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To: Amelia Fujikawa, Clean Energy Specialist
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Transmitted Via Comment Portal: <https://ecology.commentinput.com/?id=Vt8GiBShD>

September 18, 2026

RE: Draft Environmental Justice Toolkit for Clean Energy Projects

Dear Ms. Fujikawa,

Thank you for taking the time to consider our comment on the Draft Environmental Justice Toolkit for Clean Energy Projects.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Waterkeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

RE Sources appreciates this effort to elevate the importance of community involvement in clean energy project development—the purpose this toolkit serves when written as is. With the changes suggested below, we hope that the final version of this toolkit will be helpful in providing a roadmap for engagement between developers and community members, as well as tools for identifying and addressing issues of environmental justice and disproportionate harm to communities within the project area. Along those lines, we have recommendations for strengthening both the developer and community voices portions of

the toolkit to provide more detail about opportunities and approaches to promote meaningful engagement.

Strengths

The draft contains a number of strong components that bolster the utility of the toolkit.

- **Context-setting and permitting process explanation:** Section 2 “Washington State Context Setting” provides a helpful overview to the clean energy context, legislation, and permitting process in Washington. This context may be helpful to both community members and developers looking to better understand the context and process in Washington.
- **Helpful resources provided:** Helpful resources and external tools are provided throughout the toolkit, including the Washington Environmental Health Disparities Map and RMI’s Community Benefits Catalogue. These tools and others are useful for gaining more context about communities, and providing inspiration and context for what collaboration can look like.
- **Recommendation for aggregated Washington State website for Clean Energy Projects:** While this was only briefly mentioned in the toolkit, we support the Environmental Justice Council’s recommendation to build a state website with information about all clean energy projects to streamline information gathering about various proposed projects for community members. This would make it more accessible and streamlined to learn about a variety of different projects going through the approval process.

Opportunities to Strengthen

Several areas in the toolkit could benefit from expansion to provide a roadmap for collaboration between communities and developers.

- **Increase information about engagement points in project timelines for community members:** While the toolkit explains the permitting process in beginning sections, it does not explain this in the Support for Communities Engaging in Clean Energy Development section. This section could be strengthened by explaining when in the process there are opportunities for engagement, and what kind of feedback is taken into account at those different points in the process. Expanding this section to provide a roadmap with specific steps for engagement in different stages of the permitting and development process that someone without

experience in this process could follow would allow this to be a substantial and beneficial resource to communities looking to meaningfully engage in the permitting process for projects in their community. More clarity around how and when to weigh in during the permitting process would make providing feedback more accessible and clear to community members. It would also benefit developers and government entities — when the goals of each public comment period are clear and well understood, public comments are more focused and timely, making it easier to consider and implement.

- **Increase information about ways to engage the community for developers:**

Similar to the Community Voices section, the Developer Guidance section could be expanded to include more guidance on what a robust engagement program looks like for clean energy development. While there are many ideas and examples for engagement in the toolkit, more specifics are needed to conceptualize what collaboration and engagement would require and what the steps could look like. While collaboration will look different for all projects, building out the implementation details in the case studies in particular could help those looking for more support to understand what one example of collaboration looked like. This could include details like how many meetings were held, how the developer reached out to participants, any questions asked or conversations had that they felt led to the most meaningful exchanges between the community and the developer, etc.

- **Consider expanding environmental justice focus, or changing the name of the toolkit, to better reflect the content:** This toolkit is currently labeled as an environmental justice toolkit, but its contents are closer to a toolkit on collaboration and engagement between communities hosting clean energy projects and those developing those projects. While both approaches are valuable, and a very well-conducted collaborative process ideally does uncover and potentially address issues of environmental justice and disproportionate impact, the toolkit as drafted does not explicitly address environmental justice topics. Taking the name at face value for a toolkit that does not contain actionable tools for identifying and mitigating impacts of projects on communities already experiencing disproportionate environmental and health impacts may serve to minimize those impacts. Additionally, the name could lead developers to believe they have taken environmental justice into consideration in their project development process without having considered these important aspects. Consider either expanding the

toolkit to include a substantial section on assessing and addressing environmental justice impacts or renaming the toolkit according to its current contents. If the toolkit is not expanded in these areas, calling it a toolkit for community and developer collaboration for clean energy projects would be more accurate.

Conclusion

RE Sources appreciates the Clean Energy Council's recognition of the importance of cooperation and collaboration between developers and community members to improve the process of building clean energy. A more collaborative process that includes community knowledge and concerns can not only ease the process of permitting a project but also result in a stronger project better suited to address the needs of, and provide real benefits to, the host community. This toolkit can help to provide a strong foundation for beginning to make more widespread community-driven development a reality in Washington.

Thank you for your consideration of our feedback. Please feel free to reach out with any questions to heatherwl@re-sources.org, kaiah@re-sources.org, or sethm@re-sources.org.

Sincerely,

Heather Witzel Lakin, Resilient Infrastructure Policy Manager
Kaia Hayes, Land and Water Policy Manager
Seth Mangold, Community Engagement Specialist