



**Thompson Falls Hydroelectric Project
FERC Project No. 1869
Final Study Report
Environmental Justice Study**



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List of Abbreviations and Acronyms

ADA	Designated Americans with Disabilities Act
City	City of Thompson Falls
EJC	Environmental Justice Community
FERC	Federal Energy Regulatory Commission
ILP	FERC's Integrated Licensing Process
Licensee	NorthWestern Energy
NorthWestern	NorthWestern Energy
Project	Thompson Falls Hydroelectric Project
Relicensing Participants	Local, state, and federal governmental agencies, Native American Tribes, local landowners, non-governmental organizations, and other interested parties
Thompson Falls Project	Thompson Falls Hydroelectric Project
U.S.	United States

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1.0 Introduction

The Thompson Falls Hydroelectric Project (Thompson Falls Project or Project) is located on the Clark Fork River in Sanders County, Montana. Preliminary development of the Project began in June 1912, and the first generating unit was placed in service on July 1, 1915, with the Project being in continuous operation since then. Non-federal hydropower projects in the United States (U.S.) are regulated by the Federal Energy Regulatory Commission (FERC) under the authority of the Federal Power Act. The current FERC License, which was issued in 1979, expires December 31, 2025. As required by the Federal Power Act and FERC regulations, on July 1, 2020, NorthWestern Energy (NorthWestern, Licensee) filed a Notice of Intent to relicense the Thompson Falls Project using FERC’s Integrated Licensing Process (ILP). Concurrently, NorthWestern filed a Pre-Application Document.

The ILP is FERC’s default licensing process which evaluates effects of a project based on a nexus to continuing Project operations. In general, the purpose of the pre-filing stage of the ILP is to inform Relicensing Participants¹, and the public, about relicensing, to identify issues and study needs (based on a project nexus and other established FERC criteria), to conduct those studies per specific FERC requirements, and to prepare the Final License Application.

1.1 Environmental Justice Study Background

On July 5, 2022, FERC staff issued an Additional Study Request (FERC 2022) for NorthWestern to complete an Environmental Justice Study. In requesting the study, FERC staff cited Executive Order 14008, Tackling the Climate Crisis at Home and Abroad, and Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations. The request stated that these Executive Orders require federal agencies to assess the impacts of federally-licensed projects on human health or the environment, and whether those impacts would be disproportionately high and adverse for minority and low-income populations (i.e., “environmental justice communities”) in the surrounding community. If such communities do exist near the Project, FERC staff indicated it will need to assess potential effects from relicensing the Thompson Falls Project on those communities.

¹ Local, state, and federal governmental agencies, Native American Tribes, local landowners, non-governmental organizations, and other interested parties.

1.2 Goals and Objectives of Study

The goals and objectives of this study are to determine if any environmental justice communities (EJC) exist in or near the Project, and if so, the potential effects of the Project on those communities.

This Environmental Justice Study has five objectives:

1. To identify the presence of EJCs that may be affected by the relicensing of the Thompson Falls Project and identify outreach strategies to engage the identified EJC in the relicensing process, if present.
2. To identify the presence of non-English-speaking populations that may be affected by the Project and identify outreach strategies to engage non-English-speaking populations in the relicensing process, if present.
3. To discuss effects of relicensing the Project on any identified EJC and identify any effects that are disproportionately high and adverse.
4. To identify mitigation measures to avoid or minimize adverse Project effects, if any, on EJCs.
5. To identify sensitive receptor locations within the Project area and identify potential effects and measures taken to avoid or minimize any adverse effects to such locations, if present.

2.0 Methods

2.1 Study Area

The study area is the area within 1 mile of the Project boundary consistent with FERC methodology for collecting environmental justice data for hydroelectric projects and as specified in FERC’s study request (FERC 2022).

