



October 25, 2022

Gregory County Pumped Storage Project (P-14876-002)

Secretary Kimberly D. Bose
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, D.C. 20426

Dear Ms. Bose,

The Izaak Walton League of America (League) appreciates this opportunity to provide scoping comments on the Pre-Application Document (PAD) for the Gregory County Pumped Storage Project (P-14876-002) proposed for the Missouri River in South Dakota. The League regards the Missouri River as a national treasure. Many of our more than 40,000 members enjoy the world-class, year-round recreation the river provides.

Environmental Impact Statement

The League respectfully requests a full Environmental Impact Statement (EIS) be done for this proposed project. We believe the planned development could have major impacts on water quantity and quality, fish and wildlife, recreation, sedimentation, endangered species, invasive species, cultural and historic resources, air quality, noise, and quality of life.

Geologic and Soil Resources

Specifically, we support a vigorous geologic and soil resources study (4.2.1). This includes the effects of construction and operation of the powerhouse, upper reservoir, water conveyance structures, access road, and transmission facilities on soil erosion, sedimentation, and shoreline stability of Lake Francis Case. The proposed site would be on very unstable soils with underlying shale deposits.

Water Resources

We endorse the comprehensive study of water resources (4.2.2) and the effects of the proposed water withdrawals needed to fill the upper reservoir. This study should include impacts of the surface water level fluctuations on Lake Francis Case and what that may mean to basin water users, fish and wildlife, recreation, and tourism.

The study should also assess impacts to the changes in the river's flow and water velocity and how operation of the project would impact the Missouri under both high and low water conditions.

The League recommends the study also include the effects of the project on the operation of Fort Randall and Big Bend dams and incorporate evaluations of water quality, water

temperature, dissolved oxygen, and thermal stratification in Lake Francis Case. Impacts to groundwater levels and well water quality and quantity also need to be thoroughly examined.

Aquatic Resources

The League encourages a study of aquatic resources (4.2.3) to include the possible effects of the project on aquatic habitat, fish, invertebrates, and native mussel populations in Lake Francis Case. Particularly, we ask that the study be done with the U.S. Fish and wildlife Service (FWS) and South Dakota Game, Fish, and Parks (SDGFP) to examine if the proposed withdrawals will impact forage, game fish, and aquatic invertebrate production and recruitment.

We also ask for a study on the impact of the project's proposed intake structure equipped with a V-shaped trash rack with 2-inch clear bar spacing. We ask this study also to be done with the FWS and SDGFP. We believe the study should investigate what impacts the proposed 2-inch trash rack would have on the lake's forage fish, young game fish, and aquatic invertebrate populations. We also ask this study to evaluate how invasive species, especially zebra mussels, could be moved by the water withdrawals and discharges, and how that may impact the future health of Lake Francis Case.

Terrestrial Resources

We support the study of the effects of the project on terrestrial resources (4.2.4) including upland and wetland habitats. Again, we request this study be done in conjunction with biologists from the FWS and SDGFP. We urge the study examine the impacts of displacement of native wildlife including, but not limited to, mule deer, prairie grouse, and eagles. This study should also include the impacts of the construction and maintenance of the proposed 22-mile transmission line.

Threatened and Endangered Species

The effects of construction and operation of the project on threatened and endangered species must be studied (4.2.5). The League supports examining impacts to federally listed species including the piping plover, pallid sturgeon, northern long-eared bat, red knot, whooping crane, and the recently listed monarch butterfly, under the Endangered Species Act.

Recreation Resources

Recreation on the Missouri River is a major economic engine for the local, regional, and national economy. We support studying impacts to recreation resources (4.2.6) to include the West Bridge Lakeside Use Area, Charles Mix Waterfowl Production Area, and Buryanek and Center Platte Game Production Areas. The League also backs studying effects of the project on the flows into the Missouri National Recreational River, by coordinating with the National Park Service in Yankton.

Cultural Resources

The League strongly urges a detailed and complete study of the proposed project's impact to cultural resources (4.2.8) and asks that the study be done in conjunction with the consulting Tribal experts and the South Dakota State Historic Preservation Office.

Noise, Air Quality, and Traffic

The area where the proposed project would be located is known for its high quality of life. The peace and serenity of this area is the main reason people reside there. The League supports a thorough study of the impacts of noise, decreased air quality, and increased traffic from the

construction and operation of the project (4.2.10) to area residents and visitors. This study should also investigate impacts to local traffic and the roads in and near the proposed area.

Summary

Due to the enormous scope of the proposed project and the lengthy list of potential impacts to natural resources, the economy, quality of life, and the environment, the League strongly urges that a full Environmental Impact Statement (EIS) be completed on the Gregory County Pumped Storage Project rather than just an Environmental Assessment (EA). We look forward to receiving and reviewing the NEPA document from the Commission.

The Izaak Walton League of America thanks you for the opportunity to provide our scoping comments on the Gregory County Pumped Storage Project (P-14876-002). We ask to be kept informed on all future developments, meetings, hearings, and public comment periods related to this proposed project.

Thank you for your time and consideration.

Sincerely,



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