



June 28, 2026

Re: Climate Solutions' Comments on the Interagency Clean Energy Siting Coordinating Council's 2026 Draft Recommendations.

Dear Members of the Interagency Clean energy Siting Coordination Council,

Climate Solutions is grateful for the opportunity to provide comments on the Interagency Clean Energy Siting Coordinating Council's ("Council") 2026 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.

Climate Solutions is invested in the success of House Bill 1216 ("HB 1216"), the enabling language of the Council, as a commitment from the state to improve clean energy and transmission siting and permitting in Washington. Overall, we are supportive of the draft recommendations presented by the Council. We do not have commentary on every recommendation, but the recommendations for which we do have comments, questions, or concerns are listed below.

I. Assess the current landscape of and progress on efficient, effective, and responsible siting and permitting of clean generation and transmission 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 4 years, the Legislature has passed bills and agencies have undertaken numerous processes to improve siting in Washington. This includes the passage and implementation of HB 1216, which created the Ecology Coordinated Permitting Process, the Clean Energy Project of Statewide Significance designation, the creation of Non-Project Environmental Impact Statements (PEIS) for utility-scale wind, solar, and green hydrogen; HB 2309, intended to help consolidate appeals; HB 1812 and the creation of the transmission PEIS; and HB 1960. It would be prudent for either the Council and/or the Executive Order 25-11-created Joint Clean Energy Acceleration Team to assess the impact of these various efforts.

In particular, while the PEISs were created to help make SEPA analysis more efficient, it would be useful to assess their effectiveness, if these documents are being implemented to their fullest effect or as intended, and if not, what the barriers are.

II. Ensure each recommendation is specific and actionable.

As noted above, we are supportive of many of the recommendations listed in the Council's draft recommendations. However, we think it would be useful to make these recommendations more actionable by identifying which entity (e.g., the Legislature, the Department of Commerce, the Energy Facility Siting and Evaluation Council, JCEAT) can move a given recommendation forward, and whether or not legislation, a budget proviso, or existing FTE and resourcing can support a given effort. Furthermore, we would encourage the Council to prioritize this list. Given the tight 2027 budget outlook, some form of prioritization or categorization of recommendations that will support in the near-term versus the long-term will be useful as the Legislature determines which recommendations to pursue.

III. Comments specific to 2026 Draft Recommendations.

Funding and Resources

1. Continue funding for agencies on clean energy siting and permitting.

- We support continued funding for agencies' siting and permitting activities and strongly support recovering funding and staffing for the Department of Commerce's siting and permitting work that was cut during the 2026 Supplemental Budget.

2. Develop Washington's clean energy information portal.

- Climate Solutions has long advocated for some form of a clean energy dashboard that highlights clean energy projects that have been built or are actively in development. This transparency will be useful for developers, advocates, and the general public in assessing the full scope of clean energy buildout in the state and how that compares to the need for clean energy and transmission.

Battery Energy Storage Systems

- Overall, we are very interested in efforts to support BESS as a critical solution in Washington's clean energy transition. We recommend that the Council consider the inclusion of BESS more explicitly in the State Energy Strategy as a means for assessing and quantifying the role of BESS in meeting our greenhouse gas reduction requirements and requirements under the Clean Energy Transformation Act.

3. (P.1) Produce a Programmatic Environmental Impact Statement (PEIS)

- Climate Solutions is supportive of efforts to identify potential impacts, necessary mitigation, and best practices early on for clean energy technology, including BESS, and a PEIS can theoretically serve this purpose. However, it would be useful to assess the effectiveness of existing PEISs in advancing these goals before allocating additional state resources to this effort.

- Should the state pursue a BESS PEIS, we strongly encourage thoughtful crafting of the enabling language to ensure close alignment with existing requirements and processes under SEPA. Going one step further, the enabling language could require the document to clearly identify mitigation options that relate to each impact and the degree to which each mitigation option minimizes, mitigates, or avoids impacts.

3. (P.2) Provide technical assistance for local and tribal planning for stand-alone battery energy storage systems

- Climate Solutions is generally supportive of efforts to affirm best practices for BESS safety. As much as possible, we recommend that the Council should rely on existing resources and expertise from groups like the Pacific Northwest National Laboratory, which offers numerous useful resources regarding BESS safety and design considerations. The Council should also consider including in its recommendations policy examples from other states that seek to affirm BESS safety best practices and consider the ways that would interplay with the international fire codes.

Agriculture

8. Promote energy development in agricultural pivot corners.

- As the state seeks to build out clean energy and transmission resources efficiently and responsibly, avoiding Tribal Cultural Resources and sensitive lands, it is critical to enable use of marginal agricultural lands for build-out of these resources. We recommend that the state utilize existing resources to issue guidance to counties regarding the use of Agricultural Lands of Longterm Significance. There may also be an opportunity to address this issue in the model ordinance that Commerce is required to create in the implementation of HB 1960. Climate Solutions believes this is a top priority for the state to pursue.

Transmission

9. Reduce barriers to transmission planning, siting and permitting.

- We are very supportive of efforts to encourage effective, efficient, and thoughtful siting, planning, and permitting of new transmission in Washington and believe that the Washington Electric Transmission Authority (WETA) will play an important role in pushing these efforts forward. Many of the elements noted in the Council's recommendations are already or likely to be pursued by WETA per the enabling statute. We recommend that the Council identify aspects for which WETA is already planning to action and where other agencies may need to help fill in gaps either in the time before WETA is set up or once it is established.

Permitting

