



P.O. Box 306  
Charleston, WV 25321

January 11, 2020

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
Office of Energy Projects  
888 1<sup>st</sup> Street, NE  
Washington, DC 20426

Re: Project Docket Number P-15012-000-0—West Virginia  
Ulysses Pumped Storage Hydropower Project  
Freedomworks, LLC

Dear Secretary Bose:

The West Virginia Highlands Conservancy (WVHC) would like to offer comments on the preliminary permit application filed by FreedomWorks, LLC for the proposed Ulysses Pumped Storage Hydropower Project to be located in Grant County, West Virginia.

WVHC promotes, encourages and works for the conservation – including both preservation and wise management – and appreciation of the natural resources of West Virginia and the Nation. We focus primarily on the Highlands Region of West Virginia, but our work is for the cultural, social, educational, physical health, spiritual and economic benefit of present and future generations of residents and visitors alike.

The application states that the sole purpose of the preliminary permit, if issued, is to grant the permit holder priority to file a license application during the permit term. A preliminary permit does not authorize the permit holder to perform any land-disturbing activities or otherwise enter upon lands or waters owned by others without the owners' express permission.

It further states that the proposed project would consist of the following: (1) a new upper reservoir with a surface area of 1,042 acres and a storage capacity of 141,000 acre-feet at a surface elevation of approximately 2,960 feet above mean sea level (msl) created by constructing new dams with roller compacted concrete or earth and rock excavated from nearby mine site reclamation; (2) a new lower reservoir with a surface area of 1,139 acres and a storage capacity of 141,000 acre-feet at a surface

elevation of 1,280 feet msl created by constructing new dams with roller compacted concrete or earth and rock excavated from nearby mine site reclamation; (3) three new 36,960-foot-long, 24-foot-diameter penstocks connecting the upper reservoir and lower reservoir; (4) a new 800-foot-long, 50-foot-wide, 25-foot-high powerhouse containing eight turbine-generator units with a total rated capacity of 4,000 megawatts; (5) a new transmission line connecting the powerhouse to a nearby electric grid interconnection point with options to evaluate multiple grid interconnection locations; and (6) appurtenant facilities. Initial fill and make-up water for the upper reservoir would come from groundwater inputs and the Stoney River, and the water for the lower reservoir would come from groundwater inputs and North Fork Patterson Creek. The proposed project would have an annual generation of approximately 17,520,000 megawatt-hours.

**WVHC has serious concerns with the proposed project, due to likely environmental impacts, as presented within this preliminary permit application and disagrees with the assertion made by the applicant that the project will not result in any significant impacts to the waters of the US, upland habitat or to both warm and cold fisheries within the surrounding areas.**

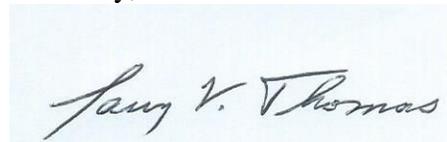
WVHC believes that a shift to renewable energy sources is critical to the long-term health of the Earth. However, we also believe that renewable energy must be produced in a way that does not negatively impact sensitive environmental resources, and it must not result in the construction of industrial-scale infrastructure in natural areas.

WVHC is in concurrence with the concerns, problems and issues presented by the West Virginia Department of Natural Resources (WVDNR) in its comment letter to Federal Energy Regulatory Commission (FERC) dated November 18, 2019. Although many of the environmental impacts of the proposed project are unknown at this point, WVHC agrees that this project as proposed presents significant impacts to the environmental resources within the proposed area.

Should FERC decide to issue a preliminary permit as requested by Freedomwork, LLC, it must take into consideration all of the concerns, problems and issues with environmental impacts regarding the preliminary permit application. In addition, as requested by the WVDNR, should a preliminary permit be deemed adequate and subsequently granted to Freedomworks LLC by FERC, the full and complete federal and state coordination processes (ie 404/401 permits) should be implemented in light of the potential negative impacts to the environment in the project area.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in cursive script that reads "Larry V. Thomas". The signature is written in black ink on a light blue rectangular background.

Larry V. Thomas  
[larryvthomas@aol.com](mailto:larryvthomas@aol.com)  
President

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