019	Tami Linder		8/22/2019	Leslie Martinsen
8/22/2019	John Poffenberger		8/22/2019	Ben Basin
8/22/2019	Lee Dayfield		8/22/2019	Eric Edwards
8/22/2019	Nancy Hamer		8/22/2019	Marianne Larkins-Strawn
8/22/2019	Ann Bronson		8/22/2019	Peter Karnig
8/22/2019	Sarah Deumling		8/22/2019	Heather Chapin
8/22/2019	Sue Moon		8/22/2019	Anna Cowen
8/22/2019	Bruce Hake		8/22/2019	Rolando Rodriguez
8/22/2019	Barbara Manildi		8/22/2019	Chris Loo
8/22/2019	Phil Hanson		8/22/2019	Paul Spindel
8/22/2019	Gemma Kim		8/22/2019	emily merollis
8/22/2019	Charlotte Pirch		8/22/2019	Ellen Stearns
8/22/2019	Martha Clemons		8/22/2019	Sheri Staley
8/22/2019	Louise Stonington		8/22/2019	Chris Adamson
8/22/2019	Lauren Murdock		8/22/2019	Damon Motz-Storey
8/22/2019	Karen Fletcher		8/22/2019	Christina Irwin
8/22/2019	Megan Warren		8/22/2019	Randall Nerwick
8/22/2019	Jeni Harris		8/22/2019	Heather Dury
8/22/2019	Jack DePue		8/22/2019	Michael Hall
8/22/2019	Sean Cearley		8/22/2019	Theresa Schumacher
8/22/2019	Juanita Dawson-Rhodes		8/22/2019	Gerritt and Elizabeth Baker-Smith
8/22/2019	Karen and Edward Osgood		8/22/2019	Jynx Houston
8/22/2019	Liz Dunlap		8/22/2019	Janet Roxburgh
8/22/2019	Thomas Thrall		8/22/2019	Bridget Bayer
8/22/2019	CR Hutchison		8/22/2019	Richenda Fairhurst
8/22/2019	Robyn Reichert		8/22/2019	Louise Wallace
8/22/2019	Tedd Ward Jr.		8/22/2019	Linda Nagy
8/22/2019	Andrew Wade		8/22/2019	Julie Bush
8/22/2019	Curtis Cawley		8/22/2019	Gerhard Letzing
8/22/2019	Tracy Cole		8/22/2019	Ryan Schwartz

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Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Ellen Brotherson		8/22/2019	Amy Houchen
8/22/2019	Priscilla Lane		8/22/2019	gisela zech
8/22/2019	marianne mauldin		8/22/2019	Joyce Follingstad
8/22/2019	Paul Eisenberg		8/22/2019	Linda Tighe
8/22/2019	Celeste Hong		8/22/2019	Alan Smith
8/22/2019	bernardo alayza mujica		8/22/2019	Betsy Toll
8/22/2019	Susan Temple Bolt		8/22/2019	Tammy Robinson
8/22/2019	Mary Buckley		8/22/2019	Joel Porter
8/22/2019	John Burns		8/22/2019	Kathryn Young
8/22/2019	Leland Block		8/22/2019	Suzan Ireland
8/22/2019	carol Denning		8/22/2019	Rachel Ellison
8/22/2019	Jim BYRNE		8/22/2019	Au Nguyen
8/22/2019	francis mastri		8/22/2019	Linda Covert
8/22/2019	Jan Thorne		8/22/2019	Maria Sause
8/22/2019	Wayne Davison		8/22/2019	Sarah Spansail
8/22/2019	Brent Rocks		8/22/2019	Robert Jones
8/22/2019	Linda Kelley		8/22/2019	Adam Lee
8/22/2019	Stephen and Kathleen Hulick		8/22/2019	Karen Stimson
8/22/2019	Jackie Stolfi		8/22/2019	Nina Diamante
8/22/2019	Ingri Benson		8/22/2019	Jane Nicolai
8/22/2019	Teresa Keane		8/22/2019	Marianne Brevard
8/22/2019	emilia novo		8/22/2019	Dianne Ensign
8/22/2019	Kevin Walsh		8/22/2019	Phil Harris
8/22/2019	kathy grieves		8/22/2019	Carolyn Savage
8/22/2019	Jan Polychronis		8/22/2019	Barbara Bernstein
8/22/2019	Pamela Smith		8/22/2019	Heather Davis
8/22/2019	Steve V.		8/22/2019	Susan Linden
8/22/2019	Shawn Ritterbush		8/22/2019	Patrick Bushart
8/22/2019	Ronald Clayton		8/22/2019	James Spooner
8/22/2019	Laura Ackerman		8/22/2019	LYDIA SWAGERTY
8/22/2019	Dianne Applegate		8/22/2019	Sandra Butler
8/22/2019	Janet Kirkland		8/22/2019	Hank Keeton
8/22/2019	Joseph Stenger		8/22/2019	James Roberts
8/22/2019	kristy overton		8/22/2019	John Wood
8/22/2019	Diane Pugh		8/22/2019	Elaine Donovan
8/22/2019	Jude Green		8/22/2019	Claudia Sanzone
8/22/2019	Patricia Browning Browning		8/22/2019	Jill Hamilton
8/22/2019	Robinson Kurth		8/22/2019	Mark Hollinrake

DPO Comment Tracking Table

Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Ann Turner, MD		8/22/2019	Jane Church
8/22/2019	Nancy White		8/22/2019	Jan Edwards
8/22/2019	Kristin Normansen		8/22/2019	Maureen Stapler Crowell
8/22/2019	Adina Parsley		8/22/2019	Darise Weller
8/22/2019	Stephen Durbin		8/22/2019	Douglas Church
8/22/2019	Kenneth Gibb		8/22/2019	Sheila Ward
8/22/2019	Kimberly Wiley		8/22/2019	S. Nam
8/22/2019	Wendy Tsien		8/22/2019	Kima Gari
8/22/2019	Victoria Miller		8/22/2019	William Barnett
8/22/2019	M. Stein		8/22/2019	John Ardner
8/22/2019	Shauna Sparlin		8/22/2019	Rodney Whisennhunt
8/22/2019	Nora Polk		8/22/2019	Jill Blaisdell
8/22/2019	George Barton		8/22/2019	Robert Carothers
8/22/2019	CL Riley		8/22/2019	Timothy Mullen
8/22/2019	Thomas Windberg		8/22/2019	Jennifer Calvert
8/22/2019	Pablo Bobe		8/22/2019	Lucile W. Brook
8/22/2019	Paul Halliday		8/22/2019	Christine Bonney
8/22/2019	John Nikkel		8/22/2019	James Mulcare
8/22/2019	Andrew Wadsworth		8/22/2019	Jean Evens
8/22/2019	Zechariah Heck		8/22/2019	Matthew Barmann
8/22/2019	Lenore Reeves		8/22/2019	Annie Orourke
8/22/2019	Judith Arcana		8/22/2019	Susan Vosburg
8/22/2019	Cynthia Enlow		8/22/2019	Douglas Matney
8/22/2019	Linda Humphrey		8/22/2019	Nancy Carl
8/22/2019	Ande Kobek		8/22/2019	Paul Sansone
8/22/2019	Lisa Frech		8/22/2019	Kyle Rolnick
8/22/2019	Lyndee Cunningham		8/22/2019	Lois Butterfield
8/22/2019	Tamara Wecker		8/22/2019	Barbara Blackwood
8/22/2019	Stashia Cabral		8/22/2019	Scott Lesko
8/22/2019	Harry Wohlsein		8/22/2019	JL Charrier
8/22/2019	Gerald Walsh		8/22/2019	Melissa Rehder
8/22/2019	Marcia Hoodwin		8/22/2019	Robert Herzog
8/22/2019	Erin Galey		8/22/2019	Daniel Sandvig
8/22/2019	Lorraine Brabham		8/22/2019	David Michalek
8/22/2019	Craig Mackie		8/22/2019	Jucy Steinberger
8/22/2019	Jai Boreen		8/22/2019	Marty Bankhead
8/22/2019	Kelly O'Hanley		8/22/2019	Linny Stovall
8/22/2019	David Arntson		8/22/2019	Annie McCuen

DPO Comment Tracking Table

Date Comment Received	Name and Organization		Date Comment Received	Name and Organization
8/22/2019	Ben Martin		8/22/2019	Mark Grzegorzewski
8/22/2019	Joyce Sherman		8/22/2019	Linda Carroll
8/22/2019	Melinda Parke		8/22/2019	Tracy Eberwein
8/22/2019	Mike Brinkley		8/22/2019	Gwen Hadland
8/22/2019	Linda Bescript		8/22/2019	Kelley Albrecht
8/22/2019	Darcy Reeves		8/22/2019	Linda mulder
8/22/2019	Theresa Nuccio		8/22/2019	Phil Goldsmith
8/22/2019	Laura Long		8/22/2019	Michael MacDougall
8/22/2019	Jk Deller		8/22/2019	Kenneth Roundy
8/22/2019	Rowan Everard		8/22/2019	Anita Brandariz
8/22/2019	Karen Paule		8/22/2019	Gloria Guy
8/22/2019	Carol Jurczewski		8/22/2019	Sharon Longyear
8/22/2019	Mack Hunter		8/22/2019	natasha myers
8/22/2019	Bob Hannigan		8/22/2019	Laree Johnson
8/22/2019	Lorraine Hartmann		8/22/2019	Mary Taylor
8/22/2019	J. Chodorow		8/22/2019	Nancy Rupp
8/22/2019	Tamara Mathews		8/22/2019	Maryellen McFadden
			8/22/2019	Erin Saylor, Columbia Riverkeeper
			8/22/2019	Nathan Baker, Friends of the Columbia Gorge
			8/22/2019	Andrea Issod, Sierra Club Environment Law
			8/22/2019	Jonah Sandford, Northwest Environmental Defense Center
			8/22/2019	Doug Heiken, Oregon Wild
			8/22/2019	Ryan Rittenhouse, Friends of the Columbia Gorge
			8/22/2019	Dan Serres, Columbia Riverkeeper
			8/22/2019	Emily Krafft, 360 PDX
			8/22/2019	Dena Turner
			8/22/2019	Janine O'Rourke, 360 PDX
			8/22/2019	Eileen Fromer
			8/22/2019	Richard Allan, Marten Law

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:

D - 503 . 241 . 2643 | E - rallan@martenlaw.com | 1050 6th Ave, Suite 2150, Portland, OR 97204

> 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_x), 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.

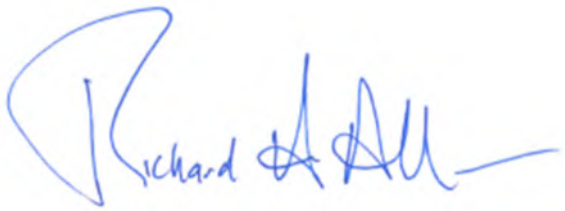
IV. The Governor has no role in the review of Perennial's Request for Amendment.

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).

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,



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 reconductored 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

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,

--
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

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.[1] Specifically, the Oregon Supreme Court has held that the rules relied on by Perennial here "are invalid."[2] Because the RFA was expressly submitted under invalid rules, it cannot be processed by ODOE and cannot be approved by EFSC.[3] 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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[1] *See* RFA at § 1.

[2] *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.").

[3] 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."[4] 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."[5] 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."[6] 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.[7] Additionally, Governor Brown has recognized climate change as "one of the most significant threats to Oregon's economy, environment, and way of life."[8] Fracked gas infrastructure, like Perennial's 415-megawatt gas-powered facility, threatens the health of our communities and our climate.

