



# Clean water. Healthy rivers.

December 5, 2025

Energy Facility Site Evaluation Council (EFSEC)  
PO Box 43172  
Olympia, Washington 98503-3172

*Submitted via email at [comments@efsec.wa.gov](mailto:comments@efsec.wa.gov)*

**RE: Cascade Renewable Transmission EFSEC Docket No. 23002, Draft Application for Site Certification**

Dear Chair Beckett and Members of the Council,

Columbia Riverkeeper submits these comments in Energy Facility Site Evaluation Council (“EFSEC”) Docket No. 23002, regarding Cascade Renewable LLC’s (“the Applicant”) draft application (“Draft Application”) for a transmission cable running from the Dalles, Oregon, to Portland, Oregon, primarily through the bed of the Columbia River (“the Cable” or “the Power line”). These comments address the completeness of the Draft Application.

## INTRODUCTION

Columbia Riverkeeper is a nonprofit whose mission is to protect and restore the Columbia River and all life associated with it, from its headwaters to the Pacific Ocean. We are committed to clean water, strong salmon runs, and healthy communities. Columbia Riverkeeper represents roughly 20,000 members and supporters in Oregon and Washington and regularly engages in decisions and policies impacting the water quality of the Columbia River Basin.

EFSEC must deem the Draft Application incomplete and suspend review of the Draft Application. The Draft Application fails to substantially comply with multiple explicit requirements for an application for site certification in WAC Chapter 463-60. The Draft Application provides insufficient baseline information for the Cable route, including a void of site-specific data on fish habitat in the Columbia River (“the River”), and fails to adequately characterize potential impacts of the project. The Draft Application also impermissibly fails to include internal studies that it relies on, fails to include a complete analysis of project

---

**HOOD RIVER OFFICE**  
P.O. Box 950  
Hood River, OR 97031  
(541) 387-3030

**PORTLAND OFFICE**  
1125 SE Madison St, 103A  
Portland, OR 97214  
(503) 432-8927

[Columbiamriverkeeper.org](http://Columbiamriverkeeper.org)  
[info@columbiamriverkeeper.org](mailto:info@columbiamriverkeeper.org)

alternatives, and fails to demonstrate the required engagement with local governments and the public.

## DISCUSSION

In order for EFSEC to start review of an application, the application must establish that it “substantially compl[ies]” with each of the sections in WAC Chapter 463-60. If the application does not comply with EFECs rules, the application must explain why the rule at issue does not apply to the project or ask for a waiver from EFSEC. An application for site certification must be “complete” on submission.<sup>1</sup>

Each of the following sections discusses ways in which the Draft Application is incomplete and far from substantial compliance with the requirements of WAC Chapter 463-60.

### **I. The Draft Application includes insufficient baseline information for the site of the proposed transmission line.**

The Draft Application lacks site-specific information on the baseline physical and environmental characteristics along the pathway of the Power line. The Draft Application includes no site-specific data on the in-water portions of the Cable. The handful of studies of the landward portions of the Cable site are cursory. For many specific categories of baseline site information required in an application by WAC Chapter 463-60, the Draft Application does not even attempt to comply nor does it explain why that information is not included.<sup>2</sup> For these reasons, the Draft Application does not include the requisite “*detailed*” site-specific information for the site’s geology and soils, fish and wildlife, or water.<sup>3</sup>

#### A. The Draft Application does not include necessary information regarding the geology and soils of the proposed site (WAC 463-60-302).

WAC 463-60-302 requires applications for site certification to include “*detailed*” baseline information regarding the natural environment for the site of the proposed project.<sup>4</sup> This information must include a “comprehensive geologic survey showing conditions at the site, the nature of the foundation materials, and potential seismic activities,” as well as a description of soils on site.<sup>5</sup>

The Draft Application does not comply with this standard. The Draft Application does not even attempt to satisfy these requirements for the in-river portions of the Cable. And for the

---

<sup>1</sup> WAC 463-60-116.

<sup>2</sup> For example, the Draft Application does not include fish and wildlife surveys at multiple times of the year, as required by WAC 463-60-332 and WAC 463-62-040(f), or any geologic information in the River, as required by WAC 463-60-302. These issues are discussed in more detail below.

<sup>3</sup> WAC 463-60-302 (for the natural environment and earth, generally); WAC 463-60-332 (for fish and wildlife and associated habitat); and WAC 463-60-322 (for water resources) (emphasis added)

<sup>4</sup> WAC 463-60-302 to -535 (emphasis added).

<sup>5</sup> WAC 463-60-302(1)(a).

landward portions, the Draft Application includes only general information collected from other sources that does not describe actual conditions at the Site.

The Applicant incorrectly argues that it does not need to analyze the soil or geologic conditions of the portion of the Power line in the river—the majority of the project—because the sources of information it looked at did not include information on the riverbed. Its reasoning for this consists of a single sentence: “the Columbia River, as a water body, does not have soil or geologic units associated with it, it is identified as as ‘water’ in databases reviewed.”<sup>6</sup> This argument is in clear contradiction to the language of WAC 463-60-302, which applies to the full project site and does not exempt submerged sites. It does not matter what “databases” the Applicant reviewed; the requirement is for the Applicant to conduct its own “survey[s]” to supply this information for the project site.<sup>7</sup>

Critical information is missing because of the lack of in-water geological information in the Draft Application. For example, the Draft Application admits that there are portions of the river, which consist of bedrock or large boulders, that will prevent Cable burial.<sup>8</sup> In these places, the Power line will be directly exposed, magnifying heat and EMF impacts to fish, as discussed below. However, the Draft Application includes no conclusive information regarding exactly where these portions are or how long they will have to be. The Applicant only mentions one 2.4 mile area that is “*potentially* rocky river bottom.”<sup>9</sup> Likewise, the Applicant includes no description of soils in other sections of the site area, including any information regarding potential contaminants in those soils.<sup>10</sup>

Even for the parts of Cable on the land, the Draft Application’s information regarding the earth does not comply with WAC 463-60-302. Again, the requirement is for “detailed,” site-specific information, including Applicant-conducted surveys. The Draft Application includes only general information about the vicinity of the project area based on a review of publicly available information. There is no description, for example, of the geology or soils that they will actually be encountering when placing the underground cable, and whether that geology will be an obstacle.

**B. The Draft Application is missing required information regarding habitat, vegetation, fish, and wildlife (WAC 463-60-332).**

WAC 463-60-332 requires applications for site certification to include “*detailed* description[s] of habitats and species present on and adjacent to the project site, including identification of habitats and species present, relative cover, density, distribution, and health and

---

<sup>6</sup> Draft Application at 3-1.