2.2 Study Methods

The methodology for the study is the methodology FERC has adopted for collecting environmental justice data for hydroelectric projects, and is summarized in FERC’s July 5, 2022, request for the Environmental Justice Study. FERC’s study request (FERC 2022) indicates that this methodology has been successfully employed on a number of projects in the licensing process and is consistent with guidance from the U.S. Environmental Protection Agency (EPA 2016). The methodology involves using statistics from the U.S. Census Bureau’s American Community Survey 5-year estimates for racial, ethnic, and poverty populations for each state, county, and census block group within the study area (Census 2022). Those statistics are then analyzed to determine if an EJC exists within the study area by applying the methods included in the guidance from the EPA (2016).

2.2.1 Minority Populations

For minority populations, the American Community Survey 2020 5-year estimates from Table B03002 were used for race and ethnicity data (Census 2022). That data was then analyzed to determine if an EJC exists based on the presence of minority populations by the following methods:

- i. 50% Analysis Method: Determine whether the total percent minority population of any block group in the affected area exceeds 50%.
- ii. Meaningfully Greater Analysis Method: Determine whether the minority population is 10% greater than the affected census block group (the overall minority population in Sanders County.)

2.2.2 Low-Income Populations

For low-income populations, the American Community Survey 2020 5-year estimates from Table B17017 were used for income information (Census 2022). That data was then analyzed to determine if an EJC exists based on the “Low-income Threshold Criteria Method” which

indicates an EJC exists if the percent of the population below the poverty level in the identified block group is equal to or greater than that of Sanders County.

2.2.3 Non-English-Speaking Groups

The EPA’s “EJScreen: Environmental Justice Screening and Mapping Tool” (EPA 2022) was used to determine non-English-speaking groups in the study area.

2.2.4 New Construction-Sensitive Receptor Locations

New construction is not proposed so the identification of sensitive receptor locations (e.g., schools, day care centers, hospitals, etc.) within the study area is not required.

2.3 Variances from the FERC-approved Study Plan

In preparing this Environmental Justice Study, NorthWestern did not encounter or implement any variances from the study plan provided in FERC staff’s Additional Study Request (FERC 2022).

3.0 Results

State, county, and census block group statistics from the American Community Survey 2020 5-year estimates for minority and low-income populations (Census 2022) are shown in **Table 3-1**. As shown in Table 3-1, there are five census block groups within the study area, and these are the five census block groups that were compared to the reference population of Sanders County to determine if any EJs exist for minority and/or low-income populations. **Figure 3-1** shows the five census block groups within the study area.

3.1 Minority Populations

As described in the study methods, the 50-Percent Analysis Method and the Meaningfully Greater Analysis Method were applied to the statistics shown in Table 3-1 to determine if an EJC exists for the Project:

- i. 50% Analysis Method – None of the minority populations exceed 50% of the total population. Thus, an EJC does not exist using this method.
- ii. Meaningfully Greater Analysis Method – This method determines if the minority population is 10% greater than the affected census block group (the overall minority population in Sanders County). Sanders County has a minority population of 10%. Thus, the threshold to qualify as an EJC using this method would be a minority population of 11%. None of the 5 census block groups have a minority population that is above 11%. Thus, an EJC does not exist using this method.

