



COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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Filed via email and via comment@efsec.wa.gov

Kurt Beckett
Chair, Washington Energy Site Evaluation Council (EFSEC)
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RE: Review of the Cascade Renewable Transmission Draft Application
EFSEC Docket No. 23002

Dear Chair Beckett and Members of the Council:

The Columbia River Inter-Tribal Fish Commission (CRITFC) has reviewed the draft application for the Cascade Renewable Transmission Project (Project) submitted by Cascade Renewable LLC (Applicant). Consistent with the Project's review schedule, CRITFC submits these preliminary comments identifying issues raised by our initial review. We recommend that EFSEC deem the application incomplete and suspend review until the Applicant provides complete, site-specific baseline data, conducts comprehensive impact analyses, and demonstrates compliance with all applicable requirements. Until this occurs, EFSEC must pause review and require a full environmental impact statement (EIS), including a robust alternatives analysis, to address these deficiencies.¹

The Applicant characterizes the Project as "benign" and asserts that it will have minimal impact on the Columbia River. This characterization misrepresents both the nature of the Project and the current condition of the Columbia River. The four CRITFC member tribes: the Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Warm Springs Reservation of Oregon, Confederated Tribes of the Umatilla Indian Reservation, and the Nez Perce Tribe, hold treaty-reserved rights to fish at all usual and accustomed places throughout the Project area. These treaty rights are property rights that predate and supersede state and federal claims. CRITFC's member tribes continue to actively and continuously use the river year-round for fishing, harvesting First Foods, and

¹ See, WAC Chapter 463060.

conducting cultural and spiritual practices that have sustained them since time immemorial.

For over a century, the tribes and their resources have borne the cumulative burden of development in the Columbia river basin while receiving little benefit to their communities, waters, or fisheries.² Today, the Columbia River already faces compounding stressors from record high temperatures, drought, low flows, altered seasonal flow timing, dams and other river structures, legacy contaminants, and invasive species. Each additional stressor further compromises decades of costly restoration efforts and threatens the recovery of salmon, lamprey, sturgeon, and other species essential to tribal subsistence, commerce, and culture. For this reason, CRITFC's framework for salmon restoration, *Wy-Kan-Ush-Mi Wa-Kish-Wit: Spirit of the Salmon Plan*, calls for collaboration, accountability, and adaptive management across institutions and regulatory entities in the Columbia Basin.³

The proposed Project to build a high-voltage direct current (HVDC) transmission line at the bottom of the Columbia River represents a high-risk undertaking with no comparable precedent in the United States. Large-scale, high-voltage transmission cables within freshwater, anadromous fish habitat are essentially nonexistent, providing no operational dataset to validate the Applicant's environmental safety claims.

The Applicant further mischaracterizes the Project as being consistent with CRITFC's 2022 *Energy Vision for the Columbia River Basin* (Energy Vision).⁴ CRITFC categorically disagrees. The Energy Vision supports responsible and well-evaluated innovation, not experimentation on treaty-protected waters. The Energy Vision calls for thoughtful renewable energy siting that minimizes impacts and relies on existing footprints, not projects that create new development impacts within highly functioning, valuable ecosystems. In the absence of any U.S. precedent for high-voltage, high-heat, direct-current freshwater transmission infrastructure, the Columbia River is not an appropriate test case or pilot location for unproven technology and a new utility corridor.

This letter will: (1) explain how the Project fundamentally misrepresents the intent and protective standards of the Energy Vision; (2) identify key technical concerns that are inadequately addressed in the Applicant's application; (3) raise questions regarding land use compatibility and the Project's site selection process; and (4) describe critical deficiencies in the draft application that preclude meaningful evaluation of environmental, cultural, and operational impacts.

² Department of Interior, *Historic and Ongoing Impacts of Federal Dams on the Columbia River Basin Tribes* (2024) (Tribal Circumstances Analysis), available at <https://turtletalk.blog/wp-content/uploads/2025/09/tribal-circumstances-analysis.pdf>.

