

# APPENDIX K: PHASE 2 DRAFT EIS COMMENTS & RESPONSES

Reproduced Letters and Cross-referenced Responses follow this Index ([hyperlinked](#)).

Commenter	Communication ID	Page Number
<b>Agency/Tribe</b>		
US Army Corps of Engineers (Andrew Shuckhart)	<a href="#">FF1-A</a>	K-1
Muckleshoot Indian Tribe Fisheries Division (Karen Walter)	<a href="#">TT1-A</a>	K-2
Department of Ecology (Joe Burcar)	<a href="#">SS1-A</a>	K-4
City of Newcastle (Steve Osguthorpe)	<a href="#">LL1-A</a>	K-9
City of Newcastle (Tim McHarg)	<a href="#">LL1-B</a>	K-22
City of Newcastle	<a href="#">LL1-C</a>	K-26
City of Kenmore (David Baker)	<a href="#">LL2-A</a>	K-28
City of Issaquah (Kevin Niven)	<a href="#">LL3-A</a>	K-30
King County Department of Natural Resources and Parks (Christie True)	<a href="#">LL4-A</a>	K-32
<b>Organization</b>		
CENSE (Don Marsh)	<a href="#">OO1-A</a>	K-744
	<a href="#">OO1-B</a>	K-792
	<a href="#">OO1-C</a>	K-809
	<a href="#">OO1-D</a>	K-719
	<a href="#">OO1-E</a>	K-37
CENSE (Don Marsh & Christina Aron-Sycz)	<a href="#">OO1-F</a>	K-42
CENSE (Don Marsh and Janis Medley)	<a href="#">OO1-G</a>	K-679
Olympus Homeowner's Association (Brian Elworth)	<a href="#">OO4-A</a>	K-687

Commenter	Communication ID	Page Number
	<a href="#">OO4-B</a>	K-712
	<a href="#">OO4-C</a>	K-724
	<a href="#">OO4-D</a>	K-735
	<a href="#">OO4-E</a>	K-782
	<a href="#">OO4-F</a>	K-796
	CSEE (Larry Johnson)	<a href="#">OO5-A</a>
<a href="#">OO5-B</a>		K-683
<a href="#">OO5-C</a>		K-717
<a href="#">OO5-D</a>		K-729
<a href="#">OO5-E</a>		K-65
<a href="#">OO5-F</a>		K-74
<a href="#">OO5-G</a>		K-77
<a href="#">OO5-H</a>		K-79
<a href="#">OO5-I</a>		K-89
<a href="#">OO5-J</a>		K-91
<a href="#">OO5-K</a>		K-94
<a href="#">OO5-L</a>		K-98
<a href="#">OO5-M</a>		K-101
<a href="#">OO5-N</a>		K-105
Bridle Trails Community Club (Norm Hansen)	<a href="#">OO6-A</a>	K-742
Canter Green Homeowners' Association (Warren Halverson)	<a href="#">OO7-A</a>	K-737
	<a href="#">OO7-B</a>	K-777
	<a href="#">OO7-C</a>	K-803
Canter Greens HOA (Warren Halverson)	<a href="#">OO7-D</a>	K-107
	<a href="#">OO7-E</a>	K-111

Commenter	Communication ID	Page Number
Bellevue School District (Melissa deVita)	<a href="#">OO10-A</a>	K-115
CURE (Bernie Dochnahl)	<a href="#">OO11-A</a>	K-116
Bellevue LifeSpring (Jennifer Fischer)	<a href="#">OO12-A</a>	K-122
Kaiser Permanente & Overlake Medical Center & Swedish Issaquah & Evergreen Health & Seattle Children's (William Biggs & Robert H. Maite & Caitlin Hillary Moulding & Todd Johnson & Jeffery Robert)	<a href="#">OO13-A</a>	K-123
Renton Chamber of Commerce (Vicky Baxter)	<a href="#">OO14-A</a>	K-125
Meydenbauer (Stacy Graven)	<a href="#">OO16-A</a>	K-127
Bellevue Chamber of Commerce (David Masin & Betty Capenstany)	<a href="#">OO18-A</a>	K-130
Seattle King County Realtors (Randy Bannecker)	<a href="#">OO17-A</a>	K-129
Bellevue Downtown Association (Irene Plenefisch & Patrick Bannon)	<a href="#">OO19-A</a>	K-132
OneRedmond (Bart Phillips)	<a href="#">OO20-A</a>	K-133
Greater Issaquah Chamber of Commerce (Kathy McCorry)	<a href="#">OO21-A</a>	K-134
Somerset Recreation Club (Eric Bidstrup)	<a href="#">OO22-A</a>	K-753
Somerset Recreation Club (Somerset Recreational Club & Its Members)	<a href="#">OO23-A</a>	K-135
Bridle Trails Community Club (Pamela Johnston)	<a href="#">OO24-A</a>	K-138
<b>Individual</b>		
Abel, Mike	<a href="#">I146-A</a>	K-757
Adcock, James	<a href="#">I182-A</a>	K-344
Allred, Curtis	<a href="#">I129-A</a>	K-708
	<a href="#">I129-B</a>	K-771
	<a href="#">I129-C</a>	K-207
	<a href="#">I129-D</a>	K-209
	<a href="#">I129-E</a>	K-211
Andersen, Ryan	<a href="#">I1145-A</a>	K-615
Andersen, Todd	<a href="#">I147-A</a>	K-749

Commenter	Communication ID	Page Number
	<a href="#">II47-B</a>	K-784
	<a href="#">II47-C</a>	K-798
	<a href="#">II47-D</a>	K-817
	<a href="#">II144-A</a>	K-613
	<a href="#">II145-A</a>	K-615
Aramburu, J Richard	<a href="#">II87-A</a>	K-354
	<a href="#">II87-B</a>	K-356
Aron-Sycz, Christina	<a href="#">II140-A</a>	K-576
Bach, Kelly	<a href="#">II127-A</a>	K-523
Barnes, Charles	<a href="#">II132-A</a>	K-533
Beffa, Julie	<a href="#">II128-A</a>	K-524
Berry, Carol	<a href="#">II135-A</a>	K-539
Bidstrup, Eric	<a href="#">II121-A</a>	K-481
Billing, Robert	<a href="#">II57-A</a>	K-292
Blodgett, Michael	<a href="#">II81-A</a>	K-343
Borgmann, Russell	<a href="#">II90-A</a>	K-362
	<a href="#">II90-AA</a>	K-399
	<a href="#">II90-B</a>	K-363
	<a href="#">II90-BB</a>	K-405
	<a href="#">II90-C</a>	K-364
	<a href="#">II90-D</a>	K-366
	<a href="#">II90-E</a>	K-368
	<a href="#">II90-F</a>	K-369
	<a href="#">II90-G</a>	K-371
<a href="#">II90-H</a>	K-372	

Commenter	Communication ID	Page Number
	<a href="#">I190-I</a>	K-373
	<a href="#">I190-J</a>	K-374
	<a href="#">I190-K</a>	K-375
	<a href="#">I190-L</a>	K-377
	<a href="#">I190-M</a>	K-378
	<a href="#">I190-N</a>	K-380
	<a href="#">I190-O</a>	K-383
	<a href="#">I190-P</a>	K-384
	<a href="#">I190-Q</a>	K-386
	<a href="#">I190-R</a>	K-387
	<a href="#">I190-S</a>	K-388
	<a href="#">I190-T</a>	K-389
	<a href="#">I190-U</a>	K-391
	<a href="#">I190-V</a>	K-393
	<a href="#">I190-W</a>	K-394
	<a href="#">I190-X</a>	K-395
	<a href="#">I190-Y</a>	K-396
<a href="#">I190-Z</a>	K-398	
Brian, Calado	<a href="#">I192-A</a>	K-410
Burnell, Suzanne	<a href="#">I1113-A</a>	K-455
Cezeaux, Thomas	<a href="#">I119-A</a>	K-179
	<a href="#">I119-B</a>	K-180
	<a href="#">I119-C</a>	K-181
Chen, Amos	<a href="#">I113-A</a>	K-170
Chevalier, Barbra	<a href="#">I115-A</a>	K-173

Commenter	Communication ID	Page Number
Coffee, Thomas	<a href="#">I156-A</a>	K-291
Coston, Nola	<a href="#">I140-A</a>	K-247
Cox, Sean	<a href="#">I150-A</a>	K-271
	<a href="#">I150-B</a>	K-272
	<a href="#">I150-C</a>	K-273
	<a href="#">I150-D</a>	K-274
	<a href="#">I150-E</a>	K-275
	<a href="#">I150-F</a>	K-276
	<a href="#">I150-G</a>	K-277
	<a href="#">I150-H</a>	K-278
Crispo, Rich	<a href="#">I134-A</a>	K-692
Cross, Martha	<a href="#">I1110-A</a>	K-449
Davidson, Mark	<a href="#">I167-A</a>	K-304
De Gennaro, Joe	<a href="#">I16-A</a>	K-159
Demund, Jeanne	<a href="#">I130-A</a>	K-699
	<a href="#">I130-B</a>	K-767
	<a href="#">I130-C</a>	K-215
Dochnahl, Bernie	<a href="#">I175-A</a>	K-310
Dontireddy, Sirisha	<a href="#">I155-A</a>	K-287
	<a href="#">I155-B</a>	K-289
	<a href="#">I155-C</a>	K-290
Elworth, Brian	<a href="#">I1122-A</a>	K-488
	<a href="#">I1136-A</a>	K-545
Elworth, Lori	<a href="#">I132-A</a>	K-704
	<a href="#">I132-B</a>	K-220

Commenter	Communication ID	Page Number
Esayan, Karen	<a href="#">II20-A</a>	K-182
	<a href="#">II20-B</a>	K-187
	<a href="#">II20-C</a>	K-190
Faith, Amy	<a href="#">II51-A</a>	K-279
Ferguson, Deron	<a href="#">II118-A</a>	K-470
Fetchero, Sam	<a href="#">II12-A</a>	K-169
Fletcher, Ann	<a href="#">II23-A</a>	K-198
Garmendia, Ricardo	<a href="#">II33-A</a>	K-728
Giboney, Angela	<a href="#">II60-A</a>	K-295
Glass, Joel	<a href="#">II106-A</a>	K-442
Graham, Eldon	<a href="#">II24-A</a>	K-199
	<a href="#">II24-B</a>	K-200
Halverson, Warren	<a href="#">II37-A</a>	K-712
	<a href="#">II37-B</a>	K-243
Halverson, Maryanne	<a href="#">II45-A</a>	K-765
	<a href="#">II45-B</a>	K-266
Hansen, Norm	<a href="#">II138-A</a>	K-565
	<a href="#">II138-B</a>	K-567
Hanson, Gwen	<a href="#">II68-A</a>	K-305
Herling, William and Sallie	<a href="#">II77-A</a>	K-314
Herman, Karla and Dave	<a href="#">II8-A</a>	K-163
Hertog, Emanuel	<a href="#">II66-A</a>	K-303
Jacobson, Jessaca	<a href="#">II98-A</a>	K-428
Jacobson, Robin	<a href="#">II49-A</a>	K-268
Johnson, Gregory	<a href="#">II41-A</a>	K-249

Commenter	Communication ID	Page Number
Jordan, Cheryl	<a href="#">II119-A</a>	K-479
Joy, George	<a href="#">II72-A</a>	K-813
Judkins, Kathy	<a href="#">II116-A</a>	K-467
Kammin, Harlan	<a href="#">II104-A</a>	K-440
Kammin, Tamra	<a href="#">II111-A</a>	K-454
Kampen, Garry	<a href="#">II83-A</a>	K-345
Kaner, Richard	<a href="#">II35-A</a>	K-702
	<a href="#">II35-B</a>	K-226
Kapoor, Rahul	<a href="#">II26-A</a>	K-203
Keller, Jennifer	<a href="#">II97-A</a>	K-419
Kim, Jane	<a href="#">II1-A</a>	K-140
Krist, Keith	<a href="#">II115-A</a>	K-464
Kristen, Stephanie	<a href="#">II65-A</a>	K-302
Lauckhart, Richard	<a href="#">II2-A</a>	K-141
	<a href="#">II2-B</a>	K-144
	<a href="#">II2-C</a>	K-148
	<a href="#">II2-D</a>	K-150
	<a href="#">II2-E</a>	K-152
LeVeque, Marcia	<a href="#">II9-A</a>	K-164
Loera, Wolfgang	<a href="#">II59-A</a>	K-294
Long, Jim	<a href="#">II76-A</a>	K-312
Lopez, Loretta	<a href="#">II31-A</a>	K-709
	<a href="#">II31-B</a>	K-775
	<a href="#">II31-C</a>	K-819
	<a href="#">II31-D</a>	K-219

Commenter	Communication ID	Page Number
Loring, James	<a href="#">II105-A</a>	K-441
Madonna, Shannon	<a href="#">II114-A</a>	K-460
Magill, Kari	<a href="#">II143-A</a>	K-612
Makar, Margaret	<a href="#">II11-A</a>	K-168
Mansfield, Peter	<a href="#">II79-A</a>	K-341
Mathis, Mary	<a href="#">II28-A</a>	K-206
Mayers, Marilyn	<a href="#">II85-A</a>	K-350
McCray, Sally	<a href="#">II70-A</a>	K-307
	<a href="#">II70-B</a>	K-308
McGiffert, Pat	<a href="#">II95-A</a>	K-415
	<a href="#">II95-B</a>	K-416
McGoff, Tom	<a href="#">II3-A</a>	K-155
	<a href="#">II3-B</a>	K-156
Medley, Janis	<a href="#">II43-A</a>	K-763
	<a href="#">II43-B</a>	K-264
Meston, Suzanne	<a href="#">II126-A</a>	K-521
Meyer, Marlene	<a href="#">II101-A</a>	K-434
	<a href="#">II101-B</a>	K-435
Mickelson, Dave and Denise	<a href="#">II18-A</a>	K-177
Mohaghegh, Massoud	<a href="#">II44-A</a>	K-800
Molloy, Rachel	<a href="#">II102-A</a>	K-436
Moloney, Esther	<a href="#">II131-A</a>	K-532
Moloney, Robert	<a href="#">II94-A</a>	K-413
Moore, Clyde	<a href="#">II130-A</a>	K-526
Moore, Margaret	<a href="#">II133-A</a>	K-535

Commenter	Communication ID	Page Number
Nickols, Michelle	<a href="#">I174-A</a>	K-818
Nolan, Joan & Robert	<a href="#">I139-A</a>	K-572
Northcroft, Gloria	<a href="#">I129-A</a>	K-525
O'Donnell, Steve	<a href="#">I142-A</a>	K-705
	<a href="#">I142-B</a>	K-722
Olson, R. Court	<a href="#">I21-A</a>	K-194
	<a href="#">I21-B</a>	K-770
	<a href="#">I21-C</a>	K-789
Orth, Roger	<a href="#">I10-A</a>	K-167
Osterberg, Ann Schroeder	<a href="#">I120-A</a>	K-480
Paltiel, Joy	<a href="#">I73-A</a>	K-815
Pevehouse, Lucy	<a href="#">I124-A</a>	K-518
Presley, Richard	<a href="#">I91-A</a>	K-409
Price, James	<a href="#">I4-A</a>	K-157
Prichard, Janet	<a href="#">I25-A</a>	K-202
Prior, Lara	<a href="#">I53-A</a>	K-282
	<a href="#">I53-B</a>	K-283
	<a href="#">I53-C</a>	K-284
Prior, Simon	<a href="#">I54-A</a>	K-285
	<a href="#">I54-B</a>	K-286
Rajendra, Sangeetha	<a href="#">I14-A</a>	K-171
	<a href="#">I14-B</a>	K-697
Razabek, Cynthia	<a href="#">I88-A</a>	K-360
Rector, Warren	<a href="#">I48-A</a>	K-756
Renn, Daniel	<a href="#">I89-A</a>	K-361

Commenter	Communication ID	Page Number
Richardson, Michelle	<a href="#">I164-A</a>	K-301
Romanchuk-Czarney, Wendy	<a href="#">I196-A</a>	K-418
Rowley, Skip	<a href="#">I1143-A</a>	K-612
Rush, Diane	<a href="#">I152-A</a>	K-281
Schwartz, David	<a href="#">I142-A</a>	K-795
	<a href="#">I142-B</a>	K-250
	<a href="#">I142-C</a>	K-251
	<a href="#">I142-D</a>	K-252
	<a href="#">I142-E</a>	K-253
	<a href="#">I142-F</a>	K-254
	<a href="#">I142-G</a>	K-255
	<a href="#">I142-H</a>	K-256
	<a href="#">I142-I</a>	K-257
	<a href="#">I142-J</a>	K-258
	<a href="#">I142-K</a>	K-259
	<a href="#">I142-L</a>	K-260
	<a href="#">I142-M</a>	K-261
	<a href="#">I142-N</a>	K-262
<a href="#">I142-O</a>	K-263	
Scott, Ian	<a href="#">I116-A</a>	K-175
Shakes, Jonathan	<a href="#">I169-A</a>	K-306
Sherman, Kathleen	<a href="#">I1107-A</a>	K-443
	<a href="#">I1107-B</a>	K-444
	<a href="#">I1107-C</a>	K-445
Sinclair, Terry & Joan	<a href="#">I193-A</a>	K-411

Commenter	Communication ID	Page Number
Smets, Martine	<a href="#">I171-A</a>	K-309
Stanley, Carloyn	<a href="#">I138-A</a>	K-245
Steinman, Jennifer	<a href="#">I1144-A</a>	K-613
	<a href="#">I1145-A</a>	K-615
Stone, Joseph	<a href="#">I186-A</a>	K-352
Stoppelman, Howard	<a href="#">I122-A</a>	K-197
Strauch, Brad	<a href="#">I1141-A</a>	K-584
Stronk, Sue	<a href="#">I136-A</a>	K-694
	<a href="#">I136-B</a>	K-761
	<a href="#">I136-C</a>	K-228
	<a href="#">I136-D</a>	K-230
	<a href="#">I136-E</a>	K-232
	<a href="#">I136-F</a>	K-239
	<a href="#">I136-G</a>	K-240
Sulzberg, Jill	<a href="#">I161-A</a>	K-296
Sweet, Joan	<a href="#">I184-A</a>	K-349
Taylor, Linda	<a href="#">I1108-A</a>	K-446
Thiel, Jeff	<a href="#">I163-A</a>	K-299
Tubbs, Leslie	<a href="#">I15-A</a>	K-158
Tung, Wei	<a href="#">I158-A</a>	K-293
Venu, Lekshmi	<a href="#">I1123-A</a>	K-517
Vestal, Josephine B	<a href="#">I1117-A</a>	K-468
Vlachopoulou, Maria	<a href="#">I1109-A</a>	K-447
	<a href="#">I1109-B</a>	K-448
von Will, Julian	<a href="#">I199-A</a>	K-430

Commenter	Communication ID	Page Number
Wadley, Diana	<a href="#">I103-A</a>	K-438
Wallace, Robert	<a href="#">I137-A</a>	K-564
Warme, Jeanne	<a href="#">I17-A</a>	K-161
Warner, Keith	<a href="#">I147-A</a>	K-675
Weir, Kristi and Tom	<a href="#">I178-A</a>	K-337
Williams, Bruce	<a href="#">I117-A</a>	K-176
Wilson, Jennifer	<a href="#">I134-A</a>	K-537
Wissner, Tim	<a href="#">I125-A</a>	K-519
Wong, Michael	<a href="#">I62-A</a>	K-298
Yahoo, Edward	<a href="#">I27-A</a>	K-205
Young, Linda	<a href="#">I39-A</a>	K-246
Young, Rob	<a href="#">I80-A</a>	K-342
Yu, Li Jian	<a href="#">I100-A</a>	K-433



6/13/2017 Weebly Email Service Mail - Comments from U.S. Army Corps of Engineers on City of Bellevue - Energize East Side



Energize Eastside EIS <info@energizeeastsideis.org>

**Comments from U.S. Army Corps of Engineers on City of Bellevue - Energize East Side**

1 message

**Shuckhart, Andrew J CIV USARMY CENWS (US)** <Andrew.J.Shuckhart@usace.army.mil> Mon, May 15, 2017 at 9:27 AM  
 To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideis.org>

Greetings,

I have given a preliminary review to the Draft EIS for this project. Please be advised that any discharges of dredged or fill material into waters of the U.S. (including tributaries to navigable waters of the U.S., as well as wetlands) may require a permit from the Department of the Army. Additionally, some activities that result in the discharge of dredged or fill material in wetlands, such as mechanized land clearing, may also require a permit. This project appears to be in an earlier planning stage, however when project designs and alternatives have been further developed, I recommend a pre-application meeting be scheduled with the Corps of Engineers. This will allow interested regulatory agencies, Tribes, and the Services to review the work and provide comments on the project design before an application is submitted, which may prevent unnecessary delays in the permit review process. Please contact me for more information on the availability and scheduling for pre-application meetings. Thank you for the opportunity to comment.

—  
 Andrew Shuckhart  
 US Army Corps of Engineers  
 Regulatory Project Manager  
 North King County  
[206-316-3822](tel:206-316-3822)

FF1-A-1

FF1-A -1 PSE will coordinate with the Corps on the 404 permitting process if the project would result in the discharge of any dredged or fill material into the waters of the U.S. The specifics of the design and exact placement of poles would be determined closer to the time that the project is constructed. The Phase 2 Draft EIS covers details of the project as known at the time of publishing. Where there was uncertainty, a worst-case assumption was used. More site-specific information will be known as the project reaches later stages of design.

7/6/2017

Weebly Email Service Mail - Energize Eastside Phase 2 Draft EIS



Energize Eastside EIS <info@energizeeastsideis.org>

**Energize Eastside Phase 2 Draft EIS**

1 message

Karen Walter <KWalter@muckleshoot.nsn.us>

Thu, Jul 6, 2017 at 10:03 AM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideis.org>

Heidi,

We have reviewed the Phase 2 Draft EIS (DEIS) for the Energize Eastside project and offer the following comments:

TT1-A-1

1. Any stream that meets the physical criteria from WAC 222-16-031 as presumed fish habitat (i.e. >2 feet width and less than 20% gradient) should be considered potential fish habitat and thus Type F waters unless there is a natural fish passage barrier downstream of the affected stream reach. Existing fish passage barriers such as check dams, culverts, etc. created by people do not constitute natural barriers as they should be removed per the State's Hydraulic Code. There are some streams in the corridor noted as Type N (non-fish bearing waters) that are likely Type F. For example, Ginger Creek (NR01 in Watershed Company 2016) is described as "the bed is made up of coarse cobble and the average width is approximated at 8 to 10 feet" and is classified as a Type Ns water. This information suggests Ginger Creek meets the physical criteria for a Type F water, which does not need to be perennial to provide fish habitat. The same is the case for NR02 which is noted to be 2-3 feet wide in Watershed Company 2016. All of the streams described as Type N or non-fish bearing in Table 3.3-1 need to be re-assessed to see if they meet the physical criteria from WAC 222-16-031 as potential fish habitat. Several would meet the criteria based on the brief (no data provided) descriptions in the various Critical Areas Reports. This is an important consideration as the impact assessment in the Phase 2 DEIS indicates no significant impacts to streams, which we disagree, as noted below.

TT1-A-2

2. We disagree with the Phase 2 DEIS impact assessment regarding tree removal. The removal of up to 5,400 trees corridor wide is significant given the current condition of the riparian and watershed conditions of the streams impacted. None of the streams in the project area meet natural wood loading rates for their bankfull width sizes based on Fox and Bolton 2007 (see attached). The project will result in the permanent removal of trees that if otherwise left alone would grow to their full height potentials and be a source of both shade and wood recruitment. Trees would also absorb water that will now otherwise be a source of overland runoff (Booth/Hartley/Jackson 2002: [http://www.d.umn.edu/~vbrady/WE\\_website/wetlands101/WE-readings/Booth2002.pdf](http://www.d.umn.edu/~vbrady/WE_website/wetlands101/WE-readings/Booth2002.pdf)). The DEIS fails to fully consider the existing degraded riparian and stream conditions due to a lack of shade and instream wood and how this has impacted salmon populations in the affected streams. Instead, the DEIS concludes that the project will result in less than significant impacts for each segment (Chapter 3.4) based also in part on vague mitigation measures and adherence to BMPs that still result in permanent tree loss from the project both due to construction and maintenance actions. For the impact assessment to be accurate, substantial mitigation would be need to be done including adding wood back into affected streams to partially mitigate for the impacts to future wood recruitment functions and to replant the stream riparian corridors and watersheds at a least a 3:1 ratio. Nowhere in the DEIS are these mitigation measures discussed.

TT1-A-3

3. The need for a new culvert on "Stream C" as part of the new Richards substation is not fully evaluated in the DEIS. The culvert needs to be fully fish passable and allow for the full passage of wood, water, sediment to downstream areas to avoid causing impacts to salmon habitat processes and functions. The assessment on page 3.3-15 is inadequate.

