

February 9, 2021

To: Sage Park, Department of Ecology SEPA Responsible Official
From: Mayor Mike Canon, City of Goldendale, WA
RE: Scoping comments, Goldendale Energy Storage Project (FFP Project 101, LLC)

I am writing as the Mayor of Goldendale to both submit the City's scoping comments and to express the City's long-standing and continued support for the Goldendale Energy Storage Project.

By way of background, the project developers have pursued an aggressive outreach and education effort for many years. The area is familiar with large project construction given the multi-generational contact with such projects (John Day Dam, Goldendale Aluminum Smelter, extensive wind projects). Local residents are well aware of the effects the proposed project is likely to have during construction and operation, leading to wide-spread support for the undertaking.

That support recognizes that many jobs will go to highly specialized contractors, but it also recognizes the role new, large projects offer for local workers during construction and operation. Also, our local school, hospital, fire, and other special taxing districts receive an influx of new funding that is well beyond the capability of the local economy to generate without such projects.

In addition to commenting on the scoping topics listed by Ecology, the importance of the proposed project to the socio-economic well-being of the City of Goldendale leads me to request that Ecology determine that a detailed socio-economic study of the project be treated not as an optional Environmental Impact Statement element but as essential information that would be helpful to the lead agency in evaluating the proposal and meeting the test of adequacy as discussed in Section 3.3.5 of the SEPA Handbook and further reinforced in *Barrie v Kitsap County (1980)*.

Many of the probable project impacts and areas for proposed study in the EIS, as listed in the January 14, 2021 scoping notice, have been previously addressed in Klickitat County's Programmatic EIS for its energy overlay zone action, which the City suggests be included by reference in the Ecology EIS.

The City's main scoping comment is our request that a socio-economic analysis be performed not as an optional element but as a key section of the EIS (see above); the City also makes the following scoping comments:

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| Air Quality | The City of Goldendale is the closest incorporated community to the project site. Given the prevailing winds and the difference in altitude, it is unlikely there would be any construction or operation effects from the project on Goldendale. |
| Transportation | The local area can easily absorb operations worker commute traffic, plus there is a robust and developing rural transit system in the Columbia River Gorge that could be adapted to worker needs. Recent experience with wind project construction, which brought hundreds of outside-the-area workers, most of whom were traveling the same route Goldendale Energy Storage construction workers would use, demonstrated that local roads can readily accommodate greatly expanded worker traffic. |
| Recreation | The Goldendale area has a rich, underutilized recreation infrastructure including state and county parks, river activities, hiking, and Maryhill Museum. Increased use of these resources during construction is unlikely to stress that infrastructure and the estimated permanent workforce would have a negligible effect on recreation. |
| Aesthetics | As stated above, the City of Goldendale is the closest incorporated community. The remote site would have no aesthetic effects. With respect to night sky viewing, both the City of Goldendale and Klickitat County recognize the importance of dark skies and have ordinances enforcing use of dark sky-compatible lighting. It has been our experience that raising this issue with project developers leads to the incorporation of dark sky considerations into facility design and operation. |
| Public Services and Utilities | While Klickitat County and Klickitat PUD would be the lead entities, there is close cooperation between emergency response organizations in this area, including Goldendale's police and fire departments. Construction and operation issues may require some specialized additional training, but that is not an unusual requirement. |

In closing, the City of Goldendale is in an area that is likely to be key to achieving the Clean Energy Transformation Act's (CETA) aggressive goals. Variable renewable energy resources, especially if the state is to achieve the 100% goal by 2045, need the kind of support a closed-cycle pumped storage hydro project like the Goldendale Energy Storage Project provides. The technology is thoroughly tested in multiple domestic and international facilities, its life-cycle cost is far below available alternatives, and it is free of the need to replace depleted batteries – which should be a consideration in both the alternatives analysis and life-cycle costing analyses.

It is the City's hope that Ecology's Section 5 obligation to incorporate CETA's goals into the department's planning and decision-making process, as stated in the statute, coupled with the statute's repeated reference to pumped storage hydro, will guide the department as it prepares this EIS.

Sincerely,

Mike Canon