3.2 Low-Income Populations

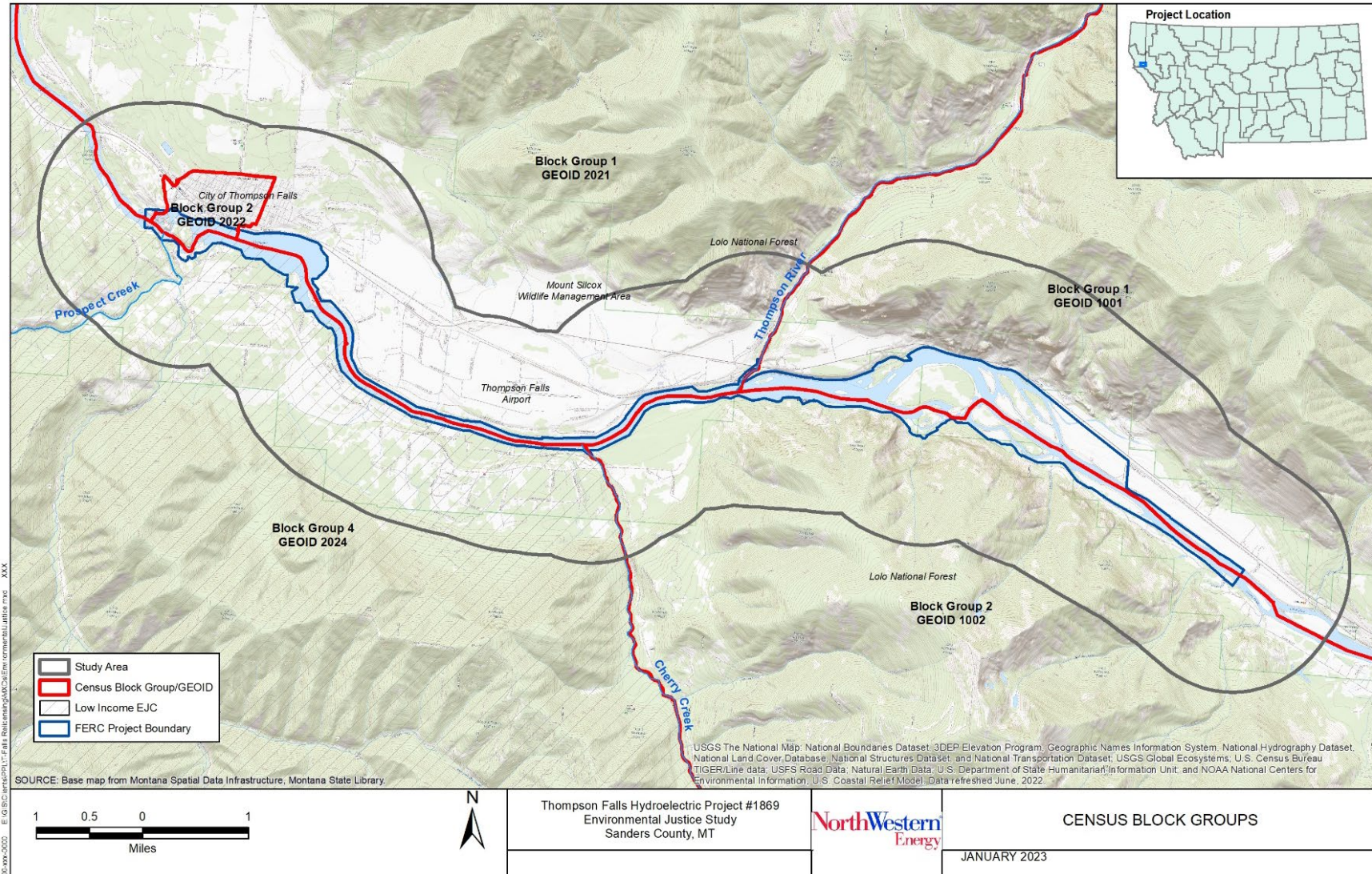
As described in the study methods, the “Low-income Threshold Criteria Method” was applied to the statistics shown in Table 3-1 to determine if an EJC exists. In Sanders County, 17.1 percent of the population is below the poverty level. The percent below the poverty level in two of the five census block groups exceeds 17.1 percent, making these two census block groups EJs. In census block group #2 (GEOID #2022), 18.2 percent of the population is below the poverty level. This census block group is located in the approximate western two-thirds of the City of Thompson Falls (City) (Figure 3-1). In census block group #4 (GEOID #2024), 22.9 percent of the population is below the poverty level. This census block group is located on the south shore of the Thompson Falls Reservoir and the Clark Fork River from Cherry Creek on the upstream end to a point 1 mile downstream of the Project (Figure 3-1).