TT1-A-4

4. Similarly for wetlands, the DEIS fails to discuss those wetlands that currently have a mature or maturing forested component which would be impacted by the project either through construction or operations. The DEIS states for the action alternative, Alternative 1 (New Richards Creek Substation and 230 kV Transmission Lines), that "All impacts would be minor and could be fully mitigated through compliance with applicable regulations and implementation of BMPs." For this statement to be accurate, wetlands with mature forested components need to be fully avoided by this project as it is unlikely they would be mitigated successfully, certainly not timely.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL.en.&view=pt&search=inbox&th=15d18db015632c28&siml=15d18db01563...> 1/2

TT1-A -1

Available information was used to identify stream types. More detailed assessments of potential fish presence, or use, will be addressed during the permitting processes. The stream typing information is used primarily to establish appropriate buffer sizes, although construction activities are not expected to occur in or near any streams, regardless of stream type. In addition, the construction activities associated with installing or replacing power poles would not cause substantial ground disturbance and would have limited impacts to instream habitat. PSE is not proposing to place poles within any streams, and thus impacts to fish-bearing and non-fish bearing streams will be avoided. See Section 5.3 of the Final EIS.

TT1-A -2

In the Phase 2 Draft EIS of the 5,400 trees potentially removed about 1,294 trees would occur in wetland and stream buffer areas. With PSE's Proposed Alignment, as analyzed in the Final EIS, approximately 545 trees would be removed in stream buffers (there would be no direct impact to streams)

A mitigation measure has been added to the Final EIS, Section 4.4.6, that critical area and buffer trees would be trimmed and not removed if possible, and that trimmed branches and trunks  $\geq 4$ " diameter be left in place to provide potential woody debris habitat. This is expected to result in greater amounts of available woody debris for the area streams, compared to the long-term natural recruitment process. Trees would also be selectively cut, leaving many smaller or preferred species trees, as well as understory vegetation in place, to provide stream shade and future wood recruitment. While trees reduce overland runoff, which can regulate flows to area waterways during rain events, they also intercept a substantial portion of rain volume (up to more than 20%), much of which is subsequently lost to evaporation rather than being available to recharge groundwater resources (Armson et al., 2013; Inkilainen et al., 2013). Groundwater provides important functions for stream habitat conditions by helping to maintain base flows and water temperatures during critical low flow summer and early fall periods. The understory vegetation that would remain in place would also replace some of the rainfall interception capabilities, lost through tree removal actions, helping to maintain runoff regulation during storm events. Therefore, while the character (species compositions) of critical area vegetation would change in some areas of the powerline corridor, there would be no substantial change in the amount of pervious surface area (overall vegetation cover), and much of the vegetation functions would be maintained.

7/6/2017

Weebly Email Service Mail - Energize Eastside Phase 2 Draft EIS

We appreciate the opportunity to comment on this proposal and look forward to responses to our comments and project changes to address these concerns. If you have questions, please contact me.

Thank you,  
 Karen Walter  
 Watersheds and Land Use Team Leader

*Muckleshoot Indian Tribe Fisheries Division*  
*Habitat Program*  
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See Section 4.4 in the Final EIS for a more detailed discussion of potential impacts to stream buffers from this project. Specific mitigation measures will be determined during the permitting process.

TT1-A -3 The Phase 2 Draft EIS was based on project information provided by PSE and reflected design details at the time of publication. New information regarding the replacement culvert on "Stream C" based on refined design details from PSE has been included in the Final EIS; see Chapter 2 and Section 5.3 of the Final EIS.

TT1-A -4 PSE will follow mitigation sequencing, including avoiding impacts to wetlands, and would comply with local jurisdictions' critical areas ordinances, which include avoidance of forested wetlands, when feasible. PSE's Proposed Alignment avoids impacts to forested wetlands; see Sections 4.3, 5.3, and Appendix M of the Final EIS.

Some of the options proposed in the Phase 2 Draft EIS that are not part of PSE's Proposed Alignment would have been near mature or maturing forested wetlands, where the wetlands or wetland buffers could have been impacted. A correction to the statement cited in the comment is included in the Errata in this Final EIS, acknowledging that, if one of these options were selected, and if it was not technically feasible to avoid the wetland, impacts, even with mitigation may not be fully mitigated through compliance with regulations. Please see Chapter 3, Errata, for further discussion.

PSE submitted permits for the Lakeside substation portion of the Bellevue Central Segment, Richards Creek Substation, and the Bellevue South Segment to the City of Bellevue in September 2017 and permits for the Newcastle Options to the City of Newcastle in November 2017. The City of Bellevue permit submittal provided information regarding the presence of forested wetlands for the Richards Creek substation, which was incorporated into the Final EIS. However, presence of forested wetlands for the rest of the alignment is unknown at this stage of the project.



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000

June 19, 2017

Heidi Bedwell, Environmental Planning Manager  
City of Bellevue Development Services Department  
P.O. Box 90012  
Bellevue, WA 98009-9012  
hbedwell@bellevuewa.gov

**RE: Ecology Comments on Energize Eastside DEIS**

Dear Ms. Bedwell:

Thank you for sending information on the Energize Eastside project for our review and comment. Based on our review of the Draft Environmental Impact Statement (DEIS), we recommend changes that are summarized in an attached table.

***Literature Sources Reviewed***

The project submittal that was reviewed by Ecology included:

- *Energize Eastside Project, Phase 2 Draft Environmental Impact Statement, Volume 1: Draft EIS*, prepared by Environmental Science Associates, Inc., dated May 8, 2017
- *Energize Eastside Project, Phase 2 Draft Environmental Impact Statement, Volume 2: Appendices*, prepared by Environmental Science Associates, Inc., dated May 2017

***Project Description***

The Energize Eastside project proposed by Puget Sound Energy (PSE) involves constructing approximately 18 miles of new 230 kilovolt electrical transmission lines and adding a new substation (Richards Creek) at the Lakeside substation in Bellevue. This linear project is located within the cities of Redmond, Bellevue, Newcastle, and Renton; and within unincorporated King County. This project will connect two existing bulk energy systems (one to the north in Redmond and one to the south in Renton), supply future electrical capacity, and improve electrical grid reliability for Eastside communities.

The project corridor is divided into six segments (Redmond, Bellevue North, Bellevue Central, Bellevue South, Newcastle, and Renton). The proposed transmission line would follow the existing corridor in four of these segments (Redmond, Bellevue North,

Newcastle, and Renton). However, within the Bellevue Central segment there are three optional alignments (Existing Corridor, Bypass Option 1 and Bypass Option 2) and within the Bellevue South segment there are five optional alignments (Existing Corridor, Oak 1 Option, Oak 2 Option, Willow 1 Option, and Willow 2 Option).

The DEIS chapters on Water Resources (3.3) and Plants and Animals (3.4) describes the critical areas (streams, wetlands, and their associated buffers) that are within the project footprint and whether there will be short-term construction impacts, cumulative impacts, and significant unavoidable adverse impacts. This includes one river (Cedar River), three major streams (Kelsey Creek, Coal Creek, and May Creek), seven named streams (East Creek, Richards Creek, Willows Creek, Goff Creek, Sunset Creek, Honey Creek, and Ginger Creek), and at least 37 unnamed tributaries. This also includes 11 Category I wetlands, 22 Category II wetlands, 63 Category III wetlands, and 57 Category IV wetlands.

The short-term construction impacts that would occur include construction of the Richards Creek Substation and installation of the new transmission lines. Construction impacts would occur from clearing and grading for the substation and excavation for the pole footing, stringing wires across streams and wetlands, and clearing for access roads and staging areas. No cumulative impacts and significant unavoidable adverse impacts would occur.

*Ecology Comments and Concerns*

We have listed our concerns with the project in the attached Table 1. This table lists the specific locations within the DEIS and our recommended changes.

Table 1. List of comments on the Energize Eastside project by the Washington Department of Ecology.

ITEM	SECTION	RECOMMENDED CHANGES
SS1-A-1	1 Fact Sheet, Governmental Actions, p. III	Add "Coastal Zone Management Consistency Determination under the federal Coastal Zone Management Act, Washington State Department of Ecology."
SS1-A-2	§ 3.3.5.5 Bellevue Central Segment, p.3.3-18	"Some of the Category IV wetlands are too small to be regulated."
SS1-A-3	§ 3.3.5.6 Bellevue Central Segment, Bypass Option 1 p. 3.3-19	Bypass Option 1 would require placement of new poles in wetland and along Kelsey and Richards creeks; same for Bypass Option 2.  This would cause a permanent conversion of the plant community from a tree to shrub strata within wetlands, streams, and their associated buffers. Any trees within the managed right-of-way would be trimmed as part of the vegetation management standards, which would impact habitat and water quality functions. We are concerned that inadequate mitigation is provided for this loss of wildlife habitat and increased water temperatures.
SS1-A-4	§ 3.3.5.7 Bellevue Central Segment, Bypass Option 2 p. 3.3-20	This would cause a permanent conversion of the plant community from a tree to shrub strata within wetlands, streams, and their associated buffers. Any trees within the managed right-of-way would be trimmed as part of the vegetation management standards, which would impact habitat and water quality functions. We are concerned that inadequate mitigation is provided for this loss of wildlife habitat and increased water temperatures.
SS1-A-5	§ 3.3.5.9 Bellevue South Segment, Oak 1 Option p.3.3-22	This would cause a permanent conversion of the plant community from a tree to shrub strata within wetlands, streams, and their associated buffers. Any trees within the managed right-of-way would be trimmed as part of the vegetation management standards, which would impact habitat and water quality functions. We are concerned that inadequate mitigation is provided for this loss of wildlife habitat and increased water temperatures.
SS1-A-6	§ 3.3.5.10 Bellevue South Segment, Oak 2 Option p.3.3-23	This would cause a permanent conversion of the plant community from a tree to shrub strata within wetlands, streams, and their associated buffers. Any trees within the managed right-of-way would be trimmed as part of the vegetation management standards, which would impact habitat and water quality functions. We are concerned that inadequate mitigation is provided for this loss of wildlife habitat and increased water temperatures.
SS1-A-7	§ 3.3.5.12 Bellevue South Segment, Willow 2 Option p.3.3-25	This would cause a permanent conversion of the plant community from a tree to shrub strata within wetlands, streams, and their associated buffers. Any trees within the managed right-of-way would be trimmed as part of the vegetation management standards, which would impact habitat and water quality functions. We are concerned that inadequate mitigation is provided for this loss of wildlife habitat and increased water temperatures.

SS1-A -1 Coastal Zone Management Consistency Determination under the federal Coastal Zone Management Act, Washington State Department of Ecology, has been added to the Errata (Chapter 3) and updated in the Final EIS Fact Sheet.

SS1-A -2 It is true that the City of Bellevue does not regulate Category IV wetlands that are less than 2,500 square feet in size.

SS1-A -3 Under the existing regulatory environment, these types of impacts to wetlands, streams, and their buffers would not be permitted. Neither Bypass Option 1 nor Bypass Option 2 are being brought forward for additional analysis in the Final EIS. See Sections 4.3 and 5.3 of the Final EIS for a description of the impacts to water resources and mitigation measures associated with PSE's Proposed Alignment, which is entirely in the existing transmission line corridor. Mitigation measures will be further detailed during the permitting process.

SS1-A -4 See response to comment SS1-A-3.

SS1-A -5 Under the existing regulatory environment, these types of impacts to wetlands, streams, and their buffers would not be permitted. The Oak 1 Option is not being brought forward for additional analysis in the Final EIS. See Sections 4.3 and 5.3 of the Final EIS for a description of the impacts to water resources and mitigation measures associated with PSE's Proposed Alignment, which is entirely in the existing transmission line corridor. Mitigation measures will be further detailed during the permitting process.

SS1-A -6 Under the existing regulatory environment, these types of impacts to wetlands, streams, and their buffers would not be permitted. The Oak 2 Option is not being brought forward for additional analysis in the Final EIS. See Sections 4.3 and 5.3 of the Final EIS for a description of the impacts to water resources and mitigation measures associated with PSE's Proposed Alignment, which is entirely in the existing transmission line corridor. Mitigation measures will be further detailed during the permitting process.

SS1-A -7 Under the existing regulatory environment, these types of impacts to wetlands, streams, and their buffers would not be permitted. The Willow 2 Option is not being brought forward for additional analysis in the Final EIS. See Sections 4.3 and 5.3 of the Final EIS for a description of the impacts to water resources and mitigation measures associated with PSE's Proposed Alignment, which is entirely in the existing transmission line corridor. Mitigation measures will be further detailed during the permitting process.

SS1-A-8

SS1-A-9

SS1-A-10

SS1-A-11

4	§ 3.3.6.1 Regulatory Requirements, p. 3.3-29	"Comply with the requirements of each applicable Partner City's critical areas ordinances..."
5	§ 3.3.6.1 PSE Vegetation Management, pp. 3.4-5 – 3.4-6	Recommend that within critical area buffers trees within Danger Zone be trimmed and not removed and that trimmed branches and trunks > 4" diameter be left in place to provide habitat.
6	§ 3.4.5.1 PSE Impacts Common to all Components, pp. 3.4-14	Alternative 1: PSE's preferred project alignment has the potential to remove up to about 4,200 trees and includes the following combination of segments and options: Richards Creek Substation + Redmond Segment + Bellevue North Segment + Bellevue Existing Corridor + Willow 2 Option + Newcastle Segment + Renton Segment.  3.4.5.8 In the Bellevue Central Segment, the Existing Corridor Option would result in the least overall tree removal, the removal of the least number of significant trees, and the removal of the least number of trees from critical areas and their buffers compared to the other two options.
7	§ 4.3.2.2, Short-Term (Construction) Impacts Common to All Segments, pp. 4.3-2–4.3-3	Mitigation also will be required for impacts under State regulations.
8		

SS1-A -8 Comment noted.

SS1-A -9 Comment noted; the mitigation measure has been added to the Final EIS, Section 4.4.6.

SS1-A -10 PSE's Proposed Alignment is the existing corridor option and would result in the least amount of trees removed compared to the other action alternative alignments. See Section 4.4 in the Final EIS.

SS1-A -11 As stated in the Phase 2 Draft EIS, Section 4.3.3.1 (Regulatory Requirements), "All of the segments and options would need to comply with applicable federal, state, and local permit requirements for stormwater, streams, wetlands, and critical areas, and Shorelines of the State."

SS1-A-12

The wetlands within this project corridor are waters of the state subject to the applicable requirements of state law (see RCW 90.48 and WAC 173.201A) and Section 401 of the Clean Water Act (33 USC §1341) and 40 CFR Section 121.2. Before any direct wetland impacts occur, the applicant shall obtain all necessary state and federal authorizations prior to beginning any ground-disturbing activities or vegetation removal. To obtain state and federal authorization, the applicant should provide:

- A jurisdictional determination from the U.S. Army Corps of Engineers stating whether the delineated wetlands are under federal jurisdiction.
- A JARPA form for impacts to jurisdictional wetlands submitted to Ecology at [ecyrefedpermits@ecy.wa.gov](mailto:ecyrefedpermits@ecy.wa.gov)
- A mitigation plan for unavoidable wetland impacts following the standards in *Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance* (Ecology Publication #06-06-011a).

If you have any questions or would like to discuss our comments, please call Doug Gresham at (425) 649-7199 or send an email to [Doug.Gresham@ecy.wa.gov](mailto:Doug.Gresham@ecy.wa.gov).

Sincerely,

Joe Burcar, Interim Section Manager  
Shorelands and Environmental Assistance Program

By email

E-cc: Meg Bommarito, Ecology

SS1-A -12 PSE will comply with these regulations. See Section 4.3.6 of the Final EIS for details.



## CITY OF NEWCASTLE

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June 27, 2017

Heidi Bedwell  
 Energize Eastside EIS Program Manager/Senior Planner  
 City of Bellevue  
 450 110<sup>th</sup> Avenue NE  
 Bellevue, WA 98004

Transmitted via U.S. Mail and email: [info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org)

Dear Ms. Bedwell:

The City of Newcastle (City) submits the following comments on the Phase 2 Draft Environmental Impact Statement (DEIS) for the proposed Energize Eastside project (Project):

**Prior comments incorporated.** The City incorporates the prior comments it has submitted on Phase 1 and Phase 2 of the DEIS, which include comments in the following correspondences and submittals:

- Letter to David Pyle from Tim McHarg, dated June 15, 2016.
- Letter to Heidi Bedwell from Tim McHarg, dated May 27, 2016.
- Memorandum to Heidi Bedwell from Tim McHarg, dated October 10, 2016.
- Comments submitted in DEIS Comment Form – Energize Eastside Phase 2 Draft EIS, EMF and Pipeline – V1, submitted by April 20, 2016 to Reema Shakra.
- Comments submitted in DEIS Comment Form – Energize Eastside Phase 2 Draft EIS, EMF and Pipeline – V2, submitted by December 13, 2016 to Reema Shakra.

**Chapter 2. Project Alternatives.** The DEIS does not identify an agency “preferred alternative” and the City concurs with this approach. Under the terms of the partner cities’ interlocal agreement, the City would object to any designation of Alternative 1 as the cities’ preferred alternative. Similar to providing alternative routes through Bellevue, the City would have preferred that the DEIS include as an alternative through Newcastle the co-location of the Project on the existing Seattle City Light transmission line corridor.

**Chapter 3.1 Land Use & Housing.** The DEIS correctly notes that the proposed Project would be regulated as a “Utility Facility – Regional”, which requires a Conditional Use Permit (CUP). (3.1-42). However, the City has not yet received a CUP application, which would provide the actual plans for construction of the Project. Thus, it is premature to conclude that the Project is consistent with applicable zoning regulations. In addition, the DEIS incorrectly states that the Project is consistent with the City’s comprehensive plan. In Chapter 3.2, the DEIS concludes that

LL1-A -1 The public comment period for the Phase 1 Draft EIS ran from 1/28/2016, through 3/14/2016, and from 5/8/2017 through 7/6/2017 for the Phase 2 Draft EIS. None of the five correspondences listed in the June 27, 2017, letter were submitted within the comment periods for the Phase 1 Draft EIS or Phase 2 Draft EIS. The City of Newcastle did not explain how the letters comment on the EIS. However, in subsequent discussions with the City of Newcastle, it was determined that the concern was to have an open record of how the City of Newcastle had commented at each stage of the development of the EIS and how their comments had been addressed. The general topics that were discussed in each of the listed letters are responded to below.

Letter to David Pyle from Tim McHarg, dated June 15, 2015: The EIS Consultant Team confirmed with the City of Newcastle that this letter was sent in 2015 and not 2016 as the 6/27/17 letter indicated. Specific environmental topics include environmental health, aesthetics, and plants and animals; all of these topics are discussed in both the Phase 1 and Phase 2 Draft EISs. Tree removal was considered as part of the assessment of impacts to the aesthetic environment (see Section 3.2 of the Phase 2 Draft EIS). Section 3.4, Plants and Animals, of the Phase 2 Draft EIS includes analysis of potential impacts from vegetation removal. Section 4.4 of the Final EIS includes an analysis of potential impacts associated with PSE’s Proposed Alignment.

The project purpose and need and timing are discussed at length in Chapter 1 of the Phase 1 Draft EIS. The EIS Consultant Team reviewed the Eastside Needs Assessment Report prepared by PSE, the Supplemental Eastside Needs Assessment Report prepared by Quanta Technology, and the City of Bellevue’s Independent Technical Analysis prepared by Utility System Efficiencies, Inc. and found them to be in accord with standard industry practice for electrical system planning. Please see the Stantec memo referenced in the Phase 1 Draft EIS, which is available on the Energize Eastside EIS project website (<http://www.energizeeastsideeis.org/>).

The alternatives requested were both evaluated in the Phase 1 Draft EIS. Alternatives for the project were developed based on applicant and public input during the Phase 1 Draft EIS scoping comment period. The use of peak generation plants was included in the analysis for Alternative 2 of the Phase 1 Draft EIS. Please see response to Key Theme EGY-1 from the Comments and Responses for the Phase 1 Draft EIS, which is included as Appendix J in the Final EIS. PSE is

LL1-A-1

LL1-A-2

LL1-A-3

responsible for ensuring that its transmission system can operate without damage to other providers on the regional grid. PSE has determined that the capacity deficiency it has identified is a local issue requiring a solution within its Eastside service area. While Seattle City Light has a transmission line parallel to PSE's within the Eastside, as noted in the Phase 1 Draft EIS, City Light has indicated that it would not grant PSE permission to use its transmission corridor because they foresee the need for that capacity in the future. See response to comment II2-A-1 for additional information.

The City of Bellevue's Independent Technical Analysis was conducted to provide information relating to the objectives, purpose and need, and timing of the Energize Eastside project to the City Council and community stakeholders. The "Ask the Consultant" forum was held to address comments relating to the USE report, which was prepared outside of the EIS process and before the EIS process began. The comments received during this process were not specific to the EIS. When a comment dealt with topics that were better addressed through EIS scoping, the City of Bellevue directed the commenter to utilize the EIS commenting process. The public had an opportunity after receiving those responses to participate in the EIS process. These comments were not incorporated into the EIS automatically. If a commenter chose to make their comment during the commenting period for EIS scoping, then their comment was recorded and addressed in the EIS process. As stated previously, the EIS Consultant Team reviewed the USE report to determine if it met standard industry practice.

For the comment on pipeline safety, please see response to comment II7-A-1.

Letter to Heidi Bedwell from Tim McHarg, dated May 27, 2016: All elements of pipeline safety listed in the letter are included in Section 3.9 of the Phase 2 Draft EIS. As the comment notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers construction risks, and electrical interference risks related to corrosion, fault conditions, and arcing. Section 3.9.1 of the Phase 2 Draft EIS identifies federal and state regulations related to pipeline safety. Section 3.9.3.2 describes how transmission lines can interact with pipelines through

electrical interference and fault conditions, and measures used to protect pipelines from corrosion and fault damage. Refer to response to comment I17-A-1 for additional information on the pipeline safety risk assessment completed for the Phase 2 Draft EIS. More information is provided in the Pipeline Safety Technical Report (Appendix I).

Section 4.9.4 of the Phase 2 Draft EIS lists construction-specific mitigation measures identified based on a review of regulations, construction BMPs, and Olympic's requirements for work proposed near their pipelines. These include specific notification and monitoring requirements, and requirements related to excavation near the pipelines. Additional mitigation measures were proposed to further reduce the potential for construction-related impacts.

Cathodic protection and electrical interference (including discussion of AC current density and AC-induced corrosion) are addressed in Sections 3.9.2.2, 3.9.5, and 3.9.7.2 of the Phase 2 Draft EIS, the latter which includes mitigation measures to support Olympic's determination of cathodic protection requirements for their pipelines. These mitigation measures incorporate the recommendations of the DNV GL AC Interference Analysis and Stantec's independent review. The DNV GL AC Interference Analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for more detailed engineering by PSE. Based on Stantec's review of DNV GL's report, the Phase 2 Draft EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational. In addition, mitigation measures have been included in the Final EIS that would require PSE to demonstrate to the Partner Cities that sufficient safety factors have been incorporated into design. As part of ongoing coordination between PSE and Olympic, additional mitigation measures may be identified during final design. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipeline system; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipelines from corrosion lies with Olympic.

Aesthetics elements that are listed in the letter are included in Section 3.2 of the Phase 2 Draft EIS. Key viewpoints were taken from public parks (Lake Boren Park) and public rights-of-way, as well as from the east and west of the corridor and from Coal Creek Parkway (see Attachment 2 of Appendix C of the Phase 2 Draft EIS). For land use, there are no property acquisitions proposed for the project. With regard to plants and animals, the Phase 2 Draft EIS assessment includes both a discussion of habitat as well as aesthetic impacts from tree removal. In the Phase 2 Draft EIS, refer to Section 3.4.3.1, which defines the significance criteria for plants and animals, as well as Section 3.2.3.4, which defines the significance criteria for scenic views and the aesthetic environment; these criteria were approved by the Partner Cities.

Memorandum to Heidi Bedwell from Tim McHarg, dated October 10, 2016: All comments were incorporated into the Phase 2 Draft EIS and informed the development of Version 3.0 (internal draft) of the Phase 2 Draft EIS with the exception of the items listed in the response to comment LL1-B-1.

Comments submitted in Draft EIS Comment Form - Energize Eastside Phase 2 Draft EIS, EMF and Pipeline -VI, submitted by April 20, 2017, to Reema Shakra: This document was to be submitted by April 20, 2017, and not 2016 as the comment letter indicated. All comments were incorporated into the Phase 2 Draft EIS with the exception of the items listed in the response to comment LL1-C-1.

Comments submitted in Draft EIS Comment Form - Energize Eastside Phase 2 Draft EIS, EMF, and Pipeline - V2, submitted by December 13, 2016 to Reema Shakra: All comments were incorporated into the Phase 2 Draft EIS and informed the development of Version 3.0 (internal draft) of the Phase 2 Draft EIS with the following exception: Item No. 5 – Comment addressed by revising text, but revisions did not include specific information regarding which segments would be feasible to underground. An evaluation of which segments are feasible to underground would require a design study examining feasible connection points to the overhead lines, right-of-way identification, utility conflicts, and other considerations.

LL1-A-3

“the project would be inconsistent with the Newcastle Comprehensive Plan.” (3.2-78) Accordingly, the City requests the first bullet on page 3.1-42 be revised to read:

- **Consistency with Plans, Policies, and Regulations:** As noted in Chapter 3.2 of this DEIS (p.3.2-78), the project would not be consistent with the Newcastle Comprehensive Plan. Zoning districts in the study area allow electrical utility facilities as a conditional use. Puget Sound Energy (PSE) must demonstrate that the placement of the poles is consistent with the required setback set forth in Newcastle Municipal Code (NMC) 18.12.130 Setbacks – From regional utility corridors”

Consistent with the City’s comments to Chapter 3.2 below, the Project must mitigate impacts to land use and zoning, and ensure consistency with the City’s comprehensive plan policies.