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[4] OAR 345-021-0010(1)(e)(D).
[5] RFA at 5.
[6] *See* OAR 345-027-0075(2)(b) (2018).
[7] *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, *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
[8] 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.[9] The Council must "determine the gross carbon dioxide emissions that are reasonably likely to result from the operation of the proposed energy facility."[10] 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.[11] In fact, EPA estimates methane to be 28 to 36 times more potent than carbon dioxide over 100 years.[12] 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.[13] 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.[14] 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.[15] 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.[16] Perennial's DEQ Air Permit (if it is still in effect) allows it to emit pollution beyond

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[9] *See* OAR 345-024-0500–OAR 345-024-0720.
[10] OAR 345-024-0590(1)(emphasis added).
[11] *Id*.
[12] EPA, Understanding Global Warming Potentials, *available at* https://www.epa.gov/ghgemissions/understanding-global-warming-potentials
[13] *See* note 2.
[14] 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
[15] Standard Air Contaminant Discharge Permit, Permit No. 30-0039-ST-01, Section 3.9 (Jan. 26, 2016).
[16] *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://d3pcsg2wjq9izr.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.[17]

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."[18] 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.[19] 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.[20]

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.[21] 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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[17] *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).
[18] *See* https://www.usclimatealliance.org/alliance-principles
[19] *See* https://www.ucsusa.org/clean-energy/coal-and-other-fossil-fuels/infographic-climate-change-risks-natural-gas
[20] *See* The Guardian, *World has no capacity to absorb new fossil fuel plants, warns IEA* (November 12, 2018).
[21] *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.[22] 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.[23] 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.[24] 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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[22] OAR 345-027-0085(5)(d) (2018)
[23] RFA at 5.
[24] 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
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Portland, OR 97214
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Doug Heiken, Conservation and Restoration Coordinator
Oregon Wild
PO Box 11648
Eugene, OR 97440
dh@oregonwild.org
541.344.067

CLIFFORD Katie * ODOE

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.

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Dan Serres | Conservation Director
Columbia Riverkeeper | 1125 SE Madison Suite 103A Portland 97214
503.890.2441 | 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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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.

#	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	solfjoanb@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	Dahlonega	GA	

12	Diana	Pope	diana.s.pope@gmail.com	Portland	OR	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.
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	

20	Jocelyn	Jones	jocelynjones@gmail.com	Portland	OR	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.
21	Michael	O,ÄôBrien	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,ÄôBrien
22	Kelly	McConnell	kellymccnnll@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	
36	Mike	Litt	littm10@comcast.net	Portland	OR	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.
37	karol	dietrich	wonmor@pacifier.com	Corbett	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.

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	squirreltree@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	mdrfdr@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	‚ÄúPerennial Wind Chaser‚Äù! 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.

77	Jorge J	Tamargo	dutchelm@netzero.net	Miami	FL	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 cought 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 . Regards jorge Tamargo
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	jbkip@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	taylorsmith1051@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	

114	Jane	Kwiatkowski	draws.it@gmail.com	Eugene	OR	term safety reasons ,Äî well-supported by science and current events ,Äî 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 & noise pollution; and (4) fracking infrastructure is disproportionately sited in nonwhite, indigenous or low-income communities [https://therevelator.org/fracking-health-studies/?utm_source=eeo&utm_medium=email&utm_campaign=eeo99
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	

137	Natalie	Ranker	nattim7072@gmail.com	North Bend	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.
138	Brian	Garrison	sumatopoppih@gmail.com	Deer Island	OR	

139	Cody	Taylor	codyetaylor@hotmail.com	Hood River	OR	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.
140	Donna	Leavitt	donnaleav@gmail.com	Edmonds	WA	We all now know the effects of fracking on ground water.....and other environmental dangers. Who needs that?
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	
146	Caroline	Skinner	caro4321@earthlink.net	Portland	OR	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,Äôs (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,Äôs RFA. Thank you.
147	Elaine	Becker	elainebecker@yahoo.com	Roanoke	VA	
148	Bruce	Cantwell	brucec@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	

157	James	Pritchard	pritchard.james2@gmail.com	Portland	OR	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
158	Brad	Nahill	turtleactivist@hotmail.com	Beaverton	OR	
159	Diane	Meisenhelter	meissun@hotmail.com	Portland	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.
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	

162	Mary	McGaughey	marymcgaughey@yahoo.com	Gresham	OR	Fracking produces more FOSSILFUEL! We wants clean, alternative energy. And! a clean energy law that supports the people, the environment, the business community. Supports all constituents. A balanced solution! PLEASE!
163	Jaromir	Guzinski	jaroguzinski@gmail.com	Woking	GB-SRY	
164	MaryAnna	Foskett	maryanna@foskettco.com	Arlington	MA	
165	Victoria	Holzendorf	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	mcgavinski@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!

198	Meryle A.	Korn	meryle.korn@gmail.com	Bellingham	WA	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!
199	Heidi	Perry	perry.heidi@gmail.com	Portland	OR	
200	Karen	Dindia	kdindia@comcast.net	Portland	OR	

201	DREW	BRADBURY	drewbradbury@gmail.com	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.
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	

210	p	perron	patriciaperron@hotmail.com	seattle	WA	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
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	

220	Sydney	Brahmavar	sydney.brahmavar@gmail.com	Portland	OR	As a community college instructor teaching climate change politics I,Äôd 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.
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	

229	Greg	Jacob	jacobgk@comcast.net	Hillsboro	OR	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.
230	Kevin	Hughes	anevolver@gmail.com	Anacortes	WA	
231	Beth	Darlington	bedarlington@vassar.edu	Poughkeepsie	NY	
232	Don	Abing	dya21rainlander@hotmail.com	Astoria	OR	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!!!!!
233	michelle	plochere	mplochere@icloud.com	Los Angeles	CA	
234	George	Feldman	feldmange@gmail.com	Portland	OR	I don,Äôt need to tell you how awful fracking is. You can stop this!
235	Ann	Luft	aaluft@yahoo.com	Douglas	MI	
236	Nancy	Melton	genevalimerick@gmail.com	Seattle	WA	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.

237	Stephen	Bachhuber	srbachhuber1@gmail.com	Portland	OR	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.
238	Olivia	Marshall	oliviamarshall92@gmail.com	Portland	OR	
239	jeremiah	jenkins	miah66@yahoo.com	Portland	OR	
240	Isaac	Ehrlich	autoblaster7@gmail.com	Rhododendron	OR	
241	Katherine Anne	Stansbury	kathycallaway@whiz.to	Oregon City	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.
242	Rebecca	Berlant	rsberlant@aol.com	Brooklyn	NY	
243	Hailey	Gurung	flanighb@gmail.com	Portland	OR	Oregon can do better. Please for the sake of all our children. Respect, Hailey Flanigan Gurung Mother of Sahas, age 8 And Balakaji, age 5

244	Nina	Rollow	nrollow37@comcast.net	Portland	OR	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.
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	stoneybrook50@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	

260	Robert	Posch	robertposch323@gmail.com	St Petersburg	FL	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 resoruces on renewables; solar, wind (esp NW Columbia Gorge) etc.
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	parsshar@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	luvtrees@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	
276	David	Frias	dfrias7733@gmail.com	Portland	OR	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.
277	Ellen	Koivisto	offstage@earthlink.net	San Francisco	CA	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.
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	
282	Alison	Derum	alderum@gmail.com	Rainier	OR	Seriously!! We'rebetter than this! Keep Oregon GREEN!!!! Don't keep bending to the pressure of consolidated corporate interests! Nobody gets rich but THEM!!!
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	
286	John	Poffenberger	dpoffenberger@whe-law.com	Cincinnati	OH	We don't need any frack gas power plants. We need more wind powered energy.

287	Lee	Dayfield	leedayfield@hotmail.com	Portland	OR	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.
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	

298	Louise	Stonington	lstoning@msn.com	Seattle	WA	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. ‚ÄúIt‚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 https://www.theguardian.com/environment/2019/aug/14/fracking-causing-rise-in-methane-emissions-study-finds 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 https://www.bloomberg.com/news/articles/2018-10-22/ge-s-23-billion-writedown-stems-from-a-bad-bet-on-fossil-fuels
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 Edwar	Osgood	karenedo@yahoo.com	Citrus Heights	CA	
307	Liz	Dunlap	bettyloodunlap@gmail.com	Medford	OR	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~
308	Thomas	Thrall	tom_thrall@hotmail.com	Forest Grove	OR	
309	CR	Hutchison	crhutch@onlinenw.com	Yamhill	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!
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	
315	Ellen	Brotherson	maiellazamu@gmail.com	Portland	OR	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!!
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	

326	Jim	BYRNE	byrnejim7@gmail.com	Ridgefield	WA	Air does not respect state borders. We need to protect the planet and our grandchildren NOW.
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	

331	Linda	Kelley	earthspirits@comcast.net	Eugene	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 allowable 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.
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!!!
336	emilia	novo	oisinhelios@yahoo.com	queluz	AL	Dear Governor Brown and the Oregon Energy Facility Siting Council: I urge you and EFSC to deny Perennial,Äôs 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 ,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. New studies released since EFSC approved Perennial,Äôs 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,Äôs RFA. Thank you for considering this comment. Sincerely, Emilia Novo
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 importanr 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	annturnerpdx106@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	jonnikl@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	
374	Judith	Arcana	ja@juditharcana.com	Portland	OR	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.
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.
378	Lisa	Frech	ljfrech@juno.com	Hillsboro	OR	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!

379	Lyndee	Cunningham	lyndeee2@gmail.com	Camas	WA	Fracking is not the way or the future nor healthy for this earth and its inhabitants.
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@nehalemtel.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	

397	Theresa	Nuccio	tnfireweed@yahoo.com	Seattle	WA	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.
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	

406	J.	Chodorow	loujoan@mac.com	Fairfax	CA	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.
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	

412	Douglas	Peterson	hdtvwiz@gmail.com	Medford	OR	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.
413	Ann	Watters RPE,BCP	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	

424	Julianne	Ramaker	ramaker@coinet.com	Bend	OR	Say 'NO!' to Perennial Wind Chaser,Äôs 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!
425	Carol	Gerl	plumeria56@charter.net	Lincoln City	OR	
426	Joan	Smith	joanesq93@gmail.com	Greenbrae	CA	
427	Laura	Allen	lauraallen@allenmead.com	Seaside	OR	It,Äôs 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,Äôs too late.
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	jcnckqc@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.

435	Rosemary	Forester	rforester9@gmail.com	Ashland	OR	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.
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. .

438	Ilene	Le Vee	leveeis@comcast.net	Olympia	WA	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 Perenial Wind Chaser's proposed gas-fired power plant cite certification. Thank you for the opportunity to comment. Ilene Le Vee 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	Darienzo	markdari@pacifier.com	Portland	OR	
451	Alain	Gauthier	alainjgauthier@gmail.com	Portland	OR	
452	Susan	Hathaway	susanhathaway@earthlink.net	Pico Rivera	CA	
453	les	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,ÄôAlessandro	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.

481	Guadalupe	Yanez	lupe.yanez49@gmail.com	El Paso	TX	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!!!!
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	

487	Barbara	Pikus	bapa.pk@gmail.com	Portland	OR	'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.
488	Linda	Browning	lembrowning5@gmail.com	Beaverton	OR	
489	Judy	Wyeth	judy@wyethdigital.com	Lodi	WI	
490	Diane	Daiute	dmaried@protonmail.com	Sweet Home	OR	

491	Annette	Keen	quiteawake@yahoo.com	Portland	OR	The health of climates, earth, human beings depend upon our abilities as stewards to readily and earnestly examine our collective ,Äòneeds,Äô. What I,Äôm saying is it is time to set aside the capitalistic approaches providing unhealthy results for our human betterment. Attend to gaining others,Äô 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.

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.

493	Eddie	Tucker	egtucker1@gmail.com	Portland	OR	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
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	

510	Yola	Hesser	geoyo@oregonfast.net	Florence	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.
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!
533	William	Crawford	bill.crawford.95442@gmail.com	Portland	OR	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,Äôt restate them here.
534	Mark	Wheeler	mark@rootsrealty.com	Portland	OR	
535	MARCELLA	CRANE	mouseychic@gmail.com	Phoenix	AZ	
536	Phillip	Callaway	phillip_callaway@msn.com	Crawfordsville	OR	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.
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	

540	Tracy	Farwell	tracy@better-energy-llc.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.
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	

545	Ellen	Saunders	ellen_l_saunders@me.com	Manning	OR	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.
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	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

550	Kelly	Jensvold	kellyjensvold@gmail.com	Beaverton	OR	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.
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	

567	Ute	Saito	utesaito@hotmail.com	Portland	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.
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	bibleeogirl@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	genevievelweber@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	canarskyyomo@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,Äôs 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	ddddddddddd98104@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	

641	Paula	Morgan	paulaymorgan@gmail.com	Winter Springs	FL	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
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	
648	Nate	Hildebrand	nate@innategraphix.com	Portland	OR	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.
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 Geor	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.

