



COLUMBIA RIVERKEEPER  
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August 13, 2025

*Submitted via online form*

**Re: Comments on 2025 Draft Recommendations**

Dear Clean Energy Siting Council:

Thank you for the opportunity to provide feedback on the Interagency Clean Energy Siting Coordinating Council's 2025 draft recommendations. Columbia Riverkeeper is a 501(c)(3) nonprofit organization with a mission to protect and restore the water quality of the Columbia River and all life connected to it. Columbia Riverkeeper has over 20,000 members in Oregon and Washington. Columbia Riverkeeper regularly comments on decisions impacting water quality, climate, and salmon habitat in the Columbia River.

We appreciate the Council's commitment to receiving input from Tribes and affected communities in this process. For more than two decades, the Columbia River has faced an unprecedented number of proposals for new coal, oil, and gas-shipping terminals, which threaten public health and safety, the river, and our climate. Pollution from fossil fuel facilities often disproportionately impacts Tribal Nations and BIPOC, low-income, and rural communities. We aim to protect the Columbia River, river communities, and the climate from harmful energy infrastructure and associated pollution.

Columbia Riverkeeper supports efforts towards clean energy development that does not further burden Tribal resources or frontline communities. In doing so, we hold the following positions:

- Columbia Riverkeeper opposes power generation, transmission, or load growth that hardens reliance on, or significantly increases demand for, Columbia Basin hydropower.
- Columbia Riverkeeper opposes the destruction of irreplaceable and culturally significant sites for energy development. These areas have long been the target for fossil fuel development, and should not become sacrifice zones for green energy either.

- Columbia Riverkeeper rejects the categorization of small modular nuclear reactors (SMNRs) and nuclear fusion as “clean energy.” SMNRs are a false solution that diverts funding from proven renewable energy technologies that are safer, less expensive, and faster to deploy.<sup>1</sup>
  - SMNRs are too costly and take too long to come online. Nuclear energy now costs five times more than renewable energy options such as solar and wind, and nuclear projects are notorious for delays and cost overruns.
  - SMNRs pollute and burden tribal communities. While the nuclear industry claims to be “clean,” it is an extremely dirty technology, beginning with uranium mining which decimates indigenous lands. SMNRs produce two to thirty times the radioactive waste of older nuclear designs—waste for which we have no national repository.
- Columbia Riverkeeper supports recommendations to pursue development options that do not require transmission connections; and incentivize upgrading existing energy infrastructure.
- Columbia Riverkeeper supports recommendations to provide long-term funding for Tribal project review; engage with Tribes on SEPA categorical exemptions; and promote Tribal clean energy projects.
- Columbia Riverkeeper supports recommendations to develop community engagement tools. These tools should be developed in collaboration with affected communities to support accessible, meaningful engagement. Guidance and best practices should include a clear plan for how feedback will be incorporated into decisionmaking.

Sincerely,

Audrey Leonard  
Staff Attorney  
Columbia Riverkeeper

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<sup>1</sup> *The Big Problems with Small Nukes*, Columbia Riverkeeper (Apr. 19, 2024), <https://www.columbiariverkeeper.org/2024/the-big-problems-with-small-nukes/>.