³ Columbia River Inter-Tribal Fish Commission, *Wy-Kan-Ush-Mi Wa-Kish-Wit* (Spirit of the Salmon), Recommendation 16: Regulatory Improvement and Coordination (2014), <https://plan.critfc.org/2013/spirit-of-the-salmon-plan/institutional-recommendations/regulatory-coordination/>.

⁴ Draft Application at 2-59.

The Project Does Not Meet the Intent of the Tribal Energy Vision

In 2022, CRITFC published the Energy Vision, outlining how future development in the region's energy generation and transmission could harmonize with the protection and restoration of tribal treaty resources, including fish, wildlife, water, and cultural sites. The Energy Vision emphasizes that a clean, reliable, and affordable electricity system can coexist with the restoration of healthy and harvestable salmon populations and broader ecosystem resilience. CRITFC advocates for a regional energy strategy that integrates renewable energy, storage, demand reduction, and efficiency to lessen demand on the Columbia River, while minimizing harm to tribal resources, and reducing reliance on fossil fuels.⁵

A core concern highlighted in the Energy Vision is the siting and expansion of transmission infrastructure. Poorly sited projects have already impacted tribal communities, First Foods, and cultural resources.⁶ Recurring vegetation management and construction have damaged ecologically and culturally sensitive areas.⁷ Section 3.6 of the Energy Vision recommends a comprehensive planning process that prioritizes strategic siting of transmission to avoid these impacts and reduce the need for new infrastructure.⁸ Section 3.10 further recommends investments that could reduce the need for transmission lines and prevent further damage to tribal lands and waters..⁹ Transmission services should be designed to avoid undermining tribal resource protections and salmon recovery efforts.¹⁰

The Applicant claims that the Project is "consistent with the 43 recommendations in the Energy Vision."¹¹ This assertion is incorrect. The Energy Vision is not a blanket endorsement of new transmission. In contrast, it establishes clear conditions and priorities that place protection of treaty-reserved resources first. The Applicant selectively cites goals while disrespecting the Energy Vision's core directive that energy development must be compatible with ecosystem restoration, fisheries protection, and tribal reserved rights. Nowhere does the Energy Vision contemplate or endorse the uncertainty of placing high-voltage, high-temperature transmission infrastructure directly within the Columbia River itself. Shifting the risks and burdens of energy development onto tribal communities and already stressed aquatic ecosystems directly conflicts with the Energy Vision's intent.

⁵ Columbia River Inter-Tribal Fish Commission, *Tribal Energy Vision for the Columbia River Basin* (2022), <https://critfc.org/energy-vision/>

⁶ Energy Vision at 23.

⁷ *Id.* at 98-99.

⁸ *Id.* at 94.

⁹ *Id.* at 102.

¹⁰ Fish protection measures need not be sacrificed to provide transmission stability. Rather transmission services need to be planned and developed in a way that enables salmon protection measures to be implemented at high levels of reliability." (*Id.* at 104).

¹¹ Application at 2-59.

The Applicant's reliance on the Energy Vision's Recommendation 36 further illustrates this mischaracterization. Recommendation 36 explicitly emphasizes minimizing the need for new transmission through demand-side management, energy efficiency, storage, distributed generation, and grid-enhancing technologies (GETs). Rather than demonstrating that these options have been fully evaluated and exhausted, the Applicant uses the recommendation to justify a new and unprecedented transmission build. This approach reverses the hierarchy established by the Energy Vision and bypasses its call to invest in less harmful alternatives specifically to prevent projects that damage tribal lands and waters.

Similarly, Recommendation 31 directs that any necessary transmission be sited near loads and within the existing grid in a manner that protects fish, wildlife, environmental values, and tribal resources. Siting an 80-plus-mile cable within the Columbia River fails this standard. The river is an ecologically sensitive, thermally stressed system that already exceeds safe temperature thresholds for salmon and lamprey and is the focus of extensive and costly restoration efforts.¹² This river is central not only to treaty-reserved rights, but First Foods and cultural practices that have existed for millennia. Construction, trenching, heat emissions, and long-term operation risk undermining restoration investments and disturbing underwater and riparian cultural resources, particularly in sensitive areas near Bonneville Dam. As we discuss further below, this project is only one of many projects proposed in the region. It is neither strategically sited, nor proximate to the grid services and energy needs of the river communities it would most impact.

