



June 28, 2026

Renewable Northwest (RNW) appreciates the opportunity to comment on the Interagency Clean Energy Siting Coordination Council's [Draft Recommendation Ideas](#) for the 2026 Annual Legislative Report. RNW is a regional 501c(3) nonprofit organization that advocates for the rapid and responsible decarbonization of the electricity grid in the Northwest. We are a membership based organization, and our members include clean energy infrastructure developers, industry related businesses, and other public interest organizations.

As clean energy advocates, we appreciate this effort to improve the efficiency and effectiveness of siting and permitting in Washington, particularly amid a constrained budget environment. We applaud the state's commitment to reducing these barriers so we can ultimately achieve Clean Energy Transformation Act requirements.

Below we offer brief feedback on each of the Council's recommendations:

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

RNW agrees that funding for permitting agencies is essential to timely and efficient processing. RNW agrees with the Council's recommendation to restore funding to agencies for participation in the Council, whose funding was reduced or eliminated in recent budgets. Funding for permitting agencies could also be tied to increased clarity and specified timelines for each agency's role in the permitting process.

2. Develop Washington's clean energy information portal

RNW agrees that it would be helpful to have a central website containing project and permitting information, as well as resources for developers and the public regarding permitting and points of contact. It would be helpful to include information about project timelines, which would provide the public with government accountability measures.

3. Produce a Programmatic Environmental Impact Statement (PEIS) and provide technical assistance for local and tribal planning for stand-alone battery energy storage systems

RNW agrees that it would be helpful for the state to provide educational resources, tools, and best practices to tribes and local governments regarding battery energy storage systems (BESS). RNW engages in this educational work frequently throughout counties and cities in the states, but as a small nonprofit with limited staff capacity and resources, we can only do so much. BESS ordinances

and moratoriums are proliferating throughout Washington counties, and trusted resources from the state would be very helpful. We support the development of a PEIS for stand-alone BESS; in order to be most effective, it must provide certainty and clarity for developers.

RNW is also interested in the legislature codifying statewide standards for emergency response and safety for BESS. This could reduce the pressure for counties to adopt their own standards, and would help ensure that standards are reasonable and workable. Responsible developers are already taking these steps on their own, so codifying those measures would simply assure communities that these steps are or will be taken.

4. Develop public information to address safety and other concerns regarding clean energy technologies

Similar to recommendation 3, RNW agrees that general trusted information provided by the state would be helpful for all clean energy types. We would encourage collaboration with the clean energy industry to ensure the information is in line with the most current industry standards, as these technologies (particularly BESS) are evolving.

5. Create a toolkit for developers to guide them through the pre-application, development, engagement, and permitting process

RNW believes this recommendation could be helpful, so long as the toolkit does not add new layers of expectations for developers. Expected timelines and decision-points that may include longer timelines than expected or ambiguous results would be helpful for setting expectations with developers. Engagement guidance, particularly around Tribal consultation, would be helpful for developers new to the state.

6. Identify opportunities and risks for siting emerging clean energy technologies through a collaborative process

Given that the geothermal collaborative process is ongoing and that Commerce is conducting offshore wind supply chain and stakeholder related work, this recommendation may not need to be prioritized, given the current budget environment. It could be helpful to identify any additional long-lead clean energy resources that may need further examination.

7. Advance community benefit agreements by collaboratively developing guidance and best practices

RNW generally agrees with this recommendation but urges nuanced CBA guidance. While community benefit agreements (CBAs) are a standard and very helpful component of clean energy siting, their appropriateness, cost, and reception vary from community to community. CBAs are best negotiated between a developer and the host community directly. Guidance from Commerce

or other agencies would be helpful for communities navigating the CBA process, but should not overpromise what communities should expect out of agreements, since their size and scope will vary depending upon the project size, location, and the community's needs. Realistic input from developers is essential in any guidance that is created. Affordability should also be a consideration, as these increased project costs can ultimately raise the cost of electricity for ratepayers outside of the host community. It may also be helpful for this guidance to include information about the other benefits of clean energy projects, including tax revenue (and additional revenue opportunities via H.B. 1960), job creation, and infrastructure improvement.