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Table 3-1. Race and Ethnicity Data, Census Block Groups

RACE AND ETHNICITY DATA											LOW INCOME DATA
Geography GEOID (last 4 digits)	Total Population Count	White Alone Not Hispanic (count)	African American (count)	Native American/Alaska Native (count)	Asian (count)	Native Hawaiian & Other Pacific Islander (count)	Some Other Race (count)	Two or More Races (count)	Hispanic or Latino (count)	Total Minority (%)	Below Poverty Level (%)
Montana	1,061,705	908,782	4,931	62,720	8,527	552	1,663	33,029	41,501	14.4	12.7
Sanders County	11,804	10,623	31	434	47	2	6	289	372	10.0	17.1
Block Group #1 GEOID #1001	1,497	1,362	0	30	24	0	0	49	32	9.0	8.0
Block Group #1 GEOID #2021	1,397	1,283	0	22	2	0	0	4	86	8.2	2.1
Block Group #2 GEOID #2022	913	843	0	19	0	0	0	0	51	7.7	18.2
Block Group #2 GEOID #1002	1,513	1,415	7	21	1	0	0	28	41	6.5	13.0
Block Group #4 GEOID #2024	489	489	0	0	0	0	0	0	0	0	22.9

Figure 3-1. Five Census Blocks in the Thompson Falls Project Area



3.3 Non-English-Speaking Groups

The EPA’s “EJScreen: Environmental Justice Screening and Mapping Tool” indicated 0 percent non-English-speaking groups in the study area (EPA 2022). Thus, no further analysis is required.

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4.0 Discussion

4.1 Minority Populations

Montana has a low minority population (14.4%) as compared with the U.S. (39.9%) (U.S. figures not shown in Table 3-1 but were obtained from the American Community Survey 2020 5-year estimates [Census 2022]). Sanders County, and the five census block groups in the study area, have an even lower minority population (10%) than all of Montana (14.4%). Thus, there is no minority population EJC present, and no further analysis is required.

4.2 Low-income Populations

As noted in Section 3.2 – Low Income Populations, two census block groups are EJCs based on low-income criteria (EPA 2022).

One is the approximate western two thirds of the City which will be referred to as “EJC-1”. It is 349 acres in size and is entirely within the study area. As noted in Section 2.1, the Study Area is the area within 1 mile of the Project Boundary. EJC-1 includes the Project’s powerhouses and much of the dam infrastructure. It includes many City businesses such as restaurants, stores, banks, and gas stations. It also includes the City’s mayoral office and other City administrative offices, and the Sanders County administrative offices (Thompson Falls is the county seat for Sanders County).

The second EJC generally consists of the south shore of the Thompson Falls Reservoir and the Clark Fork River from Cherry Creek on the upstream end to a point 1 mile below the Project’s dams and powerhouses and will be referred to as “EJC-2.” EJC-2 is part of a much larger census block group. The census block is 125,202 acres (approximately 195 square miles) in size, parts of which are more than 15 miles from the Project Boundary extending all the way to the Montana/Idaho border. EJC-2, which is the portion of the census block that is within the study area, is 4,566 acres in size.² The land in EJC-2 is primarily residential waterfront and water view properties, many of which have homes and cabins on them.

4.2.1 Project-Related Effects

The Project primarily has positive environmental, economic, recreation, and community effects on EJC-1 and EJC-2. Hydropower is a renewable energy source that produces reliable, low-cost energy (DOE 2023; NHA 2023). Hydropower plays a key role in addressing climate

² For purposes of assessing whether an EJC is present, data for the entire 125,202-acre area was applied. There is no way to determine whether the low-income population is located within the 4,566-acre subset of the 125,202-acre census block group.

change and provides benefits beyond electricity generation such as flood control, irrigation support, and recreational resources (DOE 2023; NHA 2023).

There are no greenhouse gas emissions or other air emission-related impacts associated with electrical generation from hydropower. This stands in contrast to other energy sources, particularly those involving production of energy from fossil fuels. Because renewable energy projects have minor, if any, greenhouse gas emissions, a detailed analysis of such impacts is not necessary or appropriate (United States Council on Environmental Quality 2023).