A project that cannot demonstrate a net ecological benefit cannot claim Energy Vision alignment. The Energy Vision's first goal calls for energy development that "protects and enhances environmental quality, treaty-protected resources, and supports the restoration of Columbia Basin's fish and wildlife to healthy and harvestable population levels."¹³ That goal is incompatible with installing and operating a cable projected to reach temperatures of up to 158°F within critical aquatic habitats of an already impaired river. The Applicant's characterization of impacts as "minor" and "temporary" is unsupported by site-specific data and fails to account for cumulative effects on a system that is already degraded and overburdened. Renewable energy development must harmonize with protection and restoration of tribal resources, not introduce new risks to them.

The Applicant further claims that the Project advances Energy Vision goals related to reducing greenhouse gas emissions and supporting renewable energy. However, the Energy Vision's support for renewables is conditioned on those resources being truly clean for the river and the people who depend on it. As a common carrier, the Project cannot provide assurance that it will transmit only renewable energy and could just as readily

¹² U.S. Environmental Protection Agency, *Columbia and Lower Snake Rivers Temperature Total Maximum Daily Load* (Washington, DC: U.S. Environmental Protection Agency, August 13, 2021). <https://www.epa.gov/system/files/documents/2022-06/tmdl-columbia-snake-temperature-errata-update-05102022.pdf>.

¹³ Energy Vision at 20.

carry fossil or nuclear power, such as by connecting Portland General Electric's (PGE) Carty Generating Station, a natural gas plant in Boardman, Oregon, to new large loads in Hillsboro. Labeling this transmission Project as "renewable" is plainly greenwashing.

Finally, the Energy Vision calls for transparency, comprehensive alternatives analysis, and evaluation of cumulative impacts. The Applicant has not demonstrated regional need beyond serving a limited subset of large loads, nor shown that the Project would relieve congestion, improve system-wide reliability, or enhance grid flexibility. The Proponent has yet to evaluate reasonable and prudent alternatives identified by regional planners that are less harmful and expensive. A project that bypasses these requirements and places untested infrastructure in one of the Basin's most sensitive and culturally significant waters cannot credibly claim alignment with CRITFC's Energy Vision.

A Summary of Technical Concerns with the Project

The Project presents substantial ecological risks to an already thermally altered and stressed Columbia River system. Decades of dam construction have converted long reaches of the river into reservoir-dominated, lentic systems that function as heat sinks, fundamentally shifting natural thermal regimes to unnaturally high baseline temperatures. Against this backdrop, the installation of a high-voltage transmission cable generating skin temperatures of approximately 158°F raises serious concerns regarding additive thermal loading, particularly given that the Columbia River exceeded multiple temperature standards in 2025.¹⁴

The Applicant's suggestion that river flows will simply disperse localized heating fails to account for the cumulative thermal stress imposed by introducing a more than 100-mile-long, high-temperature electrical cable into a system already operating at or beyond protective temperature thresholds for native species.

The Applicant acknowledges that some of the cable will not be buried to the required 10-foot depth, projecting "minor localized rises in ambient temperatures" in these sections.¹⁵ This assertion is inconsistent with the physics of reservoir systems, where reduced flow velocities limit thermal dispersion and retained heat accumulates rather than dissipates. In such lentic environments, any additional heat input is additive, not negligible, directly conflicting with the Columbia River temperature TMDL and threatening cold-water refuge areas essential for salmonid and lamprey survival.¹⁶

¹⁴ <https://www.wildsalmon.org/projects/hot-water-report/hwr-2025-issue-3.html>

¹⁵ Application at 3-61.

