City of Bellevue

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May 16, 2016

VIA E-MAIL & U.S. MAIL
Carol V. Helland, Environmental Coordinator
Heidi Bedwell, Senior Planner
City of Bellevue
PO Box 90012
Bellevue, WA 98009-9012

RE: Puget Sound Energy "Energize Eastside" 230 kV Transmission Line Project Proposal – DEIS Phase 2 Scoping

Dear Ms. Helland:

Below please find the Bellevue City Council's comments regarding the appropriate scope for the above referenced transmission line project proposal (the "Proposal") in connection with the Phase 2 Draft Environmental Impact Statement ("DEIS").

The Bellevue City Council on behalf of its citizens continues its interest in the scope and thoroughness of the environmental review, and therefore it is appropriate that the City representatives provide comments to the Environmental Coordinator. The regulatory requirements for expanded scoping (the process being applied to the Proposal) are intended to be a flexible framework that encourages lead agencies to promote public participation, interagency cooperation, and use of innovative methods to streamline the SEPA process, as the lead agency deems appropriate (WAC 197-11-410.)

Within this context the Bellevue City Council, operating in its role as representatives of the community, submits these comments to help ensure that the final EIS continues to adequately address issues raised by the community about the potential significant adverse environmental impacts of this significant infrastructure project. The final EIS should also clearly address how alternatives to the Proposal, including those project-specific alternatives proposed by PSE and additional reasonable project-specific alternatives identified during the Phase 2 DEIS scoping process, adequately address these issues.

The Phase 2 DEIS has been described as the portion of the environmental review that focuses on project-level environmental impacts, including geographically-specific impacts. Prior to the Phase 2 scoping period, we understand that Puget Sound Energy (PSE) has identified a "preferred alternative" for consideration for their Proposal, known as "Willow 2." As an investor-owned utility, PSE bears responsibility for planning and maintaining its infrastructure to reliably deliver electrical service to its customers and ratepayers, without direct oversight for that planning or capital improvement plan by any local jurisdiction.

We understand that Bellevue and the other participating cities to the environmental review process are preparing the final EIS to support the local jurisdictions' roles as permitting agencies. When PSE selects a final route, it will apply for permits for that project, which must comply with the cities' various codes

and regulations, including those around mitigation of impacts. To that end, focus on the positive and negative impacts of the Proposal, PSE's preferred alternative, and reasonable alternatives that meet the purpose and need of the Proposal, as defined in the Phase 1 EIS, are of critical importance to allow for effective permit review in the future.

In light of the role of the cities in the process, we believe that the Phase 2 DEIS should address those elements of the environment where significant impacts are anticipated or identified. Although we know the Phase 2 DEIS will address many elements of the environment and assess the impacts of PSE's preferred alternative, we are particularly interested in:

1. Transparency
   1.1. The Phase 2 DEIS should provide an understanding of the detailed impacts of variations along segments of the Willow 2 preferred alternative, including key factors that PSE has used to select its preferred route.
   1.2. The comparison between potential alignment variations within Willow 2 should include which variations focus on existing corridors and which allow for reducing the overall number of poles or otherwise reduce visual clutter. All comparisons should include how variations impact sensitive areas, existing residences and public safety considerations;

2. Visual impacts
   2.1. Robust visual impact simulations should be conducted along the entire alignment in order to give a true reflection of the impacts along the different geographies, topographies and surrounding land uses along the alignment.
   2.2. The Phase 2 DEIS should identify alternatives or measures to minimize identified visual impacts, including: consideration of best available technologies to minimize the bulk and scale of the transmission line infrastructure, alignment and profile modifications, and ways to minimize visual clutter.
   2.3. In addition, comments have suggested undergrounding some or all of the transmission line might be appropriate mitigation for visual impacts.
   2.4. The Phase 2 DEIS should identify where undergrounding would mitigate significant adverse visual impacts and include a description of the technical standards and requirements for undergrounding a 230kV transmission line; should identify state regulation and utility tariffs around undergrounding such lines, and identify from a technical standpoint whether undergrounding is precluded from mitigation consideration when the facility is located within regulatory proximity to the Olympic pipeline.
   2.5. There should be a specific analysis of the area required for undergrounding, areas where undergrounding is feasible and would mitigate identified impacts, a comparison of that to the space available within the existing shared utility corridor, and consideration of the safety impacts of underground colocation, if technically feasible;

3. Health and safety impacts
   3.1. The Phase 2 DEIS should carefully consider areas where the preferred alternative will be collocated with any natural gas or fuel pipeline along the alignment.