**Chapter 3.2 Scenic Views and the Aesthetic Environment.** The City concurs with the DEIS analysis of the Newcastle Segment, which concludes that north of the May Creek ravine, the impacts on the aesthetic environment would be significant (3.2-77 – 3.2-78). The DEIS correctly notes that the City has numerous comprehensive plan policies relating to aesthetic impacts (3.2-88). The City concurs with the DEIS statement that the project is “inconsistent with the City’s comprehensive plan.” (3.2-78)

LL1-A-4

However, the DEIS incorrectly notes that Newcastle does not have a regulation that directly addresses mitigation of impacts (3.2-87). NMC 18.44.052.C.1 requires that the impact of a regional utility facility, including the “design and operation on the surrounding uses, the environment and the city be minimized.” This requirement is similar to City of Bellevue LUC 20.25E.070, which provides that “design” should be used to “minimize impacts” prior to construction. Please add NMC 18.44.052.C.1 and 18.44.052.D to the mitigation discussion on page 3.2-87.

LL1-A-5

Consistent with NMC 18.44.052.C.1 and 18.44.052.D, the City believes that mitigation of aesthetic impacts must be incorporated into Project design, and continue through construction and operation. While the mitigation measures identified in the DEIS at page 3.2-88 appear to potentially mitigate aesthetic impacts, additional mitigation may be required depending on the actual Project CUP application submitted to the City (See NMC 18.44.052.C.1, C.7, and .D).

LL1-A-6

On page 3.2-88, the DEIS identifies as possible mitigation the undergrounding of certain sections of the transmission lines where unavoidable significant impacts to aesthetic environment occur. If this mitigation is listed as a possibility, then the safety of undergrounding the transmission lines needs to be included in Chapters 3.9 “Environmental Health – Pipeline Safety” and Chapter 4.9 “Environmental Health – Pipeline Safety”. Currently, such safety analysis is not present in those chapters.

LL1-A -2

The Lead Agency is not required to identify an agency-preferred alternative in the Draft EIS under SEPA; in addition, this is not a City project where a preferred course of action must be identified by the City. Co-location with the SCL corridor was analyzed in the Phase 1 Draft EIS. All alternatives were discussed with and agreed upon by the SEPA officials for the Partner Cities prior to development of the Phase 2 Draft EIS. Section 2.2.1 of the Phase 2 Draft EIS provides an explanation of why this alternative was not carried forward into Phase 2. Also see response to comment II105-A-1.

LL1-A -3

The statement regarding consistency with the Comprehensive Plan in Section 3.1 of the Phase 2 Draft EIS relates specifically to whether the Energize Eastside project as a land use is consistent with the Comprehensive Plan. It is correct that consistency with land use regulations is required for the use to be permitted, and that such a determination cannot be made before an application is submitted. A clarification is provided in Section 4.1.5.8 of the Final EIS. The statement in Section 3.2 of the Phase 2 Draft EIS relates specifically to consistency with policies regarding the aesthetic character of the project area.

LL1-A -4

NMC 18.44.052.C.1 and 18.44.052.D have been added to the mitigation discussion in Section 4.2.6 and Appendix C in the Final EIS, as well as the Errata.

LL1-A -5

It will be at the City's discretion to require additional mitigation as conditions of permit approval. SEPA does not limit mitigation measures to those identified in the EIS.

LL1-A -6

SEPA does not require that the environmental consequences of mitigation be evaluated, while allowing the lead agency to determine if such analysis is needed. In the case of the Energize Eastside project, the Phase 1 Draft EIS describes the types of impacts that could be expected with undergrounding, which was considered to be sufficient information at the Phase 2 Draft EIS stage regarding undergrounding of transmission lines. Specific impacts cannot be analyzed without identifying a specific route. To identify a specific route, a design must be developed that works with PSE's transmission system. Both PSE and Olympic have indicated that it would not be prudent to place a new transmission line underground in the shared transmission/pipeline easement, as discussed in the Phase 1 Draft EIS. PSE has also provided specific comments that identify the challenges involved with undergrounding sections of the project, which are included in the Final EIS.

- LL1-A-7 **Chapter 3.4 Plants and Animals.** The DEIS notes that NMC 18.16 exempts utility development from landscaping and significant tree retention (p. 3.4-5). However, the environmental impacts of removing approximately 300 trees (p. 3.4-31) within the City will need to be addressed under SEPA and its supplemental authority to mitigate impacts, by way of onsite restoration, planting off-site replacement trees, installing enhanced landscape and screening, and payment-in-lieu of planting, among other things.
- LL1-A-8 **Chapter 3.9 Environmental Health & Chapter 4.9 Environmental Health – Pipeline Safety.** As noted above, the DEIS does not analyze the potential safety impacts relating to the undergrounding of certain sections of the Project. The DEIS needs to include such a safety analysis because undergrounding as potential mitigation is referenced in Chapter 3.2, Chapter 3.10 and has been included in the DEIS public hearing hand-outs.
- LL1-A-9 The DEIS identifies analyzes the potential impacts of a “pool fire” caused by a pipeline release that travels 113 feet before ignition, but “where no hills, waterbodies, or catch basins are present.” (p. 3.9-29) While the DEIS characterizes the hypothetical pool fire as a “worst case” scenario, it also acknowledges that if “hilly conditions, waterbodies, or catch basins were present, the pipe contents could flow away from the site of the release, resulting in an elongated pool fire and heat flux area.” (p. 3.9-29) The City’s elevation and topography are strikingly different from the “pool fire” scenario discussed in the DEIS (pages 3.9-28 – 3.9-29). The DEIS should evaluate the impacts of a potential release or rupture under a scenario with actual hilly conditions, waterbodies or catch basins present to better understand the potential impacts in all of the partner cities.
- LL1-A-10 Under “Long-term Impacts on Resources” (pages 3.9-48-3.9-52), the DEIS does not adequately analyze the adverse environmental impacts for each environmental category (Land Use & Housing, Scenic Views and Aesthetic Environment, Water Resources, Plants and Animals, etc.). The DEIS only makes generalized statements, and does not analyze each environmental category under an applicable city segment. This is the only section in the DEIS that does not analyze the environmental impacts under a specific city segment under both alternatives. Please include an environmental assessment under the No Action and Alternative 1 for each city segment.
- LL1-A-11 Other safety impacts and associated mitigation have been identified in an attached report prepared by Richard B. Kuprewicz<sup>1</sup> of Accufacts Inc., wherein Mr. Kuprewicz concludes the following:
  - 1.Olympic Pipe Line bears the ultimate responsibility for possible PSE’s Eastside Energy (EE) project interactions that could result in an Olympic pipeline failure.

<sup>1</sup> Mr. Kuprewicz has extensive pipeline investigative background and experience, which included evaluating the Olympic Pipe Line operation for the City of Bellingham after the June 10, 1999 pipeline rupture and tragedy. (See CV attached to Accufacts, Inc. report).

- Specifically in Newcastle, the two pipelines operated by Olympic run generally down the center of the transmission line easement, but in some areas are closer to one side than another, which means there would not be a clear path on either side of the pipeline available to locate the underground corridor. Therefore, in Newcastle, it would not be feasible to require the transmission lines to be built underground in the existing corridor. It may be feasible to place the lines in a public street paralleling the existing corridor. To do so would require design evaluation of where the termini could be for an underground segment. It would also require evaluation of the need to relocate existing utilities, temporary traffic disruptions, and other impacts as discussed for underground construction in the Phase 1 Draft EIS.
- LL1-A -7 See the mitigation measures in Section 3.4.6 of the Phase 2 Draft EIS. Specific mitigation will be determined during the permitting phase.
- LL1-A -8 The Phase 1 Draft EIS discussed some of the safety issues associated with undergrounding generally. It is not possible to be more specific unless a specific location is selected. The Final EIS has a summary of the various impacts associated with undergrounding, in Section 4.2.6. Full evaluation of impacts associated with the mitigation measure of undergrounding certain sections of the project is not required to be included in an EIS (see WAC 197-11-660(2)). PSE also provided a report in 2015 on the many challenges of underground transmission lines. That report is available on the [www.energizeeastsideeis.org](http://www.energizeeastsideeis.org) website. PSE also offered specific comments on the Phase 2 Draft EIS that identify the challenges involved with undergrounding sections of the project. See comment letter I1141-A (in particular, comments I1141-A-6, -16, -31, -41, -90, and -93).

LL1-A -9 As the commenter notes, page 3.9-29 of the Phase 2 Draft EIS referred to a "worst-case" scenario. This was intended to describe the release (spill) size and not the pool fire configuration as depicted in Figure 3.9-7. This has been clarified in the Final EIS. The commenter is correct that, as noted in the Phase 2 Draft EIS sections cited, the pool fire modeling and risk assessment do not address a scenario that considers topographic relief in the corridor. While federal pipeline regulations do not address liquid pipeline release modeling or risk assessment techniques, the pool fire modeling was conducted in a manner commonly used for pipeline risk assessments.

EDM Services, the firm retained by the EIS Consultant Team to conduct the risk assessment, used CANARY modeling software (Quest, 2003) to predict the size of the pool fire based on the estimated maximum spill volume. As Section 3.9.4 of the Phase 2 Draft EIS acknowledges, Figure 3.9-7 is a schematic representation of the estimated pool fire size based on the maximum release volume and the resulting heat flux zones. The Draft EIS further acknowledges that Figure 3.9-7 does not show site-specific conditions. For example, this figure illustrates a release where no hills, waterbodies, or catch basins are present. If hilly conditions, waterbodies, or catch basins were present, the pipe contents could flow away from the site of the release, resulting in an elongated pool fire and heat flux areas. This figure also does not show where the fire could spread to if adjacent vegetation or structures caught on fire. A larger pool fire and heat flux areas could have a higher degree of harm to the environment.

Although the pool fire could be larger based on site-specific conditions, this diagram provides the basis for calculating the number of potential fatalities assuming a reasonable worst-case release volume, and informed the risk assessment results that are presented in Section 3.9.5.4. Additional information on how pool fire size was estimated is included in Section 7.1 of Appendix I-5 of the Phase 2 Draft EIS. As acknowledged in Section 7.1, there are literally thousands of possible pool size configuration scenarios based on local conditions.

In response to this comment, the Final EIS has an added section describing the general conditions in each segment that could affect the extent of a fire resulting from a large spill as well as the resources that could be affected (see Section 4.9.7).

LL1-A -10 Section 3.9 of the Phase 2 Draft EIS estimates the probability of a catastrophic pipeline release in the transmission line corridor (and the potential impacts on the natural and built environment under "Long-term Impacts on Resources"), but does not purport to describe specific risks in Newcastle, or other city segments. It describes this in a manner commonly used for pipeline risk assessments. Because of the many variables involved with a potential pipeline release in terms of location and site characteristics along an 18-mile corridor, the long-term impacts of a spill or fire on resources are described in general terms. While this section does not address resource impacts by specific city segment, it does acknowledge the general areas where impacts on resources could be the highest.

In response to this comment, the Final EIS has an added section describing the general conditions in each segment that could affect the extent of a fire resulting from a large spill as well as the resources that could be affected.

LL1-A-11

- 2.The Documents do not provide sufficient details to assure Accufacts that appropriate precautions will be implemented or effective in protecting the pipelines during the construction phase.
- 3.The DNV-GL Final Report explains how pipelines address stray current risks near high power electrical transmission lines, but correctly indicates that Olympic Pipe Line must provide additional field verifications to support key assumptions once EE goes operational.
- 4.Appendix I-5 of the Phase 2 Draft EIS EE Pipeline Safety Technical Report (“Technical Report”) risk assessment approach is not relevant nor does it represent the Olympic pipelines, especially within the City.

In light of the above concerns, Accufacts advises, and the City of Newcastle concurs and requests, that the following requirements be incorporated into the DEIS:

LL1-A-12

- 1) Given the criticality of the location of the pipelines, especially their depth, to avoid construction threats that could harm the pipelines, PSE and, especially, Olympic Pipe Line should:
  - a) Confirm and identify specific pipeline lateral locations, including the important depth values which will vary along the pipelines;
  - b) Pinpoint what specific construction activities, including their locations and possible maximum loads, that may occur during the EE installation effort that could be a threat to the pipelines;
  - c) For these identified possible construction threats, commit to detailed precautions that will be required, implemented, and monitored/checked to avoid construction damage to the pipelines; and
  - d) Verify EE activity does not introduce breakaway landslide threats to the pipelines.

LL1-A-13

- 2) During the operational phase of EE, Olympic Pipe Line, in conjunction with PSE, should:
  - a) Confirm and identify specific pipeline lateral locations, including the important depth values which will vary along the pipelines;

LL1-A -11 The EIS Consultant Team has reviewed the Accufacts Report and has the following responses to City of Newcastle’s comments.

1) This conclusion is consistent with the findings in the EIS. In addition, PSE must employ reasonable measures in the design and construction of the transmission lines, and provide information to Olympic to assist in protection of the pipelines.

2) Construction-specific mitigation measures are included in Section 5.9.4 of the Final EIS. As the Accufacts Report states, threats to the pipelines can be introduced from abnormal loads. Olympic has indicated they would locate the existing pipelines using a variety of methods, which may include electronic pipe locators, probing, and soft digging methods. Once the pipelines are located and identified, Olympic would perform pipe stress calculations for equipment crossings and surface loads, in coordination with PSE. Olympic has indicated that formal engineering assessments may be required depending on site-specific considerations. PSE will also develop construction and access plans in coordination with Olympic’s Damage Prevention Team that outline the specific actions that PSE will take to protect the pipelines from vehicle and equipment surcharge loads, excavation, and other construction activities (this would include auguring).

3) As the Accufacts Report points out, "stray current" or interference current can impact pipeline integrity if not properly addressed, and this potential impact is addressed by DNV GL (2016). The DNV GL report recommended several design modifications to reduce and control the risk of stray current to the pipelines. In turn, PSE has modified their proposal based on these recommendations, including initially operating both lines at 230 kV rather than 230/115 kV, minimizing points of pipeline and transmission line divergence, using a delta conductor configuration, and locating pole grounds away from the pipeline(s).

The Accufacts Report also discusses Olympic’s pipeline integrity program in the context of this comment. As stated in Appendix I-5 of the Phase 2 Draft EIS, Section 1.1.3, Olympic’s pipeline integrity program meets or exceeds all applicable regulatory standards. In addition to the referenced inline inspections, Olympic conducts cathodic protection testing, voltage testing, and close interval survey testing at frequencies that meet or exceed regulatory interval requirements. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipelines; therefore, beyond

PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipelines from corrosion lies with Olympic.

4) The risk assessment presented in the Phase 2 Draft EIS Pipeline Safety Technical Report does not purport to be about the specific risks in the city of Newcastle. It estimates the probability of a catastrophic release from the pipelines over the length of the co-located pipelines (for estimates of Individual Risk) and along a sample one-mile segment of the pipelines (for estimates of Societal Risk). It describes this in a manner commonly used for pipeline risk assessments, taking into account the quantity and characteristics of the fuel that could be released in a single event, as well as population density along the corridor. The purpose of the risk assessment is to inform decision-makers during the permitting process for the Energize Eastside project. Given the variations in population, land cover, and topography, it is acknowledged that there are infinite variations of circumstances in which releases could occur. Further discussion has been included in the Final EIS to help illustrate the range of possibilities for such a release in the various communities along the corridor. The probability analysis is presented in the Phase 2 Draft EIS with acknowledgement of its limitations. It is relevant insofar as it provides a general idea of the likelihood of a major release occurring along the pipeline, based on hazardous liquid pipelines of similar size throughout the United States.

LL1-A -12 The EIS Consultant Team has reviewed the Accufacts Report and has the following responses to City of Newcastle's comments.

1a) As described in the Phase 2 Draft EIS (Section 4.9.4), Olympic would locate the existing pipelines and share information with PSE. PSE indicated in their comments on the Phase 2 Draft EIS that PSE cannot be required (as a mitigation measure) to add pipeline location and depth to project plans and drawings as this information is only available at the discretion of Olympic. Olympic regards this information as confidential due to security concerns. While this information is required for permit approval, PSE's and Olympic's positions regarding this information has been clarified in the Final EIS. The Partner Cities have not agreed to this omission of utility information on the project plans, and may pursue other means of verification through the permit process.

1b) Construction-specific mitigation measures are included in Section 4.9.4 of the Phase 2 Draft EIS and Section 5.9.4 of the Final EIS. As described in Section 4.9.4, Olympic would perform pipe stress calculations for equipment crossings and surface loads, in coordination with PSE. Olympic has indicated that formal engineering assessments may be required depending on site-specific considerations. PSE will develop construction and access plans in coordination with Olympic's Damage Prevention Team that outline the specific actions that PSE will take to protect the pipelines from vehicle and equipment surcharge loads, excavation, and other construction activities.

1c) As described in Section 4.9.4 of the Phase 2 Draft EIS, based on pipe stress calculations, and in coordination with Olympic, PSE would provide additional cover to address surcharge loads that may include installing timber mats, steel plating, or temporary air bridging; utilize a combination of these; or avoid crossing in certain identified areas in order to avoid impacts on Olympic pipelines. Other measures to address construction-related activities would be identified as part of the construction and access plans developed in coordination with Olympic's Damage Prevention Team.

1d) Landslide hazards and other slope stability concerns were addressed in Chapter 3 of the Phase 1 Draft EIS and additional analysis is provided in the Final EIS. Geotechnical reports are required by code for construction in geologically hazardous areas, and must demonstrate that the project would not increase instability on unstable slopes. The Final EIS includes additional information on fault/rupture hazards, liquefaction hazards, and landslide hazard areas (see Section 4.11).

LL1-A-13

- b) Verify that the actual current densities do not pose a threat near the pipelines, especially during the early phase of EE when the power lines may be operated imbalanced (230/115 KV);
- c) Establish notification protocols that would alert Olympic Pipe Line of possible major PSE power transmission imbalances;
- d) Not only rely on periodic corrosion tool in-line inspection to assure pipeline wall loss from possible interference currents is not occurring; and
- e) Verify pipeline coating reasonable integrity to substantiate fault arcing distance determinations.

LL1-A-14

3) On page 4 of the report, Mr. Kuprewicz notes that the DEIS and Technical Report should include an analysis to identify, evaluate and assess the potential threat from a breakaway landslide. The City concurs, and requests that such an analysis be included within the DEIS:

LL1-A-15

PSE, with Olympic Pipeline's cooperation, should be able to sufficiently demonstrate to the City such details, including documented engineering analysis as needed, proving that sufficient safety factors exist to avoid threats to the pipelines during the construction and operational phases of EE.

LL1-A-16

**General comments about SEPA mitigation.** The City acknowledges the mitigation measures identified in the DEIS, but reserves its right to require Project mitigation consistent with its adopted code, comprehensive plan and supplemental authority under SEPA to address and mitigate Project impacts.

Thank you for your continued consideration of the City of Newcastle's scoping comments. Please let me know if you have questions about any of the comments the City has provided to date.

Sincerely,



Steve Osguthorpe, AICP  
Community Development Director

CC: Rob Wyman, City Manager  
Dawn Reitan, City Attorney  
Thara Johnson, Senior Planner

LL1-A -13 2a) Section 3.9.7.2 of the Phase 2 Draft EIS describes potential mitigation measures based on the results and recommendations of DNV GL's AC Interference Study and Stantec's independent, technical review. This includes the measure "Obtain and incorporate all of the pipeline parameters required for detailed modeling and study."

2b) The DNV GL analysis examined two routes: the existing transmission line corridor (Willow 1) and a route that combines parts of the existing corridor with the Newport Way area (Willow 2). For either route operating at 230 kV/115 kV, the analysis predicted that AC corrosion potential would be in the "unpredictable" range, and field monitoring and/or mitigation would be required to confirm that current densities remain within acceptable levels. The Willow 2 route was not carried forward for additional analysis in the Final EIS. The Willow 1 route is PSE's Proposed Alignment in the Final EIS and includes operating both lines at 230 kV at the outset. As a result, the possibility of creating a current load imbalance would be eliminated, should PSE's Proposed Alignment be approved through the permit process. As described in Section 3.9.7 (Mitigation Measures) of the Phase 2 Draft EIS and 4.9.8 of the Final EIS, the following condition could be imposed by the Partner Cities as part of permit approval: perform an AC interference study that incorporates the final powerline route, configuration, and operating parameters to confirm that current densities would remain within acceptable levels, and inform Olympic of any locations where additional measures may be needed to protect the pipelines.

2c) As the commenter requests, a requirement for establishing notification protocols will be added to the mitigation measure "File a mitigation and monitoring report with the Partner Cities." See Section 4.9.8 and Appendix M of the Final EIS.

2d) See response to comment I130-A-2.

2e) Section 3.9.7.2 of the Phase 2 Draft EIS and 4.9.8 of the Final EIS describe potential mitigation measures based on the results and recommendations of DNV GL's AC Interference Study and Stantec's independent, technical review. This includes the measure "Fully assess the safety and coating stress risks for phase-to-ground faults at powerline structures along the entire area of collocation, including both inductive and resistive coupling." While this analysis would consider potential coating stress, specific information about the integrity of the coating would be dependent on Olympic's willingness to share such information.

- LL1-A -14 The reason stated in the Accufacts Report for this concern is that the Energize Eastside project goes through areas designated by the various jurisdictions as geological hazard areas due to potential slope instability. The Phase 1 Draft EIS concluded that compliance with existing critical areas regulations would require that PSE demonstrate through geotechnical analysis that its design would not increase slope instability; therefore, the project was not expected to have significant impacts on unstable slopes. PSE has provided geohazard reports for most segments demonstrating that the design would not increase slope instability, and the reports will be provided with permit applications. These reports are expected to address the concern expressed in this comment. The Technical Report has not been amended with this information, but the geohazard reports are referenced in the Final EIS (see Section 4.11, Earth Resources).
- LL1-A -15 As the commenter requested, a mitigation measure has been included in the Final EIS that would require PSE to demonstrate to the Partner Cities that sufficient safety factors have been incorporated into design. See Section 4.9.8 of the Final EIS.
- LL1-A -16 Comment noted.



**MEMORANDUM**

TO: Heidi Bedwell, City of Bellevue  
Mark Johnson, ESA

FROM: Tim McHarg, City of Newcastle

DATE: October 10, 2016

SUBJECT: Comments on EE Phase 2 Draft EIS, v1.0

The following are my comments on the v1.0 draft of the Energize Eastside Phase 2 DEIS:

Chapter 1, Intro and Summary

- Page 11, Visual Quality: This discussion needs a stronger conclusion. Shouldn't the analysis indicate that there will be greater visual impacts in areas with high quality views? Consequently, shouldn't mitigation measures be focused on areas with higher quality views to avoid significant impacts?
- Page 12, Operational Impacts: Isn't magnitude of impact also based on the visual quality of the area being impacted? In other words, it is not defined just by groups of users, but on the location and nature of the view being impacted.
- Page 12, Mitigation Measures: This should include the details of the poles, including location, spacing, height, and color.

Chapter 2, Phase 2 Alternatives

- Page 11, Pole Design: Is it possible to add discussion of the specific reasons why different pole types have been selected for different segments of the route? Could this be added to Table 2.1-1 in the row discussing segments and options? If not, can it be added to the discussion of the different route segments in Sections 2.1.2.3 – 2.1.2.8?
- Page 48: Should the first sentence in the second paragraph, "During construction, existing poles and wires would be removed" be relocated to be the first sentence of the fourth paragraph? It is confusing where it is currently located. Alternatively, the entire discussion of existing pole/wire removal could be put in a new section that follows Transmission Line (Wire) Installation.

- LL1-B -1 All comments were incorporated into the Phase 2 Draft EIS with the following exceptions:
- Chapter 1, Intro and Summary, Bullet No. 3
    - o These specifications were not available for the Phase 2 Draft EIS.
  - Chapter 3, Land Use, Bullet No. 2
    - o This edit was not made, however all references to "cellular phone transmitters" are equivalent to the term "telecommunications equipment" and "cellular equipment" as used in Phase 2 Draft EIS, Chapter 2.
  - Chapter 3.2, Scenic Views and the Aesthetic Environment, Bullet No. 1(a)
    - o The term "cleared corridor" was not used in the Phase 2 Draft EIS.
  - Chapter 3.2, Scenic Views and the Aesthetic Environment, Bullet No. 2
    - o The segment-level assignment was not used in the Phase 2 Draft EIS; text was added instead to describe the areas within each segment that have higher or lower visual quality.
  - Chapter 3.4, Plants and Animals, Bullet No. 1
    - o See Appendix E, PSE Vegetation Management Standards. The standards do not prioritize management techniques (e.g., a preference for pruning versus removal).
  - Chapter 3.7, Cultural Resources, Bullet No. 1
    - o SEPA does not require evaluation of impacts from mitigation measures, therefore no analysis has been added. PSE is consulting with DAHP regarding the eligibility of the Sammamish Lakeside Talbot Hill Transmission Lines #1 and #2 and the Eastside Transmission Corridor which will determine if mitigation measures are needed, and if so, what the measures would entail.
  - Chapter 3.7, Cultural Resources, Bullet No. 2
    - o Ground-penetrating radar is a survey method, however the accuracy of the method is dependent on the conditions of the sediments in the area being studied. PSE is conducting subsurface archaeological survey of the project area, including near Newcastle Cemetery. Currently, the survey methods do not include use of ground-penetrating radar near Newcastle Cemetery; however this method could be used by the consultant if PSE requests it. The results of the subsurface survey will inform the development of an Inadvertent Discovery Plan, which PSE has committed to preparing prior to construction of the project.