<sup>7</sup> WAC 463-62-040(f); WAC 463-60-332 (application must include information on “habitats and species present, relative cover, density, distribution, health and vigor”).

<sup>8</sup> Draft Application at 2-43 to 2-44.

<sup>9</sup> Draft Application at 2-43 to 2-44.

<sup>10</sup> As discussed below, in a different section the Draft Application does reference to soil studies performed, but these are not included nor described in detail in the Draft Application.

vigor.”<sup>11</sup> This must include fish and wildlife surveys that are conducted during “all seasons” of the year.<sup>12</sup>

The Applicant includes no surveys or other site-specific habitat or count information for fish and other organisms in the River. For the landward portions of the Power line, the Draft Application includes one habitat study where their consultant walked right-of-ways along which the Cable will be sited, in one instance.

There is no site-specific information regarding fish presence or habitat on the in-river portions of the project. The only information included in the Draft Application regarding fish habitat and presence is from general sources regarding fish in the river.<sup>13</sup> In some places, the Draft Application hypothesizes what aquatic species may be present on the Site.<sup>14</sup> But the Draft Application includes no fish counts or actual analysis of habitat conditions along the pathway of the Cable. Notably, even the general information that is included is incomplete. The Applicant, for example, does not list green sturgeon as occurring in the project area—despite it being well-established that ESA-listed green sturgeon are present in the River starting below the Bonneville Dam.<sup>15</sup>

For the landward portions of the Cable, the Draft Habitat, Fish, and Wildlife Report includes at least some analysis of actual site conditions. However, as the report itself admits, “[s]urveys for locating or enumerating individual animals or plants were not part of this effort. Field surveys focused on ground-truthing forest habitat from the desktop analysis described above and include incidental observations for species and sign, including nests, burrows, etc.”<sup>16</sup> In other words, no effort was made in these studies to actually document “species present, relative cover, density, distribution, and health and vigor” as required by WAC 463-60-332(1)(a).

The Draft Application lacks the requisite detailed information regarding fish and wildlife presence and habitat. The Draft Application also plainly fails to comply with the requirement to conduct fish and wildlife surveys in all seasons of the year—they conducted no such surveys in

---

<sup>11</sup> WAC 463-60-332(1)(a) (emphasis added).

<sup>12</sup> WAC 463-62-040(f).

<sup>13</sup> See Draft Application at Section 3.4.1, Appendix H.

<sup>14</sup> See, e.g., Draft Application at 3-59 (hypothesizing, based on one study, why the Applicant thinks impacts to larval lamprey from the project will be low).

<sup>15</sup> Draft Application, Appendix H at 21 (listing federally listed aquatic species expected in the project area). It is true that the Cable site is not within the designated critical habitat for the Southern Population Green Sturgeon because the Lower Columbia River from river kilometer 74 to the Bonneville Dam was excluded from the critical habitat listing because the conservation value was judged to be low compared to the economic impact. *Endangered and Threatened Wildlife and Plants: Final Rulemaking To Designate Critical Habitat for the Threatened Southern Distinct Population Segment of North American Green Sturgeon*, 74 Fed. Reg. 52304-05 (Oct. 9, 2009), available at <https://www.federalregister.gov/documents/2009/10/09/E9-24067/endangered-and-threatened-wildlife-and-plants-final-rulemaking-to-designate-critical-habitat-for-the>. However, there is no dispute that the area still contains the threatened fish, even if in less numbers than the lower section of the River. *Id.* And some more recent research emphasizes the importance of the full stretch of the river below the Bonneville Dam to green sturgeon. Andrea D. Schreier & Peter Stevens, *Further Evidence for Lower Columbia River Green Sturgeon Spawning*, *Environmental Biology of Fishes* (Jan. 4, 2020).

<sup>16</sup> Draft Application, Appendix H at 4.

the river, and only one general survey, at an unspecified time of year, on landward portions of the Cable. This does not substantially comply with WAC 463-60-332.

C. The Draft Application is missing required information about the aquatic environment (WAC 463-60-322).

WAC 463-60-322 requires applications to include “*detailed* descriptions of the affected natural water environment,” including all “background water quality data pertinent to the site.” Once again for the in-river portions of the Power line, the Draft Application does not include any site-specific studies or data, and just references general information regarding the River.

The Draft Application’s discussion of the character of the 78.8 miles of the River that the Cable will run through is three pages long.<sup>17</sup> It does not include specific information regarding depth, temperature, or baseline water quality data for any of this span. Instead, just as with the soil and geology and fish and wildlife requirements discussed above, the Draft Application improperly eschews detailed site-specific analysis and study for general information about the surrounding area of the site collected from public sources. This does not substantially comply with EFSEC’s requirements.

The lack of any site-specific information regarding the Cable in the River for soils and geology, fish and wildlife, or water, requires EFSEC to suspend review of the Draft Application until the Applicant submits a complete Application.

**II. The Draft Application includes insufficient information on the environmental impact of the proposed transmission line.**

WAC 463-60-302 to 342 require “detailed” analyses of environmental impacts to earth, air, water, fish and wildlife, wetlands, and energy and natural resources in an application for site certification. For example, WAC 463-60-332, for “habitat, vegetation, fish, and wildlife,” requires “a detailed discussion of temporary, permanent, direct, and indirect impacts on habitat, species present and their use of the habitat during construction, operation, and decommissioning of the energy facility.”

Ultimately, the evaluation of project impacts in the Draft Application must be sufficient to “demonstrate no net loss of fish and wildlife habitat function and value.”<sup>18</sup> Plans for how the Applicant will mitigate project impacts are required in the Draft Application and must show how the project “will achieve equivalent or greater habitat quality value, and function for those habitats being impacted.”<sup>19</sup> This information is needed in order for EFSEC to achieve its statutorily-mandated goal to “preserve and protect the quality of the environment; to enhance the public's opportunity to enjoy the esthetic and recreational benefits of the air, water and land

---

<sup>17</sup> Draft Application at 3-31 to 3-34.

<sup>18</sup> WAC 463-62-040(2)(a).

<sup>19</sup> WAC 463-60-332(3)(c).

resources; to promote air cleanliness; to pursue beneficial changes in the environment; and to promote environmental justice for overburdened communities.”<sup>20</sup>

The Draft Application falls far short of including sufficient information to even begin to understand the impacts of the Cable. It lacks detailed information on the impacts from temperature increases, suspended sediment resulting from laying the Power line, potential contamination in soils that will be released, electromagnetic forces affecting fish behavior, and the concrete mattresses it will place in the River. All of these informational deficiencies are magnified by the lack of baseline, site-specific information discussed above; project impacts are not discernible without detailed information on baseline conditions. Further, the Applicant does not appear to suggest any form of compensatory mitigation, making it impossible for the Draft Application to establish that there will be “no net loss of fish and wildlife habitat function and value,” even if there were adequate information to understand the project’s impacts.