3.2. The Phase 2 DEIS should identify the potential project-specific impacts of such collocation in the event of a natural disaster (earthquake) or leak or other damage to either the proposed PSE infrastructure or the existing pipeline infrastructure.
3.3. The Phase 2 DEIS should identify the likely magnitude of the safety risk, the areas most at risk in such an event, and alternatives or measures that would minimize that risk. Measures should address best practices, best available technological solutions and other approaches to avoiding or minimizing risk.
3.4. The Phase 2 DEIS should differentiate impacts, including impacts of noise and access inconvenience, and mitigation of construction and operations for each of the preferred alternative alignments.
3.5. Each jurisdiction has different regulations so the Phase 2 DEIS should make sure that best practices mitigate across the whole line of permitting authorities

4. Ecological impacts:
   4.1. The Phase 2 DEIS should quantify the number of significant trees likely to be removed for construction of PSE's preferred alternative.
   4.2. The Phase 2 DEIS should quantify the impact of such removal to the City's overall tree canopy and to any species of concern or wildlife corridors as defined in the City's critical areas regulations.
   4.3. The Phase 2 DEIS should also evaluate modifications to avoid or minimize tree loss, as well as mitigation measures including undergrounding of the transmission line and/or replacement of trees removed in construction, that address loss of trees as well as any ecological function or habitat loss.
   4.4. The Phase 2 DEIS should seek to quantify the ecosystem service values and shapes of urban forests which would help with cost-benefit analysis.

5. The Phase 2 DEIS should include a discussion of any particular alternative that is determined to fail to meet the purpose and need of the Proposal, or is otherwise determined to be not reasonable or feasible. This transparency in the process is important to those in the community who remain concerned about the ability to fully mitigate the impacts associated with PSE's preferred alternative.

6. Property Values (from the Phase 1 Summary): "The City acknowledges that effects on property values and property tax rates are of high concern to many residents, particularly in relation to Alternative 1, Option A, as demonstrated by the large number of comments received on this topic. As described in the Phase 1 Draft EIS, the effect of a transmission line on property values is an economic rather than an environmental issue as defined by SEPA. However, the issue was discussed in the land use analysis to the extent that a change in property values could result in a change in land use... For the project-level analysis in the Phase 2 DEIS additional economic information should be provided for other jurisdictions to identify potential changes in land use. These comments and any new information should be used to refine the discussion, analysis, and characterization of these issues in the Phase 2 DEIS."

7. The Phase 2 DEIS should include a discussion of any particular alternative that is determined to fail to meet the purpose and need of the Proposal, or is otherwise determined not to be reasonable or

feasible. This transparency in the process is important to those in the community who remain concerned about the ability to fully mitigate the impacts associated with PSE's preferred alternative.

8. The Phase 2 DEIS should include in the No Action Alternatives analysis those energy efficiency components of maintenance and conservation (including energy efficiency measures and increasing demand response components to reduce end-use customer usage) other activities including additional voluntary conservation, demand-response components including AMI, and distributed generation. These components analyzed under Alternative 2 in the Phase 1 Draft EIS could be considered for mitigation components within the city's partnerships with PSE to provide an alternative energy future.

9. The Willow 2 preferred alternative alignment should examine coordination and user convenience issues if line construction occurs during construction phases of the City of Bellevue's Newport Way sidewalk CIP project.

Thank you for this opportunity to provide comment regarding the scoping of this EIS. We understand that as the Environmental Coordinator you must evaluate all comments within the framework of SEPA and its regulatory guidance.

Very truly yours,

John Stokes, Mayor
City of Bellevue