The Project employs five full-time and one seasonal employee with a combined annual income/benefit value of about \$650,000. NorthWestern also contracts with companies that provide services to NorthWestern at the Project, and average contract payments over the last 5 years total approximately \$1,300,000 per year. It is presumed that these employees and contractors spend some of that money in the local area, and since many of the businesses (e.g., gas stations, restaurants, lodging, hardware store, etc.) within the City are located within EJC-1, it is reasonable to conclude a positive economic impact is provided by the Project in EJC-1.

NorthWestern provides important recreation facilities that serve both EJCs. Island Park and Power Park are both located in EJC-1.

Island Park is located on NorthWestern-owned property and is operated and maintained by NorthWestern. The site offers trail-based recreation with views of the waterway and Project facilities. To better accommodate public access to the island from the north shoreline, the Licensee purchased three undeveloped City lots 100 feet from the Gallatin Street Bridge and developed them to provide a public parking area. Designated Americans with Disabilities Act (ADA) parking is available directly adjacent to the bridge. The parking area accommodates 17 vehicles while the Gallatin Street Bridge provides walk-in / ADA access to the island.

Benches, picnic tables, and an ADA-accessible restroom are provided along trails on the island. The upstream fish passage facility public viewing platform on the eastern edge of the island, offers views of the Main Channel Dam and the fish passage facility. Interpretive information regarding operation of the fish passage facility and fish species of interest is available at the viewing platform as well. Interpretation throughout Island Park includes historical information related to construction of the Thompson Falls Project, the Prospect Plant, and other geographically and culturally significant topics. The island is linked to the south shore by the Historic High Bridge.

Power Park is located on NorthWestern-owned property and is operated and maintained by NorthWestern. Power Park is an ADA-accessible park along the north shoreline, just above the original powerhouse with parking available for 10 vehicles. Until 2021, Power Park offered a group use pavilion with power, running water, and plumbed restrooms, as well as multiple picnic tables, and benches. The pavilion was destroyed in an arson fire in 2021. NorthWestern voluntarily reconstructed and upgraded facilities at Power Park in 2022. Currently, the park

contains an information sign related to the hydroelectric generating capacity of the Project (the FERC-required Part 8 signage), as well as an information kiosk which directs visitors to public recreation opportunities in and near Thompson Falls. The park also serves as a parking area for visitors that seek to access the Powerhouse Loop Trail by following sidewalks within the park to trail segments linked by the Powerhouse access road. The park is a popular venue for numerous outdoor events each year.

Wild Goose Landing is not located within EJC-1, but is less than 1,000 feet away, within easy walking distance. Wild Goose Landing provides open space, picnic facilities, plumbed restrooms, a boat launch and dock, a separate swimming dock, and shoreline fishing. Designated parking adjacent to the restroom facility accommodates 10 vehicles, including one ADA-designated parking space, while about 10 more vehicles may park in dispersed areas along the access road adjacent to the boat launch.

There are also non-Project recreation amenities within these two EJCs. The Cherry Creek Boat Launch is located in EJC-2, as well as a parking area and access point that provides access to Island Park from the south shoreline. The Historic High Bridge, restored in 2010 to 2011, is within both EJC-1 and EJC-2, and provides a non-motorized transportation corridor that links EJC-1 to EJC-2. The Powerhouse Loop Trail is not located within EJC-1, but is less than 1,000 feet away, within easy walking distance. All of these public recreational amenities are open to the public free of charge and maintained for public use by NorthWestern and other partners.

Based on visitor studies (NorthWestern 2022a), these Project recreation sites and the other recreational amenities are repeatedly enjoyed by local residents including residents of the two EJCs. Survey results indicate that local residents are satisfied with the opportunities and amenities available, and they feel uncrowded as they participate in recreation activities to maintain a healthy mind and body. Power Park also provides opportunities for get-togethers such as family picnics and community events such as the Trick-or-Treat Move Your Feet fun run and the annual Chicken Jamboree. The recreation facilities are also enjoyed by people that live outside the area, and presumably those people are having a positive economic impact to EJC-1 by spending money at businesses within EJC-1.

In addition, NorthWestern supports local groups and events, such as decorating in the City at Christmas time, sponsoring ads in the local paper for local high school teams and booster club sponsorship, accommodating tours of the hydro facilities for local school groups, being a member of the Chamber of Commerce, donating to the local foodbank, etc.