A. The information included in the Draft Application is insufficient to evaluate temperature impacts from the construction of the cable.

Columbia Riverkeeper is concerned with water quality impacts from the continual heat generated by the power line. Heat pollution is a significant threat to the River, exacerbated by existing structures, like dams, and the impacts of climate change. In recent years, regulators have taken steps to address these temperature concerns and the ongoing violation of temperature water quality standards, including establishing the Columbia and Lower Snake Temperature Total Maximum Daily Load (“TMDL”) in 2021. Protected and culturally significant Columbia River species like salmon, steelhead, and lamprey need cold, clean water for survival.

The Draft Application insists the thermal impacts of this project will be minor for benthic species and the aquatic environment.<sup>21</sup> However, these statements are overly conclusive, and unsupported by Columbia River-specific metrics or studies. The studies relied upon in the Draft Application are irrelevant to the conditions in the Columbia River. For example, the Applicant relies on a study from a wind energy project in the Baltic Sea to support its conclusion that impacts from a cable’s thermal radiation are insignificant.<sup>22</sup>

The conditions of the Columbia River are unique, and site-specific temperature impact studies on the Power line’s effects are necessary before this Draft Application can be considered

---

<sup>20</sup> RCW 80.50.010.

<sup>21</sup> See Draft Application at 3-59 (“Because CRT proposes burying the cable at depths for 10 feet in most areas, no thermal effects on habitat for benthic prey species are expected for 97 percent for the route . . . Effects of thermal radiation from the operation of the cable for the proposed Project, are therefore, not anticipated to measurably change the abundance, distribution of benthic organisms, or the availability of potential invertebrate prey for fish species.”); see also 3-61 (“Although increased water temperature impacts from the cable are not expected along portions of the route where the cable will be buried, minor localized rises in ambient temperatures are expected in areas where the cable is surface laid or covered by cable protection in the Columbia River.”)

<sup>22</sup> Draft Application at 3-59.

complete. The Columbia is not truly a free-flowing river; certain shallow reservoirs created by dams along the river store and retain heat. Any heat generated by cables in the sediment and the riverbed may extend to the River itself and not merely dissipate, as the Applicant repeatedly claims. Additionally, in areas where the Power line is exposed and unburied in the sediment, it will emit heat directly to the Columbia. The Draft Application fails to address this point nor explains how much heat will impact the aquatic environment in the instances the Applicant uses concrete mattresses or rock berm. Excessive heat pollution degrades water quality and threatens the health of fish and aquatic species that need clean, cold water for survival.

The Draft Application's failure to clarify the project's thermal impacts through any site-specific analysis prevents meaningful environmental analysis. Much more information is required before the Applicant can credibly claim "minimal" thermal impacts.<sup>23</sup> Columbia River-specific thermal studies must be required prior to project approval to understand the extent of impacts on water quality, salmon, steelhead, lamprey, and other benthic and culturally significant species.

**B. The information included in the Draft Application is insufficient to evaluate impacts of suspended sediment from construction of the Cable.**

The Applicant will use a hydroplow to create a trench in the riverbed to lay the Cable.<sup>24</sup> The Applicant estimates that this trench will be approximately 24 inches wide, and in most places up to 10 feet deep.<sup>25</sup> Using those figures, across the 78.8 miles of the Cable located in the River, there would be a displacement of over 300,00 cubic yards of sediment.<sup>26</sup> This is roughly equivalent to the volume of a football field, dug 140 feet deep.<sup>27</sup> The only comparable displacement of sediment in the River comes from dredging the navigation channel.<sup>28</sup> However, unlike dredging, the sediment here will not be collected and disposed of in a controlled manner in specified locations, but suspended without control in the water column.

The increase in suspended sediment from laying the Cable would result in a major impact to fish. Depending on the characteristics of the plume generated by the Cable, the suspended sediment could cause physiological damage, like gill trauma, to salmon and sturgeon in the

---

<sup>23</sup> Additionally, "minimal" impacts are *not* the same as the required "no net loss" standard under WAC 463-62-040(2)(a).

<sup>24</sup> Draft Application at 2-13.

<sup>25</sup> *Id.*

<sup>26</sup> This figure was arrived at by multiplying the width, depth, and length of the trench.

<sup>27</sup> A football field is 360 feet long by 160 feet wide.

<sup>28</sup> See Port of Portland, Dredge Oregon Launches 2025 season, Keeping Columbia River Deep and Wide Enough for Ships (May 27, 2025)

<https://www.portofportland.com/Newsroom/dredge-oregon-launches-2025-season-keeping-columbia-river-deep-and-wide-enough-for-ships> (in 2024 one Port of Portland dredge moved 1.8 million cubic yards of sediment).

project area.<sup>29</sup> Sediment generated by the project could also affect the behavior of fish in the project area, including disrupting feeding or causing fish to avoid the area.<sup>30</sup>

Despite these potential impacts, the Draft Application dismisses the issue in a couple of sentences, which state without evidentiary support that “increased turbidity would impact only areas in proximity to the hydroplow,” and “sandy material would quickly drop out of the water column and finer material would be diluted by riverine flow.”<sup>31</sup> These conclusory statements completely ignore the well-documented impacts that this kind of temporary sediment suspension can have.

Much more information and evidence is needed to understand these impacts. The Draft Application does not discuss exactly how much sediment will be suspended, what the impact of that suspension will be on turbidity, how long the sediment will be suspended, how large the plume of sediment will be, etc. Further, as discussed above, the Draft Application does not even include description of the soil composition along the route, including whether it consists of sand, gravel, silt, or clay, which would be crucial to understanding these impacts.

The difficulty in understanding impacts of the suspended sediment are magnified when combined with the general lack of site-specific information regarding the Cable route in the river. For example, to understand the impacts to sturgeon in the River from suspended sediment, we would need to know all of the above basic information: i.e., what the sediment plume will look like and how long it will last. But we would also need to know whether there are any areas along the Cable route where adult sturgeon aggregate, and whether there are any areas the Cable crosses that provide potential spawning or rearing habitat conditions for sturgeon.<sup>32</sup>

This lack of information on impact does not comply with WAC 463-60-332’s mandate for applications to include a “ detailed discussion of temporary, permanent, direct, and indirect impacts on habitat, species present and their use of the habitat during construction, operation, and decommissioning of the energy facility.” The failure to discuss the sediment plume also

---

<sup>29</sup> Long Term Management Strategy (LTMS) for the Placement of Dredged Material in the San Francisco Bay Region, *Literature Review: Potential Effects of Re-Suspended Sediments on Fishes* (U.S. Army Corps of Engineers et al. July 20, 2010), Appendix H. [https://www.spn.usace.army.mil/Portals/68/docs/Dredging/LMTS/S%20and%20S/7%20-%20LTMS%20Literature%20Review\\_Effects%20of%20Resuspended%20Sediments.pdf](https://www.spn.usace.army.mil/Portals/68/docs/Dredging/LMTS/S%20and%20S/7%20-%20LTMS%20Literature%20Review_Effects%20of%20Resuspended%20Sediments.pdf). The sediment plume’s lethality on fish in the area is dependent on how long it will last, how dense it will be, and the size of particles in it. *Id.* (summarizing research showing different levels of harm to fish based on exposure concentration and duration)

<sup>30</sup> *Id.* at Table 15 (documenting behavior responses observed in different fish to suspended sediment and increases in turbidity).