663	Erin	Marshall	erin@kismet-design.com	Portland	OR	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!
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	

672	Patricia	Janesh	psyckdoc908@gmail.com	Portland	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.
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 Junctio	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!
693	Diane	Craig	creativekiwi@comcast.net	Beaverton	OR	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 earths crust and causes EARTHQUAKES! Please do everything in your power to not only oppose and prevent short term fracking proposals but all future proposals.
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	
699	Jay	Roelof	jtroelof@outlook.com	Lincoln City	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. 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.
700	Betty	Abadia	amarone3@gmail.com	Portland	OR	
701	Lori	Kunkel	kunkelpdx@comcast.net	Portland	OR	

702	William	Schoene	williamschoene@gmail.com	Santa Monica	CA	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.
703	Susan	Heath	forbux@hotmail.com	Albany	OR	
704	Dean	Sigler	muchcatfur@comcast.net	Beaverton	OR	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?
705	Ann	Littlewood	annlittlewood3@gmail.com	Portland	OR	Please do not support any additional fossil fuel infrastructure. That way lies madness.

706	Aloysius	Wald	ajwaldtwo@yahoo.com	Columbus	OH	
707	Sarah	Thomas	sarahthomas@gmail.com	Portland	OR	
708	Mary	Duvall	mudpuddle@hughes.net	Clatskanie	OR	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.??????????????????????
709	Diane	Kent	jdkent@aol.com	Phoenix	AZ	

710	Rick	Brodner	rbrodner@gmail.com	Portland	OR	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.
711	Linda A.	Heath	heathster52@gmail.com	Grafton	OH	
712	Kevin	Chiu	kevinchiupetit@gmail.com	Seattle	WA	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 ,Äî rising temperatures and sea levels, the agricultural and economic destruction they will cause, and the societal breakdowns that will inevitably follow ,Äî 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.
713	Janet	Wynne	jmarwy@msn.com	Bellingham	WA	
714	Dana	Sewall	dlsewall@comcast.net	Gresham	OR	

715	Matthew	Genaze	aquarover@hotmail.com	Cambridge	MA	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.
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	

721	Susan	Miller	lelierre88@gmail.com	Lake Oswego	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.
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	
731	Priscilla	Martinez	priscillamartinez486@yahoo.com	Bothell	WA	We need to take better care of what is left of our environment, our wildlife, and our marine life.
732	Annalee	Dammann	alord@ymail.com	Vancouver	WA	
733	Heidi	Welte	capa_7@yahoo.com	Beaverton	OR	

734	Susan	Haywood	susansaphone2@yahoo.com	Portland	OR	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.
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	
740	Charles	Townsend	charlesntownsend@gmail.com	Portland	OR	I do not support any new projects related to fossil fuels. I reject the Request for Amendment (RFA) to Perennial Wind Chaser,Äôs (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.
741	Liz	Trojan	elizat8@pobox.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.
742	Charissa	Clifford	charissaniles@me.com	Portland	OR	

743	Sandra	Armstrong	armstrong.sandy@gmail.com	Portland	OR	Please don,Äôt 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,Äôt know how dangerous fracking is, but I believe it,Äôs very dangerous.
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 weo g 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	

752	Diane	Colcord	ceciletc2003@yahoo.com	Tillamook	OR	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.
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	
757	Susan	Atwood	rnc112124@gmail.com	Vancouver	WA	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.
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	
767	Tami	Lukachy	tlukachy@yahoo.com	Henderson	NV	You must stop destroying our planet! This is it, then there is nothing! Stop selling out for cash! No more fracking!
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	lorraineh47@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.

784	Jean	Naples	jeannaples7@gmail.com	Suffern	NY	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 willdife in Oregon, Perennial claims that 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 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
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	dmtschann@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	
808	Richard	Freeman	richcfreeman@yahoo.com	Portland	OR	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.
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	ruba_t@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	

828	Paul	Borcherding	pb_palomine@hotmail.com	La Grande	OR	Just say no to additional infrastructure for extractive industry development.
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	
832	Michael	Wilson	michaelamarwilson@gmail.com	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!
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	
838	Sue	Craig	sueacraig@gmail.com	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

839	Susan	Parks	sbparks7@gmail.com	Bend	OR	Let,Äôs 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!
845	David	Scheer	scheerdc@outlook.com	Bellingham	WA	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.?!?
846	Fredrick	Seil	seilf@comcast.net	Berkeley	CA	

847	John	Goeckermann	misterg@wizzards.net	Grants Pass	OR	DON'T SELL OUR CLEAN AIR FOR LYING PROFITEERING GREEDHEADS WHO DON'T CARE WHO THEY HARM!!!!
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	
863	Nancy	Harger	eckharg@comcast.net	Portland	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.
864	Tom	Bender	tbender@nehalemtel.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,Äôs 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@lalunaloca.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 ‚Äòfracking‚Äô 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.

						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 w a n t 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.
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	

895	Christine	Weber-Kearney	christinejwk@gmail.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
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	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

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 exsist!
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-Brow	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	pongraczsd@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	Just what we DON,ÄôT need..... another fossil fuel installation. How ‚Äúunecessary‚Äù is this if it contributes to air pollution? If a company isn,Äôt intelligent enough to install and run their plant on ‚Äúgreen‚Äù energy, how effective will it be? Innovation is imperative. This isn,Äôt 1960, and to be competitive today, every new facility must keep our environment safe.
950	Gregory	Monahan	gregorymonahan29@gmail.com	Portland	OR	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.

951	Bonnie	New	bnew1@live.com	Hood River	OR	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.
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	

960	Jerry	Rosenkoetter	rbigshepherd@gmail.com	Salem	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.
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	helena.wald@gmail.com	Portland	OR	

976	Joseph	Wythe	jhw2901@frontier.com	Sandpoiint	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.

1005	Charlotte	Sines	ladycatx@yahoo.com	Yosemite	CA	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.
1006	John	Schenck	johnbschenck@yahoo.com	Camden	SC	
1007	diane	marks	shenyen@wavecable.com	Port Angeles	WA	
1008	Patti	Brandt	prmbrandt@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	berkrobins@gmail.com	Lake Oswego	OR	

1018	Don	Steinke	crvanwash@gmail.com	Vancouver	WA	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.
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	
1022	Carol	Newman	caroltov@pacifier.com	Astoria	OR	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.
1023	Suzanne	Hamer	tedsuza@gmail.com	Woodinville	WA	
1024	Yvonne	Wright	whywrite@charter.net	Warrenton	OR	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!
1025	Tonya	Morrison	coolpharmacist@yahoo.com	Normandy	TN	
1026	Ansula	Press	ansula@gmail.com	Portland	OR	

1027	Georgia	Mattingly	glmattingly@earthlink.net	Longmont	CO	
1028	Kelly	McConnell	prvt@2ezgroup.com	Portland	OR	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.
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	
1041	Susan	McFarlane	mcfarlanesf@yahoo.com	Gresham	OR	Fracking has unknown consequences, why are we such awful stewards of Mother Earth?
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	

1045	Shaun	Hubbard	shaunalice@gmail.com	Friday Harbor	WA	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.
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	
1062	Claudia	Gray	ccloudgray@gmail.com	Drain	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.
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	

1071	Mira	Wiegmann	mira.wiegmann@cune.org	Portland	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.
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	
1077	Frances	Davis	crrfran1936@gmail.com	Terrebonne	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.
1078	Karen	May	klmay@wamail.net	Tacoma	WA	
1079	Susan	Allen	su.allen50@gmail.com	Raleigh	NC	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!

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	

1086	Ted	Gleichman	tedgleichman@mac.com	Portland	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.
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	

1100	John	Villaume	jmvillaume@yahoo.com	Portland	OR	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. Plese. Be smart. Listen to your heart.
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	It is past time for us all to make the switch to clean energy. Do right by Oregonians and deny this proposal.

1104	Valerie	Pflug	valeriepflug@gmail.com	Havana	FL	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,Äôt still send telegrams in the cell phone era and we should also evolve past the age of greed for oil.
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	

1112	Lloyd	Johnston	lajceoigthi@gmail.com	Seattle	WA	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.
1113	Jerry	Kessinger	jerrykessinger@me.com	Lynnwood	WA	
1114	Duane	Ray	duaneray@frontier.com	Gresham	OR	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.

1115	Nancy	Mogielnicki	mogsaway@yahoo.com	Portland	OR	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.
1116	Gail	Ohara	gail@chickfactor.com	Portland	OR	
1117	Erin	Chipps	erinchipps@gmail.com	Portland	OR	
1118	stephen	couche	steveco1948@comcast.net	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!
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	

1127	Kate	Miller	millerjkate@gmail.com	Lake Oswego	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.
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.

1132	Deena T.	Grossman	deenatgrossman@gmail.com	Portland	OR	Dear Governor Brown, Please act and urge EFSC to deny Perennial,Äôs 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
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!
1152	Chris	Adamson	cladamson326@gmail.com	Gig Harbor	WA	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. Deny Perennial,Äôs RFA.

1153	Damon	Motz-Storey	dmotzstorey@gmail.com	Portland	OR	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.
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 Elizab	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.

1163	Richenda	Fairhurst	pastorrichenda@gmail.com	Ashland	OR	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.
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	

1174	Betsy	Toll	betsy.toll@gmail.com	Portland	OR	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.
1175	Tammy	Robinson	shewearsgardenboots@gmail.com	Clatskanie	OR	Thank you for caring.

1176	Joel	Porter	joelypozole@gmail.com	Portland	OR	Wind Solar & Wind Solar & Wind Solar &

1179	Rachel	Ellison	methuselah90@yahoo.com	Vancouver	WA	
1180	Au	Nguyen	au@maryemerson.org	Portland	OR	
1181	Linda	Covert	linvin@comcast.net	Portland	OR	
1182	Maria	Sause	mkrausster@gmail.com	Newport	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.
1183	Sarah	Spansail	spansail2@yahoo.com	Ashland	OR	
1184	Robert	Jones	rjones553@yahoo.com	Salem	OR	Not now, not ever. We will blow that fucking plant to kingdom come if it's built.
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

1188	Jane	Nicolai	jane.nicolai@gmail.com	Vancouver	WA	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.
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	
1198	LYDIA	SWAGERTY	lydiaswagerty@gmail.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.
1199	Sandra	Butler	sriveral9@hotmail.com	Los Angeles	CA	
1200	Hank	Keeton	hakeeton@keetoncorp.com	Scotts Mills	OR	We must STOP building and supporting ALL fossil fuel facilities....or...we will sign the death certificate for our whole world!
1201	James	Roberts	jimrobj@yahoo.com	Sandpoint	ID	
1202	John	Wood	unclebob@gorge.net	Hood River	OR	Do now allow new carbon polluters' infrastructure projects.
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	
1208	Jan	Edwards	clayjan@mac.com	Portland	OR	We want no more fossil fuel developments in Oregon, the USA or the Whole World.
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	

1217	Rodney	Whisennhunt	rod.l.whisenhunt@gmail.com	Roseburg	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?
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.

1222	Lucile W.	Brook	babbles@nehalemtel.net	Nehalem	OR	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.
1223	Christine	Bonney	christine.bonney@gmail.com	Portland	OR	
1224	James	Mulcare	xsecretsx@cableone.net	Clarkston	WA	
1225	Jean	Evens	jievens@frontier.com	International Falls	MN	
1226	Matthew	Barmann	chiakacomm@mac.com	Hood River	OR	
1227	Annie	Orourke	treso7@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 üëø
1245	Mark	Grzegorzewski	esrucdesrever@yahoo.com	Saint Petersburg	FL	

1246	Linda	Carroll	lindalouise701184951@yahoo.com	Spokane	WA	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.
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.