There are no construction projects planned as part of the relicensing process, so there will not be any impacts such as dust or noise. The Project has been in operation continuously since 1915. Potential negative Project impacts may result from intermittent use of the top 2.5 feet of the reservoir to accommodate flexible capacity generation. Based on results from the Operations Studies (NorthWestern 2022b, 2023), these operations could adversely affect

access to boat docks and boat launches, that were not constructed to account for fluctuating water levels, as water levels fluctuate. However, the extent of these impacts has been documented to be minimal to moderate overall and are not disproportionately high or adverse to EJC-1 or EJC-2, as the same effects occur throughout the Project reservoir area (NorthWestern 2022b, 2023), and have been occurring, to some degree, throughout the Project's history. Thus, these are not entirely new impacts that would be created by issuance of the license.

4.2.2 Outreach

Before filing a Final License Application with FERC, applicants are required to conduct a rigorous pre-license application filing process that consists of 1) presenting the Project to Relicensing Participants; 2) consulting with those Relicensing Participants; 3) identifying issues; 4) gathering available information; 5) preparing study results and obtaining review of those results from Relicensing Participants; and 6) preparing a draft license application and providing an opportunity for Relicensing Participants to review and comment on the draft license application.

NorthWestern maintains a website with information about the Thompson Falls Project, including relicensing information, meeting notices and presentations, reports, and other documents³.

NorthWestern proactively initiated relicensing outreach discussions with Relicensing Participants in 2018. The first activity was a training program, "FERC 101," was held in Missoula, Montana on September 12. This program included FERC staff who presented information on the procedures used to relicense hydropower projects under the FERC's jurisdiction. NorthWestern also presented information on the Thompson Falls Project. The goal of the meeting was to inform Relicensing Participants of the relicensing process and schedule for the Thompson Falls Project. Presentations from this meeting, and all other Thompson Falls relicensing meetings, are posted on NorthWestern's website.

Next, prior to the commencement of the formal FERC relicensing process, NorthWestern voluntarily prepared a Baseline Environmental Document which was a compilation of existing resource information. This document was released for public comment on November 1, 2018 and is available on the website. On December 4, 2018, a workshop was held in Missoula to discuss the Baseline Environmental Document and identify any data gaps and resource issues. The presentations from that meeting are available on the website.

On October 15, 2019, from 6 to 8 p.m., NorthWestern voluntarily hosted a public meeting in Thompson Falls at the Thompson Falls Community Center. The meeting was held in the evening to avoid conflict with normal business hours with the goal of having better attendance from the public. Notice of the meeting was provided through an advertisement in the local

³ <http://www.northwesternenergy.com/environment/thompson-falls-project>

newspaper (the Sanders County Ledger), sending notice of the meeting *via* email to people who had signed up to be on the email list, and by sending post cards to people who had signed up to be on the mailing list. The material presented at the meeting included a general description of the relicensing process and the purpose of the recently completed operations test. Forty-four people attended the meeting. Attendees had many comments and questions, with most of them pertaining to the operations test that NorthWestern completed from October 8 to 10, 2019, and the impacts caused by the 4-foot fluctuation in water levels during the test. Further, during the meeting, a recommendation was made that NorthWestern provide direct contact regarding relicensing developments in addition to the newspaper, post cards, and email notices NorthWestern was already conducting. Based on the comments from the October 2019 public meeting, NorthWestern expanded email and mailings to include all landowners adjacent to the Project boundary. NorthWestern also received two comment letters from two Relicensing Participants at the meeting, the Sanders County Community Development Corporation, and the Thompson Falls Community Trails Group. These two letters and NorthWestern's response to these letters, are discussed in Section 15.1.2 of the July 2020 Pre-Application Document (NorthWestern 2020).

