March 2026

Washington State Department of Ecology
Clean Energy Coordination Team

Submitted online at https://sea.ecology.commentinput.com/?id=HECadUbpk

Re: Washington State Geothermal Collaborative – Interim Report

Dear Department of Ecology Team,

Clean Air Task Force (CATF) appreciates Washington State's leadership in convening an early, transparent geothermal collaborative process and the opportunity to provide input on the forthcoming interim report. We commend the Department of Ecology and partner agencies for proactively engaging stakeholders prior to project proposals and for centering environmental protection, Tribal rights, and community considerations from the outset.

CATF is a US-based nonprofit organization working globally to safeguard against the worst impacts of climate change by catalyzing the rapid development and deployment of low-carbon energy and other climate-protecting technologies. With 30 years of internationally recognized expertise on climate policy, science, and law, and a commitment to exploring all potential solutions, CATF is a pragmatic, non-ideological advocacy group focused on climate change and the clean energy transition. CATF has offices in Boston, Washington, DC, and Brussels, with staff working remotely around the world.

Recent technological innovations in next-generation geothermal have dramatically expanded the potential of geothermal energy, including in Washington State. Advances in deep drilling and subsurface characterization are opening access to geothermal resources well beyond traditional hydrothermal systems, suggesting that geothermal could play a meaningful role as a clean, firm energy resource over time. While additional technological progress and careful planning will be required to fully realize this potential, Washington's decision to proactively examine geothermal development through an early, collaborative, and stakeholder-driven process demonstrates strong leadership. This approach positions the state to responsibly understand its geothermal resources and to consider how they might be developed in a safe, environmentally protective, and efficient manner when Washington chooses to pursue geothermal deployment.

As the interim report is developed, CATF offers the following recommendations to ensure it not only identifies risks and opportunities associated with geothermal development, but also meaningfully positions Washington to responsibly deploy next-generation geothermal as a clean, firm resource when the state chooses to do so.

1. Clearly Affirm Geothermal's Clean-Firm System Value

The interim report should explicitly recognize next-generation geothermal technologies as a clean, firm, always-on energy resource that can support reliability, winter adequacy, and growing electricity demand. Clear system-value framing is important to ensure geothermal is evaluated appropriately alongside variable clean energy resources and other clean-firm options.

2. Include a Deployment-Readiness Roadmap

In addition to identifying risks and impacts, the interim report should outline a high-level deployment-readiness roadmap describing the policy, regulatory, and planning steps Washington would need to take to responsibly enable geothermal deployment. CATF's forthcoming state geothermal policy report expected in April 2026 will provide additional details on the most important actions policymakers can take to facilitate geothermal deployment, and we look forward to sharing those recommendations in hopes that they can inform Washington's report.

3. Elevate Transmission as a Strategic Constraint

Leading next-generation geothermal developers report that access to transmission and interconnection is the single most important barrier they face to developing geothermal projects. Transmission access should therefore be treated not only as a siting consideration, but as a first-order deployment constraint. The interim report should recommend early coordination between geothermal resource assessments, transmission planning processes, and utilities, particularly given the geographic characteristics of many geothermal resources.

4. Translate Environmental Analysis into Permitting Certainty

The report should assess whether existing SEPA and EFSEC pathways are fit-for-purpose for next-generation geothermal technologies and identify where additional guidance, inter-agency coordination, or statutory clarification may be needed. Early attention to permitting certainty

can significantly reduce future project risk while maintaining strong environmental and community safeguards.

4. Promote Calibrated Data Sharing to De-Risk Development

CATF encourages the interim report to address the role of subsurface data sharing as a key de-risking tool for geothermal development. Publicly available subsurface data can reduce uncertainty and improve outcomes for future projects. The interim report should assess what subsurface data already exist, as well as the feasibility of collecting more data and of digitizing existing data that is only available in hard-copy.

5. Distinguish Next-Generation Geothermal Technologies

The interim report should clearly distinguish conventional geothermal from next-generation geothermal technologies (including those at superhot temperatures, 400C/750F), and flag where regulatory assumptions, data needs, geographic suitability, or permitting approaches may differ. This distinction is essential to ensure future frameworks do not unintentionally disadvantage innovative geothermal systems.

6. Integrate Geothermal into Long-Term Energy Planning

The report should recommend that state agencies and utilities begin considering geothermal within long-term energy planning contexts, including resource adequacy, load growth, and reliability planning—even in the absence of near-term projects. Early inclusion will ensure that geothermal is evaluated alongside other clean-firm resources before planning decisions are locked in.

8. Convert Equity and Tribal Engagement into Process Guardrails

Washington's strong emphasis on equity, Tribal rights, and community engagement should be translated into clear, durable process expectations. These should include transparency about project approaches, risks, and mitigation strategies as well as community engagement best practices that can ensure projects are developed in partnership with host communities.

Conclusion

The interim report represents a critical opportunity to move beyond issue identification and begin defining how Washington can be prepared to responsibly deploy geothermal energy—balancing environmental protection, community trust, and the state's long-term clean-energy and reliability needs. CATF appreciates the opportunity to engage in this important work and looks forward to continued collaboration as this process advances.

Sincerely,

Ann Garth
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Clean Air Task Force