



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: PO Box 43200, Olympia, WA 98504-3200 · 360 902-2200 · TDD 360 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street, Olympia, WA

February 6, 2026

Maria Belkina
Site Specialist
Energy Facility Site Evaluation Council
comments@efsec.wa.gov

Subject: Application Review: Cascade Renewable Transmission Line

Dear Maria,

The Washington Department of Fish and Wildlife (WDFW) has reviewed the Application for Site Certification (ASC) and relevant appendices to better understand the project and potential impacts in Washington State as well as several webpages ([Cascade Renewable Transmission, Description — Cascade Renewable Transmission Project](#), [In Depth — Cascade Renewable Transmission Project](#)) to better understand the entire project. Our comments are limited to the 32.8 miles in the Columbia River and the 7.4 miles of on land portions of the project in Washington State.

On Land

The on-land portion is within the jurisdictions of Skamania County and several cities. On-land, the underground transmission cable bundle passes around Bonneville Locks and Dam and includes both river exit and entry points and laydown/work areas. The project proposes to make use of as much as previously disturbed areas as possible as well as established rights-of-ways but will result in 8.75 acres of temporary disturbance and 2.3 acres of permanent disturbance.

WDFW generally has no major concerns for impacts to terrestrial priority habitats and species along the length of the on-land and underground portion of the project. However, it appears that the transmission line will intersect through several wetland habitats. WDFW considers wetlands to be priority habitats, and we will defer to the Department of Ecology for delineating the location of those habitats and regulating impacts. Additionally, there are Oregon white oak woodlands near Fort Cascades Dr, North Bonneville and the project should avoid any activity that may disturb these trees. Finally, we have one record of Northwest pond turtle, a state endangered species, along this on-land/underground segment and it appears that the transmission line will pass through/under a wetland nearby a lake used by this species. We can provide precise location data via a Sensitive Data Request ([Sensitive PHS Data Request](#) |

[Type here]

[Washington Department of Fish & Wildlife](#)) and recommend that the project avoid any activity that may directly or indirectly impact this endangered species.

We support horizontal directional drilling (HDD) to install the transmission cable under streambeds, riparian vegetation, and within existing rights-of-ways. However, the segment south of Bridge of the Gods intersects with several streams and we are concerned about impacts to these priority habitats. We look forward to working with the project to identify and avoid potential impacts to these habitats and fish life and issue any Hydraulic Project Approval (HPA) that may be required for any on-land and underground work that may affect the bed or flow of state waters. This also applies to any construction work above or below a culvert conveying a stream.

In Water

The portion of HVDC transmission line buried in the sediment of the Columbia River would be in Klickitat, Skamania, and Clark counties and result in 49.5 acres of temporary disturbance associated with installation within the OHWM and be 11.9 acres of permanent impacts in the Columbia River for fill over and for the protection of transmission cable bundle. WDFW supports the proposed cable route in the mid-river area, in or adjacent to the Federal Navigation Channel.

Section 2.17 of the ASC provides information on the work activities that will occur within the Columbia River and states that many of the actions, specifically pre-installation clam shell dredging and cofferdam construction, will be addressed in future plans, covered under permits, and implemented by contractors.

Only generalized areas are described in the ASC for wet cofferdam construction, and we are concerned about impacts to recreational fishing activities and regionally important chum salmon spawning areas in the vicinity of Pierce and Ives Islands. Any below water structures needed to secure the cable bundle have the potential to impact recreational and fishing boats and side casting dredged material from cofferdam construction has the potential to impact not only Chum and Chinook salmon spawning areas immediately adjacent downstream but also other shallow water habitats important to aquatic wildlife.

The project identifies the in-water work windows of November 1 – March 15 above Bonneville Dam and November 1 – February 28 below Bonneville dam. Given the almost 33 miles of in water work in Washington, we do not agree that these in-water work windows would “...avoid peak uses by fish and other aquatic organisms...”

WDFW looks forward to working with the project, contractors, and permitting authorities to ensure that sensitive natural resources are avoided, impacts are minimized, and that mitigation occur, if necessary.

Sincerely,



Michael Ritter

Lead Planner, Solar & Wind Energy Development