



September 18, 2026

Clean Energy Siting Council  
Department of Ecology  
State of Washington

**RE: [Draft Environmental Justice Toolkit for Clean Energy Projects](#)**

To Whom It May Concern:

Renewable Northwest (“RNW”) appreciates the opportunity to comment on the Interagency Clean Energy Siting Coordination Council’s (“ICESCC”) Draft Environmental Justice toolkit for Clean Energy Projects. RNW is a nonprofit advocacy organization with the mission to strengthen and expand clean energy infrastructure in the Pacific Northwest. We are a membership based organization, with diverse members spanning other nonprofit public interest organizations, clean energy infrastructure developers, tech companies, consultancies, manufacturers, and more. We would like to provide high level conceptual feedback on the toolkit in addition to comments on specific sections.

RNW believes that energy development should not come at the expense of Tribal rights, cultural resources, or the environment. We also believe that responsible clean energy development should always entail early and meaningful engagement with tribes and host communities. Overall, we are supportive of the toolkit but concerned by its targeted focus on the clean energy industry. We presume the ICESCC was tasked with focusing specifically on clean energy as a reflection of the state’s decarbonization policies and priorities.<sup>1</sup> While this is incredibly well intentioned, developing a toolkit just for *clean* energy development could create unintentional barriers for the State to meet our climate and clean energy goals.

RNW sees value in many of the environmental justice initiatives outlined in the toolkit, while also acknowledging that they require significant capital and time investments from project developers. This responsibility to Tribes and host communities also adds time to an already lengthy development process in Washington.<sup>2</sup> RNW does not oppose this on its face, however by only applying to clean energy projects, the toolkit is unintentionally making clean energy more expensive to develop than carbon-intensive energy technologies.

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<sup>1</sup> The Climate Commitment Act (2021) and Clean Energy Transformation Act (2019)

<sup>2</sup> Washington currently ranks 36th nationwide for share of electricity produced coming from renewable energy sources (not including hydroelectric dams), all while attempting to meet state policy objectives of being 100% clean by 2050. [See American Clean Power’s Washington Fact Sheet.](#)

If new requirements for energy development are potentially adding costs and increasing timelines in Washington, this should be consistent and shared across all energy development types. Utilities and regulators seek the energy resources that are the least cost and least risk to customers; when extra costs are added unevenly to clean energy and not to fossil fuels and other energy resources, we unfortunately make the clean energy transition more difficult and indirectly incentivize the construction of new fossil fuels. **If the state is intent upon an Environmental Justice toolkit, we strongly urge that it be applied across the board to all forms of energy development, and potentially other types of development projects as well.**

RNW would like to offer brief comments on the following sections:

## **Section 2. Washington state context setting**

We agree with the framing in this section and appreciate the added context of the state's action and needs around clean energy, including references to energy demand more than doubling by 2050, the need for transmission expansion, and the benefits of adding clean energy to the grid. We would like to offer the following insights:

1. The energy landscape subsection mentions "It is important to note that coal was phased out as an energy source in 2025." While this is true, the Centralia Power Plant remains on standby due to federal emergency orders.
2. We would suggest adding more information about the grid benefits of battery energy storage systems ("BESS").<sup>3</sup> They insulate ratepayers by increasing grid flexibility and reliability during periods of high demand and extreme weather. BESS reduces the need for costly system upgrades and helps keep electricity rates low.
3. Under "Environmental Justice in Washington," it may be helpful to add historical context around hydropower development in Washington and how that history of injustice continues to affect perceptions of energy development today. As the HEAL Act integrates environmental justice into Ecology's work, we recommend the toolkit include the benefits of a clean energy transition to environmental health outcomes.<sup>4</sup>

## **Section 3. Developer guidance**

Overall, RNW is concerned that this section of the toolkit does not accurately represent the development process, the realities of our electricity system, and the timelines that developers

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<sup>3</sup> Renewable NW has multiple resources on the value of BESS in the region on its website: <https://renewablenw.org/factsheets>.

<sup>4</sup> 1 out of 5 Washingtonians living in fossil fuel communities are also considered disadvantaged communities, meaning they may have disproportionate poverty rates, health problems, or excessive air pollution. See the World Resources Institute's data analysis on [Fossil Fuel-producing Communities Face a 'Cumulative Burden' of Pollution, Poor Health and Job Loss in the US](#) for more.

face when exploring potential project sites. Before engaging with communities, developers must first determine if siting a project in a given location is even possible. Factors such as the ability to interconnect to transmission and the strength of the wind or solar resource are foundational to project siting. Engagement before these criteria are determined could ultimately harm communities if early expectations are set that cannot be met. This is a waste of the community and the developer's time and resources.

If this section is updated to meet the realities of the development process, the building blocks could be helpful guidance tools for developers. However, this is not a regulatory document and we are concerned that outlining "developer guidance" means this toolkit can become an avenue for project opponents arguing that a developer is not following best practices laid out by the state. We highly recommend developers and local communities address environmental justice and community benefit outcomes together.

We are especially concerned by the language on page 25, where the toolkit states: *"While this toolkit provides a starting point for developers to understand common concerns that communities may have with clean energy projects, **it is essential for developers to validate those concerns and to address impacts with the specific communities and Tribes potentially affected by a project.**"* We would suggest that this be framed differently as this current language is overly expansive. For example, there may be concerns raised that are outside the scope of the project and do not warrant validation, and addressing impacts with communities and tribes *potentially* impacted is excessive. We would suggest keeping the scope focused on reasonably expected impacts and updated language of *"we encourage developers to listen and understand those concerns and to seek reasonable solutions to address any impacts with the local communities and Tribes affected by a project."*

#### **Section 4. Supporting community voices**

We appreciate the positive community outcomes of clean energy development being included here, such as improved health outcomes from reduced fossil fuels, economic and tax benefits, and community benefits.

#### **Section 5. Community benefits plan guidance**

RNW believes that community benefit agreements should always be negotiated directly between the community or Tribe and the developer, as the negotiation process builds a foundation for a longstanding relationship. While benefit agreements are absolutely beneficial to negotiate, they are also time and capital intensive. As mentioned above, this cost should not be only placed on the clean energy industry and not other types of energy development. Equally, the cost of community benefit agreements should be balanced with the understanding that these costs - which are development costs - will ultimately be recovered in the form of utility rates. It is important to ensure that those impacted projects are consulted and see benefits from the projects while also balancing this with maintaining an affordable and reliable clean energy future.

We appreciate the opportunity to provide feedback and that the ICESCC is making efforts towards a responsibly developed clean energy future for Washington. RNW supports the principle of the toolkit, but we remain concerned by potential impacts to meeting the State's clean energy goals. If you have any questions or would like to discuss our comments, please do not hesitate to reach out.

Sincerely,

Diane Brandt  
Policy and Legislative Director  
Renewable Northwest