



Diane Butorac
Department of Ecology
Clean Energy Section Manager
P.O. Box 47709
Olympia, WA 98504-7709

Re: Interagency Clean Energy Siting Coordinating Council's 2026 Clean Energy Project Siting Report to the Legislature

June 24, 2026

Dear Diane Butorac and Ecology Program Staff:

Thank you for the opportunity to provide input on the Interagency Clean Energy Siting Coordinating Council's annual legislative report. The comments are submitted on behalf of Duwamish River Community Coalition and Front and Centered. We are environmental, climate, environmental justice, and community-led social justice organizations representing the interests of members and supporters across Washington State who want to ensure that the development of new siting processes are equitable and accessible for frontline communities.

With these comments, we seek to emphasize the importance of allowing frontline communities to participate in the creation of siting recommendations from the outset, the need for more information around transmission capacity, cumulative impacts, and best practices for developing Community Benefit Agreements prior to creating processes that can help expedite siting.

1. Continue funding for agencies on clean energy siting and permitting. We agree that consistent funding for agencies engaging in this work is necessary. The recommendation should also specify that in addition to staffing, this funding should be used to facilitate the meaningful engagement of impacted communities.
2. Develop Washington's clean energy information portal. We are supportive of an information portal to make information related to projects as accessible as possible. This recommendation should also include language that promotes awareness and transparency specifically for frontline communities. This can include translated material, elevating opportunities for public input, and the use of plain language to make these complex topics easier to understand.
3. Produce a Programmatic Environmental Impact Statement (PEIS) and provide technical assistance for local and tribal planning for stand-alone battery energy storage systems. Past PEIS' created by the Department of Ecology for Utility-Scale Solar, Utility-Scale Onshore Wind, and Green Hydrogen were highly technical and lengthy. For these types

of documents, it is important to engage potentially impacted communities early on in the drafting process and ensure that the final products are released with supplemental materials that make the information accessible. The PEIS and related tools and best practices materials should include an assessment of environmental justice impacts and the ways that the cumulative impacts of environmental and socioeconomic factors create the risk for exacerbated harm in frontline communities.

4. Develop public information to address safety and other concerns regarding clean energy technologies. We are supportive of this recommendation and the recognition of the importance of addressing public concerns related to clean energy projects. This recommendation should also include language specifying that information that is designed to promote public awareness should be created and shared in partnership with potentially impacted communities to make sure the information is accurate, adequately responsive, and being shared in culturally appropriate ways.
5. Create a toolkit for developers to guide them through the preapplication, development, engagement and permitting process. We are supportive of tribal and community engagement being called out as part of any potential toolkits created for developers. Resources should include best practices for engaging communities in addition to the sequence, and should emphasize the need to conduct meaningful engagement as early and often as possible.
6. Identify opportunities and risks for siting emerging clean energy technologies through a collaborative process. We are supportive of this recommendation and the way it emphasizes the importance of transparent and early review. The recommended model for a geothermal collaborative process does not specify when and to what degree impacted communities should be engaged and the CESCC should include this specific language in their recommendation.
7. Advance community benefit agreements by collaboratively developing guidance and best practices. We are supportive of the recommendation to utilize CBAs or other legally binding agreements to secure tangible benefits for impacted communities. Research and engagement to develop guidance resources for agencies should also consider how CBAs can fail to represent the diverse perspectives of local groups or be costly to draft and enforce for community organizations with limited resources. Understanding ways that CBAs can be insufficient to protect community interests is necessary to avoid replicating these harms.
8. Promote energy development in agricultural pivot corners. We support exploring ways to co-locate solar energy on farmland in ways that are mutually beneficial to both land owners and developers. We emphasize the importance of including these communities in decision making processes well before siting decisions are finalized so that their concerns and priorities can be used to form development plans.
9. Reduce barriers to transmission planning, siting and permitting. We recognize the importance of expanding Washington's transmission capacity. As such, proposed

methods for developing guidance and technical assistance should explicitly include early and frequent community involvement given that this is a crucial part of how developers will be able to manage opposition as well as save both time and resources by avoiding delays.

When environmental justice principles and community leadership are at the core of decisions made when siting new clean energy facilities, there is potential for positive local impacts and technological advances in energy generation that are necessary to achieve a carbon-free energy future. Washington state has been a national leader of environmental justice through groundbreaking initiatives like the Clean Energy Transformation Act and the Healthy Environment for All Act and has the opportunity to build upon this legacy by creating equitable and comprehensive frameworks for clean energy siting.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jamie Hearn".

Jamie Hearn, Climate and Community Planning Lead
Front and Centered
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