

Gordon Tebb

Based on my review of the draft legislative update, here are several questions that could strengthen discussion with Ecology, DNR, Tribes, utilities, local governments, or legislators:

1. How will the final report distinguish between "resource potential" and "developable potential"?

The report identifies Mount Baker, Mount St. Helens, and Wind River valley as high-potential geothermal areas, but several constraints—Tribal rights, cultural resources, federal lands, water resources, protected landscapes, transmission access, and seismic risk—could materially reduce practical development potential.

2. What criteria will Ecology use to determine whether a site is "preferable" for geothermal development?

The legislative directive calls for siting factors, including geologic suitability, proximity to transmission lines, and groundwater-surface water continuity. It would be useful to know whether these factors will be weighted, screened, mapped, or translated into a decision framework.

3. How will Tribal consultation affect the final recommendations, especially where geothermal focus areas overlap culturally significant landscapes?

The report emphasizes government-to-government consultation and Tribal rights, interests, and resources. A key question is how Tribal input will be incorporated into siting guidance, regulatory recommendations, and any future development pathways.

4. What level of seismic risk is considered acceptable for enhanced geothermal systems in Washington?

Because enhanced geothermal systems may involve hydraulic fracturing and induced seismicity, the final report should clarify how seismic hazard assessments will inform permitting, monitoring, operating limits, and potential exclusion areas.

5. How will water quantity and water quality risks be evaluated across different geothermal technologies?

Conventional, enhanced, and closed-loop systems have different water-use and contamination profiles. The report should clarify how impacts to aquifers, surface waters, fisheries, and injection-fluid chemistry will be assessed.

6. Should Washington prioritize closed-loop or lower-impact technologies over enhanced geothermal systems?

The report describes advanced closed-loop systems as emerging technologies that do not rely on underground fractures or fluid movement in surrounding rock. That raises a policy question: should state guidance favor technologies with lower seismic and groundwater interaction risks?

7. What regulatory gaps are most consequential: exploration, drilling, water rights, seismic monitoring, Tribal consultation, decommissioning, or local land-use authority?

The report previews a regulatory overview and gap analysis. It would be helpful to ask which gaps are likely to require legislation versus agency guidance or model ordinances.

8. How will communities benefit if geothermal development occurs near them?

The preliminary recommendations mention community and Tribal benefit agreements. A useful question is whether Washington should require, encourage, or simply provide guidance on such agreements.

9. How will the state ensure that rural communities and overburdened communities are not asked to absorb disproportionate environmental or infrastructure burdens?

The report identifies overburdened communities as a required impact area. The final report should explain how equity considerations will influence siting, mitigation, engagement, and benefit-sharing.

10. What additional data must be collected before Washington can make credible policy decisions on utility-scale geothermal development?

The report notes that technical research and seismic hazard assessments are still pending. A central question is whether the 2027 final report will be sufficient for policy action or whether further exploration funding and studies will be needed first.