¹⁶ U.S. Environmental Protection Agency, *Columbia and Lower Snake Rivers Temperature Total Maximum Daily Load* (Washington, DC: U.S. Environmental Protection Agency, August 13, 2021). <https://www.epa.gov/system/files/documents/2022-06/tmdl-columbia-snake-temperature-errata-update-05102022.pdf>

Electromagnetic field (EMF) effects present poorly understood but potentially severe risks to species that depend on electromagnetic cues for essential life functions. Pacific lamprey, salmon, and sturgeon all use electromagnetic or electric field sensing for navigation, migration, prey detection, and reproduction. The sections where cable burial falls short of 10 feet are of particular concern, as much of the Applicant's argument for minimal EMF impacts relies on deep burial. Additionally, benthic invertebrates, which are the foundation of the aquatic food web, would experience the highest and longest EMF exposure due to their sedentary riverbed habitat, yet virtually no data exists on EMF effects on these organisms. In addition, the consequences of cable shielding failure from mechanical damage, seismic activity, or thermal stress – even if unlikely – are disproportionately high. In the absence of site-specific stress validation, claims of low risk remain unquantified rather than proven. The Columbia River should not serve as a testing ground for unproven technology when controlled experiments have not adequately demonstrated safety.

While species-specific research on EMF effects to Pacific lamprey embryos is limited, evidence from other aquatic taxa proves that early life stages are sensitive to chronic EMF exposure, supporting a precautionary approach.¹⁷ A study examining effects of a subsea Direct Current (DC) cable on edible crab and European lobster embryonic development found that continuous exposure to 2.8 mT EMFs throughout development resulted in altered egg volume, reduced larval size (including carapace height, total length, and eye diameter), increased larval deformities, and reduced swimming performance. Although the studied species do not exist in the Columbia River, the proposed Project would be a similar high voltage DC cable (versus an AC line), and it is reasonable to expect similar embryonic-level effects in species that rear in river sediments and substates. Pacific lamprey, for example, are a culturally significant species that may experience comparable vulnerabilities to chronic EMF exposure during early development. These potential impacts warrant further consideration and full environmental review.

Construction impacts pose immediate threats through massive sediment disturbance and potential contamination mobilization. The project would displace over 300,000 cubic yards of sediment, which is equivalent to excavating a football field to 140 feet deep, yet the Application provides no comprehensive analysis of turbidity impacts or resuspension of legacy pollutants. The cable route crosses two Superfund sites (Bradford Island and Portland Harbor) and additional state cleanup sites, but the application lacks adequate sediment contamination characterization along the route. Jet plowing or trenching methods could resuspend PCBs, heavy metals, and other contaminants, while destroying

¹⁷ Petra Harsanyi, Kevin Scott, Blair A. A. Easton, Guadalupe de la Cruz Ortiz, Erica C. N. Chapman, Althea J. R. Piper, Corentine M. V. Rochas, and Alastair R. Lyndon, "The Effects of Anthropogenic Electromagnetic Fields (EMF) on the Early Development of Two Commercially Important Crustaceans, European Lobster (*Homarus gammarus* [L.]) and Edible Crab, *Cancer pagurus* (L.)," *Journal of Marine Science and Engineering* 10, no. 5 (2022): Article 564, <https://doi.org/10.3390/jmse10050564>

spawning gravels and benthic invertebrate communities. Post-construction sedimentation could impact incubating invertebrates and fish eggs and juvenile fish habitat. Years of restoration work to improve cold-water refugia and spawning habitat could be undermined by construction disturbance.

The risks of cable failure and long-term operational impacts are also inadequately addressed in the Application. Cable damage could release dielectric fluids, insulation materials, or other toxic substances into the river. Thermal runaway or arcing in a submerged high-voltage system could overheat sediments or cause localized combustion. The Applicant's assertion that the cable will not require maintenance is implausible, meaning repeated riverbed disturbance for inspection and repair would prolong ecological impacts indefinitely. Furthermore, the cable creates a fixed infrastructure barrier that will impact tribal treaty fishing activities, limits fisheries management and future restoration flexibility, and could interfere with restoration-based dredging operations, navigation channel use and maintenance, or habitat enhancement projects.

