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**Cc:** [EFSEC mi Comments](#); [energy.siting@oregon.gov](mailto:energy.siting@oregon.gov)  
**Subject:** Scoping Comment - Cascade Renewable Transmission EIS (NWP-2022-00126-2)  
**Date:** Wednesday, February 4, 2026 10:30:39 PM

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External Email

Dear CRT Project Team,

I am submitting these comments on behalf of **OpenGorge**, a community group dedicated to transparency and open data governance in public infrastructure.

While we understand the regional need for transmission capacity, the installation of high-voltage cabling in the Columbia River requires a "glass bottom" approach to public oversight. If this project proceeds, it must operate with rigorous, enforceable, and transparent monitoring protocols.

We request that the Environmental Impact Statement (EIS) mandate the following data reporting and infrastructure requirements as binding conditions:

### 1. Real-Time Contaminant Reporting

The EIS must require **daily public reporting** of water and sediment quality during all dredging and trenching activities.

- **Specific Focus:** Testing must explicitly monitor for long-lived radioactive isotopes and heavy metal species known to exist in historical riverbed sediment.
- **Rationale:** These elements pose a bio-accumulation risk that threatens the health of subsistence fishers and recreational users. Daily data prevents "after-the-fact" discoveries of toxic plumes.

### 2. Biological Food Source Monitoring

To ensure the safety of the local food supply, the project must fund a **monthly toxicology report** derived from randomly drawn fish samples in the vicinity of the cable route.

- **Rationale:** Turbidity sensors alone cannot measure bio-accumulation. Regular biological sampling is the only way to ensure the food supply remains safe for human consumption.

### 3. Integrated Early Warning System

The project must establish a redundant **early warning and communication procedure** for any readings that exceed established safety baselines.

- **Digital:** Immediate alerts via a public online dashboard.
- **Physical:** Alerts must be broadcast to physical digital signage at major recreation areas, boat ramps, and fishing sites to protect users currently on the water.

#### 4. Post-Installation Operational Transparency

Transparency must not end when construction finishes. The EIS must require regular, permanent reporting on:

- **System Status:** Continuous data regarding power loss, heat dissipation into the surrounding water, and the physical condition of the cable.
- **Rationale:** To verify that the cable is not heating the riverbed to levels that alter fish behavior or degrading over time.

#### 5. Maximizing Public Utility: Fiberoptic & Seismology

If the riverbed is to be disturbed, the public benefit can be maximized. We request the inclusion of high-capacity fiberoptic cabling with ample **dark fiber** alongside the power transmission.

- **Seismic Monitoring:** The fiberoptic system must include **Distributed Acoustic Sensing (DAS)** capabilities.
- **Rationale:** The Gorge is a seismically active area. This offers a rare, low-cost opportunity to create a sensor array for geologic study and early earthquake warning systems. This dual-use infrastructure benefits public welfare and monitors the cable for accidental damage (e.g., anchor strikes) before catastrophic failure.

#### 6. Open Data Standards (Transparency Requirements)

To ensure this data is truly accessible to the public and independent scientists, OpenGorge requests:

- **Machine-Readable Formats:** All reported data (turbidity, heat, toxicology) must be published in open formats (CSV, JSON, API) rather than locked in static PDF reports.
- **Independent Verification:** Monitoring equipment must be calibrated and audited by an independent third party, not solely by the project applicant.
- **Baseline Transparency:** The "normal" baseline levels for contaminants must be established and published *before* work begins to validate future "out of ordinary" alerts.

We urge the Corps to include these specific transparency requirements in the scope of the EIS. The public deserves to know not just that the project is safe, but *how* that safety is being measured.

Sincerely,

**Dr. Jarrod McClean, PhD** Chief Scientist | OpenGorge.org [www.opengorge.org](http://www.opengorge.org)