1254	Anita	Brandariz	anna12lago16@aol.com	Brooklyn	NY	around at what is happening on the planet. We are on the brink of extinction if we don,Äôt end our fossil fuel dependence, and clear cutting of precious trees now. What we have done, (when I say ,Äúwe,Äù I mean corporations,)in the name of American interests, is invaded our neighbors to the south of us and have overthrown governments that wouldn,Äôt 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,Äôt act now to try to reverse
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

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 Timíne Way, Pendleton, Oregon 97801

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 Perrenial Wind Chaser Station Request for Comments on the Complete Request for Amendment 1 and Draft Proposed Order

General Comments:
Thank you for contacting the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) regarding the Perrenial 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

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

CLIFFORD Katie * ODOE

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

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").[1] 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.[2] 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

[1] https://www.sightline.org/2019/02/12/calling-natural-gas-a-bridge-fuel-is-alarmingly-deceptive/
[2] 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

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

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

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

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

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

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

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

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

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 follis fuel infrastructure in Oregon. It will become a stranded asset for the investors and and a CO2 emitting plant that in needed in Oregon.

Sincerely,
Chris Baker

CLIFFORD Katie * ODOE

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

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

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

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

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

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 provice 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

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

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

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

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

CLIFFORD Katie * ODOE

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

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

From: ott.irene@frontier.com
Sent: Thursday, August 8, 2019 10:51 PM
To: CLIFFORD Katie * ODOE
Subject: Iinvalid 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 thid

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 th he 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

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

CLIFFORD Katie * ODOE

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 Perenial 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

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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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

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.

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

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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.

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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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

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

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

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

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

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

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

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

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

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

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 Peremmial 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

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

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

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

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

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

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

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

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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

From: Maureen Lauran <Maureen.Lauran.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.

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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.

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

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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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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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: 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.

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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

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

CLIFFORD Katie * ODOE

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:

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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

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:

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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.

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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,
Connie Butler
6405 N Burrage Ave
Portland, OR 97217

CLIFFORD Katie * ODOE

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.

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

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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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

Regards,
Robin Anderson
155 Endresen Rd
Hoquiam, WA 98550

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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,
Betty Sinnett
2615 NE 359th Ave
Washougal, WA 98671

CLIFFORD Katie * ODOE

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

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.

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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,
Nancy Cushwa
2715 N Terry St
Portland, OR 97217

CLIFFORD Katie * ODOE

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:

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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

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:

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

Regards,
Marianne Larkins-Strawn
16415 NE 11th St
Vancouver, WA 98684

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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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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,
Dani Maron-Oliver
75 Heron Point Drive
Longview, WA 98632

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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.

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

Regards,
Abigail Burns
5445 SW Dover Ln
Portland, OR 97225

CLIFFORD Katie * ODOE

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.

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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

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:

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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

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:

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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

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:

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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

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:

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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

CLIFFORD Katie * ODOE

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:

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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

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:

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

Regards,
Sarah Cook
316 E 13th St
The Dalles, OR 97058

CLIFFORD Katie * ODOE

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:

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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,
Gary McCuen
1825 Fairmount Ave S
Salem, OR 97302

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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.

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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

CLIFFORD Katie * ODOE

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.

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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

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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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

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.

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

Regards,
Kelly OHanley
6134 NE Alameda St
Portland, OR 97213

CLIFFORD Katie * ODOE

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.

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,
Kelly OHanley
6134 NE Alameda St
Portland, OR 97213

CLIFFORD Katie * ODOE

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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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,
Jane Heisler
2731 SE Harrison St.
Portland, OR 97214

CLIFFORD Katie * ODOE

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.

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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,
Janet Kimball
8051 28th Ave NE
Seattle, WA 98115

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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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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,
Sandra Siegner
9640 SW Lancaster Rd
Portland, OR 97219

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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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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

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.

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

Regards,
Marshall Goldberg
3080 SW Raleighview Dr
Portland, OR 97225

CLIFFORD Katie * ODOE

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.

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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,
Monica Gilman
25525 S. Laura Ln
Estacada, OR 97023

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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 Spence
5810 S 144th St
Tukwila, WA 98168

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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.

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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

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.

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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,
Maliea Yakymi
6 Wilkes Rd
White Salmon, WA 98672

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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

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.

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,
Solea Kabako
2021 W Scenic Dr
The Dalles, OR 97058

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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:

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

Regards,
Ken Long
150 Keisala Rd
Woodland, WA 98674

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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.

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

Regards,
Sheila Dooley
3300 Vensel Rd
Mosier, OR 97040

CLIFFORD Katie * ODOE

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:

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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,
Ineke Deruyter
9322 N Oswego Ave
Portland, OR 97203

CLIFFORD Katie * ODOE

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

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.

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,
DONALD GARNER
589 NW COUNTRY VIEW RD
White Salmon, WA 98672

CLIFFORD Katie * ODOE

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:

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,
Gloria Fisher
8725 NE Davis St
Portland, OR 97220

CLIFFORD Katie * ODOE

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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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,
Elizabeth Laskey
4838 NE 41st Ave
Portland, OR 97211

CLIFFORD Katie * ODOE

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:

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,
Cathy Sampson-Kruse
545 SW Sunrise Cir
Metolius, OR 97741

CLIFFORD Katie * ODOE

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.

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

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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.

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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

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Lois Bancroft
50 Moore Rd
White Salmon, WA 98672

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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 Beam
19773 Bellevue Way
West Linn, OR 97068

CLIFFORD Katie * ODOE

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.

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

Regards,
Sharon Rickman
1165 Officers Row
Vancouver, WA 98661

CLIFFORD Katie * ODOE

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

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

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.

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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,
Dermot Noonan
4510 48th Ave NE
Seattle, WA 98105

CLIFFORD Katie * ODOE

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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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

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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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

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:

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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,
Susanna Cicerone
5703 SW Corbett
Portland, OR 97239

CLIFFORD Katie * ODOE

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:

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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,
Michele Class
1430 NE Village St
Fairview, OR 97024

CLIFFORD Katie * ODOE

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.

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

Regards,
Shira Fogel
15496 SE Adair Pl
Clackamas, OR 97015

CLIFFORD Katie * ODOE

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.

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,
Martha Neuringer
4140 SE 37th Ave Apt 9
Portland, OR 97202

CLIFFORD Katie * ODOE

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.

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,
Wesley Kempfer
5324 NE AINSWORTH ST
Portland, OR 97218

CLIFFORD Katie * ODOE

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:

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 Hart
4224 SE Clay St
Portland, OR 97215

CLIFFORD Katie * ODOE

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

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Sherry Salomon
2393 SW Park Place #204
Portland, OR 97205

CLIFFORD Katie * ODOE

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

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

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

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

CLIFFORD Katie * ODOE

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.

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

Regards,
Mary Hill
7104 Christina Dr
Catlettsburg, KY 41129

CLIFFORD Katie * ODOE

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.

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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,
Tracy Hardwick
1903 Oakwood Dr
The Dalles, OR 97058

CLIFFORD Katie * ODOE

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.

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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,
Joel Hildebrandt
2776 Wagner Ct.
Ann Arbor, MI 48103

CLIFFORD Katie * ODOE

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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

Regards,
James Soares
PO BOX 559
Everson, WA 98247

CLIFFORD Katie * ODOE

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.

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,
Colleen Wright
4160 Chapman Way
Lake Oswego, OR 97035

CLIFFORD Katie * ODOE

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.

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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,
Dana Hardwick
1903 Oakwood Dr
The Dalles, OR 97058

CLIFFORD Katie * ODOE

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.

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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,
Tod Johnston
3965 SW Pendleton St
Portland, OR 97221

CLIFFORD Katie * ODOE

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.

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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

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:

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

Regards,
Cody Traweek
4240 Lemon Rd NE,
Olympia, WA 98506

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

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.

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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,
Lizbeth Hermansen
90 SW Russell Ave
Stevenson, WA 98648

CLIFFORD Katie * ODOE

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.

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,
Susan Miller
PO Box 564
Mosier, OR 97040

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Angie Holwege
31708B NE Wand Rd
Troutdale, OR 97060

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

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

Regards,
Linda Hanson
688 Dry Creek Rd
Mosier, OR 97040

CLIFFORD Katie * ODOE

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Matt Morrissey
2758 NE Rodney Ave
Portland, OR 97212

CLIFFORD Katie * ODOE

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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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

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

Regards,
Claudia Sanzone
3149 NW Miller Rd
Portland, OR 97229

CLIFFORD Katie * ODOE

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.

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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

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:

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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

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:

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

Regards,
Susan McLaughlin
2015 NW 17th Avenue
Camas, WA 98607

CLIFFORD Katie * ODOE

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:

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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:

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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

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

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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

CLIFFORD Katie * ODOE

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

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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,
Christine TOLOTTI
3451 Cook-Underwood Rd
Cook, WA 98605

CLIFFORD Katie * ODOE

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.

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

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Virginia White
1229 29th St
Port Townsend, WA 98368

CLIFFORD Katie * ODOE

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:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser 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,
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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Tim Sherry
4208 N Juneau St
Portland, OR 97203

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Jeremy Benjamin
817 S St Andrews Place, 107
Los Angeles, CA 90005

CLIFFORD Katie * ODOE

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.

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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.

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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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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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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,
Stephen Bachhuber
3428 SE 9th Ave
Portland, OR 97202

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Donna Murphy
2134 NE 37th Ave
Portland, OR 97212

CLIFFORD Katie * ODOE

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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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.

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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

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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

Regards,
Roy Moulton
4 Birdie Ln
White Salmon, WA 98672

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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

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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

CLIFFORD Katie * ODOE

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:

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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

CLIFFORD Katie * ODOE

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:

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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:

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

Regards,
Lailah Hamblin
5020 NE Emerson Court
Portland, OR 97218

CLIFFORD Katie * ODOE

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

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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

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:

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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

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

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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

CLIFFORD Katie * ODOE

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:

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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

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:

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In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Vicki kolberg
3749 NE 23rd Ave
Portland, OR 97212

CLIFFORD Katie * ODOE

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:

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,
Laurie Kerr
11102 NE 196th St
Battle Ground, WA 98604

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Chad lehn
4830 SE Hans Nagel Rd
Washougal, WA 98671

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Emilia Brasier
4132 NE Hayes St
Camas, WA 98607

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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 Nelson
524 W 3rd Pl
The Dalles, OR 97058

CLIFFORD Katie * ODOE

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:

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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

CLIFFORD Katie * ODOE

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.

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

Regards,
Ken Zeman
25612 207th Place Southeast
Covington, WA 98042

CLIFFORD Katie * ODOE

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.

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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

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.

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

Regards,
Jeff Forbes
4625 SE 67th Ave
Portland, OR 97206

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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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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,
Merle Clifton
4457 NE CAMPAIGN ST
Portland, OR 97218

CLIFFORD Katie * ODOE

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:

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 Hansen
3303 NW Dahlia Dr
Camas, WA 98607

CLIFFORD Katie * ODOE

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.

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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,
Cynthia Clements
5408 SE Long St
Portland, OR 97206

CLIFFORD Katie * ODOE

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.

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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

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.

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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,
Richard Kolber
11412 NE 49th St
Vancouver, WA 98682

CLIFFORD Katie * ODOE

From: Robert Thinnes <Robert.Thinnes.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.

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

Regards,
Robert Thinnes
3207 NE 22nd Ave
Portland, OR 97212

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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

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

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Antoinette Peterson
7118 SE Steele St
Portland, OR 97206

CLIFFORD Katie * ODOE

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:

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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:

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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

CLIFFORD Katie * ODOE

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

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

Regards,
Craig Heverly
3712 SE 9th Ave
Portland, OR 97202

CLIFFORD Katie * ODOE

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:

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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

CLIFFORD Katie * ODOE

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:

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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

CLIFFORD Katie * ODOE

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

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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

CLIFFORD Katie * ODOE

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

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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

CLIFFORD Katie * ODOE

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

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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

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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,
Andrea Almeida
8009 SE Yamhill St
Portland, OR 97215

CLIFFORD Katie * ODOE

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.

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

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

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:

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

Regards,
April Atwood
6306 SE 21st Ave
Portland, OR 97202

CLIFFORD Katie * ODOE

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.

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

Regards,
Shireen Press
5032 NE Simpson St
Portland, OR 97218

CLIFFORD Katie * ODOE

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.

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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,
Janie Cohen
1702 SE 57th Ave
Portland, OR 97215

CLIFFORD Katie * ODOE

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.

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,
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.

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 Stewart
515 SW Cheltenham St
Portland, OR 97239

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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.

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

Regards,
Carmen Sanchez
2837 Islander Ave NW
Salem, OR 97304

CLIFFORD Katie * ODOE

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.