The Project lacks any proven precedent for environmental safety. Large-scale, high-voltage transmission cables of this type in freshwater systems are essentially nonexistent in the United States, providing no operational dataset to validate the Proponent's claims. The cumulative impact of adding thermal load, EMF exposure, sediment disturbance, and contamination risk to a river system already burdened by high temperatures, low flows, pollution, and decades of degradation represents "death by a thousand cuts" for Columbia River recovery efforts. The burden must fall squarely on the Applicant to conduct rigorous, independent baseline studies; provide transparent disclosure of all design variables and monitoring data; and demonstrate through controlled experiments, not in-river testing, that this project will not harm aquatic species, water quality, or habitat restoration investments. The Application's reliance on assumptions, modeling gaps, and unverified claims is insufficient given the magnitude of ecological risk to this irreplaceable resource. This Application should be deemed incomplete.

Land Use Compatibility and Site Selection Issues

The Applicant has failed to fully comply with EFSEC procedural and consultation requirements, reflected in the Application's incomplete analysis of impacts to tribal communities and its failure to consider mitigation and alternative options.¹⁸ By law, the Applicant is required to engage in pre-application consultation with local, state, federal, and tribal governments.¹⁹ The Applicant was also required to make public efforts to seek the "meaningful involvement of all people, regardless of race, ethnicity, or socioeconomic status."²⁰ Despite numerous conversations with tribal governments and CRITFC leadership and staff, the Applicant has not meaningfully consulted at a pre-decisional level

¹⁸ WAC Chapter 463-60 & WAC 463.60.115 (Requiring an applicant to substantially comply with all sections).

¹⁹ WAC 463.60.101(1).

²⁰ WAC 463.60.101(2).

regarding the scope, siting, or routing of its intended Project. The Applicant has not meaningfully engaged tribal or local river users regarding the foreseeable impacts of construction, operation, maintenance, and decommissioning of a first-of-its-kind in-river HVDC transmission cable.²¹ The application lacks sufficient site-specific information, impacts analysis, mitigation measures, or consideration of project alternatives.²²

1. *Failure to assess impacts to tribal river uses and activities*

The Project is incompatible with existing tribal uses and treaty-protected fisheries activities. The Project directly conflicts with existing and continuous tribal uses of the Columbia River for treaty-reserved fishing and management. As detailed above, the Applicant has not provided sufficient information to evaluate impacts to river ecosystems and ecological functions that support tribal fisheries. Further, the application also fails to assess impacts to tribal fisheries management, enforcement, restoration activities, and harvest. The Applicant gives little acknowledgment of the disruptions and burdens that tribal fishers, managers, and families would experience during construction, operation, and eventual decommissioning of the Project. The impacts to the treaty fisheries are notably absent from proposed mitigation measures.²³

The Project will have a profound impact on reserved fishing sites, particularly in the “Zone 6” section of the Columbia River. Zone 6 is a stretch of river between Bonneville and McNary dams that is reserved exclusively for treaty tribal commercial fishing and managed by CRITFC’s member tribes under *U.S. v. Oregon*. It is the only stretch of the river where tribal families routinely engage in commercial, subsistence, and ceremonial fishing at 31 federally reserved treaty fishing sites. These sites were reserved by Acts of Congress and subsequent amendments, are federally owned, and are managed by CRITFC’s member tribes for exclusive fishing practices, including seasonal and extended residential use by fishing families.²⁴ Impacts from the Project would occur wherever tribal fishing takes place but would be most direct and severe from just below Bonneville Dam to The Dalles, Oregon. The tribes employ various fishing techniques in the river and along the banks, including several fishing platforms along the river just below Bonneville Dam and many other fishing platforms. Eleven of the federally reserved in-lieu and treaty fishing access sites are located within the Project area.²⁵

Construction, operation, maintenance, and decommissioning of the Project threaten to disrupt tribal lifeways, fisheries management, and enforcement activities. The proposed overland segment runs immediately adjacent to the North Bonneville in-lieu fishing site,

²¹ Application at 1-53.

²² WAC 463-60-065, WAC 463-60-352 – 535, WAC 463-60-085, WAC 463-60-296.

