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Dear EFSEC Council,

In preparation for the Cascade Renewable Transmission project (CRT) update at the December 17<sup>th</sup> Council meeting, staff have prepared associated processes, as well as some additional information on our current work with the hope that this context supports your review.

Pre-Application Background:

[RCW 80.50.330](#) and [340](#) impose unique preapplication requirements on developers proposing electric transmission facilities, including a requirement to attempt to negotiate the facility route with local governments. EFSEC has adopted [WAC 463-61 \(Electrical Transmission Facilities\)](#) to guide this process. Over the last couple of years, the applicant took various actions in an effort to meet these requirements. CRT and EFSEC staff met for an initial consultation in September of 2023. After this meeting, in December 2023, Cascade Renewable submitted its pre-application request, pre-application plan, and pre-application deposit of \$10,000.

Pre-application stakeholder notification as required under WAC 463-61-060, occurred within three days of filing with EFSEC. According to CRT pre-application materials, CRT mailed pre-application notices to:

- landowners within 300 feet of the proposed corridor,
- seven cities and three counties along the river corridor,
- relevant tribes, agencies, and other stakeholders.

Copies of the notice were also filed with Skamania, Clark, and Klickitat Counties, and the cities of Stevenson, North Bonneville, Camas, Washougal, Bingen, and White Salmon.

Vancouver was initially notified, though, according to the CRT pre-application materials filed with EFSEC, it was established early on that the route did not pass through Vancouver city limits, and route negotiations did not continue after that.

Section 2.5 of the CRT September 2025 application for site certification (ASC) summarizes pre-application coordination results.

Additional public informational hearings were held under the pre-application requirements for transmission lines in Clark County, Skamania County, and Klickitat County on February 6, 7, and 8, 2024, respectively. These were attended by then Chair Kathleen Drew and EFSEC

Staff. Documents pertaining to these initial meetings may be found within the pre-application section of the Council SharePoint [here](#). You can also find documentation of the required route negotiations in the Council SharePoint.

#### CRT November 17-19 Public Hearings De-Brief:

I would also like to provide some information regarding the comments received during the November 2025 CRT public hearings. As to comments that the application is a draft and these hearings were scheduled prematurely, we recognize that the application materials were marked with the term “draft.” However, EFSEC considers the materials received to be the formal application submission based on our authorizing statute. In addition to pre-submission communications with the applicant confirming application details (e.g., number of copies, etc.), we received a transmittal memo marking the package as for EFSEC’s use. We also received the deposit of \$50,000 which [RCW 80.50.071\(1\)\(a\)](#) requires an applicant to submit “at the time of application submission.”

We have traditionally used the date of receipt of application materials and the deposit as the relevant date for scheduling public informational meetings required by law. [RCW 80.50.090\(1\)](#) provides that: “The council shall conduct an informational public hearing in the county of the proposed site as soon as practicable but not later than sixty days after *receipt of an application for site certification*.” (Emphasis added.) We also will have begun additional outreach to local jurisdictions, partner agencies, and tribes, as directed by statute to notify these parties upon receipt of an application. The statutory requirement to hold a public informational meeting does not make reference to whether or not the application is complete. This is in contrast with language in [RCW 80.50.100\(1\)\(a\)](#) that states EFSEC shall report to the governor its recommendation within 12 months of receipt of an application “deemed complete by the director.” That completeness review can take months due to the length and complexity of most applications before EFSEC. If the staff were to hold off scheduling the initial informational hearings until the determination that an application is complete enough to proceed, there would be risk of violating RCW 80.50.090 stating that the hearings shall occur within the 60 days following “receipt of an application.” Also, public comments received at the public informational hearing can help inform the Director’s determination of whether the application is complete or whether there are potential project impacts that require further information.

#### Current CRT Project Status:

Since holding the public informational and land use hearings in Clark, Skamania, and Klickitat County on November 17, 18, 19 respectively, EFSEC staff have completed a review of comments received alongside our review of the application materials. We are working with our consultant and AAGs to develop a land-use-specific data request to be sent to the Applicant. We believe this additional information is necessary to have a complete record in


support of the Council's land use consistency determination. We will be providing the applicant's responses to both the Council and the public in early 2026, likely in late January or February. The Council may wish to afford those parties that commented on the subject of land use consistency a chance to respond to the additional information provided by the applicant in response to EFSEC staff's data requests, and for the applicant to reply to those responses before the administrative law judge drafts a determination on land use consistency for the Council's consideration.

While further developing that record for the Council's land use consistency determination, staff are also working to identify the full composition of the CRT Project Council. Staff have sent additional EFSEC outreach letters to local jurisdictions which made the requirement for local participation more explicit than previous notifications. The Port of Skamania letter invited the port to appoint a non-voting member. Letters to the cities of Stevenson, Camas, and Bingen indicated that the line appears to pass through their city limits and that they shall appoint a Council member. Cities of Washougal and White Salmon letters indicated that we do not believe the proposed line passes through their jurisdiction, however if they disagree, we have requested additional discussions to clarify the final decision. Lastly, staff are working with City of North Bonneville staff to determine whether or not the route passes through city limits. We believe it does, but on federal property. As a result, city staff have questions on how this federal interface applies to city land use codes and the city's participation for this project.

Once the full composition of the project council is established, staff propose that we hold additional public comment on the supplemented land use information as described above, and if the Council desires, we can schedule an additional land use hearing.

We hope this information finds you well and staff are available to answer any questions you may have.

Best wishes,

  
Ami Hafkemeyer  
Director of Siting and Compliance