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,
Kalama Reuter
920 NE Field Ave
White Salmon, WA 98672

CLIFFORD Katie * ODOE

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.

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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

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

CLIFFORD Katie * ODOE

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

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.

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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,
Nicole Calvert
12901 NE 28th St
Vancouver, WA 98682

CLIFFORD Katie * ODOE

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.

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,
Collyn Baldwin
2815 NE 13th St
Gresham, OR 97030

CLIFFORD Katie * ODOE

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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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 Grout
3712 NW Sandpiper Dr
Woodland, WA 98674

CLIFFORD Katie * ODOE

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.

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,
Stephanie Heisler
sheisler6@comcast.net
Portland, OR 97211

CLIFFORD Katie * ODOE

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.

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

Regards,
Sherry Wolfson
1215 SE 49th Ave
Portland, OR 97215

CLIFFORD Katie * ODOE

From: Robert Kimbro <Robert.Kimbro.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.

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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

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.

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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,
ANDREW WADE
3413 Brookside Drive
Hood River, OR 97031

CLIFFORD Katie * ODOE

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.

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

Regards,
Elaine Nelson
6786 SW 204th Ave
Aloha, OR 97078

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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 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.

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

Regards,
David Milholland
2000 NE 42nd Ave
Portland, OR 97213

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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

Regards,
Christopher Kralik
631 NW 18th Loop
Camas, WA 98607

CLIFFORD Katie * ODOE

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

Regards,
Ryan Murtfeldt
51 Columbia Ave
Underwood, WA 98651

CLIFFORD Katie * ODOE

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:

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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

CLIFFORD Katie * ODOE

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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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,
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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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,
Carole Beauclerk
1500 SW Park Ave
Portland, OR 97201

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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

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.

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

Regards,
kathy cain
6231 NE 22nd Ave
Portland, OR 97211

CLIFFORD Katie * ODOE

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.

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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

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:

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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

CLIFFORD Katie * ODOE

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:

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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

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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:

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,
Colleen Bonin
22824 ne 254th ct
Battle Ground, WA 98604

CLIFFORD Katie * ODOE

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:

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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

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:

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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

CLIFFORD Katie * ODOE

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:

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

Regards,
Mary Bailey
3131 NW Clubhouse Dr
Bend, OR 97703

CLIFFORD Katie * ODOE

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:

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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

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:

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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

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:

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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

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

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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

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:

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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

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.

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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 Sendek
31485 NE Wand Rd
Troutdale, OR 97060

CLIFFORD Katie * ODOE

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:

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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:

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

Regards,
Ellen Stearns
3920 SW Hillsdale Ave
Portland, OR 97239

CLIFFORD Katie * ODOE

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

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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

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:

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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

CLIFFORD Katie * ODOE

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:

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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

CLIFFORD Katie * ODOE

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

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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

CLIFFORD Katie * ODOE

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

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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

CLIFFORD Katie * ODOE

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

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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,
Susan Tracy
4311 NE 106th St
Vancouver, WA 98686

CLIFFORD Katie * ODOE

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:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser 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,
Rob Karnuth
951 W 7th Ave
Eugene, OR 97402

CLIFFORD Katie * ODOE

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

CLIFFORD Katie * ODOE

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:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser 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,
Helen Jaskoski
P.O. BOX 66074
Portland, OR 97290

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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:

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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

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:

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,
Aleita Hass-Holcombe
2022 NW Myrtlewood Way
Corvallis, OR 97330

CLIFFORD Katie * ODOE

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:

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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.

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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

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

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.

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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

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

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

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

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

CLIFFORD Katie * ODOE

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

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:

I urge you to reject the Request for Amendment (RFA) to the site certificate for the Perennial Wind Chaser 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,

Charles Gadway
256 Bates Rd
White Salmon, WA 98672

CLIFFORD Katie * ODOE

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.

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

Rabecca Whalen
23445 NE Glisan St
Wood Village, OR 97060

CLIFFORD Katie * ODOE

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.

In the five years since Perennial first proposed this project, the environmental impacts of fracked gas have become increasingly apparent. It is now clear that in order to combat climate change we must reject new fossil fuel infrastructure, including new fracked gas power plants like the one proposed by Perennial. Any increase in air pollution, including greenhouse gases, is a direct and unnecessary threat to the Columbia River Gorge National Scenic Area, our communities, and the environment in general. Moreover, the Perennial proposal would be sited immediately adjacent to an existing power plant, the Hermiston Generating Project, which would result in significant concentrations of pollution in a localized area. Air quality in the Gorge is 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 Silvertooth
45474 Main St
Antelope, OR 97001

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

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.

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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

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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,

steve miesen
6275 Holmes St
West Linn, OR 97068

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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:

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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

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.

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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

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

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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Sincerely,
Paulette Lichatowich

CLIFFORD Katie * ODOE

From: Gary McCuen <outreach@csadvocate.io>
Sent: Wednesday, August 14, 2019 8:42 AM
To: PER Comments * ODOE
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Thank you.

Sincerely,
Gary McCuen

CLIFFORD Katie * ODOE

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,

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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,
Maggie Stock

CLIFFORD Katie * ODOE

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

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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

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,

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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,
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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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.

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,
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,

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,
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,

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,
David Coffin

CLIFFORD Katie * ODOE

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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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,
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.

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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,
matt glidden

CLIFFORD Katie * ODOE

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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Thank you.

Sincerely,
Karen Drescher

CLIFFORD Katie * ODOE

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,

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Thank you.

Sincerely,
Sky Yeager

CLIFFORD Katie * ODOE

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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Steven Schafer

CLIFFORD Katie * ODOE

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

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Thank you.

Sincerely,
A Michael Dianich

CLIFFORD Katie * ODOE

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,

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Thank you.

Sincerely,
Ann Watters RPE,BCPP

CLIFFORD Katie * ODOE

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,

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Thank you.

Sincerely,
Paul Spindel

CLIFFORD Katie * ODOE

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,

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Thank you.

Sincerely,
Dan Sherwood

CLIFFORD Katie * ODOE

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

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,

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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,
Marvin Higgins

CLIFFORD Katie * ODOE

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

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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,
Jan Monical

CLIFFORD Katie * ODOE

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

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,

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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

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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,

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CLIFFORD Katie * ODOE

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

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Sincerely,
Anthony Albert

CLIFFORD Katie * ODOE

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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CLIFFORD Katie * ODOE

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

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

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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Thank you.

Sincerely,
Sarah Deumling

CLIFFORD Katie * ODOE

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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Thank you.

Sincerely,
Charlie Graham

CLIFFORD Katie * ODOE

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

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Thank you.

Sincerely,
Allan Peterson

CLIFFORD Katie * ODOE

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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Thank you.

Sincerely,
Tom Bender

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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Theron Brayman

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

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,
Donlon McGovern

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

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,
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

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,
Don Jacobson

CLIFFORD Katie * ODOE

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

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,
Bob Thomas

CLIFFORD Katie * ODOE

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

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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Thank you.

Sincerely,
Peter Luciano

CLIFFORD Katie * ODOE

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

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,

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Thank you.

Sincerely,
Lauren Thompson

CLIFFORD Katie * ODOE

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,

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Thank you.

Sincerely,
brad bush

CLIFFORD Katie * ODOE

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,

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Thank you.

Sincerely,
CJ James

CLIFFORD Katie * ODOE

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,

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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,

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Thank you.

Sincerely,
Michael Halloran

CLIFFORD Katie * ODOE

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,

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Thank you.

Sincerely,
Joseph Micketti

CLIFFORD Katie * ODOE

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

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

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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,
Anne Ryland

CLIFFORD Katie * ODOE

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.

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.

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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,
joan viers

CLIFFORD Katie * ODOE

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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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,
Dean Sigler

CLIFFORD Katie * ODOE

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.

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,
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:

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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,
BERKLEE ROBINS

CLIFFORD Katie * ODOE

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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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

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.

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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,
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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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

CLIFFORD Katie * ODOE

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

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.

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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

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:

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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

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.

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,

Monica Maxa
2115 E St
Washougal, WA 98671

CLIFFORD Katie * ODOE

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.

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 Rogers
2014 Lonely Ln
Mosier, OR 97040

CLIFFORD Katie * ODOE

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.

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

Celina McClaren
4320 SW Corbett Ave Apt 206
Portland, OR 97239

CLIFFORD Katie * ODOE

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

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.

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

Regards,

Brook Kirklin
12700 SW Jennett Ct
Beaverton, OR 97008

CLIFFORD Katie * ODOE

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.

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,

Marie McKim
2140 NW Savier St
Portland, OR 97210

CLIFFORD Katie * ODOE

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.

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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

CLIFFORD Katie * ODOE

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.

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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

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.

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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

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.

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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

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.

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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

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.

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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

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.

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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

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.

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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

CLIFFORD Katie * ODOE

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.

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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,

Michael Wolf
3126 NE 7th Ave
Portland, OR 97212

CLIFFORD Katie * ODOE

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

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.

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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

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

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

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.

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

Sarah Duvall
600 SE 177th Avenue, Apt. Z-282
Vancouver, WA 98683

CLIFFORD Katie * ODOE

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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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,