<sup>31</sup> Draft Application at 3-55 to 3-56.

<sup>32</sup> It is true that the proposed route seems to mostly follow the Federal Navigation Channel, which typically does not provide important spawning ground for sturgeon. Oregon Department of Fish and Wildlife, *Lower Columbia River and Oregon Coast White Sturgeon Conservation Plan* (Aug. 2011). However, there are many areas where the Cable diverges from the Channel, including in getting to its multiple land crossings.

explicitly does not comply with WAC 463-60-322(2), which requires description of “plume characteristics under all discharge conditions.”

C. The information included in the Draft Application is insufficient to evaluate impacts to federal and state-level toxic cleanup sites.

In addition to increased turbidity, dredging has the potential to disturb contaminated sediments, releasing pollution into the water and food web. The Columbia River Basin was designated as a “Critical Large Aquatic Ecosystem” that warrants protection in the EPA’s 2006–2011 Strategic Plan due to longstanding toxic and pollution contamination. Water quality and the impact of industrial and agricultural activities on the Columbia River have long been a concern. As a result of these activities, there are many toxic contaminants—including mercury, dichloro-diphenyl-trichloroethane (“DDT”), polychlorinated biphenyls (“PCBs”), arsenic, copper, lead, and polycyclic aromatic hydrocarbons (“PAHs”)—found in the entire Basin, impacting water quality, fish, and other aquatic species. Many of these toxic pollutants are hydrophobic, meaning they persist in the environment and latch onto sediment rather than dissolving in the river.

This contamination could affect drinking water, fish, and those who consume fish. Re-releasing harmful pollutants into the water and the surrounding environment is a large concern with this project. More information, including site-specific studies, is needed about the direct, indirect, and cumulative impacts of dredging 100 miles of the Columbia River to determine the safety and long-term consequences of this proposed action.

*i. Superfund Site Concerns*

The Project crosses through two sites on the National Priorities List (“NPL”): Bradford Island and Portland Harbor. The Draft Application lacks information needed to determine the impacts of dredging near and through these Superfund sites.

Throughout the 1900s, the Army Corps of Engineers (“Corps”) used Bradford Island and the Columbia River as a dumping ground for Bonneville Dam’s toxic and hazardous industrial waste. These practices contaminated the river, its sediment, and the area’s resident fish populations with toxic chemicals, including cancer-causing PCBs. In addition to PCBs, other contaminants of concern include lead, mercury, petroleum chemicals, semi-volatile organic compounds (“SVOCs”), PAHs, volatile organic compounds (“VOCs”), heavy metals, herbicides, and pesticides.<sup>33</sup> As a result of this contamination, there is a fish advisory for resident fish

---

<sup>33</sup> Oregon Health Authority (“OHA”), Bradford Island Superfund Site, <https://www.oregon.gov/oha/ph/healthyenvironments/trackingassessment/environmentalhealthassessment/pages/bradford-island-superfund-site.aspx#:~:text=These%20activities%20resulted%20in%20chemical,resident%20fish%20in%20the%20area.>

between Bonneville Dam and one mile upstream to Ruckel Creek in Oregon, and in the North Bonneville Treaty Fishing Access site in Washington.<sup>34</sup>

The Applicant's confidence about avoiding contamination at this site raises serious concerns.<sup>35</sup> Namely, because numerous questions remain surrounding the Bradford Island cleanup. The complex geography and hydrology of the area, the duration of the contamination, and a lack of good recordkeeping for past waste disposal make it difficult to establish a contamination perimeter. The investigation into the nature and extent of the contamination at and around the site is ongoing. For example, just this year, an additional area of contamination was identified on Cascade Island at Bonneville Dam and will be added to the site's removal and cleanup plan. The potential to spread this contamination through the project's dredging activity is a direct threat to public health, safety, and the environment.

Further, concerns around contamination spreading from the Portland Harbor cleanup site must be addressed. While there is only a small portion of the Portland Harbor cleanup area that may be impacted by this project and connecting the in-water cable to the Portland converter station, explicit care must be taken to prevent the spread of contaminated sediment.

Site-specific, geotechnical investigations must occur before this Draft Application moves forward or is deemed complete. As highlighted above, the Applicant has failed to characterize or study sediment contamination levels along the *entire* proposed project route. There is a long history of industrial use and contamination along this stretch of the river; old pulp mills and aluminum smelters are two examples of the industry historically present. The contamination problems at Bradford Island, Portland Harbor, and other cleanup sites along the project route are just examples of the type of sediment contamination that may exist at other, undiscovered locations in the river corridor. The Applicant must complete a full-scale sediment characterization and study to understand the realities of sediment dredging and environmental impacts along the project route. Without this information, the Application and any subsequent environmental review is incomplete.

#### *ii. Washington State Cleanup Concerns*

The Draft Application also fails to contemplate the project's impacts on the Georgia Pacific paper mill facility in Camas, Washington ("GP Camas"). This is a glaring omission and

---

<sup>34</sup> See OHA, Bonneville Dam Fish Advisory, [https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/EducationalResources/Final\\_FieldPoster-English-LowRes.pdf](https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/EducationalResources/Final_FieldPoster-English-LowRes.pdf).

<sup>35</sup> See Draft Application at 4-11 ("The proposed cable route will avoid the [Bradford] island and transit 2.5 miles downstream of the site and 4 miles upstream. While the extent of remediation areas is still being determined, the cable alignment is anticipated to be outside the limits (USEPA 2024d) . . . Based on the results of the site-specific geotechnical investigation, facilities will be sited to avoid or minimize disturbance of existing contamination.").

the Applicant's failure to address this site reinforces the Draft Application's incompleteness. GP Camas is a highly polluted active site along the banks of the Camas Slough and the Columbia River. Hazardous contaminants of concern for the soil, groundwater, and sediment include PAHs and carcinogenic PAHs; benzene, toluene, ethylbenzene, and xylenes ("BTEX"); PCBs; lead; chromium; dioxins; and furans.

