



**DEPARTMENT OF
NATURAL
RESOURCES**

**Aquatic Resources
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September 9, 2025

Cascade Renewable Transmission, LLC
Attn: Chris Hocker
501 Kings Highway East, Ste 300
Fairfield, CT 06825

CERTIFIED MAIL
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Subject: Proposed Electrical Transmission Cables and Fiber Optic Lines for Cascade Renewable Transmission, LLC

Dear Mr. Hocker,

Thank you for the opportunity to preliminarily review your proposed project to install a 12-inch high-voltage direct current transmission cable throughout approximately 78 miles of Columbia River bedlands, shorelands and tidelands to interconnect existing substations located in The Dalles, Oregon and Portland, Oregon. As currently proposed, the cable in the Columbia River will frequently cross back and forth between the Washington and Oregon state borders. The proposal would encumber approximately 32 miles of Washington state-owned aquatic lands.

Based on the limited information DNR has received at this point, DNR has concerns regarding the resulting benefits and impacts this project presents to state-owned aquatic lands.

DNR manages 2.6 million acres of state-owned aquatic lands and is required under RCW 79.105.030 to provide a balance between various public benefits, including encouraging direct public use and access, fostering water-dependent uses, ensuring environmental protection, and utilizing renewable resources. Based on the information provided, however, DNR fails to see how this project fits within the management guidelines set forth in RCW 79.105.030 or how encumbering miles of state-owned aquatic lands would generally benefit Washingtonians.

In addition, RCW 79.105.210 directs DNR to "consider the natural values of state-owned aquatic lands as wildlife habitat, natural area preserve, representative ecosystem, or spawning area prior to . . . authorizing any change in use." The Columbia River is a major migratory corridor that provides important habitat for both migrating adult spawners and out-migrating juvenile salmonids among other sensitive aquatic species. Given what we know about your proposal at this time, it seems unlikely this project can avoid significant impacts to a point where the natural values for management of state-owned aquatic lands discussed above can be protected.

Currently, there is an existing utility corridor that runs alongside I-84 and the Columbia River from The Dalles area to Portland. This existing corridor is already used for this purpose. As proposed,

a trenched cable in the Columbia River would create a completely new utility corridor that will significantly burden the State of Washington and its highly valued state-owned aquatic lands.

At this point – and, again, based on the information supplied to date – DNR questions whether any potential benefits from this project would outweigh the potential burdens to state-owned aquatic lands. We, therefore, strongly encourage you to submit a completed Joint Aquatic Resources Permit Application (JARPA) to DNR with all relevant project details as soon as possible so DNR can thoroughly review your proposed project.

While we understand that you are seeking site certification pursuant to Chapter 80.50 RCW, such certification does not preempt DNR's management authority over state-owned aquatic lands which is proprietary in nature. *See Columbia Riverkeeper v. Port of Vancouver USA*, 188 Wn.2d 80, 98-99, 392 P.3d 1025 (2017) (Chapter 80.50 RCW only preempts regulation and certification matters relating to energy facility sites). DNR therefore cautions that you run the risk of investing resources into this project where DNR may not authorize the use or encumbrance of the state-owned aquatic lands.

As indicated above, DNR's review of the project has been preliminary to date and no final decision has been made concerning your proposal. DNR will provide a formal response once a JARPA is received and reviewed.

Please feel free to contact me with any questions.

Sincerely,



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Cc: DNR Title and Records Office