



August 15, 2025

Re: Climate Solutions' Comments on the Interagency Clean Energy Siting Coordinating Council's 2025 Draft Recommendations.

To the members of the Interagency Clean Energy Siting Coordinating Council,

Climate Solutions is grateful for the opportunity to provide comments on the Interagency Clean Energy Siting Coordinating Council's ("Council") 2025 Draft Recommendations to the Legislature. Climate Solutions is a clean energy nonprofit organization working to accelerate clean energy solutions to the climate crisis. The Northwest has emerged as a hub of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub.

Overall, we want to share our appreciation for the Council's work to advance clean energy and transmission projects and siting processes in the state. Climate Solutions is invested in the success of House Bill 1216 ("HB 1216"), the enabling language of the Council, as a commitment from the Legislature to improve clean energy siting in Washington.

We support many of the recommendations put forward by the Council—in particular: developing transmission siting and permitting tools and improving capacity and efficiency of transmission; providing long-term funding for Tribal review and promoting Tribal clean energy projects as supported by Tribes; amending the Growth Management Act to include clean energy development and expanding the scope of what constitutes a "Utility Facility"; and assessing lands available for clean energy development. Below, we provide overarching recommendations to help ensure that this report provides clear, actionable, and effective recommendations to the Governor and the Legislature.

I. Include requirements under RCW 19.405 and analysis from the State Energy Strategy in criteria for the 2025 Draft Recommendations to the Legislature ("draft recommendations").

The Council lists a variety of criteria considered when developing these draft recommendations including advancing the goals of HB 1216, addressing clean energy siting and permitting concerns, and supporting current or expected clean energy technologies. This generally appears to be a useful framework for considering viable recommendations. However, we recommend that the Council also include in this set of criteria the requirements under RCW 19.405, the Clean Energy Transformation Act, as well as the electrification scenario per Appendix A in the 2021 State Energy Strategy. Although this may be subsumed within specific criteria, we believe it's



important to explicitly highlight the legal language driving the need to accelerate deployment of clean energy, as well as the state's framework for achieving those mandates.

The Council could consider amending the criterion regarding “current or expected...technologies” to state “supports current or expected clean energy technologies as needed to meet requirements under RCW 19.405 and as supported by the 2021 State Energy Strategy.”

II. Ensure each recommendation is specific and actionable.

Overall, we support many of the recommendations put forward by the Council. However, we are concerned that the recommendations lack detail and are too high level to be implementable or actionable. At minimum and where feasible, we recommend identifying which entity (e.g., the Legislature, the Department of Commerce, the Energy Facility Siting and Evaluation Council) can move a given recommendation forward.

III. Consider the Council's, state agencies', and the Legislature's progress on efficient, effective, and responsible siting and permitting of clean energy projects.

As noted in HB 1216, the Council is required to track progress on efficient, effective, and responsible siting and permitting of clean energy projects. In the last four years, the Legislature has passed a number of bills and agencies have undertaken numerous processes to improve siting in Washington including – but not limited to – House Bill 1812, HB 1216, and the creation of non-project Environmental Impact Statements for utility-scale wind, solar, green hydrogen, and transmission. It would be prudent for the Council, with the state's support, to analyze how these various bills and processes have improved siting in Washington, how the state can utilize new resources like the PEISs to support the goals of the Council, and where gaps remain.

Climate Solutions thanks the Council for its consideration of these comments. We look forward to continuing to work with the Council as it refines these recommendations and continues to assess opportunities to improve clean energy siting and permitting in Washington.

Sincerely,

Altinay Karasapan
Washington Regulatory Policy Manager
Climate Solutions