A 2021 Department of Ecology ("Ecology") order required GP Camas to develop a Remedial Investigation Workplan and prepare a Remedial Investigation Report to address the site's historic release of hazardous substances. To date, the facility has submitted a draft Remedial Investigation Workplan, which includes a site sampling and analysis plan. Lady Island, located between the Camas Slough and the Columbia River, is included in the Remedial Investigation's scope of work, and the site's Wastewater Treatment Facility discharges to the Columbia River. The contamination from GP Camas is a growing concern as the cleanup is still in the early stages. The Applicant must expeditiously educate itself on this site and exercise great sensitivity around it.

As highlighted above, sediment dredged around NPL sites, state-level cleanup sites, and areas up and downstream of these contaminated areas requires robust sediment sampling and testing to ensure there are no contamination issues downstream. Failure to do extensive sediment sampling and studies will result in increased hazards to human, species, and environmental health.

D. The information included in the Draft Application is insufficient to evaluate impacts of Electromagnetic Fields ("EMFs") resulting from operation of the Cable.

Many species of fish and invertebrates in the project area have some form of electromagnetic senses. These can be both magneto-sensitivities or electro-sensitivities. Salmonids have been shown to use magnetic forces for navigation.<sup>36</sup> Sturgeon and lamprey likewise are sensitive to electric fields.<sup>37</sup> Sturgeon have been shown to detect low levels of electric fields from potential prey for feeding.<sup>38</sup>

Anthropogenic EMFs have been shown to impact behavior of salmon and sturgeon. A study done on the Trans Bay Cable—a 53 mile cable in the San Francisco Bay owned and operated by the Applicant<sup>39</sup>—looked at behavior changes and migration success in Chinook

---

<sup>36</sup> L.C. Naisbett-Jones & K.J. Lohmann, *Magnetoreception and Magnetic Navigation in Fishes: A Half Century of Discovery*, 208 J. Comp. Physiol. A 19 (2022).

<sup>37</sup> Pieterjan Verhlest et al., *Electromagnetic Fields and Diadromous Fish Spawning Migration: An Urgent Call for Knowledge*, Environmental Pollution (Feb. 2025), <https://www.sciencedirect.com/science/article/pii/S014111362400518X>.

<sup>38</sup> Xuguang Zhang, *Use of Electrosense in the Feeding Behavior of Sturgeons*, Integrative Zoology (Mar. 28, 2012).

<sup>39</sup> Draft Application at 2-37.

salmon smolts and green sturgeon.<sup>40</sup> The study analyzed fish behavior before and after the Trans Bay Cable was activated. It found that “[c]hinook salmon smolts may be attracted to the activated cable based on analysis of cable crossing, mis-directions, and first presence at the array data.”<sup>41</sup> Travel time for migrating green sturgeon was also shown to be impacted: “travel time was increased for outbound migrations but decreased for inbound migrations.”<sup>42</sup> Further, both sturgeon and salmon experienced an average decrease in successful migrations—a 4.0 % decrease for sturgeon and an 11.1% decrease for salmon.<sup>43</sup> However, the sample size was not large enough for the decrease in migration success to be statistically significant.<sup>44</sup>

This study has a number of notable shortcomings when it comes to understanding the impact the Cable will have. For one, the study only looked at behavior of Chinook salmon smolts, and not the impact of adult salmon migrating to spawning grounds. It also did not—nor does any other real-world study we are aware of—look at impacts to other important fish present in the River, including lamprey. The study was also limited in scope and time frame, looking only at one year after activation of the Trans Bay Cable.<sup>45</sup>

There is also good reason to believe that the impact of the Cable to migrating fish will be significantly greater than the impacts of the Trans Bay Cable. The Trans Bay Cable is shorter than the proposed Power line.<sup>46</sup> And it is not clear if there are as many stretches along the Trans Bay Cable where it is unburied—as the Cable would be for multiple miles. Finally, the San Francisco Bay is much wider, on average, than the stretch of the River that the Cable will run through—meaning fish will have less room to distance themselves from the Cable.<sup>47</sup>

Another real-world study, performed on the Neptune Regional Transmission System—which was built by the Applicant, connecting New Jersey and New York—and the Cross Sound Cable, between Connecticut and New York, also found that HVDC cables have an impact on fish behavior.<sup>48</sup> The study found significant changes in behavior in lobsters and skates

---

<sup>40</sup> R. Kavet et al., *Assessment of Potential Impact of Electromagnetic Fields from Undersea Cable on Migratory Fish Behavior*, Final Technical Report, OCS Study No. BOEM 2016-041 (Sept. 2016), <https://www.boem.gov/sites/default/files/environmental-stewardship/Environmental-Studies/Pacific-Region/Studies/BOEM-2016-041.pdf>.

<sup>41</sup> *Id.* at ix.

<sup>42</sup> *Id.*

<sup>43</sup> *Id.* at vii-viii.

<sup>44</sup> *Id.*

<sup>45</sup> *Id.* at vii.

<sup>46</sup> The Trans Bay Cable is 53-miles long, while the proposed Cable would have 78.8 miles in the River.

<sup>47</sup> The San Francisco Bay is between 3 and 12 miles wide. *San Francisco Bay*, Encyclopaedia Britannica (last updated 2025), <https://www.britannica.com/place/San-Francisco-Bay>. The Draft Application does not include any information regarding the width of the River in the project area, but it is likely far less than 3 miles, at its widest. For example, the Hood River Bridge is less than a mile long. Port of Hood River, *Hood River Bridge*, <https://www.portofhoodriver.com/hood-river-bridge>.

<sup>48</sup> Zoe Hutchison et al., *Electromagnetic Field (EMF) Impacts on Elasmobranch (shark, rays, and skates) and American Lobster Movement and Migration from Direct Current Cables*, OCS Study No. BOEM 2018-003 (Mar. 2018), <https://espis.boem.gov/final%20reports/5659.pdf>.

near the activated cables.<sup>49</sup> Importantly, the study also measured EMF levels, and found both electric and magnetic fields that exceeded levels expected to cause biological effects, despite the Cables' electric shielding.<sup>50</sup> This evidence clearly contradicts the Applicant's claim in the Draft Application that electric fields are not a concern because of the proposed shielding.<sup>51</sup> Neither of these two studies, which looked at transmission lines built by the Applicant, are discussed in the Draft Application.