²³ Application at 1-11 to 1-19.

²⁴ Act of March 2, 1945 (59 Stat. 10, chapter 19) (“River and Harbor Act of 1945”) and Title IV of Public Law 100-581 (102 Stat. 2944).

²⁵ See fishing access sites by river mile at <https://critfc.org/for-tribal-fishers/in-lieutreaty-fishing-access-sites/>.

where tribal fishers live and work, and would be affected by construction noise, pollution, traffic disruptions, and impacts to emergency services. This segment is also adjacent to the Bradford Island Superfund site where contaminants in the riverbed are elevated, at times necessitating issuance of fish consumption alerts. The Applicant claims the overland route benefits tribal fisheries and asserts that no residential units would be affected.²⁶ This assertion is incorrect. Tribal fishers reside at and near this site for extended seasons and would be directly impacted or displaced by construction-related effects, as the Applicant elsewhere acknowledges.²⁷

The Applicant has failed to analyze socioeconomic impacts from the Project on tribal communities as required by Washington law.²⁸ The Applicant must provide a detailed analysis of primary and secondary socioeconomic impacts, including impacts to governmental services and local economies. The application does not acknowledge or evaluate impacts to the tribal treaty economy or to tribal governmental services related to fisheries management, enforcement, and restoration. Once again, tribal communities are being asked to bear the burdens of energy development without adequate consultation, mitigation, or recognition of treaty-protected economic activity.²⁹

2. Inadequate analysis of Project alternatives

The Project application currently includes inadequate site selection justification and a deficient alternatives analysis. The Applicant has failed to analyze reasonable alternatives to the proposed in-river route.³⁰ Alternative proposals required for analysis would include routes that do not traverse the Columbia River, routes that do not involve in-river placement, and alternatives related to construction methods or materials. The only “alternatives” included in the Application either involve minor adjustments within the same in-river corridor, such as shifting the cable toward the channel center or extending the route length, or a cursory review of alternatives the Applicant has concluded it cannot pursue.³¹ The Application provides no documentation or analysis demonstrating that alternative routes or sites were ever seriously considered. Review of Applicant’s presentations to tribal staff dated to March 9, 2022, indicates no substantive changes to the Project route, despite repeated concerns raised by tribal leaders and staff. The Applicant references pre-feasibility studies dated from 2020 and 2021, but these are not included in the application and, in any case, appear to only evaluate the same proposed in-river corridor. The Applicant concludes in this application, without supporting analysis, that the in-river route would result in fewer impacts and greater feasibility than other

²⁶ Application at 2-19, 2-54.

²⁷ Application at 1-19.

²⁸ WAC 463-60-535

²⁹ See Tribal Circumstances Report (2024).

³⁰ WAC 463-60-296

³¹ Application at 2-53 to 2-60.

alternatives.³² This conclusion is unsupported and does not satisfy EFSEC's alternatives analysis requirements for a project of this novelty, magnitude, and risk.

There is a lack of demonstrated regional need for the Project. The Applicant has not provided studies or analysis to support its assertion that the Project is necessary and beneficial for Washington residents. The Project is intended to serve Portland General Electric's (PGE) loads in the Portland and Hillsboro area, where projected load growth is driven by data centers and technology manufacturing developments.³³ PGE's most recent Integrated Resource Plan identifies this Project as the most expensive transmission option under consideration, at more than twice the cost per kilowatt-hour of alternatives such as the Bethel-Round Butte Upgrade.³⁴ PGE's participation in the California day-ahead market is expected to expand renewable energy access along a north-south corridor, not the proposed east-west pathway. Many residents in the affected area are served by public utilities reliant on BPA resources, which is pursuing its own regional transmission upgrades.³⁵ The Applicant has not demonstrated how serving PGE's new large-load customers would alleviate Washington grid constraints or provide commensurate regional benefit.