Cheri Ceridwen
2020 NW Northrup St. # 806
Portland, OR 97209

Attachment D: Zoning Figures

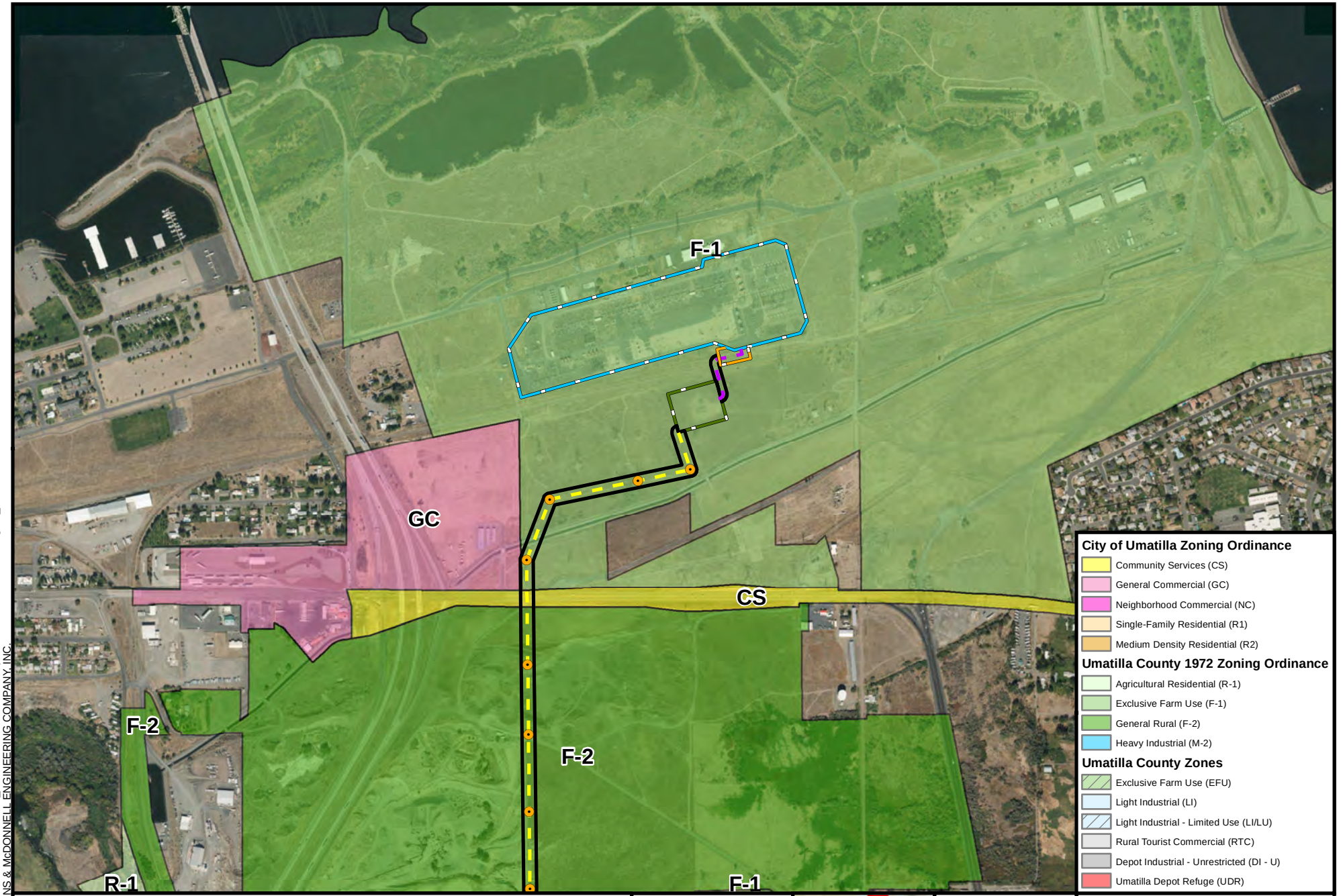


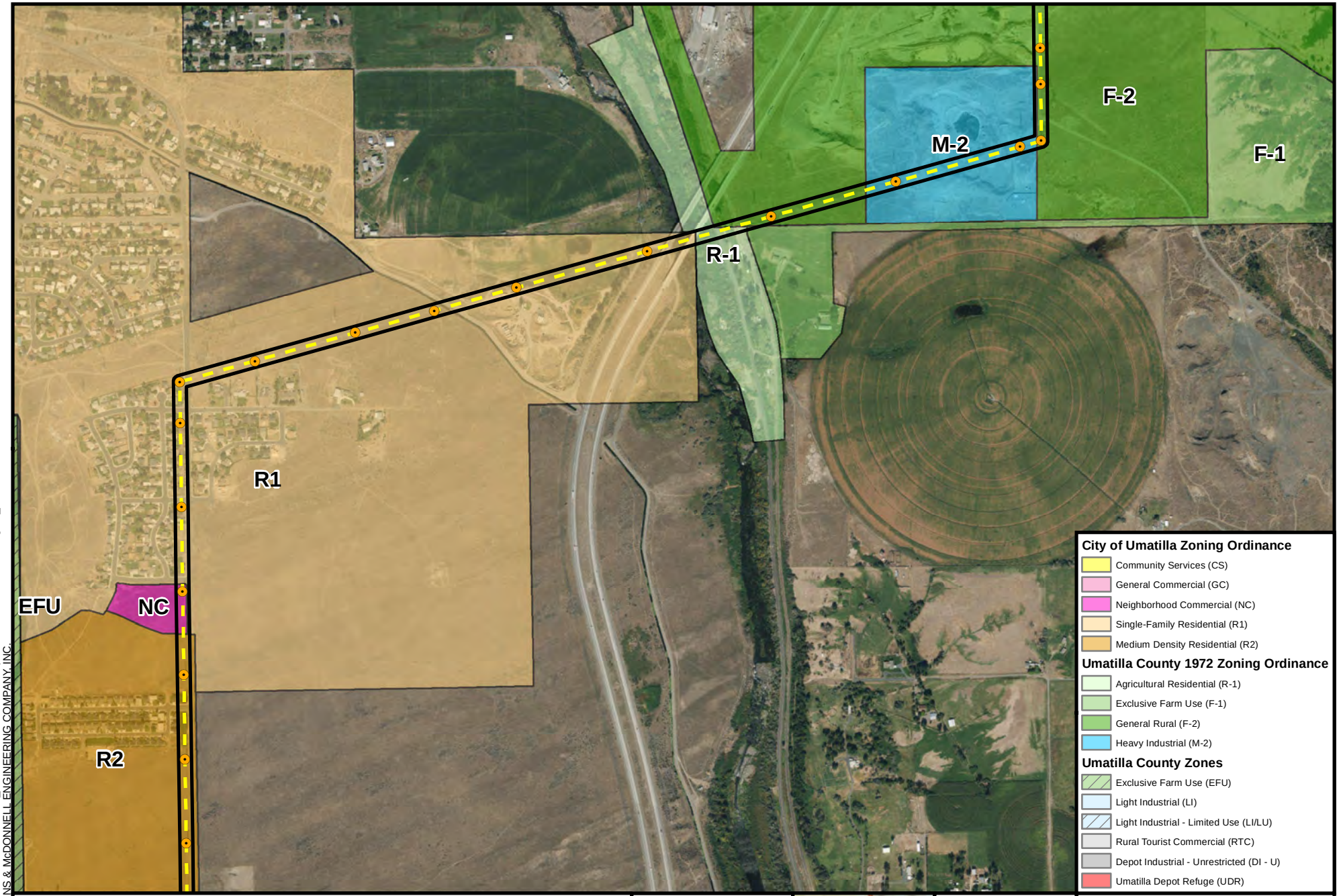
Figure K-1
Project Overview
Perennial Wind Chaser Station
Umatilla County, Oregon

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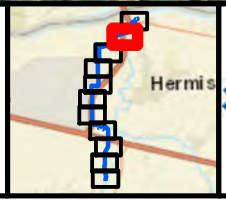
Legend

- Energy Facility Site
- Site Boundary
- Step-up Substation Boundary
- McNary Substation
- Existing Transmission Line
- Proposed Underground Transmission Line
- Proposed Transmission Line
- Proposed Riser Structure Fenced Area
- Proposed Gas Line
- Existing Transmission Structure
- Proposed Transmission Structure

N

500 250 0 500

Scale in Feet



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Perennial Wind Chaser Station
Umatilla County, Oregon

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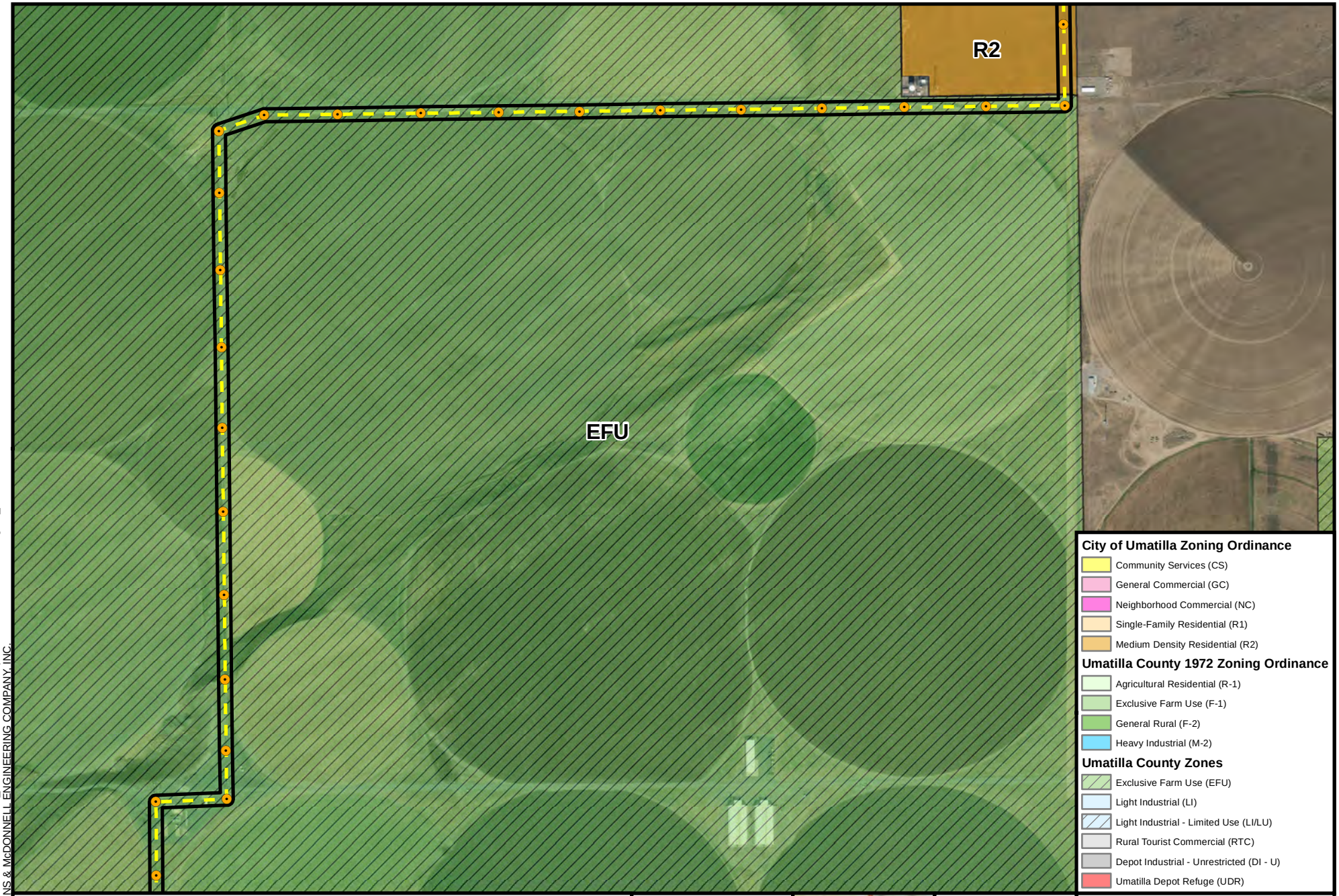


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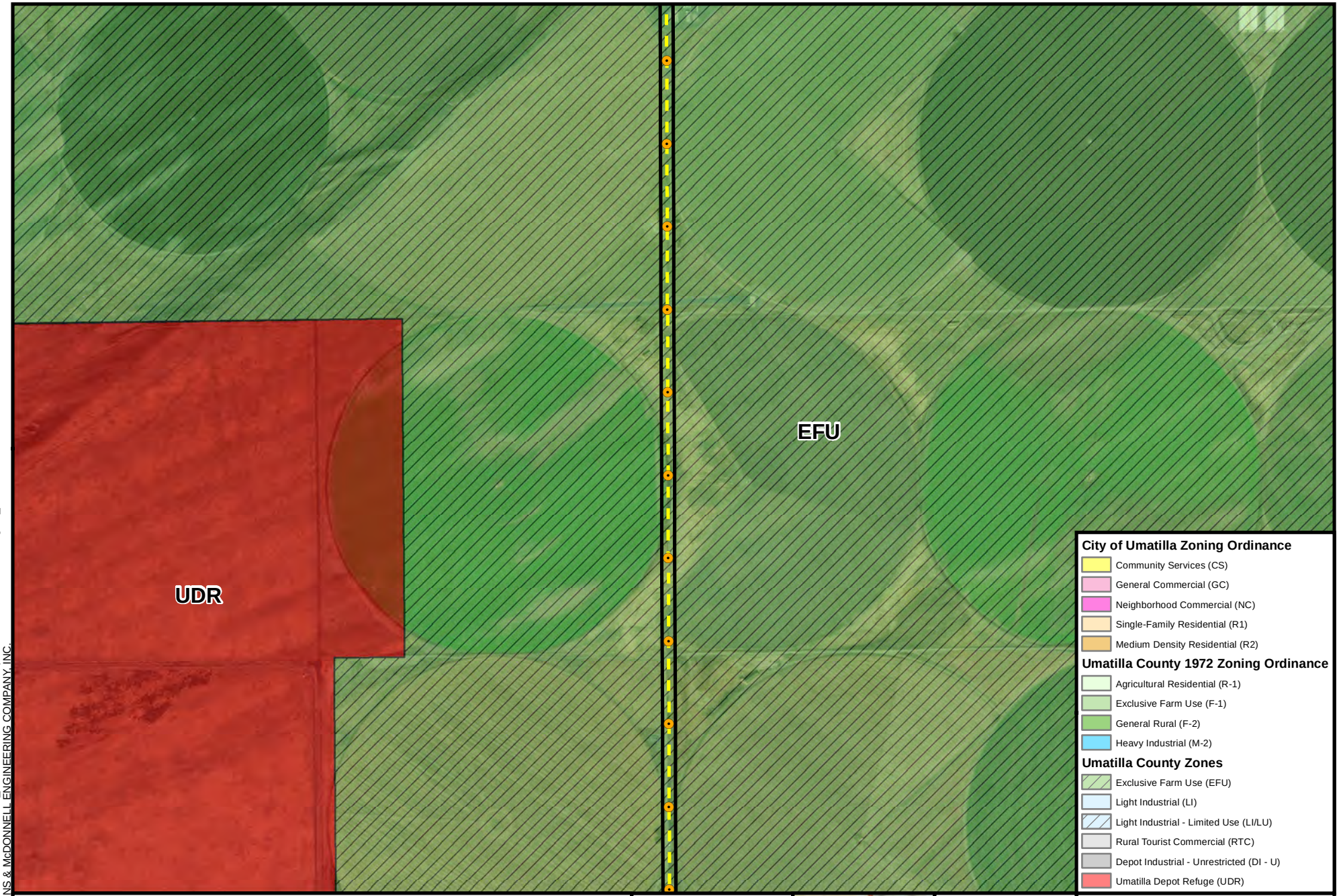