LL1-B-1

LL1-B-1

## Chapter 3, Land Use

- Page 16, Table 3.1-1 (Newcastle Segment):
  - Neighborhood Character: Other Newcastle neighborhoods that are adjacent to the PSE ROW include Newport Woods and Eden's Grove.
  - Housing: In addition to single family, there are 30 multi-family units in Del Mar Village (Parcel No. 2804059136) and 41 townhome units under construction on Parcel No. 3987700145).
- Page 18, 3.1.3.1, Methodology for Analyzing Long Term Impacts: Suggest replacing the term "cellular phone transmitters" with "wireless communication facilities."
- Page 30, 3.1.5.12, Newcastle Segment:
  - The Energize Eastside transmission lines would be classified as a "Utility Facility – Regional" which would allowed through a Conditional Use Permit. This term should be used in this section.
  - In the discussion of impacts, it is important to state that one of the reasons that the land use and housing impacts are less than significant is because the utility transmission facility use already exists adjacent to the existing land uses and housing. All future land use designations were planned with the anticipation that the utility transmission facility use would remain and could be potentially expanded per the Comprehensive Plan policies.

## Chapter 3.2, Scenic Views and the Aesthetic Environment

- Page 12, Newcastle Segment:
  - Description of a "150 foot cleared corridor" is not accurate and should be revised. Typically, half of the 150 foot easement is in rear yards, which are landscaped and have typical improvements. There is significant vegetation within the corridor. Vegetation within the corridor is maintained relative to height, but it is not cleared.
  - Add trail users to affected population, since there are trails within the PSE corridor and in the viewshed of corridor.
- Pages 4-13, Table 3.2-1: The visual quality of every segment is "Medium," with the exception of the Richards Creek Substation. This analysis takes the high quality and low quality portions of each segment and averages them to medium. I understand that the segments are relatively long and contain significant diversity, but isn't the resulting conclusion that they are all of medium quality simply the law of averages?
- Page 26, Table 3.2-3, Newcastle Segment: Please add the following Newcastle Comprehensive Plan Policy:
  - LU-G6 The City should identify and preserve open space, wildlife habitats, recreational areas, trails, connection of critical areas, natural and scenic resources, as well as shoreline areas.

Please add discussion of this additional policy in the Table, as well as in Section 3.2.5.12 as necessary.

- Page 44, Section 3.2.5.12, Newcastle Segment, Visual Quality of the Aesthetic Environment: Statements and conclusions regarding visual and aesthetic impacts need to be proven by the visual simulations. Aren't the visual simulations the data from which the conclusions are being derived? If not, what is the data being used for the analysis and conclusions? The visual simulation provided for KVP 15 does not support the stated conclusion of reduction of visual clutter due to a reduction in the number of poles. It shows an equal or slight increase in the amount of clutter due to the additional height of the poles with no visible reduction in the

- Chapter 3.9, Pipeline Safety, Bullet No. 2
  - PSE and OPL have not provided documentation of these meetings. However, PSE and OPL have indicated they will continue to coordinate through final design and construction. Potential mitigation measures have been identified that would require PSE to identify specific mitigation measures or a suite of measures, following their detailed engineering analysis of the final design and based on site-specific conditions and field assessments conducted at project start-up and during peak loading scenarios (See 3.9.7.1, final paragraph).
- Chapter 3.9, Pipeline Safety, Bullet No. 4
  - Subsequent to this comment, the EIS Consultant Team met with the Partner Cities to develop a threshold for significance that reflects the policies of the Partner Cities. The EIS Consultant Team held two workshops with staff from the Partner Cities, one in November 2016 and one in February 2017. The threshold for significance presented in the Phase 2 Draft EIS is based on the Partner Cities workshop discussions.
- Chapter 3.10, Economics, Bullet No. 2
  - No edits were made. Newcastle was used because it has the fewest number of ratepayers (see 3.10). The presence of the Olympic Pipeline is discussed as a factor in the feasibility of undergrounding (see 3.10.4.2).

LL1-B-1

- number of poles. The simulation accurately documents the conclusion regarding increased contrast due to tall poles.
- Page 49, City of Newcastle: Delete Comprehensive Plan UT-P2, since this applies only to distribution lines, not transmission lines such as EE.

#### Chapter 3.3, Water

- Page 7, Table 3.3-1, Newcastle Segment: Please note that Newcastle adopted an update to the Newcastle Municipal Code Critical Area regulations (Chapter 18.24) in May. The changes are now codified and can be found here: <http://www.codepublishing.com/WA/Newcastle>

#### Chapter 3.4, Plants and Animals

- Page 28, Section 3.47, Mitigation Measures: Wouldn't a significant mitigation measure be for PSE to develop a vegetation management program that systematically prioritizes tree pruning over tree removal wherever feasible?

#### Chapter 3.7, Cultural Resources

- Page 10, Section 3.7.2.1, Sammamish Lakeside Talbot Hill Transmission Lines #1 and #2 and the Eastside Transmission Corridor: If this is eligible for listing as a historic district, the H-frame structures will be retained to mitigate impacts to the historic resource. If this mitigation is required and the H-frame structures are retained, this will in turn necessitate in significant changes to the visual and aesthetic analysis. A major conclusion of the visual and aesthetic analysis is that visual clutter will be reduced in most segments due to the reduction in the number of poles. It would appear that conclusion will no longer be valid if the H-frame structures are retained as historic resources.
- Page 36, Section 3.7.6.2, Historic Cemeteries: Recommend adding use of ground penetrating radar in the area adjacent to Newcastle Cemetery to assist in identification and location of possible unmarked graves.

#### Chapter 3.9, Pipelines

- Page 4, Section 3.9.1.4, Pipeline Offsets: Note that NMC Section 18.12.130 provides for a required setback of five feet for all buildings or structures from utility property or easement lines delineating the boundary of regional utility corridors. This setback requirement would apply to electrical transmission towers, since they meet the NMC definition of "structure." In Newcastle, the 50 foot Olympic Pipeline easement is generally centered within the PSE easement. For the purpose of regulating electrical transmission towers, the 50 foot pipeline easement would be considered as the regional utility corridor for application of this setback standard. All electrical transmission towers would be required to be set back 5 feet outside the boundaries of the Olympic Pipeline easement. Since the pipelines are generally centered in the easement through Newcastle (i.e. 25 feet from the boundary of the pipeline easement), the effective setback of an electrical transmission tower from the pipelines would be approximately 30 feet.
- Page 5, Section 3.9.2.1, Olympic Pipeline: This states that PSE and OPL meet regularly to develop mitigation strategies. Can the resulting documents be included in the appendices of the Ph 2 DEIS? If not, can the documents be reviewed and summarized by EDM?
- Page 9, Section 3.9.4, Risk Assessment: This section needs significant work to make it readable and understandable. An explanation of quantitative risk analysis would help as background for most readers. What is it? Why was it selected? Does it aid in analysis, conclusion and

LL1-B-1

recommendation of mitigation measures for the Energize Eastside project, or is it simply an actuarial analysis of risk analogous to that used by the insurance industry?

- Page 11, Section 3.9.5, Risks During Operations: The definition of "significance" needs discussion by the partner cities. This needs to be contextualized, humanized and made understandable to the average reader however possible.
- Page 19, Section 3.9.7, Mitigation Measures: The public has repeatedly brought up the risk of collocation during a seismic event. Is that risk not going to be analyzed or discussed in this section?

#### Chapter 3.10, Economics

- Page 2, Section 3.10.1, Revenue Sources: The City of Newcastle does not have B&O taxes.
- Page 3, Section 3.10.2, Cost of Undergrounding a Transmission Line: Aren't there two factors that need to be considered in the discussion regarding undergrounding: 1) Cost; and 2) Feasibility? In the areas, such as Newcastle, where transmission lines are collocated with the OPL, isn't undergrounding technically infeasible? If that is correct, this should be stated in this discussion.
- The Summer, 2016, edition of the Appraisal Journal includes a peer reviewed article, "Property Value Impacts from Transmission Lines, Subtransmission Lines and Substations." Would it be possible at this point to review it and include any findings or methodologies from the article in the property value impact analysis that is being prepared as part of the Ph 2 EE EIS? [https://www.appraisalinstitute.org/assets/1/7/TAJ\\_Preview\\_Front\\_Page.pdf](https://www.appraisalinstitute.org/assets/1/7/TAJ_Preview_Front_Page.pdf)
- Page 13, Section 3.10.5, Mitigation Measures: In addition to mitigating reduced AV by increasing mil levies, cities could also choose to reduce expenditures to match the reduced revenues.

COMMENT FORM - ENERGIZE EASTSIDE PHASE 2 DRAFT EIS, EMF and Pipeline\_v1

Review Contact/Phone: Reema Shakra/211.542.6044

Please use this sheet to record your comments and send to [rahul@energize.com](mailto:rahul@energize.com) before 5:00 p.m. on April 26th. Thank you!

Item No.	Page Number	Line Number	Commenter	Comment	EIS Response
1	1	1	Comment	Clarify the different time period horizons are used for the analysis – 2010-2015 vs 2012-2015 vs 2011-2015. This would appear to skew the risk analysis data and result in statistically significant risk data.	
2	1	1	1	1	
3	1	1	1	1	
4	1	1	1	1	
5	1	1	1	1	
6	1	1	1	1	
7	1	1	1	1	
8	1	1	1	1	
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21	1	1	1	1	
22	1	1	1	1	
23	1	1	1	1	
24	1	1	1	1	
25	1	1	1	1	
26	1	1	1	1	

LL1-C-1 All comments were incorporated into the Phase 2 Draft EIS with the following exceptions:

- Item 4, Section 3.9-15
  - This section is in reference to the next planned inline inspection in compliance with Olympic’s integrity management program. The Cities of Redmond and Bellevue would have to interpret their franchise agreements and determine whether the construction of the Energize Eastside project triggers an inspection. The EIS discussion does not need to address this issue at this time.
- Item 8, Section 3.9-20
  - Consistent with the discussion on April 24, 2017 with the City of Newcastle, EDM Services, ESA, and City of Bellevue, this comparison is a valid approach and was made by EDM Services in their report.
- Item 10, Section 3.9-25
  - The DNV-GL Report uses ‘may or may not occur’ and ‘unpredictable’ interchangeably. The EIS section uses ‘may or may not occur’ (including this text box) consistently throughout. Using the term unpredictable along with all the other risk assessment terminology may be harder for a reader to understand.
- Item 14, Section 3.9-32
  - The requirement is intended to apply to lines placed underground.
- Item 15, Section 3.9-34
  - Consistent with the discussion on April 24, 2017 with the City of Newcastle, EDM Services, ESA, and City of Bellevue, the pipelines are considered 'modern' because they were built during a time when regulations and industry codes were in place and construction practices were safer than in the early days of major pipeline construction.
- Item 18.a, Section 3.9-44
  - The report acknowledges that while a more severe event is possible, the risk results are based on the most severe event estimated by the model based on data assumptions and event scenarios, and represent a reasonable worst-case consistent with industry practice for purposes of the EIS. Additional scenarios of potential pool fires are discussed in Section 4.9 of the Final EIS.
- Item 21 and 22, Section 3.9-37 and 40
  - The significance thresholds were determined based on past workshop sessions with the Partner Cities (Bellevue, Redmond, Renton, and Newcastle). "Substantial increase" is a determination

LL1-C-1



- made by the Partner Cities.
- Item 23, Section 3.9-51-53
    - Consistent with the discussion on April 21, 2017 with the Partner Cities, an assessment of impacts was made in one location under a new heading titled Conclusion.



## City of Kenmore, Washington

June 12, 2017

Heidi Bedwell  
City of Bellevue  
Development Services Department  
P.O. Box 90012  
Bellevue, WA 98009-9012

Subject: Comments on Energize Eastside Phase 2 DEIS

Ms. Bedwell:

Thank you for the opportunity to comment on phase two of the draft environmental impact statement for Energize Eastside. This is a very important project for the safety and economic viability of our region.

Our support for the project is based on the damaging consequences to Kenmore and the rest of the eastside that will follow from the delay/no action alternative and the resulting blackouts. These consequences are not acceptable to Kenmore and will damage our local economy and public safety.

To support our position, I refer to the following from the DEIS:

### Chapter 2: Project Alternatives

- The disadvantages of delaying the project are that the risks of power outages (described in Chapter 1 of the Phase 1 Draft EIS) that would be associated with the No Action Alternative could develop over time.
- It is also possible that the awareness of the risk of outages could discourage development within the Eastside that would place the Partner Cities at an economic disadvantage to other jurisdictions in the region.

### Chapter 6: Significant Unavoidable Adverse Impacts

- The No Action Alternative would not be consistent with city comprehensive plan policies, as discussed in the Phase 1 Draft EIS. The No Action Alternative could lead to unavoidable significant adverse land use impacts in the long term if unreliable power supply were to outweigh the regional factors amenable to growth and development, leading to development inconsistent with regional growth plans and targets.

18120 68<sup>th</sup> Ave NE · PO Box 82607 · Kenmore, WA 98028

Office: (425) 398-8900 · Fax: (425) 481-3236 · cityhall@kenmorewa.gov ·  
www.kenmorewa.gov

2

LL2-A-1

It is very clear that the delay/no action alternative is a very poor choice and will harm our communities. I urge you to move forward with the Energize Eastside project as soon as possible.

Sincerely,



David Baker, Mayor  
City of Kenmore

cc: Bellevue City Council

LL2-A -1 Comment noted.

6/13/2017

Weebly Email Service Mail - Energize Eastside EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS**

1 message

**Keith Niven** <KeithN@issaquahwa.gov> Sun, Jun 11, 2017 at 1:57 PM  
To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>  
Cc: "council@bellevuewa.gov" <council@bellevuewa.gov>, City Council <CityCouncil@issaquahwa.gov>, Jen Davis Hayes <JenH@issaquahwa.gov>

I am providing this letter on behalf of the City of Issaquah.

It is our understanding that the Energize Eastside project is necessary to improve the delivery and reliability of power to the eastside. Although the proposed improvements are not located within the City of Issaquah, City businesses have reported poor power quality and repeated power interruptions. The no action alternative currently being considered would increase the potential for disruption to our residents and businesses and is not considered an acceptable outcome.

LL3-A-1

Like other eastside cities, Issaquah is growing and the demand for power will only increase. Not moving forward with the basic infrastructure necessary to keep our region prospering would be negligent. I have attached a comment letter provided by the City in March 2016 as it summarizes the concerns of the City.

If you would like to follow up with the City, please do not hesitate to contact me.

Keith Niven, AICP, CEcD

City of Issaquah

Economic Development Director

Development Services Director

(425) 837-3430



**EnergizeEastsideDEISLetter3.12.2016.docx**  
180K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4ds2&view=pt&search=inbox&th=15c98f2c89f35de&siml=15c98f2c89f35de>

1/1

LL3-A -1 Comment noted.



P.O. Box 1307  
Issaquah, WA 98027  
425-837-3020  
issaquahwa.gov

March 11, 2016  
Heidi Bedwell  
Energize Eastside EIS Program Manager  
Senior Planner, Land Use division, Development Services  
City of Bellevue

RE: Energize Eastside Phase One DEIS

Dear Ms. Bedwell,

Thank you for the opportunity to review and comment on the Energize Eastside Environmental Impact Statement.

LL3-A-2

As part of the growing Eastside, sufficient and reliable electricity is important to Issaquah. It is essential to maintaining a high quality of life for our residents and a reliable, thriving operating environment for our businesses. We are greatly concerned about PSE projections for power deficiencies as soon as winter 2017 and the resulting consequence of increased power outage frequency all over our region—including Issaquah. For these reasons, we do not support the No Action Alternative nor do we support Alternative 2. Instead of securing electrical service reliability, the DEIS finds Alternative 2 to be second only to the No Action Alternative for adverse impacts to reliability, with the added possibility of burdening other utilities and greatly impacting one of Issaquah’s most-visited natural and recreational areas (Lake Tradition Plateau) via noise generation.

LL3-A-3

In addition to these comments, we would like to correct a few errors found with the DEIS. Figure 10-2 regarding future land use incorrectly labels most of the park lands and open space (including Lake Sammamish State Park, Squak Mountain State Park and Natural Area, and Cougar Mountain Regional Wildland Park, among others) as planned “institutional lands.” There is no planned change from their current uses as park land and open space. Indeed, Figure 10-5 also mislabels large swaths of land within the project area, including the Issaquah Highlands, the area surrounding the Lake Tradition substation, and the parklands on Cougar and Squak. While we agree with the statement on page 10-11 that parcel-by-parcel reconciliation of data is unnecessary for the purposes of the analysis, we feel the extent of this error is worthy of correction.

LL3-A-4

The City of Issaquah applauds our fellow Eastside cities’ efforts in working with PSE to discover the best fit solution that will ensure reliable power supply to our area for years to come. We look forward to the next phase of the DEIS for more detailed information about the alternatives. Please consider me your City of Issaquah point of contact and as a resource for future work and information needs associated with the DEIS.

Sincerely,

Andrea Snyder  
Economic Development Manager  
City of Issaquah  
425-837-3424

- LL3-A -2 Comment noted.
- LL3-A -3 Comment noted. These items have been corrected in Chapter 3, Errata, of the Final EIS.
- LL3-A -4 Comment noted.



**King County**  
 Department of  
 Natural Resources and Parks  
 Director's Office  
 King Street Center  
 201 S Jackson St, Suite 700  
 Seattle, WA 98104-3855

June 20, 2017

Heidi Bedwell  
 Environmental Planning Manager  
 City of Bellevue  
 Development Services Department  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

Dear Ms. Bedwell:

I am writing to provide comments from the King County Department of Natural Resources and Parks (DNRP) in response to Puget Sound Energy's (PSE) Phase 2 Draft Environmental Impact Statement (DEIS) for its Energize Eastside Project. The alternatives and related potential infrastructure development clearly encompass multiple places where existing and planned KC DNRP facilities could be impacted, and we appreciate the opportunity to provide information about these impacts to inform further consideration of these alternatives.

These comments pertain most directly to facilities, projects, and programs owned, operated, and/or implemented by, respectively, the Wastewater Treatment Division (WTD) and the Parks and Recreation Division (Parks) within DNRP. WTD owns and operates numerous and far-reaching facilities throughout western King County, including significant public facilities within and/or across several sections of the alternatives under consideration. The effective implementation, operation, and maintenance of these critical wastewater facilities are and will continue to be important points of consideration for PSE as the Energize Eastside project moves forward.

Parks owns property interests in the Eastside Rail Corridor (ERC) supporting the development of a much-anticipated regional trail within the ERC. King County has established, pursuant to the Reciprocal Coordination and Cooperation Covenant Agreement with PSE, a Planned Trail Area for the regional trail alignment throughout our ERC ownership area. King County also has an approved ERC Trail Master Plan that establishes a preferred trail alignment and has completed a planning level EIS related to the alignment proposal within the Eastside Rail Corridor. The two "bypass" routes under consideration call for the use of a segment of the ERC, over which King County holds property interests supporting trail and utility uses, for facilities that could be part of the implemented Energize Eastside project. While the ERC

LL4-A -1 See response to comment LL4-A-2 in regards to WTD facilities.

Bypass Options 1 and 2 as evaluated in the Phase 2 Draft EIS are not part of PSE's Proposed Alignment and were not further analyzed in the Final EIS.

LL4-A-1

Heidi Bedwell  
June 20, 2017  
Page 2

LL4-A-1

vision, developed by King County and the other owners of the ERC, supports the use of the ERC for transit, trails, and utilities, installation and operation of such facilities in this segment would affect the planning, design, implementation, and operation of a regional trail facility.

Staff from WTD and Parks have prepared more detailed comments on the substance of the DEIS. They are provided below. Please note that this letter includes an enclosed figure depicting specific locations where the alternatives under consideration intersect with existing or planned WTD facilities, and a figure that depicts the planned alignment of the regional trail in the bypass segments.

Detailed comments from WTD:

The alternatives intersect with WTD facilities in the following places, listed from north to south:

- All action alternatives would cross the Lake Hills Interceptor in the Bellevue Central Segment
- The Bellevue Central Bypass options 1 and 2 would:
  - Cross and parallel the Lake Hills Interceptor
  - Parallel the Eastside Interceptor (ESI) sections 11 and 12
  - Cross the Bellevue Force Mains
  - Cross and parallel the Factoria Trunk
- The Oak 1 and Oak 2 alternatives in the Bellevue South Segment would cross and then parallel the Factoria Trunk
- All alternatives would cross the Coal Creek Trunk in the Bellevue South Segment
- The Oak 1, Oak 2, and Willow 2 alternatives in the Bellevue South Segment would also closely parallel the Coal Creek Trunk
- All alternatives would cross the Cedar River Interceptor in the Renton Segment

LL4-A-2

The approximate locations of these crossings and parallels are shown on the attached map. In addition, WTD may have permanent easements or similar property rights for these conveyance facilities.

WTD also has a capital project currently in design that parallels the Bellevue South Willow 1 and 2 alignments. This project, the Coal Creek Siphon and Trunk Parallel is currently in alternatives analysis with predesign scheduled to begin in the third quarter of 2017 and construction expected to go from late 2021 through 2024.

WTD is requesting that PSE and the City of Bellevue consider the potential impacts of the proposed project on these and other wastewater facilities when identifying and analyzing the impacts of project alternatives. WTD would need to be assured the right to maintain and repair our facilities, and, in the event that a sewer line must be relocated, new permanent easements will need to be provided. Impact analysis for the DEIS should be more specific regarding potential impacts to wastewater facilities.

LL4-A -2 Potential impacts to utilities were discussed in the Phase 1 Draft EIS, which found that impacts could be adequately mitigated and no significant impacts are expected. PSE will coordinate with King County WTD where PSE's Proposed Alignment is near existing or planned facilities. All potentially affected utilities must be shown on permit application plans, and conflicts can be addressed through the permit process. Information provided to PSE from King County will be utilized to avoid conflicts with existing and planned facilities.

Heidi Bedwell  
 June 20, 2017  
 Page 3

LL4-A-2

WTD is also requesting that PSE and the City of Bellevue submit design drawings and other project information for review as design development continues so that King County staff can more directly assess the project's impacts.

WTD has Record Drawings available for all of our facilities in the Energize Eastside route options. Requests for WTD Record Drawings, further design information of the Coal Creek Siphon and Trunk Parallel, or further PSE Energize Eastside design level development information should be sent to:

Mark Lampard, P.E.,  
 Local Public Agency Coordinator  
 King County Wastewater Treatment Division  
 201 South Jackson Street, KSC-NR-0503  
 Seattle, WA 98104-3855  
 (206) 477-5414  
[mark.lampard@kingcounty.gov](mailto:mark.lampard@kingcounty.gov)

Detailed comments from Parks:

The Energize Eastside Bypass Option 1 and 2 within the Bellevue Central Segment intersect with the ERC between approximately the Lake Hills Connector and NE 1<sup>st</sup> Street. Depending on the pole alignment, there could be impacts to the planned alignment of the trail and related structures and features inherent in the fully constructed profile such as retaining walls, footings, drainage, soft surface shoulders, fencing, lighting, connector pathways, landscaping and other trail furnishings.

LL4-A-3

The full profile width for the developed trail will typically be between 20-24 feet at the surface. The ERC Master Plan and EIS established a trail planning envelope through the section indicated for Bypass Options 1 and 2 that is 30 feet wide, predominantly centered on the existing railbed centerline. The 30 foot width for planning allows necessary flexibility for the exact lateral alignment of the trail to be determined during the design phase based on physical constraints or the need to minimize impacts or costs. Subsurface improvements such as drainage, other utilities and structural footings may extend beyond the width of the surface profile.

The ERC right-of-way width is constrained to approximately 75 feet at the southern portion of PSE's identified bypass route near the Lake Hills Connector. The ERC widens to 100 feet of available right-of-way north of that point, however the corridor is on steeply sloping and heavily vegetated topography through the entire section with significant underground utilities on the outer edges such as WTD's Eastside Interceptor, fiber optic and other utilities. These and other physical structures in the corridor including WTD's Medina Force Main Odor Control facility on the north side of SE 1<sup>st</sup> Street contributed to the selection of the preferred trail alignment to avoid these features and constraints.

LL4-A -3 Bypass Options 1 and 2 as evaluated in the Phase 2 Draft EIS are not part of PSE's Proposed Alignment and were not further analyzed in the Final EIS.

Heidi Bedwell  
June 20, 2017  
Page 4

Parks would also like to make PSE aware of potential constraints to pole placement where the identified bypass routes continue through the SE 1<sup>st</sup> Street crossing before heading east out of the ERC. Where the planned trail alignment is approaching the crossing of SE 1<sup>st</sup> Street from the south, it must curve out toward the eastern property boundary in order to approach the skewed roadway crossing at a ninety-degree angle. On the north side of the crossing the trail curves toward the western property boundary before coming back into alignment on the centerline. Sheet 64 of the attached Master Plan Volume 2 plan set shows this layout, which would preclude pole placement on the outer edges of the corridor where the trail is aligned for this crossing. Pole placement must also avoid blocking sight lines at this or other roadway crossings.

