



September 17, 2026

Via Electronic Filing

Amelia Fujikawa
Clean Energy Specialist
Department of Ecology
cleanenergy@ecy.wa.gov

Re: Comments on Department of Ecology's Draft Environmental Justice Toolkit for Clean Energy Projects

Dear Amelia Fujikawa:

Front and Centered appreciates the opportunity to provide comments on the Draft Environmental Justice Toolkit for Clean Energy Projects (Toolkit). Our organization's mission is to advocate for the interests of frontline communities, who are first and worst impacted by the climate crisis, in advocating for a just transition from an extractive to a regenerative economy. As a climate justice coalition of organizations led by and serving communities of color in Washington, our comments focus on equity concerns for frontline communities, including increasing accessibility in participation processes with consideration for the unique cultural, socioeconomic, and technological needs of different communities.

We recognize the importance of developing more clean energy facilities in Washington to transition away from fossil-fuel dependent energy systems. This transition is necessary to improving the public health of our communities by ensuring they have clean air, reducing warming impacts through lower emissions, and meeting state clean energy goals mandated by the Clean Energy Transformation Act (CETA). Yet it is also crucial that we create equitable frameworks for clean energy development to prevent upholding the same harms that our communities are already experiencing under existing energy systems.

For frontline communities, siting processes often do not provide enough time to meaningfully engage with decisionmaking. Available information is also often incredibly technical and of high volume, making it difficult to understand what is being proposed

and how input can best be provided. Creating collaborative processes that give impacted communities the ability to shape these projects is an important part of trust building and empowering frontline communities to share honest feedback. Therefore, we are supportive of the effort to create an Environmental Justice Toolkit for both communities and developers to provide guidance on best practices for clean energy development and offer the following comments for your consideration:

Section 2. Washington state context setting

- The clean energy in Washington section is well organized and easy to follow. We appreciate the inclusion of this background, since many frontline communities do not have the capacity to research existing state laws related to clean energy development and then conduct the analysis to determine how these laws are implemented on a statewide basis.
- The section on green hydrogen should include an important distinction in Washington's definition of green electrolytic hydrogen that is of particular importance to frontline communities. Washington's definition for "green electrolytic hydrogen" includes hydrogen produced through electrolysis and does not include hydrogen manufactured using steam reforming or any other conversion technology that produces hydrogen from a fossil fuel feedstock.¹ While the term "renewable hydrogen" is more aligned with standard definitions of green hydrogen by explicitly requiring electricity inputs be renewable², it is still important to highlight this definition because it increases the potential for harms stemming from the use of fossil fuels in production to be improperly assessed and mitigated in frontline communities. This distinction is particularly important given the way state definition is inconsistent with both national and global definitions of green hydrogen developed within similar timeframes³ that require electrolysis be powered through "near 100% renewable energy."⁴ Being clear about Washington's definition can prevent misleading communities who make assumptions on project-specific impacts based on common terminology.
- We are supportive of including "The case for collaboration" and the clear explanation of how working with communities is in a developer's best interest to move projects forward as efficiently as possible. It is important to emphasize the

¹ RCW 80.50.020(15)(a)-(b).

² RCW 80.50.020(22).

³ Green Hydrogen Organisation, Green Hydrogen Standard 2.0 - The Global Standard for Green Hydrogen and Green Hydrogen Derivatives (2023) at 5; Hydrogen Production: Electrolysis, U.S. Department of Energy, <https://www.energy.gov/eere/fuelcells/hydrogen-production-electrolysis>.

⁴ Ibid.

mutually beneficial nature of collaborative relationships, particularly when they are often framed as a courtesy to communities and Tribes.

Section 3. Developer guidance

- We are supportive of having separate sections for developers and community members to make this resource as useful as possible for multiple audiences.
- We support the discussion in the subsections “Decrease risk and reduce community opposition” and “Move through environmental review and permitting more efficiently” which emphasizes how community engagement is a critical component of clean energy development. The following resources further demonstrate this important point and could be used to strengthen this part of the Toolkit:
 - *Going slow to go fast: public response and engagement in renewable energy projects* (Nature Reviews Clean Technology)⁵
 - *The Energy Is About To Shift: Pathways to a Community-Centered, Resilient, and Decarbonized Grid for New England* (Acadia Center, Clean Air Task Force)⁶
 - *Engaging Communities In Renewable Energy Projects For Sustainable Development* (OSISA Journal)⁷
- We support the inclusion of a social characterization assessment as part of Building Block #1, particularly the point about the importance of understanding the community's relationship with development and developers. Understanding past harms is an important part of moving forward more responsible projects that are responsive to community priorities and needs.
- As part of Building Block #4, the Toolkit should also include ways to disseminate information outside of online forums. In some communities, internet access can

⁵ Boudet H, Hazboun S, Haggett C, Batel S. Going slow to go fast: public response and engagement in renewable energy projects. Nature Reviews Clean Technology; 2025 Nov. Available from: <https://www.nature.com/articles/s44359-025-00116-3>

⁶ Butterworth B, Dickerson J, Falkenburg N, Manitus N. The Energy Is About To Shift: Pathways to a Community-Centered, Resilient, and Decarbonized Grid for New England. Clean Air Task Force & Acadia Center; 2024. Available from: https://acadiacenter.wpenginepowered.com/wp-content/uploads/2024/11/AC_CATF_EnergyShift_Report_2024_R10-1.pdf

⁷ Uzorka A, Fakuade OV, Olaniyan AO. Engaging Communities In Renewable Energy Projects For Sustainable Development. OSISA Journal; 2024 Jan. Available from: https://www.researchgate.net/publication/378187892_Engaging_Communities_In_Renewable_Energy_Projects_For_Sustainable_Development.

be limited and utilizing public spaces like libraries, schools, or foodbanks, cultural newspapers or print publications, or radio shows are often an important way local communities are able to get information about upcoming events. While Table 1 is presented in a helpful format with the pros and cons of each communication channel, it would be helpful to add other forms of print channels so developers are aware of the wide range of opportunities to use existing avenues of communication.

- We recommend that elements of Building Block #5 be incorporated into all of the previous four. While it is helpful to have a distinct section on how developers can meet accessibility needs and increase inclusion through understanding cultural norms, it is important that developers understand this as an ongoing, integrated component that must be implemented throughout the entire development process. Identifying and collaborating with community leaders, transparency in the development process, and meaningful opportunities for engagement are all predicated on the community's ability to understand that information that is being provided. If the studies and plans being provided are not supplemented with translated materials, public meetings, facilitators, and/or the use of a third-party facilitator from the beginning, the developer is less likely to get the type of feedback and support that is necessary to move projects forward. Learning about the cultural and accessibility needs of a specific community should be part of the social characterization assessment recommended under Building Block #1, so the information gained early in the engagement process can be utilized throughout to increase trust and communication.

Sec. 4 Supporting community voices

- We are supportive of a section in the Toolkit focused on helping frontline communities engage in the development process, particularly in light of the acknowledgement that it can be difficult for communities to track projects without a single website or agency in charge of sharing information publicly.
- We appreciate the inclusion of Tables 2 and 3, particularly the examples of different types of community benefits that can be requested. Often, communities who are unfamiliar with the Community Benefit Agreement process do not know what it is possible to ask for and these examples are incredibly helpful.

We appreciate the opportunity to provide comments. Please do not hesitate to contact us if you have any questions.

Respectfully,

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