Additionally, the expectation of CBAs can inadvertently put a higher cost and burden on clean energy development compared to natural gas or other thermal resource development, which are generally not being asked to develop these agreements. If recommendations are being developed for wind, solar, and BESS resources, we ask for parity with natural gas, coal, and nuclear projects.

8. Promote energy development in agricultural pivot corners

We support this recommendation but caution its limited applicability to the development of large, utility-scale generation that is needed to adequately meet rising electricity demand. The typical size of these projects is around 5MW. Most utility-scale developers would not utilize this opportunity. Instead, RNW is interested in GMA interpretation or amendment that would allow the siting of clean energy projects on agricultural lands with the use of agrivoltaics. We would also be interested in GMA amendments that would provide counties with greater local control to site clean energy projects on unused or unsuitable agricultural lands.

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

RNW strongly supports this recommendation and any opportunities for expanding our transmission capacity, the largest bottleneck to bringing clean energy resources online. While we are excited by the potential for the Washington Electric Transmission Authority (WETA) to fill important gaps in our state's transmission infrastructure, the Council should make additional recommendations to meet our urgently growing transmission needs, as the WETA will take some time to be fully running.

RNW also continues to strongly support a SEPA categorical exemption for reconducting existing transmission lines, which can greatly increase transmission capacity with minimal impacts to habitat and other resources.

10. Encourage siting of clean energy facilities near emerging large energy use facilities

RNW supports this recommendation, although it will not always be practical or feasible for clean energy facilities to be sited near emerging large loads. We would encourage the explicit mention of the usefulness of BESS systems to help meet capacity needs amid transmission constraints.

11. Assess opportunities to reduce litigation delays

RNW strongly supports this recommendation and would appreciate the results of such an assessment to be made available to the public.

12. Support geothermal collaborative process recommendations

RNW supports this recommendation, and we are eager to identify ways to support advanced geothermal in Washington. We are also interested in establishing a Northwest Geothermal Collaborative with neighboring states, similar to the Intermountain West Geothermal Consortium that was recently established. Interstate collaboration can be very beneficial for emerging resources, as supply chains, workforces, and expertise are established.

13. Identify mechanisms to effectively protect vital habitat, including shrub steppe, while supporting clean energy development

RNW would appreciate the ICESCC reevaluating habitat mitigation measures related to clean energy, particularly WDFW's Wind and Solar Siting Guidelines, which the overwhelming majority of clean energy developers in RNW membership have found to be overly burdensome and restrictive. We had serious concerns about WDFW's process for developing the guidelines, which lacked public transparency and provided few direct opportunities for meaningful industry feedback. If meeting the state's clean energy targets laid out in the Clean Energy Transformation Act is a priority, then the state must right-size these guidelines in order to accomplish them. Responsible development is central to RNW's mission, and developers routinely adhere to required avoidance and mitigation measures as well as additional, voluntary conservation efforts and community benefit agreements. States like [Colorado](#) have reasonable wildlife guidelines that developers find workable and usable, which Washington could seek to emulate. WDFW's guidelines introduce significant uncertainty, expense, and siting concerns that RNW views as unworkable and ultimately threatening to the state's clean energy development pipeline. We recommend that the guidelines be withdrawn and the agency directed to revise them with industry collaboration in a public process.

If considering the value of declining habitat in the siting of clean energy projects, we urge the state to consider the consequences of worsening climate change on these habitats. While development comes with certain impacts (which are often avoided or mitigated), climate change has serious cascading impacts.

RNW also believes that Washington should explore opportunities for mitigation banking, as well as its limitations around conservation easements. There could be additional opportunity to explore options for third party mitigation activity.

Thank you for your consideration of our comments on the Council's 2026 Annual Legislative Report recommendations. We are happy to provide further detail or discuss any of our comments. We look forward to collaborating with the Council and each of the Agencies as the legislature considers the final recommendations.

Sincerely,

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Renewable Northwest