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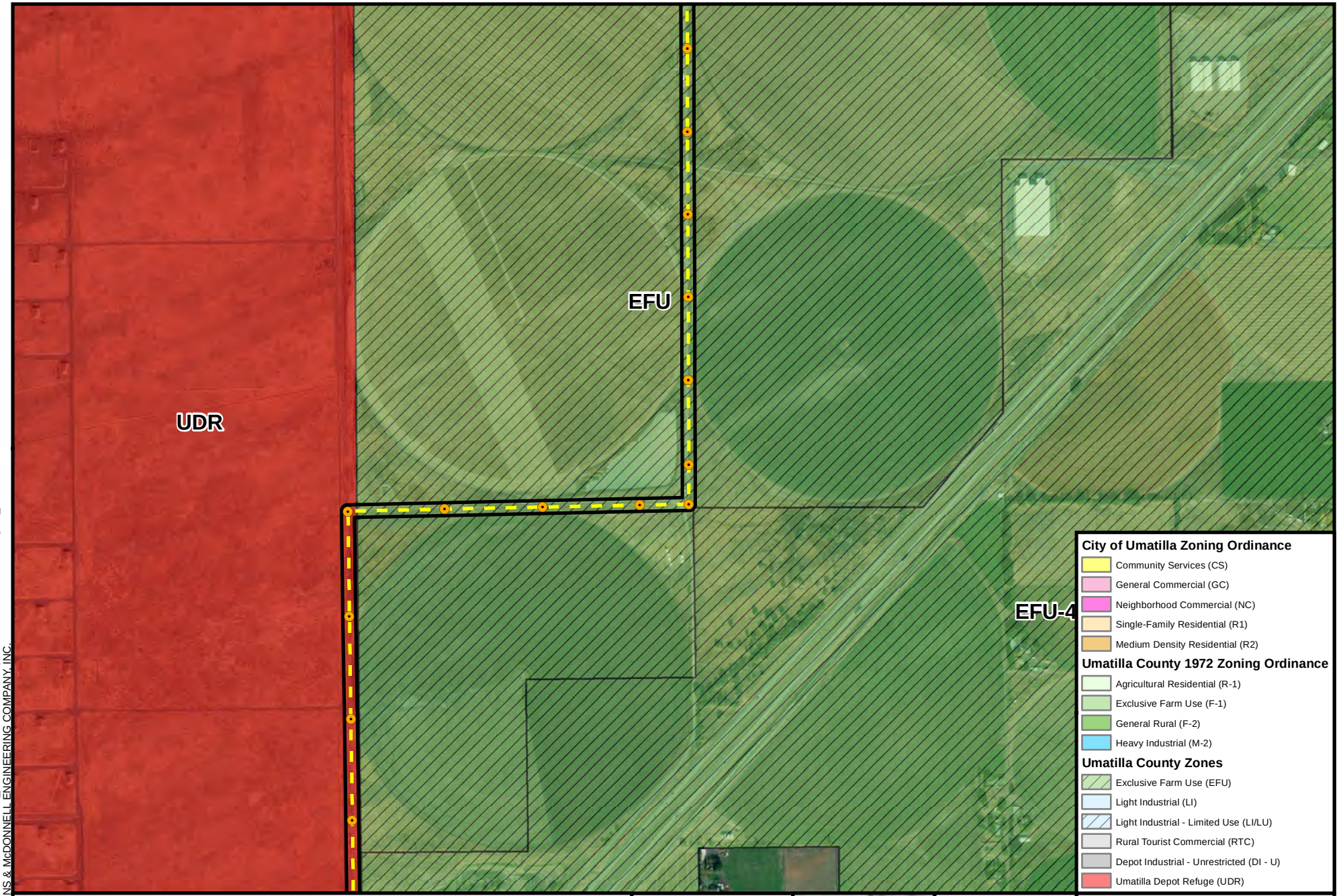


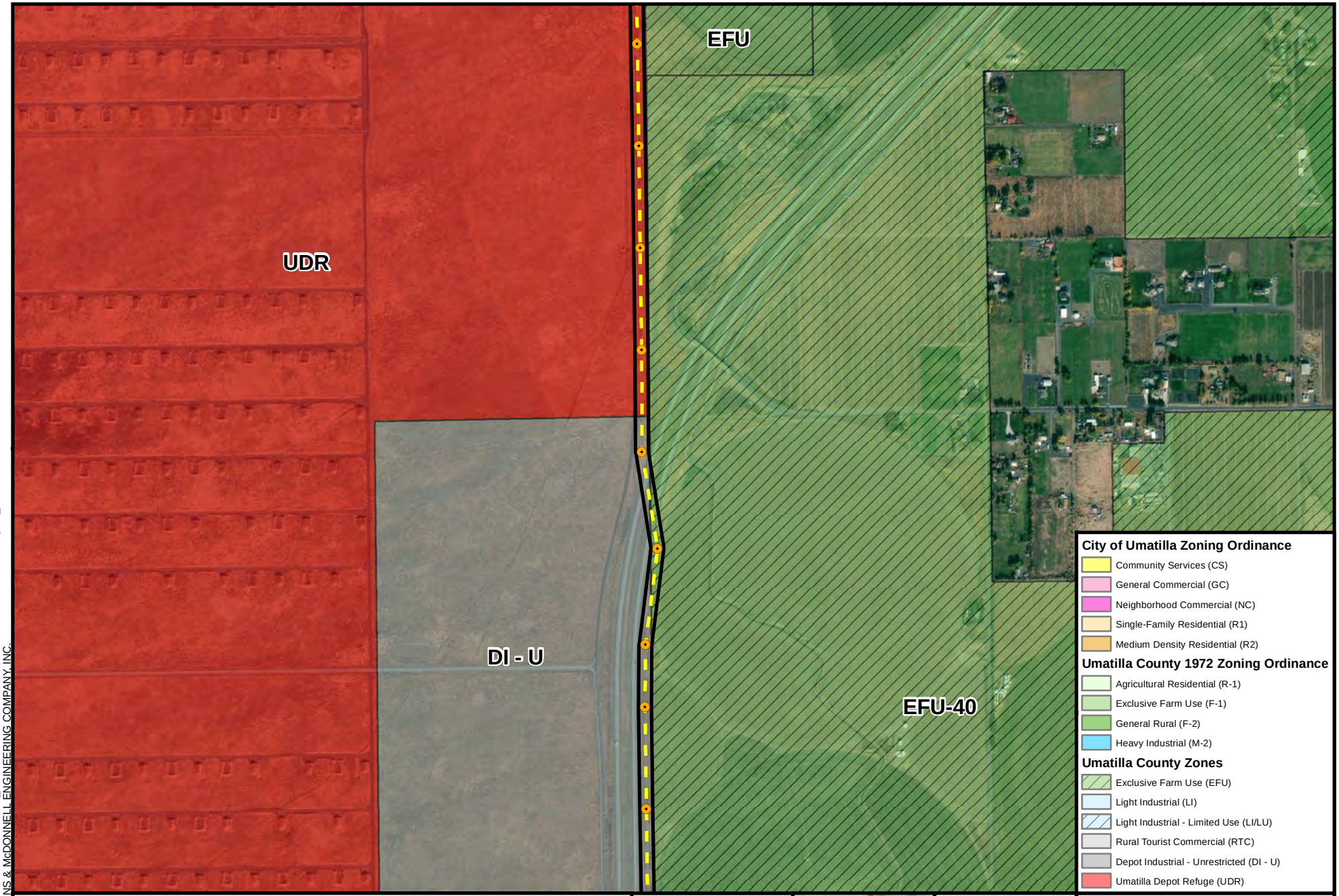
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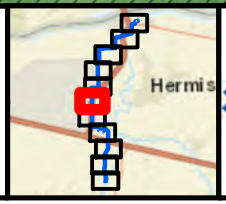
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Scale in Feet



BURNS McDONNELL

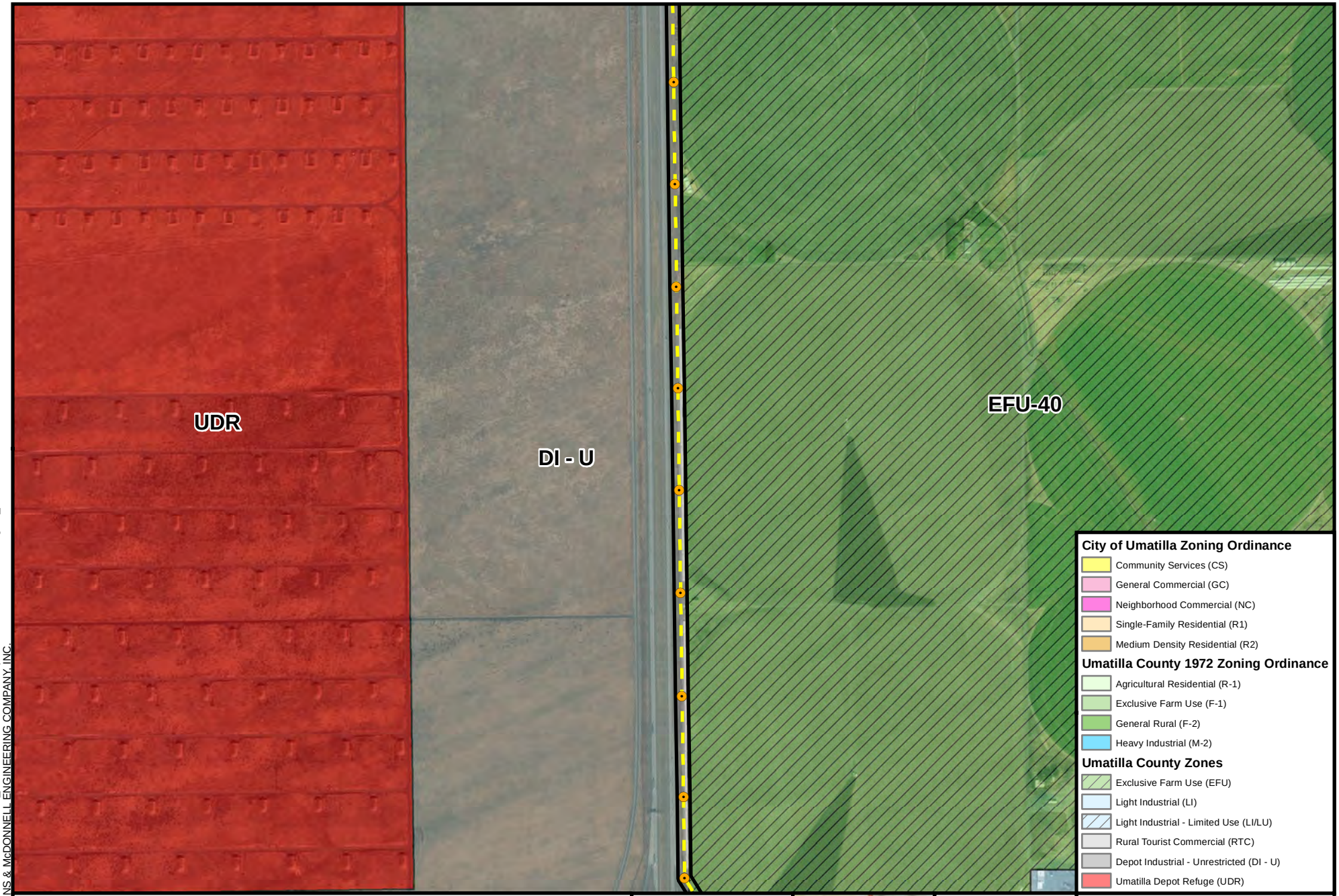
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BURNS McDONNELL

