



KLICKITAT COUNTY NATURAL RESOURCES & ECONOMIC DEVELOPMENT DEPARTMENT

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November 9, 2020

Breean Zimmerman
Department of Ecology
Central Regional Office
1250 West Alder Street
Union Gap, WA 98903-0009
breean.zimmerman@ecy.wa.gov

RE: Goldendale Pumped Storage Project 401 Comments

Dear Ms. Zimmerman:

Thank you for the opportunity to comment on FFP Project 101, LLC's application for 401 water quality certification for Federal Energy Regulatory Commission (FERC) license application (FERC No. 14861) for the proposed Goldendale Energy Storage Project (Project). The Project is located in Klickitat County, with the exception of transmission lines that aerially span the Columbia River to connect with transmission infrastructure located in Oregon.

Klickitat County has been at the forefront of the state's transition to clean, renewable energy resources for over two decades. It is clear that utility-scale energy storage capacity, such as will be provided by the 1,200 MW Project, is needed in order to integrate power from intermittent renewable energy sources (e.g., wind and solar) on the regional power grid and enable the state to meet its decarbonization goals while maintaining grid reliability. I submit that the Project will provide significant environmental benefit and is in the public interest.

The Project is an off-stream, closed-loop pumped storage facility that will not discharge to surface water or ground water. And, as stated in Section 2.2.5 of Exhibit E of the Project's FERC final license application, the Project is not expected to cause any impacts to wetlands within or adjacent to the Project area. Section 2.3 of Exhibit E of the Project's FERC final license application presents a comprehensive suite applicant recommendations to minimize and mitigate project effects to water resources. The project will obtain a National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit. The applicant will develop and implement a Soil Erosion Control Plan, a Hazardous Substances Spill Prevention and Cleanup Plan, and an operational adaptive water quality monitoring and management program that will stay with the project for the term of its FERC License.

Over the last five years I have attended many meetings and site tours with the applicant and representatives from Ecology, WDFW, numerous stakeholder organizations, local officials, and legislators, as well as one site visit attended by Governor Inslee. I believe the input from these meetings and input received by the applicant through public comment and agency consultation processes are reflected in the Project's FERC final license application. I also believe that the applicant will continue to work with Ecology, other agencies, and stakeholders to ensure that the proposed project will not negatively impact water quality.

Thank you for considering my comments.

Sincerely,



David McClure
Director