Parks has initiated the design phase for the Wilburton Segment of the ERC Trail, which includes the area identified for PSE's Bypass Options 1 and 2. The design of the trail in this area will take place between now and early 2019. This area will be included in the first section of the ERC Trail scheduled for construction from mid-2019 through 2020. This highly anticipated first segment of the trail includes opening the portion of the trail across the nearby Wilburton Trestle to the public by the end of 2020. This segment of the trail is expected to host a high volume of trail users for recreation and nonmotorized transportation, with an estimated average peak volume of 3,000-4,000 bicycle trips per day. Parks is considering a policy change that could make trails such as the ERC open 24 hours per day. If PSE were to select the alignment within the ERC as identified in its bypass route options, an operational agreement with Parks would be necessary to stipulate the terms of access, maintenance, protection of trail, and protocols for any operational activities that could impact trail users.

Parks is requesting that PSE and the City of Bellevue consider the potential impacts of the proposed project on the ERC Trail in terms of physical alignment, potential conflicts, aesthetic impacts, operational impacts, and impacts to the natural environment within the ERC when identifying and analyzing the impacts of project alternatives. Parks is also requesting that PSE and the City of Bellevue submit design drawings and other project information for review as design development continues so that King County staff can assess the project's impacts.

Parks has AutoCAD drawings of the planned trail alignment, corridor topography, surveyed property boundaries and centerline, as well as electronic GIS data layers featuring numerous features of the natural and built environment in and around the ERC. These files are available for use by PSE in evaluating the Energize Eastside route options. Parks also completed numerous planning level studies of the corridor including studies of the ecosystems, historic and cultural resources, geologic conditions, roadway crossings, and corridor right-of-way constraints. Requests for these files, design information for the ERC Trail Wilburton Segment, or further PSE Energize Eastside design level development information that impacts the ERC should be sent to:

LL4-A-3

Heidi Bedwell  
June 20, 2017  
Page 5

Erica Jacobs  
Project Manager, Eastside Rail Corridor Regional Trail  
King County Parks and Recreation Division  
201 South Jackson Street, KSC-NR-0700  
Seattle, WA 98104-3855  
(206) 477-5539  
[erica.jacobs@kingcounty.gov](mailto:erica.jacobs@kingcounty.gov)

LL4-A-3

Thank you for the opportunity to provide comments regarding this project. Please feel free to contact David St. John, Department of Natural Resources and Parks, Environmental Affairs Officer, at (206) 477-4517 or [david.st.john@kingcounty.gov](mailto:david.st.john@kingcounty.gov), or Mark Lampard and Erica Jacobs as noted above, if you have any questions about the information provided in this letter or related matters.

Sincerely,



Christie True  
Director

Enclosures

cc: Mark Isaacson, Division Director, Wastewater Treatment Division, Department of Natural Resources & Parks (DNRP)  
Kevin Brown, Division Director, Parks and Recreation Division, DNRP

**Liv Benson**

---

**From:** Liv Benson  
**Sent:** Thursday, July 13, 2017 1:26 PM  
**To:** Liv Benson  
**Subject:** FW: Energize Eastside phase 2 comments

**From:** Pam Johnston [mailto:pamjjo@msn.com]  
**Sent:** Thursday, July 6, 2017 4:15 PM  
**To:** info@EnergizeEastsideEIS.org; Don Marsh <don.m.marsh@hotmail.com>; Loretta Lopez <llopez@mstarlabs.com>  
**Subject:** Re: Energize Eastside phase 2 comments

Yes. Please add fit CENSE. Please also add that I am the president of the Bridle Trails Community Club.  
Sincerely,  
-pamela Johnston

7/6/2017

Weebly Email Service Mail - Energize Eastside phase 2 comments



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside phase 2 comments**

1 message

**Don Marsh** <don.m.marsh@hotmail.com> Thu, Jul 6, 2017 at 10:42 AM  
To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>  
Cc: Pam Johnston <pamjjo@msn.com>

Dear Ms. Bedwell,

OO1-E-1

CENSE would like to explicitly incorporate as our comments the excellent document authored by CENSE member Pamela Johnston, reproduced below, regarding the various ways in which PSE's "Energize Eastside" proposal violates the spirit and letter of Bellevue's Comprehensive Plan.

Sincerely,

Don Marsh, President  
CENSE.org

City of Bellevue  
Development Services Department  
Attn: Heidi Bedwell, Environmental Planning Manager  
P.O. Box 90012  
Bellevue, WA [98009-9012](tel:98009-9012)

Choose the no build option.

See Responses To Letter

The Bel-Red area is no longer industrial. The new comprehensive plan calls for an Urban area. Bellevue neighborhoods are unfairly impacted.

OO24-A

*POLICY S-BR-1. Implement the Bel-Red Subarea Plan in a manner that integrates the three dimensions of sustainability: sustainable economy, society, and environment; meeting the needs of the present without compromising the needs of future generations.*

Energize Eastside is compromising the environment and shortening unnecessary resources that compromise future generations.

*POLICY S-BR-4. Develop and implement a phased approach to new commercial development, so that transportation, open space, and other infrastructure is in place or committed to serve the needs of growth. This may include*

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&server=EZPUTRTfxl.en.&view=pt&search=inbox&th=15d18fea1c3fb26f&siml=15d18fea1c3fb26f> 1/4

OO1-E -1 Comment noted.

7/6/2017

Weebly Email Service Mail - Energize Eastside phase 2 comments

*establishment of a year 2030 commercial development limitation consistent with the terms of an interlocal agreement with the city of Redmond, for the purpose of coordinating land use and mitigation between the two cities.*

Energize Eastside does not account for this phased approach.

*UT-60. Work with Puget Sound Energy, telecom providers, state regulatory agencies, and other responsible parties to develop funding tools that enable full mitigation of the neighborhood impacts of deploying electrical and telecommunications infrastructure.*

Neighborhood impacts are not being addressed. There are significant adverse impacts to scenic views.

*UT-61. Allow new aerial telecommunication lines on existing systems provided that they shall be designed to address visual impacts and are required to be placed underground at the time of undergrounding electrical distribution lines.*

Energize Eastside does not adequately address the visual impacts. There would be significant adverse impacts to scenic views.

See Responses To Letter OO24-A

*UT-69. Avoid, when reasonably possible, locating overhead lines in greenbelt and open spaces as identified in the Parks and Open Space System Plan.*

These areas have not been avoided. They have not been planned to be placed underground.

*UT-74. Encourage system practices intended to minimize the number and duration of interruptions to customer service.*

Energize Eastside does not address the neighborhood problems.

*UT-75. Prior to seeking city approval for facilities, encourage utilities service providers to solicit community input on the siting of proposed facilities which may have a significant adverse impact on the surrounding community.*

Outreach was inadequate. Meetings without listening to the public is not outreach.

*UT-94. Require in the planning, siting, and construction of all electrical facilities, systems, lines, and substations that the electrical utility strike a reasonable balance between potential health effects and the cost and impacts of mitigating those effects by taking reasonable cost-effective steps.*

The balance is not reasonable.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxI,en,&view=pt&search=inbox&th=15d18fea1c3fb26f&siml=15d18fea1c3fb26f> 2/4



7/6/2017

Weebly Email Service Mail - Energize Eastside phase 2 comments

*UT-95. Work with Puget Sound Energy to implement the electrical service system serving Bellevue in such a manner that new and expanded transmission and substation facilities are comparable and consistent with the local context and the land use pattern established in the Comprehensive Plan.*

*Discussion: Where feasible, electrical facilities should be sited within the area requiring additional service. Electrical facilities primarily serving commercial and mixed use areas should be located in commercial and mixed use areas, and not in areas that are primarily residential. Further, the siting and design of these facilities should incorporate measures to mitigate the visual impact on nearby residential areas. These considerations must be balanced with the community's need to have an adequate and reliable power supply.*

Neighborhoods are overly impacted.

*UT-96. Require siting analysis through the development review process for new facilities, and expanded facilities at sensitive sites, including a consideration of alternative sites and collocation.*

*Discussion: Sensitive facility sites are those new facilities and existing facilities proposed to be expanded where located in or in close proximity to residentially-zoned districts such that there is potential for visual impacts absent appropriate siting and mitigation. The city will update Map UT-7 to the extent needed to stay current with changes in Puget Sound Energy's system planning.*

Energize Eastside has failed to mitigate the impact to residential property

*UT-99. Work with and encourage Puget Sound Energy to plan, site, build and maintain an electrical system that meets the needs of existing and future development, and provides highly reliable service for Bellevue customers.*

*Discussion: Providing highly reliable service is a critical expectation for the service provider, given the importance of reliable and uninterrupted electrical service for public safety and health, as well as convenience. Highly reliable service means there are few and infrequent outages, and when an unavoidable outage occurs it is of short duration and customers are frequently updated as to when power is likely to be restored. A highly reliable system will be designed, operated and maintained to keep pace with the expectations and needs of residents and businesses as well as evolving technologies and operating standards as they advance over*

Energize Eastside does not address the specific reliability problems of neighborhoods.

*EN-12. Work toward a citywide tree canopy target of at least 40% canopy coverage that reflects our "City in a Park" character and maintain an action plan for meeting the target across multiple land use types including right-of-way, public lands, and residential and commercial uses.*

Too much impact without mitigation in full.

*EN-13. Minimize the loss of tree canopy and natural areas due to transportation and infrastructure projects and mitigate for losses, where impacts are unavoidable.*

Mitigation is inadequate.

gamela johnston

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxI,en,&view=pt&search=inbox&th=15d18fea1c3fb26f&siml=15d18fea1c3fb26f> 3/4

See Responses To Letter OO24-A



OO1-E

COMMENT

RESPONSE

7/6/2017

Weebly Email Service Mail - Energize Eastside phase 2 comments

3741 122nd Ave NE,

Bellevue 98005

CENSE member

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxL.en.&view=pt&search=inbox&th=15d18fea1c3fb26f&siml=15d18fea1c3fb26f> 4/4



7/5/2017

Weebly Email Service Mail - Phase 2 Draft EIS Comment from CENSE



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Phase 2 Draft EIS Comment from CENSE**

1 message

**Don Marsh** <donmarsh@cense.org>  
To: info@energizeeastsideeis.org

Fri, Jun 30, 2017 at 10:39 AM

Dear Ms. Bedwell,

Please accept the attached PDF document as an overview of CENSE comments for the Phase 2 Draft EIS. While I am submitting this on behalf of many CENSE members, individual members are submitting detailed comments that CENSE would like to incorporate as our broader response to this incomplete and inaccurate EIS.

We reiterate our request for a Supplemental EIS when more of the important details of the project route, tree removal, and pole locations are known.

Sincerely,

Don Marsh, President  
CENSE.org

My personal address:

4411 137<sup>th</sup> Ave. SE  
Bellevue, WA 98006 **Comments on Energize Eastside Phase 2 Draft EIS.pdf**  
4220K<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jever=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15cfa1682f66d8ab&siml=15cfa1682f66d8ab> 1/1

OO1-F -1 Comment noted.

## Comments on Energize Eastside Phase 2 Draft EIS

June 30, 2017

CENSE submits this document in response to the Energize Eastside Phase 2 Draft Environmental Impact Statement.

On behalf of several thousand residents from at least eighteen neighborhoods in the four Eastside cities that will be impacted by the "Energize Eastside" project, CENSE asserts that this EIS does not fulfill its purpose. It is inadequate, incomplete, and biased towards the project applicant. It does not deserve support by the citizens, city councils or any legal authority.

In this document, CENSE highlights seventeen requests for additional analysis and data. Although this is not a comprehensive list of our questions and concerns, CENSE asks that these requests be specifically addressed in the Final EIS, and that the EIS team provide a list of changes that are made in response to these questions.

### About CENSE

CENSE (Coalition of Eastside Neighborhoods for Sensible Energy) is an all-volunteer citizen organization operating as a non-profit corporation in the state of Washington. The organization formed in May, 2014 in response to a disappointing "Community Advisory Group" created by PSE to provide advice on the route for the transmission line. Residents wondered why no alternatives were considered by the advisory group, especially at a time when smart "non-wire" alternatives are being implemented in many other cities.

Respectfully submitted,



Don Marsh, President  
4411 137<sup>th</sup> Ave. SE  
Bellevue, WA

Christina Aron-Sycz, Vice President  
13725 NE 34<sup>th</sup> Place  
Bellevue, WA

OO1-F -2 See response to comment II14-B-3.

**Summary**

CENSE finds the Draft EIS deficient in the following areas:

1. **Site-specific** details are missing, such as which route the transmission line will take.
2. Is it normal to site an **overhead 230,000-volt transmission line** in a residential area?
3. **Recent technology developments** provide feasible solutions that have not been studied.
4. **Pipeline safety concerns** remain unanswered.
5. Analysis of **earthquake risk** is not sufficient.
6. Methodology for determining **view impacts** is incorrect.

**1. No site-specific detail**

It is unusual to have a two-phase EIS, even for a project of this size. To help the public understand the difference between each phase, the Phase 1 Draft EIS included this explanation:

*The Phase 1 Draft EIS broadly evaluates the general impacts and implications associated with feasible and reasonable options ... The Phase 2 Draft EIS will be a project-level evaluation, describing impacts at a **site-specific and project-specific level**.<sup>1</sup>*

The public understood this to mean that Phase 2 would include site-specific details, such as which route would be used, which trees would be removed or trimmed, and where exactly the poles would be placed. These details are the only way that environmental impacts can be truly evaluated.

For example, one member of CENSE may lose a 75-year-old cedar tree that provides critical screening and shade for his house. Whether that particular tree survives is very significant to him. In some cases, a pole that is positioned 10 yards one way or the other can change the value of a property by tens of thousands of dollars.

For these reasons, CENSE takes strong exception to this statement in the EIS:

*... information about the project is approximate and subject to change and refinement as the design is developed. Where there is uncertainty about potential impacts, the Phase 2 Draft EIS uses conservatively high impact assumptions to ensure that any potential significant impacts are addressed. (p. 1-3)*

The public is not able to make “conservatively high impact assumptions” about how this project affects them. If a resident assumes that her home will be destroyed as a consequence of this project, is that “conservative” enough?

After CENSE complained about the lack of data on poles and trees, the EIS team published a web page that allows residents to see impacted trees and proposed pole locations. While we appreciate the effort, the data comes with a hefty caveat: “Accuracy and completeness of the information on this map is not guaranteed.” The public cannot provide meaningful comments on this EIS without accurate and complete information about the project.

<sup>1</sup> [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/01\\_chapter\\_1\\_introduction\\_and\\_summary.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/01_chapter_1_introduction_and_summary.pdf), p. 1-4

OO1-F-2

**CENSE asks:**

1. A Supplemental EIS must be issued when PSE can provide information about the final route, a list of trees to be cut, the exact placement and height of poles, and the size and type of foundation for each pole. This information is essential for residents to assess the environmental impact of the project in their neighborhoods, schools, and parks.

**2. Is it normal to locate an overhead 230,000-volt line in residential areas?**

PSE has proposed a transmission line “upgrade” that would place two 230,000-volt transmission lines (if guidelines recommended by the safety consultant DNV-GL are followed) in a 100-foot wide utility corridor shared with two high-pressure hazardous liquid pipelines. This seems like a lot of dangerous infrastructure packed into a very tiny space. Furthermore, the corridor passes through dozens of densely settled residential neighborhoods and very close to homes and schools.

For example, one of the pipelines passes less than 200 feet from Tyee Middle School, which holds approximately 1,000 schoolchildren daily. Is it wise to increase the risks of a devastating fire by quadrupling the power in the wires that are within striking distance of the pipeline?



OO1-F-3

Stringent codes in California prevent schools from being located within 1,500 feet of a hazardous liquid pipeline:

*The site shall not be located ... within 1500 feet of the easement of an above ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study...<sup>3</sup>*

<sup>2</sup> [https://energizeeastside2.blob.core.windows.net/media/Default/Safety/PSE\\_AC\\_Analysis\\_Bellevue\\_WA\\_FINAL\\_PP16591\\_12132016.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/Safety/PSE_AC_Analysis_Bellevue_WA_FINAL_PP16591_12132016.pdf), p. (v)  
<sup>3</sup> <http://www.cde.ca.gov/ls/fa/sf/title5regs.asp>, sec. 14010(h)

OO1-F-3

The pipeline safety risk assessment prepared by EDM Services for the Phase 2 Draft EIS estimated the change in risk associated with PSE's proposal based on national data collected by PHMSA; applicable industry standards, reports, and studies; and reports and studies prepared for the Energize Eastside project, including the DNV GL AC Interference Study. While it is not uncommon for transmission lines to be co-located with hazardous liquid pipelines, the PHMSA incident report database does not distinguish between co-located and non-co-located pipelines.

In the absence of any such data, EDM Services reviewed the PHMSA incident report database for the period from January 2010 through December 2015 to identify releases that may have been caused by a pipeline's proximity to electrical utility facilities. Unfortunately, the external corrosion-caused releases do not include data to identify releases caused by AC interference with cathodic protection systems; nor do the excavation damage-caused releases identify construction related specifically to overhead power line or other electrical utility construction. However, the following observations are noteworthy; they help put the additional pipeline risk posed by ground faults due to the co-location of overhead HVAC lines and hazardous liquid pipelines into perspective.

- Of the 2,362 reported hazardous liquid pipeline incidents from January 2010 through December 2015, 15 (or 0.6 percent) were reported as being caused by an indication of “stray current” on the incident report.
- Based on the incident reports, it does not appear that any of the seven fatalities were a result of co-located pipelines and overhead HVAC lines.
- Based on a review of the Olympic incident reports, there do not appear to be any Olympic releases that were caused by the pipelines being co-located with the existing overhead HVAC lines.
- Six (0.25 percent) of the 2,363 hazardous liquid pipeline incidents from January 2010 through December 2015 may have been caused due to their proximity to electrical utilities. These incidents were identified by reviewing all incidents caused by “other outside force damage”, where “electrical arcing from other equipment or facility” was marked on the PHMSA Form F 7000 Accident Report.

See the Pipeline Safety Technical Report (Appendix I-5 in the Phase 2 Draft EIS) for additional information.

As described in Section 3.9 of the Phase 2 Draft EIS, electrical system

According to PSE documents, there are thousands of children attending schools and day care centers within 600 feet of the transmission lines and pipelines. This represents a risk to the safety of our children that state and local governments should be mitigating. Even a slight increase in risk, as the EIS says the Energize Eastside project would incur, is going in the wrong direction.

It's not just schools and hundreds of homes that are within the high-risk zone. Newcastle's City Hall is located just over 100 feet downhill from the pipeline. If a breach were to occur in this area, burning gasoline or jet fuel would naturally flow towards this building. It's not clear that those serving their city or civic-minded citizens attending a council meeting would have time to escape the flames.



Is it normal industry practice to build an overhead 230,000-volt transmission line through residential neighborhoods in the United States? CENSE performed a search which revealed only two examples in the last 20 years. One occurred in Chino Hills, California. In 2011, a utility installed a 500,000-volt transmission line through neighborhoods that strenuously objected. The state oversight commission agreed with them and compelled the utility to take down the overhead lines and place them underground:

*Said CPUC President Michael R. Peevey, "It's the dawn of a new era in transmission line planning in this state. In urban and suburban areas, we have to look anew at how we site transmission lines, and carefully weigh their role in fulfilling the state's energy goals against their impact on community values. I know undergrounding costs more, but I believe in this instance the costs are manageable and relatively minor considering the overall well-being of the populace in doing so."*<sup>4</sup>

The second project returned by the internet search is a 230,000-volt transmission line proposed for Chandler, Arizona (pop. 254,000). This line was also opposed by residents, who successfully lobbied for a route change to minimize residential impact:

<sup>4</sup> <https://www.chinohills.org/DocumentCenter/View/8267>

upgrades and pole replacements in the shared utility corridor are not uncommon. PSE previously upgraded its 115 kV line to a 230 kV line for 15 miles north of the Sammamish substation in Redmond. In 2007 and 2008, PSE replaced and reframed hundreds of poles in the shared corridor. In 2016, PSE replaced poles to address a specific safety concern created by nearby construction in Newcastle. For all of these upgrades and replacements, PSE coordinated closely with Olympic in the design and construction of these activities.

The remainder of the questions posed in the comment are outside the scope of the EIS.

001-F-3

*The Salt River Project this week released a revised plan on the contentious issue of how to get more electricity to the Price Road Corridor and its booming tech sector in a way that will have less impact on Chandler neighborhoods.*

*SRP has been attempting to build the route since 2013, but the proposed above-ground-lines have drawn the ire of residents concerned about property values and potential health and safety risks.*

*SRP said the new plan stems from the adjusted power needs.*

*"When this project was originally proposed several years ago, SRP was projecting a need for about 1,300 megawatts," [SRP spokesman Scott Harelson] said. Now the utility expects the area to only need 1,000 megawatts. 5*

Although both the Chino Hills and Chandler projects have similarities to PSE's proposed project, neither affects as many neighborhoods. Neither is collocated with hazardous liquid pipelines. CENSE believes that Energize Eastside is a unique and precedent-setting project.

It is also notable that BPA, the federal authority that manages the Northwest power grid, recently canceled a major transmission project in southwestern Washington and Oregon.<sup>5</sup> BPA's reasons mirrored other canceled projects: lower-than-expected demand for electricity and good technological alternatives that save customers money.

OO1-F-3

**CENSE asks:**

2. In the last twenty years, how many overhead transmission lines of 230,000 volts or greater have been constructed in the United States through densely settled residential neighborhoods?
3. How many of those projects included two 230,000-volt circuits placed in a corridor that was 100 feet wide or less?
4. Of those projects, how many shared the utility corridor with one or two hazardous liquid pipelines?
5. If there were any projects that located transmission lines and pipelines in a narrow corridor through residential areas, what can we learn about how they mitigated risk? Did they have any accidents that we can learn from? Were their emergency response plans adequate to prevent losses of property and lives?

<sup>5</sup> <http://www.azcentral.com/story/news/local/chandler/2017/03/30/salt-river-project-to-build-power-lines-southern-chandler/99778596/>  
<sup>6</sup> [http://www.oregonlive.com/business/index.ssf/2017/05/bpa\\_nixes\\_costly\\_and\\_controversial.html](http://www.oregonlive.com/business/index.ssf/2017/05/bpa_nixes_costly_and_controversial.html)

OO1-F-4

**3. Insufficient evaluation of alternatives**

Until the need for Energize Eastside is proven, CENSE recommends the “No Action” alternative, which would continue to provide reliable electricity for the foreseeable future. CENSE has provided in previous EIS comments the Lauckhart-Schiffman Load Flow Study that demonstrates that Energize Eastside is not needed.<sup>7</sup> Criticisms of that study have been rebutted by the author of the study. However, if PSE can show data that substantiates the need, CENSE believes that smarter solutions using demand response, electrical efficiency, and perhaps some battery storage would provide the best solution for safety, cost, environmental impact, and preservation of the beauty of the Eastside for future generations.

In response to the Phase 1 DEIS, CENSE hired industry consultant EQL Energy to provide analysis of a better non-wired alternative than the one evaluated in the EIS. This became known as “Alternative 2B.” PSE quickly dismissed this alternative:

*Both Alternative 2 and Alternative 2B represent options that PSE could pursue. However, PSE has determined that these solutions either do not meet the project objectives, or they offer a short-term solution that would not meet PSE’s performance criterion for serving 10 years or more after construction... (p. 2-56)*

CENSE responds that PSE has “stacked the deck” against alternative solutions by using an unrealistic scenario, unlikely operating conditions, an implausible forecast of demand growth, and willing ignorance of conservation and efficiency trends. Moreover, PSE has an incentive to do this, because a larger, more expensive project will produce higher revenues for the company.

For example, the Phase 1 DEIS disqualified batteries from further consideration using this argument supplied by PSE:

*An energy storage system with power and energy storage ratings large enough to reduce normal overloads has not yet been installed anywhere in the world. For comparison, the largest operational transmission scale battery facility in the U.S. can provide 32 MW of power for about 40 minutes (Strategen, 2015). However, larger facilities are being developed in California and elsewhere.<sup>8</sup>*

After the Phase 1 DEIS was published, Southern California experienced an uncontrolled release of methane gas that was needed to generate electricity to serve peak winter demand. Fearing the possibility of rolling blackouts, the utility company asked Tesla to install a grid battery. The project was completed within three months of signing the contract. The battery farm, shown below, can supply 20 MW of power for four hours, the typical length of peak demand on the Eastside.

<sup>7</sup> <http://cense.org/Lauckhart-Schiffman%20Load%20Flow%20Study.pdf>

<sup>8</sup> [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/02\\_chapter\\_2\\_project\\_alternatives.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/02_chapter_2_project_alternatives.pdf), p. 2-40

OO1-F -4 The comment misstates the analysis presented in the Phase 1 Draft EIS. That analysis did consider battery storage and examined it in combination with other approaches in Alternative 2. It is acknowledged that since the report on energy storage prepared by Stratagen for PSE, other facilities have been proposed and built, and battery technology continues to advance.