The Draft Application Is Incomplete

The application is incomplete due to the absence of fundamental, site-specific baseline information for the proposed in-river cable route. The Applicant has not conducted or provided required surveys, nor has it completed seasonal studies necessary to understand baseline ecological conditions. The application lacks fish counts, habitat characterization, and a comprehensive geologic assessment of riverbed conditions, leaving unresolved where cable burial may be infeasible due to bedrock or boulder fields. Without these data, EFSEC cannot evaluate the feasibility of construction methods or the extent of disturbance to aquatic habitats.

The application also fails to adequately assess project impacts. It provides insufficient information to evaluate thermal effects, suspended sediment generation, and electromagnetic field (EMF) impacts on fish behavior and migration, particularly for salmon, lamprey, and sturgeon. The Applicant references internal studies related to temperature, magnetism, and geology but does not include them, preventing independent

³² Application at 2-53.

³³ Portland General Electric, 2023 Clean Energy Plan and Integrated Resource Plan Update, at 9 (August 15, 2025), https://downloads.ctfassets.net/416ywc1laqmd/UULUBLOdenMjnrFJHv2mV/c382e175edae0e6ccffb806cd02bb6db/2023_CEP_IRP_Update_Errata.pdf.

³⁴ PGE IRP/CEP, at 89-91.

³⁵ See <https://www.bpa.gov/energy-and-services/transmission/grid-expansion-and-reinforcement-portfolio>.

review. In addition, the application does not demonstrate compliance with “no net loss” standards or propose compensatory mitigation for habitat or activity-related impacts.

Meaningful public and intergovernmental engagement have also been inadequate, with many stakeholders first learning of the Project at public hearings, and the Applicant has apparently not demonstrated completion of the required 60-day good-faith negotiations with affected local governments. Collectively, these deficiencies preclude meaningful environmental review and warrant a finding that the application is incomplete.

Finally, throughout the application the Applicant has failed to meaningfully acknowledge, analyze, or mitigate the uniquely significant and cumulative impacts to the tribal fisheries and the ecosystems on which they depend on the Project’s proposed route through the heart of the Columbia River treaty fishing areas.

Conclusion


The Columbia River is not an appropriate testing ground for unprecedented and unproven infrastructure. The proposed Project would install a high-voltage, high-temperature transmission cable within the bed of a river that is already ecologically stressed and central to treaty-protected fisheries, cultural practices, and ongoing restoration efforts. No other river in the United States hosts infrastructure of this kind and length, and the Applicant has offered no operational precedent or comprehensive data to demonstrate that the risks to fish, habitat, and cultural resources can be avoided or mitigated. Although marketed as a clean energy project, the transmission line carries no binding requirement to deliver renewable power and could transmit fossil fuel-based or nuclear energy. Characterizing the Project as “renewable” therefore obscures its substantial ecological and cultural risks and amounts to greenwashing rather than responsible energy development. The burden is on the Applicant to demonstrate this Project is safe, as opposed to us proving that the Project is not safe for the Columbia Basin ecosystem and communities.

The point of the transition to renewable energy is to lessen the environmental impacts of energy production and transmission. This isn’t limited to just its carbon footprint; it must also be clean for the river and the people who live along the river and those who rely on the river’s bounties for ceremonial, subsistence and economic uses as guaranteed by treaties with the U.S. This Project adds risk, cost, and uncertainty to an already overburdened system without clearly demonstrating regional need or public benefit, particularly for Washington communities and tribal nations that would bear the impacts. Protecting treaty-reserved fisheries and tribal rights must be integral to any energy future, not sacrificed for expedience or convenience. At a minimum, full site-specific data, meaningful consultation, and comprehensive environmental review are prerequisites before exposing the Columbia River to irreversible harm. Accordingly, CRITFC urges EFSEC to deem the application incomplete, require a full environmental impact statement (EIS), and suspend further review until the Applicant provides complete baseline information,

robust impact analyses, and demonstrates full compliance with all requirements of WAC Chapter 463-60.

Thank you for your consideration. If you have further questions, please contact CRITFC staff, Julie Carter or Karlen Yallup at (503) 238-0667.

Sincerely,

DocuSigned by:

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Aja K. DeCoteau
Executive Director