The results from these real-world studies are worrying for the potential impact the Cable could have on the already stressed fish species in the River. As discussed above, the Columbia River is too warm, presenting an existential threat to multiple species of migrating fish that must make it to their spawning grounds before being cooked alive.<sup>52</sup> Any change in the migratory behavior of these fish caused by the Cable could result in significant additional mortality, forcing fish to stay in warm waters longer before making it to their spawning grounds. Fish like the Snake River Sockeye, which have a long journey and must also traverse the too-warm waters of the Snake River, are particularly at risk.<sup>53</sup>

The Draft Application does not provide any in-depth analysis of these impacts and is missing key information that would be necessary to understand potential effects. The basic argument in the Draft Application is that there will be no EMF impact because the Applicant conducted an internal modeling analysis—which is not included in the Draft Application—showing that when the Cable is buried at 10 feet, magnetism levels will not exceed background levels.<sup>54</sup> Even if EFSEC took the Applicants unsupported assertions at face value (which it should not), this fails to address what magnetism levels or EMF impacts will occur when the Cable is not buried at 10-feet, which will be true across a significant but undisclosed portion of the Cable route. Additionally, the Draft Application does not reckon with any real world studies, like the one discussed above for the Trans Bay Cable, that show the Cable will impact anadromous fish migration.

The Draft Application also fails to adequately discuss impacts of EMF to fish behaviors other than migration. Because we do not have site-specific habitat information, it is impossible to know how the areas surrounding the Cable could be impacted by EMFs. However, it is possible that White Sturgeon congregate in areas near the Cable's path, or that lamprey spawn in the soils

---

<sup>49</sup> *Id.* at xvii (“*Leucoraja erinacea* (the Little skate) exhibited a strong behavioral response to the EMF from the [Cross Sound Cable] . . . For both species, the behavioral changes have biological relevance in terms of how the animals will move around and be distributed in a cable EMF zone.”)

<sup>50</sup> *Id.* at xiv.

<sup>51</sup> Draft Application at 3-56 to 3-57.

<sup>52</sup> Columbia Riverkeeper, *Salmon Dying from Hot Water in Columbia River* (July 27, 2021), <https://www.columbiariverkeeper.org/2021/salmon-dying-from-hot-water>.

<sup>53</sup> Courtney Flatt, *Biologists Truck Snake River Sockeye to Cooler Idaho Waters*, OPB (Aug. 4, 2024), <https://www.opb.org/article/2024/08/04/trucking-snake-river-sockeye-idaho/>.

<sup>54</sup> Draft Application at 3-56 to 3-59.

surrounding the Cable.<sup>55</sup> The study on the Applicant's Neptune Cable showed that HVDC cables can impact movement and foraging behavior of electro- or magno- sensitive fish and invertebrates in the cable's vicinity.<sup>56</sup> Thus, the possibility of fish foraging or spawning habitat in the Cable's path presents unique difficulties for understanding the Cable's impact that the Applicant must more fully reckon with once it assesses actual on-site habitat conditions and species presence.

EFSEC must require several additional categories of information and study from the Applicant. First, the Applicant must conduct location-specific modeling of projected EMF levels and evaluate those projections in relation to habitats and species known to occur along the corridor as well as the existing EMF environment.<sup>57</sup> Second, the Applicant must address all aquatic species with sensitivity to EMFs, in detail. For several aquatic species—such as lamprey—that are known or expected to be sensitive to EMFs, the Applicant cites no studies or analyses regarding how these species might respond to EMFs from the Power line. If these studies do not currently exist, the Applicant must conduct them. Third, the Applicant must provide documentation of fish movement patterns along the Cable's route to determine how frequently, and during which life stages, various species may be exposed to elevated EMFs or altered habitat conditions. Finally, the Draft Application mentions that a condition on the Applicant's other underwater cables has been “preparing reports comparing pre- and post-installation conditions related to benthos, fish and shellfish, thermal impacts, and electromagnetic field impacts.”<sup>58</sup> Those reports must be included in this application.<sup>59</sup>

The Draft Application does not provide sufficient analysis of how EMFs from the Cable may affect fish behavior. The proposed route traverses 78.8 miles of critical habitat for multiple species of fish, yet the potential effects of a cable of this scale in such a setting remain poorly

---

<sup>55</sup> The Applicant cites a study that demonstrated, in one part of the River, spawning lamprey are less likely to be found as you move away from the bank of the river. Draft Application at 3-58. This does not establish that no lamprey (spawning or not) will be near the Cable, nor does it rule out that certain sections of the Cable, outside of the study's limited area, provide important spawning habitat. This is a good example of why EFSEC's rules requiring fish surveys at multiple times of the year are critical.

<sup>56</sup> Zoe Hutchison et al., *Electromagnetic Field (EMF) Impacts on Elasmobranch (shark, rays, and skates) and American Lobster Movement and Migration from Direct Current Cables*, OCS Study No. BOEM 2018-003 (Mar. 2018), <https://espis.boem.gov/final%20reports/5659.pdf>.

<sup>57</sup> A study that found significant behavior changes in skates and lobsters in relation to a subsea power cable concluded that there is a need to “integrate an understanding of the natural and anthropogenic EMF environment together with the responses of sensitive animals when planning future cable deployments and predicting their environmental effects.” Zoe Hutchison et al., *Anthropogenic Electromagnetic Fields (EMF) Influence the Behaviour of Bottom-Dwelling Marine Species*, Sci Rep., (Mar. 6, 2020), <https://pmc.ncbi.nlm.nih.gov/articles/PMC7060209/>.

<sup>58</sup> Draft Application at 2-36.

<sup>59</sup> The Draft Application cites to one of these studies for the proposition that benthos will not be impacted. Draft Application at 3-58. However, the study does not appear to be available online. And a different report references this study as making an opposite conclusion that “the bottom-dwelling (benthic) community in the vicinity of the Cross-sound Cable had not fully recovered by the time the 30-month post-installation study was completed.” Community & Environmental Defense Services, *A Preliminary Review of the Impact of Placing Portions of an Extra-High Voltage Transmission Line Beneath the Chesapeake Bay & Other Waters* (Mar. 9, 2009), <https://ceds.org/wp-content/uploads/2022/12/SubmergedCablePreliminaryLiteratureReview.pdf>.

studied. Without additional information, EFSEC cannot reasonably evaluate the magnitude or likelihood of EMF-related impacts.

E. The information included in the Draft Application is insufficient to evaluate the impacts of concrete mattress and rock berm usage.

The Draft Application fails to address the specifics concerning the use of concrete mattresses/rock berm and their environmental impacts. The Draft Application merely states that “[a]rticulated concrete blocks (mattress) or rock berms could alter a total area of 2.4 acres of streambed habitat by adding hard substrate.”<sup>60</sup> The Draft Application has no detailed information about where along the proposed route concrete mattresses or rock berm will be installed. The Applicant further fails to specify the number of concrete mattresses or the amount of rock berm that will be installed. There is no stated maximum number nor an estimate on how many will be used for this project.