With regard to selection of alternatives, PSE selected the 230 kV transmission facility for its proposal, and that is the proposal that the EIS has to examine. It is conceivable that PSE could have proposed an energy storage facility, or a combination of energy storage and generation, and even that they would do so on an incremental basis as described in the comment. However, PSE determined that those technologies would not meet their objectives. SEPA does not provide authority to compel an applicant to build a completely different type of project than they have proposed, including a project that the applicant does not believe would meet its objectives.



*Tesla battery farm in Southern California*

001-F-4

PSE may say that 20 MW of storage is not enough to meet Eastside demand. It is difficult to know if that is true, given the insufficient data that has been published by PSE. But PSE's charts show that the need, if it exists, would grow gradually over time. Unlike the immediate need experienced by Southern California, PSE can buy batteries incrementally as the need develops over years. An incrementally scaled solution has two advantages. First, customers will save a lot of money if electricity demand does not grow as fast as PSE expects. Second, battery prices are falling rapidly and storage capacity is rising. A purchase that can be deferred for a few years will acquire bigger batteries for less cost.

The timing of the need is also important. PSE says it must rush to construct Energize Eastside, because Bellevue and its neighbor cities are at risk of "rolling blackouts" in the summer of 2018. However, the EIS says that the Richards Creek substation will take up to 18 months to build. If you believe PSE's forecasts, there is no way to build a transmission solution in time to avoid the risk of outages. Like California, there appears to be only one alternative that can be built fast enough: Tesla grid batteries.

Batteries provide other advantages. For example, a battery can store clean electricity from intermittent renewable sources like sun and wind. This electricity can be withdrawn during peak hours, reducing the need for fossil fuel generation and the resulting carbon emissions.

PSE implies that the amount of land needed to site batteries could be a challenge. However, we found enough space to locate eight battery farms the size of Southern California's 20 MW installation in the area PSE has set aside for the new Richards Creek substation. The total capacity for a facility of this size would be  $8 \times 20 \text{ MW} = 160 \text{ MW}$  for four hours (640 MWh) using technology that is available today. That is more capacity than the Eastside is likely to need to meet PSE's 10-year performance criteria. If it is built incrementally, storage densities are anticipated to increase faster than demand, so this location could provide sufficient capacity to meet Eastside needs for many years to come.

OO1-F-4



Proposed "Richards Creek" substation, from Phase 2 Draft EIS

When BPA canceled its transmission line project in southwestern Washington in May 2017, the agency said battery storage was one of the technologies it would use to meet electrical demand. This provides further validation for the idea that batteries can be used to address transmission issues in the Northwest, saving money for customers.

There are several battery manufacturers that offer products suitable for our needs. One especially interesting technology is the vanadium flow battery available from Mukilteo-based UniEnergy Technologies (UET).<sup>9</sup> Although the cost of flow batteries is somewhat higher than the lithium-ion batteries offered by Tesla, there are two attractive features of UET's product. It has very low flammability, and storage capacity does not decline after years of use. Furthermore, UET is a local clean-tech company that provides local jobs and contributes to the Puget Sound economy. Instead of spending our money on poles that are manufactured out of state (and probably overseas), it is smart to invest in products made by local workers.

This alternative is much safer and less expensive than the collocated transmission lines and pipelines that PSE proposes.

<sup>9</sup> <https://www.forbes.com/sites/jamesconca/2016/12/13/vanadium-flow-batteries-the-energy-storage-breakthrough-weve-needed/#403aa8c65bde>

OO1-F-4

**CENSE asks:**

6. The EIS must do a credible job of evaluating alternatives and comparing the environmental impact of each. In this case, the EIS must clearly explain why batteries can or cannot meet the Eastside's peak demand needs. PSE has demonstrated that it cannot evaluate this alternative without bias. PSE is biased because it is obligated to maximize returns for the company's shareholders. There is no question that PSE's shareholders will enjoy higher revenues from a transmission line than a battery farm. The only fair and credible way to evaluate alternatives is to get appraisals from battery manufacturers that also have their own incentives to provide a storage-based solution. After the alternatives are completely described and analyzed, the EIS must then compare the environmental impacts of each to determine which has the least environmental impact. That analysis should include analysis of carbon emissions and the carbon impact of destroying thousands of trees.
  
7. Alternatives evaluated in Phase 1 of the EIS were often evaluated in isolation from other integrated resources. If conservation couldn't solve the problem *by itself*, it was dismissed as a part of the final solution. If batteries were unable to serve the entire load *by themselves*, they were eliminated from further consideration. Since there is only one technology that could handle PSE's projected need by itself (a transmission line), that was the only alternative that was brought forward for study in Phase 2. However, this single technology criterion is arbitrary. If the criterion had been "reduce carbon emissions during evening hours when the sun isn't shining," then transmission lines would have lost to batteries. Are the criteria proposed by PSE what we need at a time when addressing climate change is crucial to the health and well-being of ecosystems?

**4. Safety risk**

The Phase 2 DEIS cites the following formula for evaluating risk (p. 1-29):

$$Risk = Event\ Probability\ (Likelihood) \times Severity\ of\ Consequences\ (Impact)$$

Using this definition of risk, the EIS concludes the risk of a pipeline accident caused by colocation of higher-voltage transmission lines is “not considered significant.”

We object to this finding because the likelihood of an accident cannot be quantified, and therefore the level of risk cannot be calculated. The EIS says, “it is not possible to calculate exact risks along the existing corridor.” (p. 1-29)

DNV-GL, the pipeline safety consultant engaged by PSE, was also not able to evaluate the risk. According to the consultant, safe operation would require post-construction analysis, mitigation, and good communication between PSE and the Olympic Pipeline Company:

*After the transmission lines are energized, field monitoring and/or mitigation may be needed (to be performed by the pipeline operator) ...<sup>10</sup>*

In other words, safety cannot be guaranteed by design. The level of risk will depend on careful monitoring by Olympic. However, Olympic is already under Final Order by the federal Office of Pipeline Safety for failing to appropriately monitor and mitigate its pipelines from the corrosive effects of electromagnetic fields emitted by today’s transmission lines:

*Respondent [Olympic] failed to correct identified deficiencies in its corrosion control system that could adversely affect the safe operation of the pipeline... Respondent did not contest these allegations of violation.<sup>11</sup>*

Although DNV-GL tried to evaluate safety risks due to accelerated corrosion and accidental arcing of electricity into the pipelines, there are other risks that were not evaluated. The risks of construction damage and damage due to earthquakes were not addressed. These risks cannot be easily dismissed.

The deaths of three boys in the Bellingham explosion of 1999 can be traced back to damage inflicted on the Olympic pipeline by construction workers, years earlier. Installation of new transmission poles will require operation of heavy machinery close to the pipeline. Such activity can cause small cracks or dents in the half-century-old pipeline which may not be noticed. These small imperfections can concentrate the effects of electromagnetic fields, accelerating corrosion until a pipeline breach occurs.

A pipeline breach in a densely settled Eastside neighborhood could have “catastrophic” consequences, according to the Bellevue Fire Department:

*Given that pipeline incidents continue to occur in this country, and many for undetermined reasons, the community is still at risk. The combination of: a highly flammable liquid, in large quantities, and in urban environment translates into a significant consequence risk that approaches the “catastrophic” level.<sup>12</sup>*

<sup>10</sup> [https://energizeeastside2.blob.core.windows.net/media/Default/Safety/PSE\\_AC\\_Analysis\\_Bellevue\\_WA\\_FINAL\\_PP16591\\_12132016.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/Safety/PSE_AC_Analysis_Bellevue_WA_FINAL_PP16591_12132016.pdf), p. vi

<sup>11</sup> [https://primis.phmsa.dot.gov/comm/reports/enforce/documents/520155014/520155014\\_Final%20Order\\_01132016\\_text.pdf](https://primis.phmsa.dot.gov/comm/reports/enforce/documents/520155014/520155014_Final%20Order_01132016_text.pdf), p. 2

<sup>12</sup> [https://fire.bellevuewa.gov/UserFiles/Servers/Server\\_4779004/File/Fire%20PDFs/Standards%20of%20Coverage.pdf](https://fire.bellevuewa.gov/UserFiles/Servers/Server_4779004/File/Fire%20PDFs/Standards%20of%20Coverage.pdf), p. 66

OO1-F -5 To address pipeline safety concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which summarizes the findings of a risk assessment completed by EDM Services (a firm retained by the EIS Consultant Team) that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks. The purpose of a risk assessment is to identify, describe, and estimate risk, in recognition of the potential hazards and with a focus on describing risk in terms of consequences (severity of a pipeline incident) and the likelihood of occurrence. The risk assessment used available information and reasonable worst-case assumptions to provide a reasonable examination of this risk to help the public and decision-makers understand potential impacts.

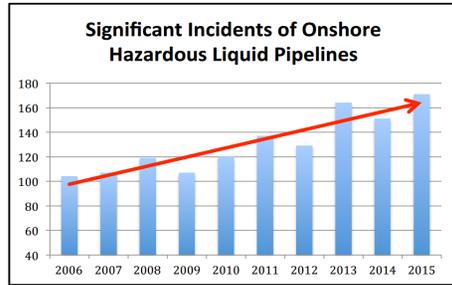
A separate analysis of electrical interference prepared by DNV GL provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for more detailed engineering by PSE. The Phase 2 Draft EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational.

The DNV GL report concluded that the pipeline and proposed transmission line could coexist safely with proper engineering and safety precautions by PSE and Olympic. The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study completed by DNV GL. Based on Stantec’s experience and industry standards, it is their opinion that the technical approach used to achieve an optimal transmission line route and powerline configuration to minimize the AC interference risks on the Olympic Pipeline system is consistent with industry practice. However, Stantec recommended additional analysis be performed in the detailed design stage of the project in order to verify mitigation needs for the project prior to transmission line energization (Stantec, 2017). These measures were incorporated into Section 3.9.7.2 of the Phase 2 Draft EIS (and updated Section 4.9.8.2 of the Final EIS).

Per federal law, Olympic is responsible for the maintenance and safe operation of the pipelines; therefore, beyond PSE employing reasonable measures in the design and construction of the

It appears that the Bellevue Fire Department and the EIS team use different definitions of risk regarding this pipeline safety issue. However, it's important to understand that a pipeline breach could release tens of thousands of gallons of jet fuel or gasoline that would flow downhill. Once ignited, the fuel would consume many homes and claim the lives of those in its path. The Bellevue Fire Department would not be able to extinguish the flames. Local firefighters would instead concentrate on evacuating residents. Efforts to put out the blaze would have to wait for specialists to arrive with special fire-fighting foam from SeaTac airport. In the terrible San Bruno pipeline explosion in 2010, it took 60 to 90 minutes to shut off the gas after the explosion, according to San Bruno Fire Chief Dennis Haag.<sup>13</sup>

The likelihood of a pipeline accident may be low, but there have been two such incidents in the past 20 years in Bellingham and Renton.<sup>14</sup> Pipeline accidents have been increasing during the last decade, as shown in this chart from the Pipeline and Hazardous Materials Safety Administration (PHMSA):<sup>15</sup>



PHMSA Significant Incident Data - 2/19/2016

The EIS concludes that any increased risk of a pipeline accident due to this project is "not considered significant." Residents disagree. Any increase in the risk of a catastrophic disaster is unacceptable.

To be fair to the people it serves, the EIS should compare the risk of a pipeline accident to the risk of the power outage that PSE seeks to avoid. Although PSE has not quantified the likelihood of such an outage, the probability is extremely low. In the load flow study conducted by Quanta for PSE, the variables used to model such an outage required the following conditions to occur simultaneously:

- Peak demand hours (6 hours during work days only, probability of 18%)
- Temperatures below 23° F (probability during the last 10 years: 0.4%)
- 1,500 MW exported to Canada (has not happened in the last 10 years during cold weather)
- Two major outages of Eastside electrical equipment (very rare)
- Six local generation plants offline (extremely rare)

<sup>13</sup> [https://en.wikipedia.org/wiki/San\\_Bruno\\_pipeline\\_explosion](https://en.wikipedia.org/wiki/San_Bruno_pipeline_explosion)

<sup>14</sup> <http://www.firehouse.com/news/10518901/section-of-pipeline-catches-fire-in-renton-washington>

<sup>15</sup> <http://pstrust.org/wp-content/uploads/2016/03/EC-Weimer-Testimony-March-2016.pdf>

transmission line and providing information to Olympic, the responsibility for protecting the pipeline from corrosion lies with Olympic. While local governments cannot use this SEPA process to compel Olympic to protect their pipeline as required by federal law, the EIS notes that PSE can help mitigate risks by providing Olympic with information that would help them understand corrosion risks to the pipeline that could be caused by the transmission line.

Construction risks are addressed in Section 4.9 of the Phase 2 Draft EIS.

Regarding earthquake-related damage, see response to comment I120-A-1 for information on how seismic risks were addressed in the Phase 2 Draft EIS and Final EIS.

Regarding emergency response, see response to comment I190-F-7 for information on Bellevue Fire Department Response capabilities in the unlikely event of a pipeline incident.

Regarding the significance criteria used, see Section 3.9.5.1 of the Phase 2 Draft EIS, which defines the significance criteria used for Environmental Health, Pipeline Safety. These criteria were approved by the Partner Cities.

Regarding the concern that pipeline incidents are on the rise, the raw data from the PHMSA database are somewhat misleading. There was a major change in the reporting threshold for hazardous liquid pipelines in January 2002. At that time, the reporting threshold was reduced from 50 barrels (2,100 gallons) to 5 gallons. As a result, beginning in 2002, there was a significant increase in the number of reported spills, since operators were then required to report much smaller releases. Also, the nation's pipeline mileage has increased over time.

Regarding the probability of outages, see response to comment I12-B-4. Regarding the flow of power to Canada, see response to comment 001-D-3.

001-F-5

The cumulative probability is obtained by multiplying the individual probabilities together, and the result is vanishingly small. The impact of this kind of power outage would also be small. Approximately 3% of PSE's customers would experience an outage of 15 minutes or less while BPA redirects the flow of electricity to Canada. Power could be restored as soon as the export to Canada is eliminated.

To summarize the risk of a pipeline accident compared to the risk of a power outage, we have prepared this table, which should also appear in the EIS:

Event	Likelihood	Impact	Risk (Likelihood x Impact)
"Rolling blackout"	Unlikely	Low (15 minute outage, small percentage of customers)	Low
Pipeline fire	Unlikely	<b>Catastrophic</b> (homes lost, possible deaths)	Significant

**CENSE asks:**

8. The EIS should clearly explain the risk of a power outage. The public does not currently understand the low likelihood of this kind of outage or how quickly it could be mitigated using existing operational procedures. The EIS should explain what responsibility BPA has to stop a transfer that endangers local infrastructure.
9. The EIS should clearly explain the risk of a pipeline fire with highly flammable liquids under pressures up to 500 psi, where local fire departments do not have the special foams to put out such fires, and where it may take several minutes to hours before the flow of fuel can be shut off. What is a realistic estimate of how long such a fire would burn before it could be extinguished? To understand the risks, the public should be fully aware that this isn't a typical fire that can be handled by local firefighters.
10. The EIS must compare the increased risk of a pipeline disaster with the risk of a power outage in the "No Action" alternative. See our table above.
11. The EIS should help the public understand that safe construction of the transmission lines will require flawless communication and cooperation between PSE and Olympic. Safe operation of both facilities will require continuous cooperation of these two companies for many decades to come. Neither has a safety record that inspires confidence.<sup>16, 17</sup>

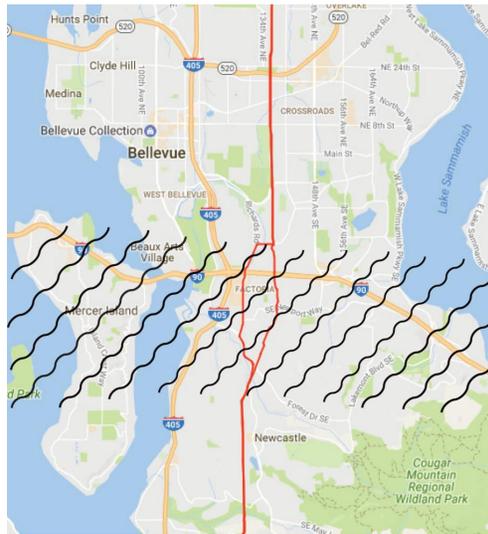
<sup>16</sup> <http://www.bellevuejournal.com/business/state-hits-pse-with-1-25-million-fine/>  
<sup>17</sup> <http://www.seattletpi.com/local/article/Criminal-indictments-in-deadly-pipeline-explosion-1065760.php>

**5. Earthquake risk**

The Phase 2 Draft EIS does not evaluate seismic hazards because

*... impacts under all alternatives would be less-than-significant ... (p. 1-10)*

We do not understand how the authors reached this conclusion. As Bellevue resident Jim Sweet explained in his comments on the Phase 1 Draft EIS, the "Seattle Fault" is a major fault line running east and west through our community, roughly following the I-90 freeway:



In the map above, the orange lines mark the route of the two Olympic Pipelines that transport 13 million gallons of jet fuel and gasoline through the Eastside each day. The wavy black lines indicate the area that could slip as much as ten feet during a major earthquake, rupturing the pipelines and spilling tens of thousands of gallons of highly flammable liquids. That could happen with or without Energize Eastside.

However, Energize Eastside introduces two additional risk factors. First, the voltage carried by the transmission lines would double, increasing the distance an electric arc can travel through the air or soil. Second, tall poles made of steel will conduct electricity more effectively than the shorter wooden

OO1-F -6 See response to comment I120-A-3.

OO1-F-6

OO1-F-6

poles we have today. These additional risks increase the possibility that electricity will ignite spilled fuel, creating a catastrophic fire at a time when emergency responders will be overwhelmed. Also, because the firefighting teams with specialized knowledge and equipment must arrive by crowded and potentially damaged roads, the fire could burn for hours before a credible response can be mobilized. A man-made catastrophe on the heels of a natural disaster is a frightening possibility.

CENSE is dismayed that the Phase 2 Draft EIS did not address this scenario after it was described in public comments for the Phase 1 DEIS. The EIS misses an opportunity to engage the public and educate them on a matter of life and death importance. If this fear is overblown, help us understand what the facts are. If the EIS is not the right place to address these questions, tell us why. Don't dismiss the issue with a sentence or two and expect that to be sufficient.

***CENSE asks:***

12. The EIS should clarify what additional risks may exist after this project endures a major earthquake. How will the new transmission poles respond to seismic activity compared to the smaller wooden poles that exist today? How do the risks compare to alternatives like demand response and electrical efficiency? Is there any safety record of collocated transmission lines and hazardous liquid pipelines undergoing a major earthquake? If so, what can we learn from the experience of others? If not, what confidence can we have that this risk has been appropriately mitigated on the Eastside?

OO1-F-7

**6. View impact methodology is incorrect**

The methodology used to evaluate the visual and aesthetic impacts of the proposed poles and wires raises several concerns.

CENSE objects to the use of the Federal Highway (FHWA) impact methodology for this project. This methodology is not intended to be used for evaluation of transmission lines. Both the Forest Service and the Bureau of Land Management (BLM) have better methods. The BLM methodology seems especially applicable in this case.

The decision to limit visual analysis to ¼ mile is very problematic and lacks convincing justification. It's not hard to find examples of visual impacts from greater distances with the existing 230 kV line operated by Seattle City Light.

For example, here is a screen shot taken from the street view of Google Maps on 124th Ave. NE:



<https://www.google.com/maps/@47.623102,-122.1750312,3a,57.7y,353.15h,94.66t/data=!3m0!1e1!3m4!1suBz2mIRTPzK3!0002N7g2e0!1!3312886656>

Do you see the notch in the tree line directly above the avenue? That notch is 1¼ miles away from the camera. But it is visible from much farther away. Here is another screen shot taken from the Somerset neighborhood, almost 6 miles away:

OO1-F -7 The Bureau of Land Management (BLM) methodology and Forest Service methodology were developed for assessing visual impacts to BLM lands and Forest Service lands, respectively. Although the BLM methodology can be a suitable methodology for non-BLM projects, it was determined that the FHWA methodology was more appropriate for this project given the urban setting and linear nature of the proposal.

It is true that the project could be seen at distances greater than a quarter mile. Given that the proposed location would be in an area that is generally well-vegetated, developed, and has varying topography, the views where this project would still be noticeable are few. This was confirmed by desktop analysis, site visits, and GIS analysis. For example, one simulation (see Figure 4.2-8 in the Final EIS) is taken from just beyond a quarter mile away, and visibility of the line is limited (not producing significant aesthetic impacts). A quarter mile was selected because that is where it is most likely to have significant adverse impacts. In the screenshots provided in the comment, the line is visible, but not a defining feature. It blends with the surrounding development. Furthermore, the project would not create new "notches" in the treeline as shown, because it would use an existing corridor. The mere visibility of the project does not constitute a significant impact. Simulations from Downtown Bellevue were not created because it is outside the quarter-mile study area; no specific location was identified in the comment where impacts could be significant. There would be enough visual separation between the project and Downtown Bellevue that the project would not result in significant adverse impacts.

The Somerset simulations were outdated when the Phase 2 Draft EIS was published. The Final EIS provides updated simulations with the revised Willow 1 configuration, as well as additional simulations to support findings (see Section 4.2.5.6 and Appendix C of the Final EIS). While PSE's Proposed Alignment presented in the Final EIS (using Willow 1 for the Bellevue South Segment) was chosen because it requires the least amount of mitigation to address induced AC interference with the Olympic Pipeline system, all of PSE's options and alignments evaluated in the Phase 2 Draft EIS could be operated safely. Willow 1 does have higher pole types than Willow 2, but the Final EIS presents a modified version of Willow 1 with typical poles approximating 80 feet in height in Somerset (see Section 4.2.5.6 of the Final EIS).

To clarify, subjectivity associated with visual assessments is related to

OO1-F

COMMENT

RESPONSE

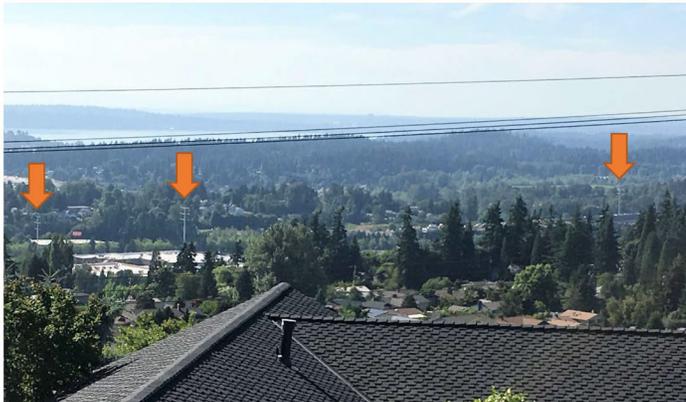


<https://www.google.com/maps/@47.5677097,-122.1595809,3a,41.8y,348.69h,86.08t/data=!3m6!1e1!3m4!1s96FmN-QfbgeVJ8Br8eOw7e0I71331286656>

The notch in the above photo is over the dump truck. It may be hard to see depending on your computer screen, but it is quite visible in real life. Compare it to the size of downtown buildings to get an idea. Will Energize Eastside put a second notch in this tree-covered ridge?

OO1-F-7

Power poles are also visible at distances greater than ¼ mile. Here is a photo taken near the Somerset Rec Club. The visible man-made structures include some roofs, nearby transmission lines, and the Seattle City Light power poles. The latter are noticeable against the background even 1 mile away:



values placed on certain aesthetic environments and scenic views. To some, a view of the water is more beautiful than a wooded area. Others prefer cityscapes or built environments with avant-garde architecture. These values vary from person to person and in order to understand the aesthetic and scenic values of those residing in the study area, Partner City plans and policies were relied upon. Contrast is objective. Whether or not the height, form, or color of an object is similar to what is around it. A comprehensive visual analysis requires looking at both the objective and the subjective components of the visual environment, which was the approach used in the EIS analysis.

The selection of viewpoints that has been provided by PSE and PSE's contractor, Power Engineers, is limited by the ¼-mile criterion and therefore not representative of what residents will experience if the transmission line is built.

The simulations shown in Appendix C are misleading. For example, the photos shown on pages 28 and 29 of "Appendix C, Attachment 2" show views from the Somerset neighborhood that are not labeled "Willow 2." Because the DNV-GL pipeline safety report says that Willow 2 cannot be safely operated due to induced currents on the Olympic pipeline, it is misleading to show these photos and omit the more probable solution, Willow 1. Willow 1 would have significantly taller poles, and there would be two of them, as shown on page 30 of the same document. These omissions must be addressed in a Supplemental EIS that CENSE requests be issued when the final route is chosen.

Explanations of the EIS methodology include repeated statements that scenic impacts are "subjective and difficult to measure." CENSE respectfully disagrees. There are both subjective and objective attributes to scenic impact analysis. The EIS should be clear about the difference and describe evaluation criteria for objective attributes that can be measured.

***CENSE asks:***

- 13. Forest Service or BLM methodology for analyzing the visual impacts of transmission lines should be used in this project. Whichever methodology is chosen, the EIS should include an explanation of why it is preferred.
- 14. Visual analysis should be extended well beyond ¼ mile when poles are placed on hills or are visible from hills. The Seattle City Light lines provide a good example of how poles and treeless corridors can be visible from a distance.
- 15. Photo simulations from higher elevations are needed. We wonder what impacts would be visible from skyscrapers in downtown Bellevue. It would be especially helpful to see what the EBCC bypass routes would look like from downtown Bellevue. This omission seems negligent.
- 16. Other omissions in Appendix C need to be rectified. Outdated or ambiguous simulations in the Somerset neighborhood are unacceptable.
- 17. A clear distinction between objective and subjective scenic impacts must be explained, and more objective measurements should be provided.

