



**KLICKITAT COUNTY
NATURAL RESOURCES &
ECONOMIC DEVELOPMENT DEPARTMENT**

127 W. Court St., Goldendale, Washington 98620
Telephone: 509 773-7060

February 12, 2021

Sage Park
Regional Director
Central Regional Office
Department of Ecology
1250 West Alder Street
Union Gap, WA 98903-0009

RE: Goldendale Pumped Storage Project 401 SEPA Scoping Comments

Dear Ms. Park:

Thank you for the opportunity to provide SEPA scoping comments regarding 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.

The Project is an off-stream, closed-loop pumped storage facility that will not discharge to surface water or ground water. Public Utility District #1 of Klickitat County (Klickitat PUD) will supply water to the Project utilizing its municipal water right for the Cliff's Water System. Klickitat PUD may supply water from its water right for use in a pumped storage generating facility (RCW 54.16.410).

The Project's lower reservoir is located on a portion of the former Columbia Gorge Aluminum Smelter (AL Smelter) site, which Ecology is investigating for cleanup (Facility ID #95415874. Cleanup ID #11797). A considerable amount of data and information have been produced to support this investigation. This would be a good resource for data and information to incorporate in the Environmental Impact Statement (EIS) for the Project 401 water quality certification. With respect to the AL Smelter site cleanup, the Project will contribute to site cleanup by removing and disposing of contaminated materials from the area identified as the West Surface Impoundment, which is where the Project's lower reservoir will be located.

The Project's upper reservoir is located in an area that is already heavily disturbed as a result of livestock grazing and wind energy development. Roads that were constructed for the wind energy projects will be used by the Project. Several EISs were produced to support SEPA

review for nearby wind energy projects and for Klickitat County's Energy Overlay Zone. Many of these documents are on the County's website <http://www.klickitatcounty.org/273/Wind-Projects> and <http://www.klickitatcounty.org/283/Index-to-Final-Energy-Overlay-Zone-EIS-F>. I recommend contacting Klickitat County's Planning Director to identify the most relevant EISs for consideration in the SEPA review for the Project's 401 water quality certification.

The Project's upper reservoir is located in the Swale Creek subbasin of WRIA 30, Klickitat. Watershed planning under chapter 90.82 RCW has been conducted for WRIA 30 and the approved watershed plan is being implemented. Klickitat County is the Lead Agency for watershed planning and plan implementation in WRIA 30. The scope of the watershed plan includes the optional water quality component (RCW 90.82.090) and habitat component (RCW 90.82.100), as well as the required water quantity component (RCW 90.82.070). We conducted numerous studies in Swale Creek basin during watershed plan development and implementation. Ecology has the WRIA 30 Watershed Plan and Detailed Implementation Plan, as well as many of the study reports that have supported plan development and implementation. However, many of these reports are available on the County's website <http://www.klickitatcounty.org/239/WRIA-30---Klickitat-Planning-Documents>. I recommend that Ecology utilize the data and information from watershed planning and plan implementation for the SEPA review for the Project's 401 water quality certification.

Swale Creek has water quality issues (e.g. Category 5 for temperature impairment). While I anticipate there will be very little (possibly during construction) if any water quality impact from the Project, I ask that Ecology consider work done under watershed planning (.e.g. the draft water quality maintenance and monitoring program plan that was developed with grant funding from Ecology) and consult with Klickitat County during development of mitigation options if Ecology determines that there will be impacts and mitigation is appropriate.

WRIA 31 Rock/Glade is immediately to the east of WRIA 30. Klickitat County is also the Lead Agency for watershed planning in WRIA 31 under chapter 90.82 RCW. As in WRIA 30, we conducted many water quality, habitat, and water quantity assessments to support the development of the approved watershed management plan for WRIA 31. Please contact me if the geographic area of SEPA review for the Project extends into WRIA 31 and I will provide data and information from watershed planning. Also, as in the Swale Creek subbasin of WRIA 30, please consult with Klickitat County during development of mitigation options if Ecology determines that there will be impacts in WRIA 31 and mitigation is appropriate.

Klickitat County is a distressed area, as identified by Washington Employment Security Department <https://esd.wa.gov/labormarketinfo/distressed-areas>) and the Project is within a Historical Underutilized Business Zone (HubZone) designated by the US Small Business Administration <https://maps.certify.sba.gov/hubzone/map#center=46.046738,-120.036648&zoom=9> and a Qualified Opportunity Zone census tract designated by Governor Inslee and confirmed by the Internal Revenue Service <https://maps.certify.sba.gov/hubzone/map#center=46.046738,-120.036648&zoom=9> . The Project will provide a significant number of much needed, good paying jobs during construction and operation.

The clean technology sector (including the Project) and redevelopment of the AL Smelter site are identified as a catalyst opportunities in Klickitat County's Economic Development Strategic Plan <http://www.klickitatcounty.org/DocumentCenter/View/3482/2017-05-22-Klickitat-County-Strategic-Plan-V14-FINAL-1> . The Project is also identified as the top priority in the Mid-

Columbia Economic Development District's Comprehensive Economic Development Strategy, not just for Klickitat County, but for the Washington side of the Columbia River Gorge Region. https://www.mcedd.org/wp-content/uploads/2019/04/CEDS_2019update_full-doc.pdf
SEPA review for the Project should include these economic development planning documents and an analysis of the economic impacts of the Project.

Utility-scale energy storage capacity, such as will be provided by this 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 SEPA review for the Project should give significant weight to the environmental benefits of the Project.

Thank you for considering my comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "David McClure", with a long horizontal flourish extending to the right.

David McClure
Director