On March 11, 2020, from 6 to 8 p.m., NorthWestern voluntarily hosted a second public meeting in Thompson Falls at the Thompson Falls Community Center. Once again, the meeting was held in the evening to avoid conflict with normal business hours with the goal of having better public attendance than the October 2019 meeting. Notice of the meeting was provided through an advertisement in the local newspaper, sending notice of the meeting by email to people who had signed up to be on the email list, and by sending post cards to people who had signed up to be on the mailing list and to landowners adjacent to the Project boundary. Twenty-two people attended the meeting. Based on the comments from the October 2019 public meeting, NorthWestern added all landowners along the reservoir to the mailing list to make sure all landowners were also provided notice of the meeting. The material presented at the meeting included a general description of the relicensing process, the results of the October 2019 operations test including the observed impacts to resources, and of NorthWestern's intention to propose a maximum 2.5-foot fluctuation in water levels under the new License to address resource impacts observed during the October 2019 operations test which tested a 4-foot fluctuation. Attendees had many comments and questions, with most of them pertaining to the operations test that NorthWestern completed from October 8 to 10, 2019, and the impacts caused by the 4-foot fluctuation in water levels during the test.

As described above in Section 4.2.1, NorthWestern completed a recreation visitor survey in 2021 (NorthWestern 2022a). Three of the survey sites were in EJC-1 and two of the survey sites were in EJC-2. Of the visitor survey responses, 78 percent came from within the two EJCs, indicating both significant outreach and feedback from respondents that were recreating within the two EJCs.

In addition to the extensive outreach conducted under the ILP regulations, several additional outreach activities were done voluntarily by NorthWestern to engage the Relicensing

Participants and the public. The goals of these extra efforts were to learn about potential concerns or gaps in data and to establish a common understanding among all the interested parties as to what is involved with relicensing a hydroelectric project. All of the comments received with these outreach activities will be considered as NorthWestern prepares both the Draft and Final License Applications.

All of these activities were available for participation by residents of the two EJs. Several individuals and small businesses within these two EJs opted to be included on the mailing list for relicensing notices. It is also important to note that elected officials in the City and Sanders County, who represent people in the two EJs, have been actively involved in NorthWestern's consultation process.

In conjunction with the Updated Study Report meeting during the daytime in Missoula on May 24, 2023, NorthWestern intends to host an additional public meeting in Thompson Falls on the evening of May 25 to review the results of the studies conducted for relicensing, and to receive public comment. This will be another opportunity for residents of the two EJs to provide comment on the Project prior to the filing of the Draft License Application.

Once NorthWestern completes the Draft License Application, it will be made available for review and comment by federal and state resource agencies, other Relicensing Participants, and the public. When preparing its Final License Application with the FERC, NorthWestern will consider all comments received, make any appropriate adjustments to the application based on comments, and respond to all comments received as part of the Final License Application.

As required by the Federal Power Act and FERC's regulations, NorthWestern will file the Final License Application with FERC no later than December 31, 2023.

4.2.3 Mitigation

The existing Project license allows NorthWestern to fluctuate the reservoir up to 4 feet in elevation. Based on results from the October 2019 Operations Test, NorthWestern determined that doing so could have negative effects on various resources. Consequently, NorthWestern, in its relicensing application, will propose to reduce the authorized fluctuation amount from 4 to 2.5 feet, which should still allow NorthWestern to provide baseload generation and flexible capacity needs during the new license term. As part of its Final License Application, NorthWestern will propose to continue to provide recreational opportunities that benefit the EJs and all members of the public.

5.0 Conclusions and Recommendations

There are two EJCs within the study area based on the presence of low-income populations. There are significant benefits from the Project, including serving as a low-cost renewable energy source, and providing economic and recreation benefits to the communities. Outreach to the Thompson Falls community, including the EJCs, has been conducted and is ongoing. Based, in part, on public input, NorthWestern opted not to adopt the 4-foot fluctuation that is allowed under the current license, and instead proposes to use only the top 2.5 feet of the reservoir. As part of its Final License Application, moreover, NorthWestern will propose to continue to provide recreational opportunities that benefit the EJCs and all members of the public. Based on the above, there are no disproportionately adverse Project impacts on the identified EJCs.

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