Installing these features can lead to habitat degradation and permanent impairment to shorelines and the riverbed. The Applicant must provide more information regarding the specific number of mattresses or berms to be added to the environment. At this stage, the Draft Application is incomplete and cannot support a meaningful impacts analysis.

F. The Draft Application makes no attempt to establish no net loss.

An Application for site certification must include a mitigation plan that shows the project “will achieve equivalent or greater habitat quality value, and function for those habitats being impacted.”<sup>61</sup> This mitigation plan must “include a detailed discussion of mitigation measures, including avoidance, minimization of impacts, and mitigation through compensation or preservation and restoration of existing habitats and species, proposed to compensate for the impacts that have been identified.”<sup>62</sup> Because of the value of the River, the scope of impacts of the Cable along nearly 80 miles of the River, and the risk that the Cable poses to the water quality and multiple species of fish, Columbia Riverkeeper does not believe that the Applicant can possibly comply with this provision of EFSEC’s rules. Regardless, the Draft Application does not even attempt to do so.

The Applicant’s proposed mitigation measures consist of minor steps to reduce impacts of operation and construction of the Cable, like developing an Erosion and Sediment Control Plan.<sup>63</sup> The Draft Application does not propose any mitigation to compensate for what remains after these measures have been taken, including any restoration or preservation. It cannot

---

<sup>60</sup> Draft Application at 3-56.

<sup>61</sup> WAC 463-60-332(3)(c). Ultimately, EFSEC must conclude that the proposed project will result in “no net loss of habitat functions and values.” WAC 463-62-040(2)(a).

<sup>62</sup> WAC 463-60-332(3).

<sup>63</sup> Draft Application at 1-11 to 1-19.

reasonably be argued that the Cable as proposed will have *no* impact on habitat in the nearly 80 miles of the River it will go through. Accordingly, by failing to include any plan to compensate for that impact, the Draft Application plainly does not comply with these requirements.

### **III. The Draft Application must include internally referenced studies.**

Part of the challenge with understanding the impacts of the Cable is that the Draft Application frequently references internal studies that are not included in the Draft Application. The Draft Application cannot rely on these studies to demonstrate the Cable's impacts without actually including them.<sup>64</sup>

Throughout the Draft Application, there are references to studies or analysis done by the Applicant on different issues regarding the Power line's potential impacts. The Applicant provides extremely limited information from these analyses or how they were conducted, but uses them to support its analysis of impacts at will. For example, the Applicant claims they conducted "an analysis of temperature influence from the cable at various depths."<sup>65</sup> It uses this analysis to argue that warming impacts to sediment and water will be negligible, but there is no background information on how the analysis was performed or what factors were considered. Further, there is no information shared that quantifies what warming effect the cable will have when it is buried in less than 10-feet of sediment, or not buried at all.

The same story is true for multiple other internal studies referenced in the Draft Application, including a study on magnetism levels expected from the Cable at various burial depths,<sup>66</sup> a marine survey of river geology,<sup>67</sup> and sediment sampling conducted at the request of the Portland Sediment Evaluation Team.<sup>68</sup> Without including these studies, relied on in its analysis, the Draft Application does not comply with the requirements to submit detailed information regarding the project's impacts.

### **IV. The Draft Application includes an insufficient description of alternatives to the Cable.**

WAC 463-60-296 requires the application to "include an analysis of alternatives for site, route, and other major elements of the proposal." While present, the Draft Application's alternatives analysis is lacking. Its site selection reasoning is based on the in-river corridor being the area that will "minimize use conflicts and potential impacts" to aquatic communities.<sup>69</sup> However, that analysis relies on deficient data and incomplete information on the environmental

---

<sup>64</sup> See WAC 463-60-065 (" . . . [A]n applicant for site certification must identify in the application all information known to the applicant which has a bearing on site certification. ").

<sup>65</sup> Draft Application at 3-59.

<sup>66</sup> Draft Application at 3-57.

<sup>67</sup> Draft Application at 2-54.

<sup>68</sup> Draft Application at 2-51.

<sup>69</sup> Draft Application at 2-53.

impacts of this project. As described above, there is a severe lack of site-specific environmental studies supporting the Applicant's claims and proposal thus far. Further, none of the information relied upon for this analysis, including the referenced pre-feasibility studies, is included in the Draft Application packet.

To address the deficiencies in the Draft Application's alternatives analysis, EFSEC must require a full environmental impact statement (EIS) for the project, that includes a thorough alternatives analysis. The scope of this analysis should center on whether the same energy goals can be achieved outside of the river. For a project of this magnitude and novelty, serious thought should be given to whether this is truly the best solution for transmission needs. EFSEC should consider whether a project that can transmit only 1,100 MW of power—a moderate amount—is worth the extensive work it would take to install cables that have a life of merely 40 years. Additionally, a study should be conducted to understand the breadth of potential solutions available to serve Western Oregon and Washington's energy transmission needs.

**V. The Applicant did not engage in adequate negotiations with local governments along the Cable's route.**

There are specific procedures that an applicant for a transmission line must follow prior to submitting their application to coordinate with local governments on siting. If a local government has a designated electrical transmission corridor, EFSEC must consider certification of proposed transmission lines in that corridor.<sup>70</sup> When local governments do not have a designated electrical transmission facility corridor, the Applicant must attempt to negotiate with affected cities and counties to agree to a corridor plan.<sup>71</sup> These negotiations must go on for at least 60 days before the Applicant can move forward with submitting an Application.<sup>72</sup>

The Draft Application does not include information regarding whether the impacted local jurisdictions have preexisting, designated electrical transmission corridors. If they do, the Cable must be sited within those corridors.

Regardless, based on the information in the Draft Application, the Applicant has not demonstrated that they made a good-faith effort to negotiate with impacted jurisdictions. The Applicant claims that "pre-application corridor negotiations were initiated on December 20, 2023" via an "informational mailing . . . to officials of three counties and seven cities in Washington where the transmission route would either be buried underground (Skamania County only) or buried under the Columbia River in Washington State waters adjacent to the specified county or city."<sup>73</sup> For the most part, the Applicant claims, the local governments did not

---

<sup>70</sup> RCW 80.50.330(2).

<sup>71</sup> RCW 80.50.330(3); WAC 463-61-080.

<sup>72</sup> WAC 463-61-080(2).

<sup>73</sup> Draft Application at 2-24.

respond.<sup>74</sup> Because the local governments did not respond to the communications they sent, the Applicant claims they satisfied their negotiation duties.