OO1-F-7

6/13/2017

Weekly Email Service Mail - Comments to Phase 2 Draft EIS for PSE Energize Eastside project



Energize Eastside EIS <info@energizeeastsideeis.org>

**Comments to Phase 2 Draft EIS for PSE Energize Eastside project**

1 message

**Larry Johnson** <larry.ede@gmail.com>

Tue, May 9, 2017 at 2:32 PM

To: info@energizeeastsideeis.org

To: EnergizeEastside EIS staff

Please include this email and the attached letter to the WUTC among the public comments regarding the Phase 2 Draft EIS for the PSE Energize Eastside project.

O05-A-1 | This letter is offered in support of the "No Action" alternative for the reasons stated therein. It is also intended to support  
O05-A-2 | contentions that the draft EIS in its current state is inadequate and flawed.

Sincerely,

Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
8505 129th Ave SE Newcastle, WA 98056  
tel.: 425 228-3786  
email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

 letter to utc et al.pdf  
3845K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&view=pt&search=inbox&th=15bef21f8db9068e&siml=15bef21f8db9068e>

1/1

O05-A -1 Comment noted.

O05-A -2 Comment noted.

**Citizens for Sane Eastside Energy (CSEE)**

May 8, 2017

The Washington Utilities and Transportation Commission  
 98504-7250, 1300 Evergreen Park Dr SW  
 Olympia, WA 98502

sent by email to the individual Commissioners

Dear Commissioners:

This letter is in response to comments made in an email by Mr. Jens Nedrud of PSE to you and others, dated May 4, 2017, regarding PSE’s Energize Eastside project and a 3/16 IRPAG meeting.

Mr. Nedrud’s remarks are misleading and distort the facts, yet they are unfortunately consistent with PSE’s determined hard-sell methods to get the \$200-\$300 million project built at all costs, regardless of the economic waste and the grave risk to lives and property if built as proposed, i.e. too close to two aging pipelines transporting highly flammable petroleum products under pressure.

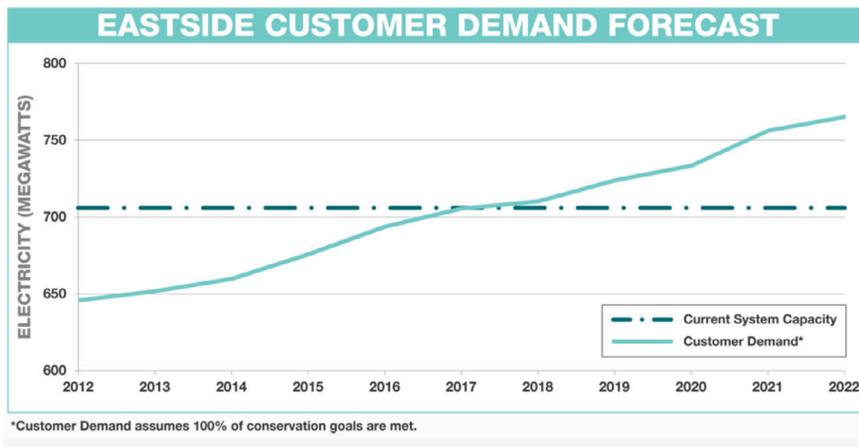
005-A-3

The two chief mantras PSE keeps repeating in its PR efforts to sell Energize Eastside are: 1) There is so much economic and population growth on the Eastside, the project is needed to meet a generic “consumer demand;” and 2) Nothing has been done “since the 1960s” to upgrade the grid in the Eastside. The ads PSE has published in numerous media outlets repeatedly beat these “Consumer Demand” and “Need for Upgrade” drums. CSEE has collected over two dozen of them.

PSE’s inflated consumer demand claims

005-A-4

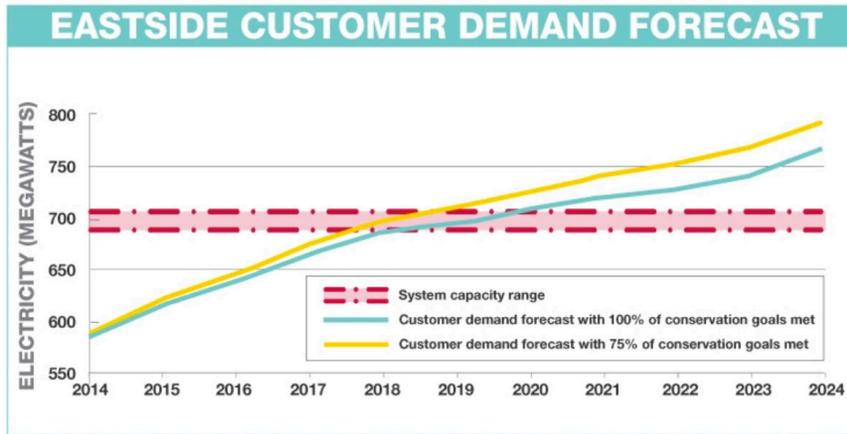
In December of 2013, PSE had on its website dedicated to the Energize Eastside project the following chart, which was its prime lead-in to justify the project. Words introducing the chart stated that “[g]rowth studies predict that demand for reliable power will exceed capacity as early as 2017:”



005-A -3 Comment noted.

005-A -4 The growth rate within the Eastside has been and is expected to continue to be greater than the growth rate in PSE’s overall service area, which contributes to the need for a 230 kV transmission line in the location that it is proposed. PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers. The graph included in the Phase 1 Draft EIS is from PSE-commissioned studies, and includes block loads estimated by major customers in the years 2014 to 2018. Such block loads were not considered for the years 2018 to 2024 because they are assumed to be included in the long-term growth rate.

Two years later, in December 2015, that chart was replaced by this one:



This chart was accompanied with a warning: “Without substantial electric infrastructure upgrades, tens of thousands of residents and businesses will be at risk of more frequent and longer power outages.”

That is a gross and irresponsible exaggeration. From the graph above, it appears PSE anticipates a spectacular (and preposterous) Eastside demand growth rate of 4% in the next four years. That is ten times the future growth rate predicted for a wildly booming Seattle by Seattle City Light’s Saphir Hamilton, Engineering and Technology Innovation Officer, who in 2014 laid out these facts (<https://youtu.be/gZWM-yNxxwZY>, starting at 0:52 into the video):

005-A-4

“In the last four years nationwide, per-customer energy use has declined by 2%, both residential and non-residential. Here in Seattle it’s declined 2.7% for non-residential, and it has declined 7.6% per customer for residential energy use. Even with all the growth that you see here in Seattle and south Lake Union, we’re projecting total load growth of less than a half of a percent over the next five years. This is a huge change in the entire makeup of energy use industry in the United States, and especially here in Seattle where we’re leading the way.”

I have asked Mr. Hamilton to update this data with what is known now in 2017, and I will update with that information when received. Meanwhile, PSE no longer has a chart on its Energize Eastside website with growth projections. But that does not deter it from making outlandish growth claims.

PSE’s false “no update since the 1960s” claims

Here is an example of one of several ads of like content that PSE has published in various media outlets:



005-A -5 The ad does not constitute data or information used to reach any of the conclusions in the EIS. While portions of the grid have been replaced or upgraded, the Eastside transmission grid has not had a major capacity increase since the 1960s.

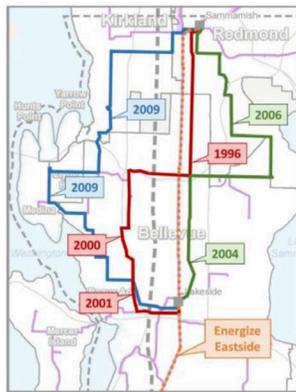
Additionally, see response to Key Theme OBJ-3 (Lauckhart/Schiffman study finding #2) in the Comments and Responses for the Phase 1 Draft EIS, which is included as Appendix J of the Final EIS, for an explanation of why a scenario that includes failure of components of PSE's system simultaneously with a high demand period due to high or low temperatures was chosen for PSE's planning model.

005-A-5

Note the blatant falsehood contained in this ad: "The Eastside electric grid was last upgraded in the 1960s." The ad also makes a false correlation between general daily electricity usage and power outages, when PSE knows full well the ostensible need for Energize Eastside is to meet very rare N-1-1 emergency events where federally mandated reliability is the only issue, not the general daily supply and demand for electricity.

As former Puget Power Vice President for Power Planning, Richard Lauckhart, has argued in documents he has sent you, there have been numerous upgrades and expansions made to the Eastside grid since the 1960s, as illustrated in this graphic for lines added and the years they were built:

**New 115 KV lines built in the Eastside in recent years**



005-A-6

In conclusion, whether in terms of PSE's complying with your requirements for a proper and adequate IRP, or whether as evidence at some future rate hearing on Energize Eastside when you will need all the facts, it remains that PSE simply cannot be trusted to tell the truth when so much of its future profits are at stake. You will recall that the WUTC levied its greatest fine ever on a utility, \$1.25 million, for PSE's having intentionally falsified gas pipeline safety inspection records over a period of four years (see <https://sane-eastside-energy.org/2014/04/30/pse-fined-1-25-million-in-falsifying-gas-pipeline-safety-inspection-reports-for-4-years-running/>). It is thus not totally surprising that, while Mr. Nedrud finds flaws in the Lauckhart-Schiffman load flow studies, PSE has yet to release CEII-related data PSE submitted for the studies it relies on that would reveal what sorts of fundamental assumptions were used, even though FERC made it clear to PSE that Mr. Lauckhart and CENSE's Don Marsh have CEII clearances and should be given access to that CEII data.

PSE has stubbornly refused to provide that information. The WUTC should demand that they do.

I realize the power the WUTC has to regulate and influence PSE is woefully inadequate. But for a project with such great potential for irrevocable damage, I hope the WUTC can use its own resources to conduct fully unbiased and untainted flow studies, if need be, to determine for itself the need for Energize Eastside, or at least to establish the validity of such studies as have been done. This is, after all, your area of expertise and public trust. That would be a positive effort undertaken for the common good of all Washingtonians and for the future of our environment.

Sincerely,



Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE), [www.sane-eastside-energy.com](http://www.sane-eastside-energy.com)  
 8505 129th Ave. SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
[larry.ede@gmail.com](mailto:larry.ede@gmail.com)

cc: CENSE  
 City Councils of Bellevue, Newcastle, Redmond and Renton  
 NW Energy Coalition  
 Sierra Club

005-A -6 The Partner Cities do not have requirements for preparing an Integrated Resource Plan (IRP). The Partner Cities are aware that PSE has been fined recently for non-compliance with reporting requirements. However, the Lead Agency does not have authority under the SEPA process to compel PSE to release the CEII-related data used in its planning models.

6/30/2017 Weebly Email Service Mail - CSEE submissions to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**CSEE submissions to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside**

1 message

Larry Johnson <larry.ede@gmail.com> Mon, May 22, 2017 at 12:12 PM

To: info@energizeeastsideeis.org  
Cc: Rich Crispo <RichC@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindan@ci.newcastle.wa.us, Johnd@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevetie <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>

To: EnergizeEastside EIS staff

Please include this email, the attached comments of CSEE (including its six attachments) and the PDF version of the text from <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-pses-hard-sell-of-energize-eastside-project/> among the public comments regarding the Phase 2 Draft EIS for the PSE Energize Eastside project.

005-E-1

These comments are offered in support of the "No Action" alternative. They are also submitted in support of what should be a do-over of the Seattle City Light Eastside Lines alternative which the Phase 2 draft EIS negligently dismisses based on false information from PSE which the authors of the draft EIS apparently adopted at face value without further inquiry.

005-E-2

For that and other reasons stated in the attached comments, they are also submitted to support contentions that the draft EIS in its current state is inadequate, incomplete and defective.

Sincerely,

Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
8505 129th Ave SE  
Newcastle, WA 98056  
tel.: 425 227-3352  
email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

**2 attachments**

CSEE comments to Phase 2 draft EIS - 5:22:2017.pdf  
10370K

Four Big Lies in PSE's Hard-Sell of Energize Eastside | Citizens for Sane Eastside Energy.pdf  
70K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15c319683b1bbafd&siml=15c319683b1bb...> 1/1

- 005-E -1 Comment noted. Also see response to comment I12-A-1. The attachments are either not comments on this EIS and therefore do not require responses, or are copies of comment letters submitted separately that have been addressed separately as their own comments.
- 005-E -2 Comment noted.

Citizens for Sane Eastside Energy (CSEE)

8505 129th Ave. SE  
Newcastle, WA 98056  
tel.: 425 227-3352  
email: larry.ede@gmail.com

May 22, 2017

Ms. Heidi Bedwell  
Energize Eastside EIS Program Manager  
City of Bellevue Development Services Dept.  
450 110th Ave. NE  
Bellevue, WA 98004

[submitted by email to info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org)

Re: Comments regarding Energize Eastside Phase 2 Draft EIS

005-E-3

According to section 1.3 of the Phase 2 Draft EIS, “the lead agency is responsible for ensuring that a proposal that is the subject of environmental review is properly defined. **The process of defining the proposal includes an understanding of the need for the project, to enable a thorough understanding of the project’s objectives**” (emphasis added). CENSE’s expert on Northwest regional power planning, Richard Lauckhart, submitted on May 17, 2017, a white paper detailing the complete failure of the EIS process and EIS drafts to address the fundamental issue of project need. His comments are attached hereto as Attachment A.

005-E-4

We agree. It is manifestly absurd to blindly push ahead with evaluating a proposed project’s potential environmental impacts if the project itself makes no sense. And certainly nothing could be more central to the project’s “No Action” “alternative” than proof that building Energize Eastside (“EE”) would satisfy no legitimate need.

005-E-5

Citizens for Sane Eastside Energy (CSEE) is composed chiefly of persons who are most directly threatened by the dangers to life and property if PSE’s proposed Energize Eastside project is allowed to go forward. While some may find it easy to dismiss CSEE as “NIMBY” (“Not In Our Back Yard”), the truth, no matter by whom spoken, still remains the truth. We submit EE is driven solely by PSE’s foreign investor owners who stand to make up to a handsome 9.8% return on EE if built. That is the real motivation for PSE’s wanting to build a boondoggle that should be in *no-one’s* back yard.

005-E-6

It is difficult to assess the many problems associated with EE, not only because of a number of complex technical issues involved, but also because PSE has been from the outset duplicitous and fraudulent in presenting a number of misleading justifications for the project.

There are at least four major areas of such deceit underlying PSE’s determined efforts to hard-sell Energize Eastside that will be addressed here. They are:

- 005-E -3 See reponse to 005-H-17.
- 005-E -4 See response to 005-H-18.
- 005-E -5 Comment noted.
- 005-E -6 Comment noted.

Page 2

005-E-7

**1. EE is based on a failed ColumbiaGrid flow study that included exaggerated, false NERC criteria.**

005-E-8

The project’s foundational justification is a uniquely strange, failed load flow study conducted by ColumbiaGrid in 2013, the results of which (the studies did not “solve”) were dismissed by ColumbiaGrid then as something one could comfortably ignore since the studies bizarrely *exceeded* NERC requirements.<sup>1</sup> But those unnecessarily beefed-up, false criteria for that failed “informational” study nevertheless found their way into the Quanta flow studies that are fundamental to PSE’s argument for the supposed need for EE. For further details, see Attachment A.

In short, the core rationale for EE is based on a fairy tale.

The fact that PSE’s aggressive pitches for EE are founded in myth is further buttressed by the fact that PSE steadfastly refuses to release to CENSE’s expert the data inputs used in the Quanta studies done under PSE’s supervision and control, even though FERC has made it clear to PSE that CENSE’s expert is entitled to see and study that information.

005-E-9

The Lauckhart-Schiffman flow studies are the only untainted studies ever done for EE, and they show no need for EE. Yet an email from PSE’s Bradley Strauch to Mark Johnson of ESA, dated 3/25/2016, attached hereto as Attachment B, reveals that PSE still clings to the exaggerated “informational” ColumbiaGrid flow studies criteria beyond those required of NERC when criticizing the Lauckhart-Schiffman studies for not meeting those absurd criteria which Strauch mischaracterizes as “minimum:”

“...as we have already stated in PSEs Phase 1 DEIS comments, the Lauckhart and Schiffman document does not meet the minimum federally required planning standards necessary to provide or develop meaningful results; therefore, it has no relevance when evaluating PSE [sic] thoroughly vetted project proposal.”

<sup>1</sup> See page 12 of the ColumbiaGrid 2013 System Assessment Report, first full bulleted paragraph, which includes this language: “**This case is being studied for information purposes and mitigation is not required as it goes beyond what is required in the NERC Reliability Standards**” (emphasis added). That is to say, the study used three major failure events occurring in the scenario tested, or what NERC calls an “N-1-1-1 event,” when only two critical system component failures are required for NERC compliance, i.e. an “N-1-1 event.” ColumbiaGrid is not known to do studies for “information purposes” only, and we submit that PSE wanted these bizarre studies done in order to create a justification for EE. The ColumbiaGrid 2013 System Assessment Report is available online at <https://www.columbiagrid.org/Notices-detail.cfm?NoticeID=109>.

005-E -7 See response to 005-H-21.  
 005-E -8 See response to 005-H-21.  
 005-E -9 See response to 005-H-21.

- Page 3
- 005-E-10 Ironically, it is rather the PSE/Quanta studies that are wrong and irrelevant, since their foundation is that failed, bogus ColumbiaGrid study.<sup>2</sup>
- 005-E-11 CSEE submits that a project of EE's magnitude, costing \$200 to \$300 million and portending catastrophic and irreversible consequences, should be solidly based on complete and totally transparent flow studies, trust, and clarity, involving simultaneously all stakeholders. If done fairly and openly, all parties affected by this controversial project stand to benefit.
- 005-E-12 **2. PSE has misrepresented its desire and efforts to seek an alternative route with Seattle City Light.**
- 005-E-13 One must conclude from the current EIS draft that PSE has apparently succeeded so far in selling the notion that PSE tried but failed to obtain Seattle City Light's (SCL's) permission to

<sup>2</sup>Probably aware that its rationale for EE as a reliability solution has become flimsy, PSE's justification for EE has morphed into one based on the need for a vague "system upgrade," discussed further in Item 4 in this document and Attachment F. A chronology:

- 1) October 2013. PSE/Quanta release their Eastside Needs Assessment. It states the need was identified with a power flow model (a/k/a load flow model). They indicate their input assumptions include 1,500 MW to Canada and a shut down of local generation from several peaker plants (built specifically to meet reliability emergencies!). This results in the very exaggerated NERC N-1-1-1 event that ColumbiaGrid found to be irrelevant and thus merely "informational."
- 2) December 2013. PSE (without Quanta) provides an Executive Summary of the Eastside Needs Assessment. That Executive Summary provides the infamous "Eastside Capacity and load line (The Problem)" graph where brownouts could start as soon 2017. The Executive Summary indicates that Quanta ran load flow studies, but the Executive Summary changes the justification for EE's need: the need to meet generic customer demand as shown in the "The Problem" graph (included in Attachment F-1 hereto). Note that Quanta did not sign on to this Executive Summary; it is a PSE-developed document.
- 3) 2014-2015: PSE draws a number of questions and criticisms regarding the assumptions in the Quanta load flow studies. Eventually, PSE's lead project consultant, Mark Williamson, goes on the record to admit that including the 1,500 MW to Canada in the Quanta studies was a mistake (YouTube video at <https://youtu.be/UixzxsOmPic>), yet PSE has never done anything to correct that mistake or counteract the wrong conclusions others have made from that mistake. PSE also cannot explain why it had Quanta shut down six local generators (peaker plants) in the load flow study. Not surprisingly, PSE has abandoned the myth that EE's need derives from a load flow study. Yet they refuse to re-run the load flow study without 1,500 MW to Canada or with all PSE generators running. The Lauckhart-Schiffman's studies do just that, however, resulting in their conclusion that there is no need for EE.  
  
For the PSE/Quanta 1,500 MW assumption, see page 8 of the Eastside Needs Assessment at [https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside\\_Needs\\_Assessment\\_Final\\_Draft\\_10-31-2013v2REDACTEDR1.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf).  
For the PSE/Quanta shut down of local generation, see Table 4-4 on page 32 of the same document.
- 4) 2016: PSE begins focusing on the aforementioned "Problem" graph that it published in its December 2013 Executive Summary. PSE revises that graph to include a mysterious "capacity" line at 700 MW and an exaggerated Eastside load growth that is some ten times greater than what Seattle City Light predicts for booming Seattle. See Attachment F-2. PSE removes the embarrassing 2013 graph from its website and abandons use of it as the basis for the need for EE.
- 5) 2017: PSE's selling point for EE is now: "Nothing has been done to update the Eastside grid for 50 years," a blatantly false claim refuted in Attachment F.

- 005-E-10 See response to 005-H-21.
- 005-E-11 See response to 005-H-21.
- 005-E-12 See response to 005-H-22.
- 005-E-13 See response to 005-H-22.

Page 4

share SCL's Eastside line as a route for EE, a route PSE spokespersons repeatedly assured citizens at public meetings was PSE's "first choice" for EE.

A variant of this misleading narrative is found on the FAQ page of PSE's website dedicated to EE:

**"Routing**

"•Why can't PSE use the Seattle City Light corridor that runs from Redmond to Renton?

"PSE **looked into** using the Seattle City Light corridor and **yes, if rebuilt, the corridor could work to meet the Eastside's energy needs**. However, PSE has been told by Seattle City Light that this corridor is a key component of their transmission system and **is not available for our use**." (emphasis added; from <http://energizeeastside.com/faqs>)

The underlined words in the last sentence of that paragraph are a link to a June 2, 2014, letter from Uzma Siddiqi, SCL's System Planning Engineer, to the City of Bellevue's Mr. Nicholas Matz, Attachment C, where she writes:

"SCL foresees current and future uses of these existing east side facilities and **prefers not to utilize** SCL's transmission lines for PSE's native load service needs." (emphasis added).

"Prefers not to utilize" is hardly the same thing as "refuses to allow." And note that Ms. Siddiqi's letter is directed to a City of Bellevue employee and not to PSE, who in fact never even tried to make a formal request for sharing those lines. That conclusion is made crystal clear in an April 25, 2017, letter from SCL's Sephir Hamilton, Engineering and Technology Innovation Officer, to me, Attachment D:

"As your letter mentions, although PSE and Seattle City Light have had limited discussions about PSE's Energize Eastside Project, **PSE has never formally requested transmission service on Seattle City Light's Eastside transmission lines. Obviously, if PSE would make a formal request for transmission service on Seattle City Light's Eastside lines, Seattle City Light would respond appropriately.**" (emphasis added)

CSEE submits that PSE never tried to act on its "first choice" for an EE route because to have done so would have deprived its owners of a highly lucrative project, boondoggle though it be.

Further, virtually none of the information PSE has provided the authors of this latest draft EIS about the very real and superior SCL Eastside lines alternative to EE (assuming *arguendo*

005-E -14 See response to 005-H-22.

005-E -15 See response to 005-H-22.

005-E-14

005-E-15

OO5-E-16 Page 5  
 something like EE is needed) is accurate. In the May 11, 2017, letter of CENSE’s expert, Richard Lauckhart, to Ms. Heidi Bedwell, Attachment E, there are paragraphs cited from the current draft EIS which in part or in whole contain incomplete or erroneous information, with his rebuttals of same. Those comments further buttress the conclusion that if PSE were to follow the steps as outlined in FERC Order 888, SCL would have little choice but to cooperate with PSE in coming up with a far more workable, less expensive, and above all, less dangerous solution than EE, assuming there is any objective need for EE.

OO5-E-17 The Phase 2 draft EIS is woefully inadequate and simply wrong when it comes to the SCL Eastside line alternative, and it needs to be completely done over again without PSE pressure or interference.

OO5-E-18 **3. PSE has mounted an aggressive PR campaign, similar in kind and credibility to a political campaign,<sup>3</sup> in order to mislead the public into thinking EE will fulfill a need to meet future Eastside growth that PSE claims is 10 times that of booming Seattle.**

For details, see Attachment F-1 and F-2.

OO5-E-19 **4. PSE repeatedly and falsely advertises the lie that EE is needed as a “long overdue Eastside grid upgrade” despite several expansions of the Eastside grid in the past two decades.**

For details, see Attachment F-2 through F-4.

Sincerely,



Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE)

cc: CENSE

<sup>3</sup> To head up PSE’s aggressive PR campaign, it went as far as Wisconsin to hire lawyer Mark Williamson to act as its chief consultant for getting the project through the approval processes. Williamson’s website brags about his prowess in getting projects like Energize Eastside approved by treating them the same way as a political campaign: “Williamson has developed a strategic communications technique patterned on “election campaigning” – polling, message development and communication – tools that he employs, and has for years, to get utility projects approved, sited, built and on-line. He is a hands-on utility executive that gets the job done from day one.” [http://prwcomm.com/now/?page\\_id=71](http://prwcomm.com/now/?page_id=71). PSE’s strategy is all about winning rather than fairly arguing the merits of the project or considering possible options that would better serve the public interest.