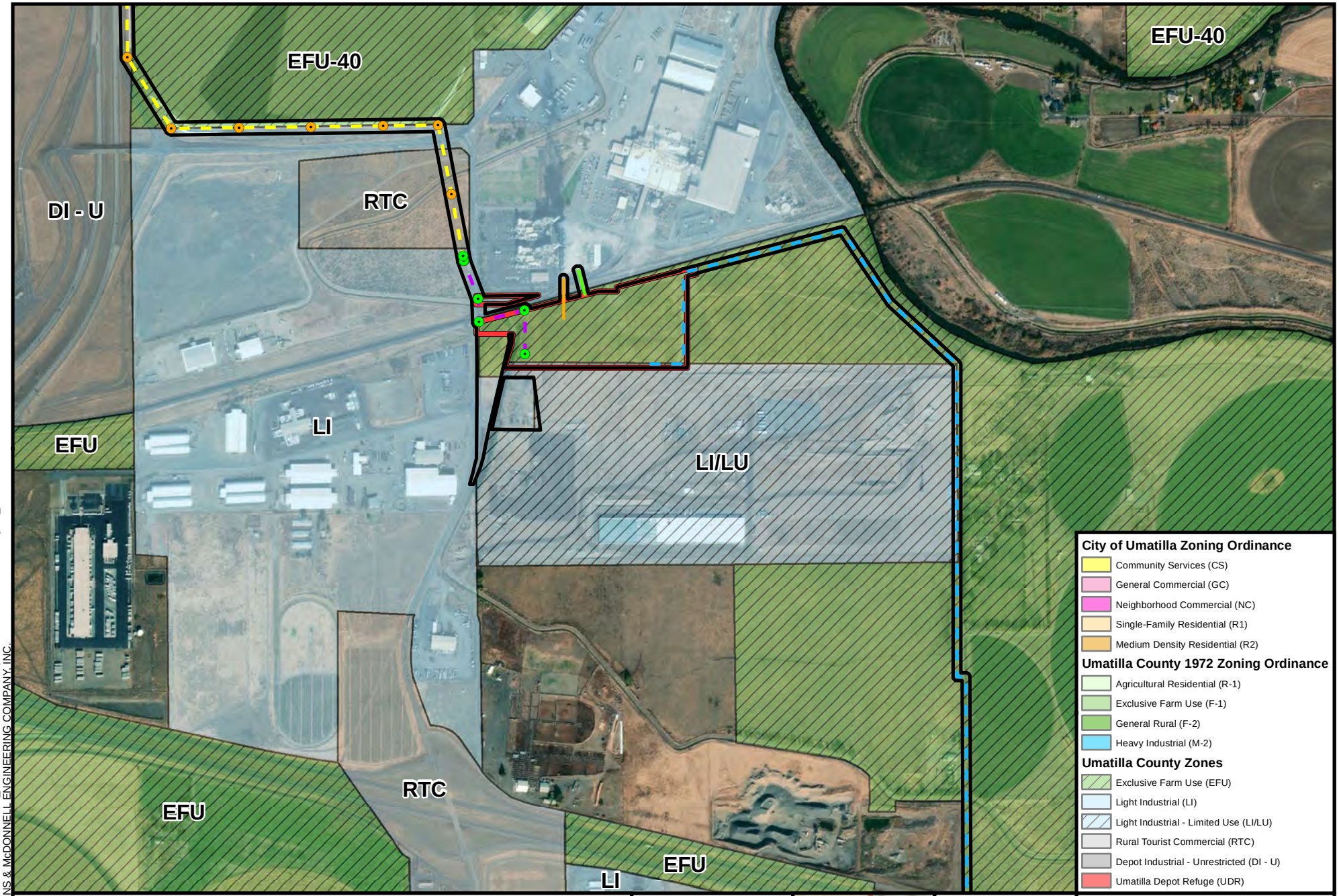
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- Site Boundary
- Step-up Substation Boundary
- McNary Substation
- Existing Transmission Line
- Proposed Underground Transmission Line
- Proposed Transmission Line
- Proposed Riser Structure Fenced Area
- Proposed Gas Line
- Existing Transmission Structure
- Proposed Transmission Structure

N

500 250 0 500

Scale in Feet



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Figure K-1
Project Overview
Perennial Wind Chaser Station
Umatilla County, Oregon

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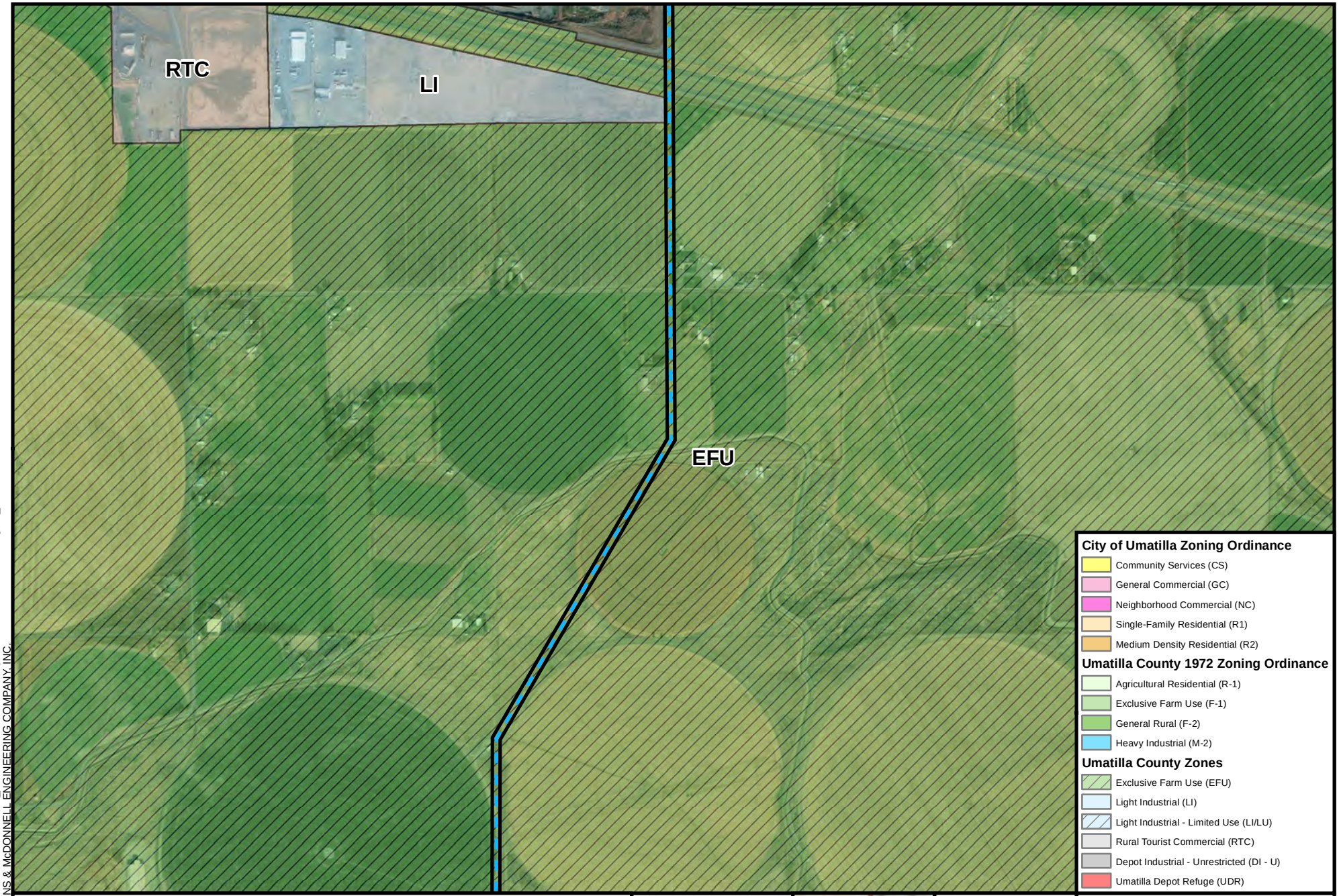


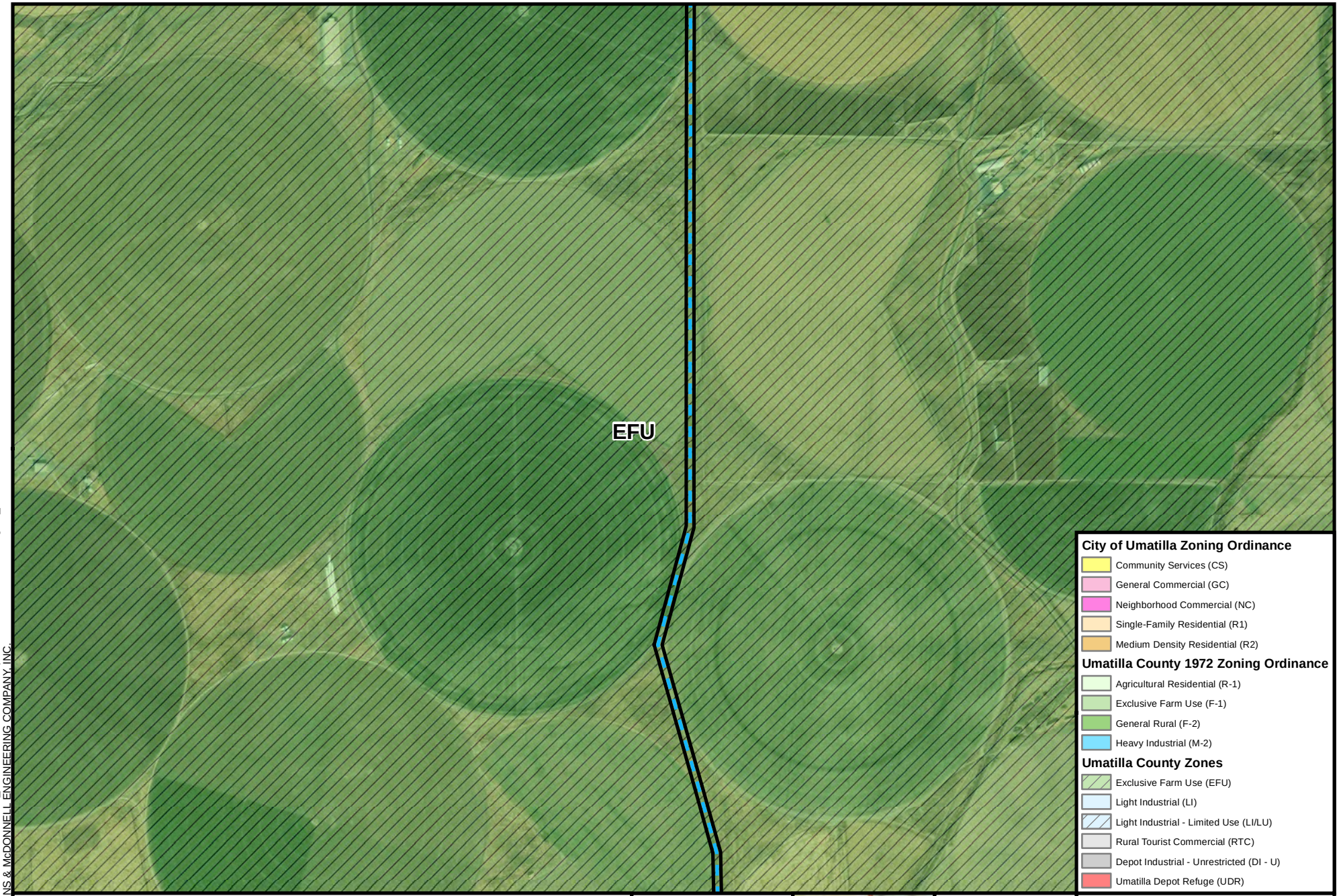
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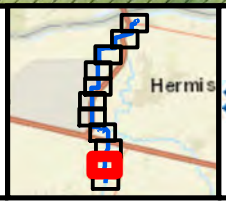
Legend

- Energy Facility Site
- Site Boundary
- Step-up Substation Boundary
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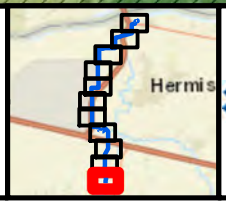
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