This level of vague communication with local governments is not sufficient to demonstrate compliance with RCW 80.50.330(3). Based on the Applicant’s record of outreach, in only one instance did it actually provide information on the negotiations process to one of the ten local governments impacted.<sup>75</sup> All of its other documented communications to local governments only express giving general project information.<sup>76</sup> During the land use hearings for the Cable, multiple local government officials expressed that they had only learned of the project in the leadup to the hearings—confirming that the Applicant did not make a meaningful effort to negotiate. Further, as we pointed out at the hearings, alongside Friends of the Columbia Gorge, the Applicant failed to secure local representation on EFSEC as required by RCW 80.50.030(4)-(5) for all of the local jurisdictions except Skamania County.

The duty to negotiate is mandatory. WAC 463-61-080 says “the preapplicant and affected cities, towns, and/or counties *shall* negotiate to designate a corridor for the electrical transmission facility.” This does not allow a local government to waive that right to negotiation, let alone to waive it by failing to respond to unclear emails from the Applicant sent to unspecified representatives. Without any statements from the local governments, the Applicant cannot claim negotiation ever started.<sup>77</sup>

EFSEC must require the Applicant to conduct a more thorough review of whether there are designated utility corridors in affected jurisdictions. If there are not, EFSEC must require the Applicant to re-initiate negotiations and actually negotiate with affected jurisdictions before submitting a new, final application.

## **VI. The Applicant has not ensured meaningful public involvement in this process.**

An application for site certification must show a meaningful effort to engage with the public during the preapplication process. This must include “information for contacting local interest and community groups to allow for meaningful involvement of all people, regardless of race, ethnicity, or socioeconomic status.”<sup>78</sup>

The Applicant’s only claim for compliance with this requirement is that it “maintains a contact list for interested stakeholders.”<sup>79</sup> It does not share who those stakeholders may be or delineate any actual outreach it has conducted to public stakeholders.

---

<sup>74</sup> Draft Application at 2-24 to 2-25.

<sup>75</sup> Draft Application at 1-49.

<sup>76</sup> *Id.*

<sup>77</sup> Draft Application at 1-49.

<sup>78</sup> WAC 463-60-101(2).

<sup>79</sup> Draft Application at 1-44.

The lack of public outreach being conducted by the Applicant was made clear during EFSEC’s informational and land use hearings on the Draft Application. As the hearings progressed, more and more people and organizations turned up as they first heard about the project from the hearings themselves. Even regulatory stakeholders like local governments and the Columbia River Gorge Commission expressed that they had not received sufficient information about the project with enough time to participate in the hearings.

## **VII. The Draft Application overstates compliance with the Tribal Energy Vision.**

A particularly egregious example of the Draft Application's overly conclusive nature is its statement that “the Project is consistent with the 43 recommendations” in the Columbia River Inter-Tribal Fish Commission’s (CRITFC) Energy Vision.<sup>80</sup> The CRITFC Tribal Energy Vision makes energy-related recommendations for the Columbia River Basin to protect the treaty-protected resources of the Columbia Plateau treaty tribes. It is a thorough report discussing how the Columbia River’s energy future can balance a system supporting healthy, harvestable fish and wildlife populations, Tribal treaty and cultural resources, and reliable, affordable clean energy. Despite stating otherwise, the Draft Application does not actually demonstrate that the Project “would minimize impacts to fish and wildlife populations” or have impacts that are “minor, temporary, and capable of being mitigated[.]”<sup>81</sup> Further, CRITFC disagrees with this representation of their recommendations and goals.<sup>82</sup> To say the Cable is in line with the Energy Vision is both a misrepresentation of the document and the project itself.

## **CONCLUSION**

Columbia Riverkeeper is deeply concerned about the impacts of the Power line. The Columbia River is the lifeblood of the Pacific Northwest, and its health has already been stretched thin by energy development in the form of the dams. Many species of fish in the River are struggling to maintain existence. This novel and experimental project, which would site 80-miles worth of a high voltage line through the bed of the river, could further hamper the potential recovery of these fish.

The Applicant has not even established a clear need for this transmission. The Western Transmission Expansion Coalition, a coalition of electric load-serving entities studying transmission needs across the West, does not include the Cable in its anticipated transmission

---

<sup>80</sup> Draft Application at 2-59.

<sup>81</sup> Draft Application at 2-60.

<sup>82</sup> Henry Brannan, *Battle Over \$1.5B Project to Put Giant Power Line Under Columbia River Will Get Local Meetings Next Week* (Nov. 15, 2025), <https://www.columbian.com/news/2025/nov/15/battle-over-1-5b-project-to-put-giant-power-line-under-columbia-river-will-get-local-public-meetings-next-week/>.

projects over the next 10 years.<sup>83</sup> And Portland General Electric’s (PGE) most recent Integrated Resource Plan shows that the Cable is handily the most expensive per kw/h proposed regional transmission project of similar stature.<sup>84</sup> The Applicant has also failed to establish that the Power line will not primarily serve large load customers, like data centers, as has happened with other recent large scale transmission projects.<sup>85</sup>

EFSEC should suspend review of the Draft Application and request that the Applicant provide the necessary information described above and resubmit a complete and final application. As we highlighted at the Land Use Hearings for this project, alongside Friends of the Columbia Gorge, the fact that this is a *draft* application already clearly runs afoul of EFSEC’s rules.<sup>86</sup> The complete lack of compliance with multiple WAC chapter 463-60 provisions and other application requirements is only another reason to discontinue further review of the Draft Application.

Sincerely,

Teryn Yazdani  
Staff Attorney

---

<sup>83</sup> Western Transmission Expansion Coalition, *Update to the WestTEC Regional Engagement Committee* (Nov. 13, 2025), [https://www.westernpowerpool.org/private-media/documents/ES\\_REC\\_Update\\_-\\_251113.pdf](https://www.westernpowerpool.org/private-media/documents/ES_REC_Update_-_251113.pdf).

<sup>84</sup> Portland General Electric, 2023 Clean Energy Plan and Integrated Resource Plan Update at 91 (updated Aug. 2025), <https://portlandgeneral.com/about/who-we-are/resource-planning/combined-cep-and-irp>.

<sup>85</sup> Gosia Wozniacka, *A 300-Mile Power Line Was Supposed to Serve the Public. Now it May Serve a Data Center*, the Oregonian (Oct. 27, 2025), <https://www.oregonlive.com/environment/2025/10/a-300-mile-power-line-was-supposed-to-serve-the-public-now-it-may-serve-a-data-center.html>.

<sup>86</sup> See WAC 463-60-116 (stating, antithetically to the idea of submitting a draft application that “[a]pplications to the council for site certification shall be complete and shall reflect the best available current information and intentions of the applicant”); RCW 80.50.090 (referring to “an application” not a “draft application” as the starting point of EFSEC’s review).