OO5-E -16 See response to 005-H-22.  
 OO5-E -17 See response to 005-H-22.  
 OO5-E -18 See response to 005-H-23.  
 OO5-E -19 See response to 005-H-24.

Four Big Lies in PSE's Hard-Sell of Energize Eastside | Citizens for... <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-ps-es-har...>

## Citizens for Sane Eastside Energy

An open forum for opposition to PSE's "Energize Eastside" project

### Four Big Lies in PSE's Hard-Sell of Energize Eastside

005-E-20

**PSE will do and say anything to get its boondoggle Energize Eastside ("EE") project past the scrutiny of what appear to be naive and ill-informed consultants charged with the current Environment Impact Studies ("EIS") for EE. CSEE hopes through public comment to expose PSE's deceitful acts regarding EE in order to counter notions that PSE is somehow owed special deference by and unlimited access to those consultants. Several emails produced by the City of Bellevue to CSEE under public records requests indicate the relationship between PSE, the City of Bellevue and the EIS consultants is far too cozy.**

**To download CSEE's submission of its comments on the botched EIS process up until now and the inadequate Phase 2 draft EIS, [click here](#).**

**To summarize those comments, here are the Four Big Energize Eastside Lies that PSE has gotten away with so far — but should no more:**

005-E-21

**1. EE is based on a failed ColumbiaGrid flow study that included exaggerated, false NERC criteria.** Yet PSE used those studies despite their failures (the studies could not "solve" to a working solution) by having a pliant consulting firm, Quanta, use them for inputs in load flow studies in order to justify EE. The phony data far exceeded the federal reliability requirements as adopted from the North American Electric Reliability Corporation (NERC).

**The core rationale for EE is based on a fairy tale.** See the full CSEE submission for details.

005-E-22

**2. PSE has misrepresented its desire and efforts to seek a much superior alternative route with Seattle City Light, using SCL's existing Eastside lines.** Though PSE spokespersons told the public early on that the SCL Eastside lines were its "first choice" for EE and they tried to obtain permission from SCL to utilize that route, the truth is otherwise. **It turns out PSE never made a formal request for those lines.** FERC Order 888 sets out mandatory guidelines on how that process works; if SCL were to refuse

- 005-E -20 See response to 005-H-11.
- 005-E -21 See response to 005-H-12.
- 005-E -22 See response to 005-H-13.



Four Big Lies in PSE's Hard-Sell of Energize Eastside | Citizens for... <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-ps-es-har...>

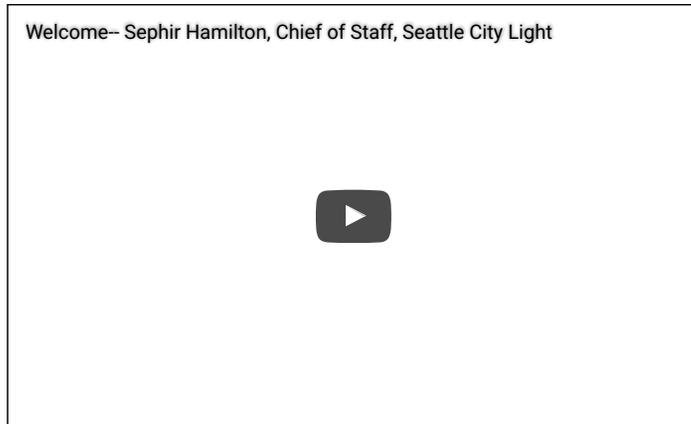
005-E-22 | to cooperate, FERC would have the right to put SCL out of business by denying it access to any other FERC-regulated lines in the grid.

005-E-23 | Despite how easy it was for CSEE to uncover the truth about this common-sense SCL alternative to EE, the writers of the Phase 2 draft EIS appear to have bought hook, line and sinker the PSE's lies about how hard they supposedly worked to get cooperation from SCL, and how supposedly insurmountable such a task would be. It is not, as former PSE VP for Power Planning, Richard Lauckhart, explains in the full CSEE submission. In fact, he says, the SCL lines alternative could be built much faster, safer and cheaper than the bloated EE that PSE would prefer to see built.

We hope the EIS consultants do a better job and do their own homework on this SCL lines alternative rather than simply rely on whatever PSE tells them.

005-E-24 | **3. PSE has mounted an aggressive PR campaign, similar in kind and credibility to a political campaign, in order to mislead the public into thinking EE will fulfill a need to meet future Eastside growth that PSE claims is 10 times that of booming Seattle.**

That absurd falsehood is readily rebutted by SCL's Saphir Hamilton, Engineering and Technology Innovation Officer, who in 2014 laid out these facts, starting at 0:52 into the video:



"In the last four years nationwide, per-customer energy use has declined by 2%, both residential and

005-E -23 See response to 005-H-14.

005-E -24 See response to 005-H-15.

Four Big Lies in PSE's Hard-Sell of Energize Eastside | Citizens for... <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-ps-es-har...>

005-E-24

non-residential. Here in Seattle it's declined 2.7% for non-residential, and it has declined 7.6% per customer for residential energy use. Even with all the growth that you see here in Seattle and south Lake Union, we're projecting total load growth of less than a half of a percent over the next five years. This is a huge change in the entire makeup of energy use industry in the United States, and especially here in Seattle where we're leading the way."

005-E-25

**4. PSE repeatedly and falsely advertises the lie that EE is needed as a "long overdue Eastside grid upgrade" despite several expansions of the Eastside grid in the past two decades.** We have already discussed this false advertising campaign in depth in a recent post here. The full CSEE submission on the Phase 2 draft EIS includes this discussion in Section 4 of that document.

**Public comment on the Phase 2 Draft EIS is now being taken from May 8 through June 21, 2017. You can make your comments by email to [info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org). To have your comment made part of the official record, you must include your name and physical mailing address. For more information, go to <http://www.energizeeastsideeis.org/participate.html>.**

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This entry was posted in Uncategorized on May 21, 2017 [<https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-ps-es-hard-sell-of-energize-eastside-project/>].

005-E -25 See response to 005-H-16

6/30/2017 Weebly Email Service Mail - Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

### Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside

1 message

**Larry Johnson** <larry.ede@gmail.com> Tue, May 23, 2017 at 4:06 PM

To: info@energizeeastsideeis.org  
 Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindan@ci.newcastle.wa.us, JohnD@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstariabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevetie <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>

To: EnergizeEastside EIS staff

Please include this email and the attached additional comment regarding the Phase 2 Draft EIS for the PSE Energize Eastside project, and regarding as well the lack of Integrity and credibility of the EIS process to date itself.

This submission is supplemental to the two documents I submitted yesterday.

Sincerely,

Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
 8505 129th Ave SE  
 Newcastle, WA 98056  
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 email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

Comment re COB bias.pdf  
 327K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRtFl.en.&view=pt&search=inbox&th=15c378fe5878fff8&siml=15c378fe5878fff8> 1/1

**Citizens for Sane Eastside Energy (CSEE)**

8505 129th Ave. SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
 email: larry.ede@gmail.com

May 23, 2017

Ms. Heidi Bedwell  
 Energize Eastside EIS Program Manager  
 City of Bellevue Development Services Dept.  
 450 110th Ave. NE  
 Bellevue, WA 98004

submitted in person at Hazen High School public meeting

Re: Additional Comment regarding Energize Eastside Phase 2 Draft EIS

Yesterday I submitted by email on behalf of CSEE two documents to be included in the public comments record regarding the Energize Eastside Phase 2 Draft EIS. One of those is a print-out of the text at <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-pses-hard-sell-of-energize-eastside-project/>. There I state *inter alia*: “Several emails produced by the City of Bellevue to CSEE under public records requests indicate the relationship between PSE, the City of Bellevue and the EIS consultants is far too cozy.” Further, “the writers of the Phase 2 draft EIS appear to have bought hook, line and sinker the PSE’s lies about how hard [PSE] supposedly worked to get cooperation from SCL, and how supposedly insurmountable such a task would be... We hope the EIS consultants do a better job and do their own homework on this SCL lines alternative rather than simply rely on whatever PSE tells them.”

005-F-1

Included in the several emails mentioned above is Attachment A hereto, from City of Bellevue’s Nicholas Matz to Chris Salomone, dated May 19, 2014, with subject header, “FW: Mayor’s Meeting Notes.” The email contains this language: “Energize Eastside: \* Tonights [sic] objective is buy-off on plan.” That statement alone raises legitimate concerns about the City of Bellevue’s ability to serve as an objective and impartial Lead Agency in the EIS process. Other emails produced through public records requests add to a body of evidence that the City of Bellevue’s staff is unduly influenced by PSE and clearly biased in its favor.

More important than the substance of the EIS document is the integrity of the EIS process itself. If that process is corrupted than any report resulting from it will be inherently worthless. PSE has had unlimited access to COB employees working on Energize Eastside, while CENSE and CSEE are limited to rushed sound bites at a handful of public occasions. Their pleas for total transparency and disclosure of basic data inputs for load flow studies PSE relies on to justify Energize Eastside fall on deaf ears in Bellevue. Our experts are given not even 1% of the hearing time and access that PSE gets. For example, despite the many legitimate criticisms of Energize Eastside by former Puget Power Vice President for Power Planing, Richard Lauckhart, and the

005-F-2

- 005-F -1 See response to comment I136-A-5 with regard to the EIS Consultant Team. The City of Bellevue and the EIS Consultant Team have contacted SCL independent of PSE to determine whether they would share their transmission line corridor for this project. The result of that communication is summarized in the Phase 2 Draft EIS Section 2.2.1, Seattle City Light Transmission Line. Considered but Not Carried Forward. The statement taken from the email communication of City staff not involved in the preparation of the EIS or permit review for the Energize Eastside project is mischaracterized as attempting to get early Council buy-off on PSE’s project, which it was not.
- 005-F -2 Comment noted. The EIS process has been conducted in accord with SEPA rules regarding public input. The Partner Cities do not have authority to require PSE to release sensitive data regarding their electrical grid. The EIS Consultant Team has reviewed the many comments and reports submitted by Mr. Lauckhart. See responses to his comments in this Final EIS.

005-F-2

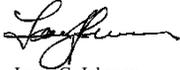
independent flow studies he performed with Mr. Schiffman, *COB staff and the EIS consultants have never contacted him* to discuss his concerns. Indeed, COB staff and the Bellevue City Council have been consistently and remarkably incurious about why Lauckhart and CENSE (on flow studies and several other key issues) never get any straight answers or relevant information from PSE, which as stakeholders they are entitled to.

005-F-3

The entire EIS process to this point is reminiscent of how the SEC was asleep at the wheel for years while Bernie Madoff bilked investors of some \$65 billion with his giant Ponzi scheme, even though for most of those years financial experts were screaming at the SEC to investigate. The SEC dropped the ball, apparently thinking Madoff was somehow beyond reproach. The City of Bellevue is following down that same path with PSE.

Some other entity other than the City of Bellevue needs to be in charge of the EIS process if the EIS is to have any integrity and credibility.

Sincerely,



Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE)

cc: CENSE

005-F -3 Comment noted.

6/30/2017 Weebly Email Service Mail - Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside**

1 message

Larry Johnson <larry.ede@gmail.com> Wed, May 24, 2017 at 1:24 PM  
 To: info@energizeeastsideeis.org

Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindsay@ci.newcastle.wa.us, JohnD@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <ccouncil@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevetie <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>, Philipp Schmidt-Pathmann <psp@neomer.us>

To: EnergizeEastside EIS staff

Please include this email as additional comment regarding the Phase 2 Draft EIS for the PSE Energize Eastside project, including the two documents attached hereto, authored by Newcastle residents Clyde Moore and Jean Garber.

CSEE adopts as its own by reference herein as if fully set forth the entire text of these two attached documents.

005-G-1 To the best of our knowledge, Mr. Moore and Ms. Garber have not been publicly heard from regarding Energize Eastside since 2015, and they may or may not have the same concerns today. We do not know. But independently, CSEE itself has the concerns raised in their letters. CSEE is not satisfied that either the Phase 1 or Phase 2 EIS to date adequately addresses the many serious safety issues raised in these attached documents. Indeed, how can any EIS draft ever be considered "adequate" regarding the hazards of constructing huge new steel towers with concrete foundations much bigger than the current ones, when we know next to nothing about where those towers will go and how they will be transported and erected? Further, the massive concrete block foundations will have to be "vibrated" into places that PSE has yet to define or explain, or what the extent and duration of those vibrations will be. As Mr. Moore points out, there is a probability of unknown magnitude that nearby homes will be moved from their foundations due to this construction technique.

005-G-2 In addition, PSE hasn't even done sufficient soils studies yet to determine whether and where there may be geological and slope issues preventing a stable placement of some or all of these steel towers.

005-G-3 If this project is still subject to so much guesswork, how can the EIS relative to it not be just so much more guesswork as well?

005-G-4 There is another overlooked and significant safety issue in the current draft EIS. As noted in your handout given to citizens last night at Hazen High School, it appears that PSE will have to apply for land use variances along the proposed route through Newcastle because current Newcastle zoning prohibits the placement of the proposed new steel towers from coming even more dangerously close to the Olympus Pipeline Company's petroleum aging pipelines. That possibility of variances, which will be vigorously and aggressively opposed by CSEE by every legal means necessary, poses even more extreme safety hazards than anywhere else along the 18-mile route; yet the current draft EIS ignores these added risks. How can that be otherwise, really, since we have no idea where in Newcastle such PSE variance applications might be directed, or whether the City of Newcastle would be inclined to grant them. Does the EIS team even have a clue from PSE whether PSE has a viable Plan B for Energize Eastside if Newcastle denies their requests for variances? If so, where is the EIS for that Plan B?

005-G-5 The attorney for CENSE, Mr. Rick Aramburu, has stated many valid objections to the EIS drafts and this EIS process in his letters to you and the Bellevue City Council. Among his many cogent criticisms is his observation that this entire EIS process is unnecessarily rushed and premature because it was launched before PSE has even yet to file any application for permits with any of the four affected cities. Why was the cart so hurriedly put before the horse here? Construction and land use permits require specificity. Until sufficient specificity of that sort is articulated, this entire EIS process is a phony Potemkin Village.

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15c3c21afc9ad32&siml=15c3c21afc9ad... 1/2

- 005-G -1 The Partner Cities believe that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA.
- 005-G -2 Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review. According to PSE, based on refined design plans, approximately 60% of the poles would be directly embedded, require no foundations, and would be excavated using vacuum trucks. Those with foundations are excavated using an auger (drill).

Chapter 2 of the Phase 2 Draft EIS describes how the poles would be transported and erected. Additional information on construction methods is included in the Final EIS, Chapter 2. The project does not involve "massive concrete block foundations" that would have to be vibrated into the ground. None of the construction methods are expected to require vibration or other construction techniques that could move homes off of their foundations or otherwise destabilize the foundations of nearby structures.

- 005-G -3 See response to comment I120-A-3. PSE has provided a geohazards report for the project which was reviewed Final EIS and is included on the [www.energizeeastsideeis.org](http://www.energizeeastsideeis.org) website.
- 005-G -4 Comment noted.
- 005-G -5 The City of Newcastle will determine whether the Energize Eastside project will be granted a variance from the setback requirements. The variance would allow for the use of shorter poles to minimize visual impacts in that portion of the project. Without the variance, the project would need to be constructed at least 5 feet outside of the Olympic Pipeline system easement, which typically extends 50 feet within the PSE easement area. The Variance and the No Variance Options are evaluated for the Newcastle Segment in the Final EIS and include simulations (see Sections 4.2.5.7 and 4.2.5.8).
- 005-G -6 Responses to Mr. Aramburu's letters on the Phase 1 Draft EIS and Phase 2 Draft EIS are provided in the Final EIS. It is normal to prepare an EIS at an early stage of design. The Phase 2 Draft EIS was prepared based on design drawings and survey information similar to that required for permit applications.

005-G

COMMENT

RESPONSE

6/30/2017 Weebly Email Service Mail - Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside

005-G-7 Indeed, it is possible your entire effort to date may turn out to be a totally irrelevant waste of resources: last week BPA dropped its major I-5 Corridor transmission project since it found better alternatives. PSE may yet do likewise,

005-G-8 As CSEE has asserted elsewhere and does so again here, the EIS process needs to be done over again at the appropriate time with a Lead Agency other than Bellevue that is capable of doing it right.

Sincerely,

Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
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2 attachments

 Clyde's\_Comments\_on\_Energize\_Eastside\_2-24-14.pdf  
83K

 Comments\_on\_Energize\_Eastside\_2-24-14.pdf  
76K

005-G -7 See response to comment 001-C-8.

005-G -8 Comment noted.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15c3c21acfc9ad32&siml=15c3c21acfc9ad...> 2/2

6/30/2017 Weebly Email Service Mail - Update to CSEE's 5/22/2017 submissions to the public comment record regarding the Phase 2 Draft EIS for Energi...



Energize Eastside EIS <info@energizeeastsideeis.org>

**Update to CSEE's 5/22/2017 submissions to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside**

1 message

Larry Johnson <larry.ede@gmail.com> Thu, Jun 1, 2017 at 3:29 PM

To: info@energizeeastsideeis.org  
 Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindsay@ci.newcastle.wa.us, Johnhd@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevetie <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>

**UPDATE to email below sent on May 22, 2017:**

005-H-1

In the CSEE comments submitted along with the email below, in Attachment F-2 I stated with regard to Seattle City Light's past customer usage data and future demand forecasts, done in 2014: "I have asked Mr. Hamilton [of Seattle City Light] to update this data with what is known now in 2017, and I will update with that information when received." Today I have received that updated information.

005-H-2

In an email sent to CSEE, copy attached, Mr. Hamilton states:

"After conferring with staff, our currently adopted 2016 load forecast calls for system kWh sales to grow cumulatively by 1.6% from 2016 to 2021. That said, we regularly refine that forecast and it is likely to change later this year. I should also clarify that I believe it was my intent in that video to say that we were projecting load growth of less than half a percent per year over that five year period, and if I omitted the "per year" then I misspoke.

"From 2014 to 2016, kWh consumption by all Seattle City Light customers declined by approximately 2.1% for residential customers and 1.5% for non-residential customers."

005-H-3

Thus, SCL is projecting a 0.3% annual growth rate (it was 0.4%). **That is 8 times lower than PSE's absurd future growth forecast.** By no stretch of the imagination can the Eastside be growing at eight times the rate of Seattle. Just take a trip to Seattle and look around you.

005-H-4

Even SCL's 0.3% projection seems aggressive considering the consumption declines in the last couple of years. For example, solar energy resources are growing and absorbing demand that PSE and SCL would otherwise have to meet. And on the Eastside, Expedia is leaving for Seattle and Microsoft no longer looks to PSE for its energy needs, preferring to supply its own. Further, broader adoption of conservation measures, improved building construction strategies and exponential growth in new energy technologies on the Eastside are surpassing past expectations. Outdated and destructive poles-and-wires transmission projects like Energize Eastside are dinosaurs. Future generations will wonder what we could possibly have been thinking. We do not need an H-bomb to kill a fly.

005-H-5

As with the many still-unknown assumptions used in the Quanta load flow studies data that PSE hides from the city councils, the EIS consultants, the WUTC, FERC, CENSE, CSEE and perhaps even PSE's own employees, PSE has again hidden the ball here about how it calculates and justifies its grossly exaggerated growth forecasts. We suspect PSE simply invents whatever numbers it needs in order to justify Energize Eastside.

005-H-6

**We ask the city councils to demand that PSE show its homework** as a condition precedent to any permits the cities might consider granting for this grotesque project.

005-H-7

We have gotten no data from PSE that gives us any clue what is actually happening in the grid on the east side of Lake Washington. There are also significant questions raised by the latest updates to the Environmental Stewardship website (<http://www.ci.bellevue.wa.us/environmental.htm>) that deserve a separate discussion.

005-H-8

We hope and trust that those persons whom we elect to represent and protect us will not be satisfied with anything less than all relevant information from PSE, and that you will keep on asking PSE and insisting until you get it. CSEE (and I

- 005-H -1 Comment noted.
- 005-H -2 Comment noted.
- 005-H -3 See response to comment 005-A-4.
- 005-H -4 See response to comment 005-A-4. While Microsoft has chosen to purchase power directly rather than through PSE, they still use PSE transmission lines for delivery of power generated outside of Microsoft's Eastside facilities.
- 005-H -5 Comment noted.
- 005-H -6 See response to comment I131-A-6. The City of Bellevue, as the lead agency for the SEPA review, is not required to evaluate project need, but rather is tasked with ensuring that the EIS presents a thorough analysis of potential environmental impacts from the proposed project.
- 005-H -7 See response to comment I131-A-6.
- 005-H -8 Comment noted.

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6/30/2017 Weebly Email Service Mail - Update to CSEE's 5/22/2017 submissions to the public comment record regarding the Phase 2 Draft EIS for Energi...

005-H-8 I am sure CENSE as well) stands ready to assist you in any way we can. If Energize Eastside is allowed to wreak the kind of damage it surely portends, there will be no way to undo it.

005-H-9 We also trust that those in charge of an already seriously compromised EIS process will start over again and do it right when PSE submits permit applications so we all can learn for the first time just exactly what the actual, detailed proposed project parameters are for Energize Eastside. Last week many residents in Newcastle received fliers from PSE tacked to their doors, stating crews would be sent along the PSE and OPC rights-of-way to determine pipeline locations in order to provide data to help determine the location of the towers for Energize Eastside, as if the project were already a done deal. That surveying work, undertaken only now, is a clear admission that even PSE still has no idea where it might be putting the new steel towers — so how can any EIS at this juncture have any useful meaning when so many fundamental aspects of this project are still unknown, even to the party proposing it?

Sincerely,

Larry Johnson

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To: EnergizeEastside EIS staff

Please include this email, the attached comments of CSEE (including its six attachments) and the PDF version of the text from <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-pses-hard-sell-of-energize-eastside-project/> among the public comments regarding the Phase 2 Draft EIS for the PSE Energize Eastside project.

005-H-10 These comments are offered in support of the "No Action" alternative. They are also submitted in support of what should be a do-over of the Seattle City Light Eastside Lines alternative which the Phase 2 draft EIS negligently dismisses based on false information from PSE which the authors of the draft EIS apparently adopted at face value without further inquiry. For that and other reasons stated in the attached comments, they are also submitted to support contentions that the draft EIS in its current state is inadequate, incomplete and defective.

Sincerely,

Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
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3 attachments

 RE\_SCL Eastside Line.rtf  
7K

 CSEE comments to Phase 2 draft EIS - 5:22:2017.pdf  
10370K

 Four Big Lies in PSE's Hard-Sell of Energize Eastside | Citizens for Sane Eastside Energy.pdf  
70K

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005-H -9 Comment noted. PSE has provided preliminary designs for all options evaluated in the Phase 2 Draft EIS. PSE has continued to refine its preferred alignment and has provided those plans for the EIS process as well. It is not uncommon for an EIS to be prepared based on preliminary plans and for plans to change during the EIS process.

005-H -10 See response to comment 005-E-1.

Four Big Lies in PSE's Hard-Sell of Energize Eastside | Citizens for... <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-ps-es-har...>

## Citizens for Sane Eastside Energy

An open forum for opposition to PSE's "Energize Eastside" project

### Four Big Lies in PSE's Hard-Sell of Energize Eastside

**PSE will do and say anything to get its boondoggle Energize Eastside ("EE") project past the scrutiny of what appear to be naive and ill-informed consultants charged with the current Environment Impact Studies ("EIS") for EE. CSEE hopes through public comment to expose PSE's deceitful acts regarding EE in order to counter notions that PSE is somehow owed special deference by and unlimited access to those consultants. Several emails produced by the City of Bellevue to CSEE under public records requests indicate the relationship between PSE, the City of Bellevue and the EIS consultants is far too cozy.**

005-H-11

**To download CSEE's submission of its comments on the botched EIS process up until now and the inadequate Phase 2 draft EIS, [click here](#).**

**To summarize those comments, here are the Four Big Energize Eastside Lies that PSE has gotten away with so far — but should no more:**

**1. EE is based on a failed ColumbiaGrid flow study that included exaggerated, false NERC criteria.** Yet PSE used those studies despite their failures (the studies could not "solve" to a working solution) by having a pliant consulting firm, Quanta, use them for inputs in load flow studies in order to justify EE. The phony data far exceeded the federal reliability requirements as adopted from the North American Electric Reliability Corporation (NERC).

005-H-12

**The core rationale for EE is based on a fairy tale.** See the full CSEE submission for details.

**2. PSE has misrepresented its desire and efforts to seek a much superior alternative route with Seattle City Light, using SCL's existing Eastside lines.** Though PSE spokespersons told the public early on that the SCL Eastside lines were its "first choice" for EE and they tried to obtain permission from SCL to utilize that route, the truth is otherwise. **It turns out PSE never made a formal request for those lines.** FERC Order 888 sets out mandatory guidelines on how that process works; if SCL were to refuse

005-H-13

- 005-H -11 Comment noted. See response to comment II36-A-5.
- 005-H -12 Comment noted.
- 005-H -13 Utilizing the SCL corridor was explored as an option in Phase 1 of the Draft EIS (see Section 2.3.2.3). See Section 2.2.1 of the Phase 2 Draft for an explanation on why this alternative was not brought forward.



Four Big Lies in PSE's Hard-Sell of Energize Eastside | Citizens for... <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-ps-es-har...>

005-H-13

to cooperate, FERC would have the right to put SCL out of business by denying it access to any other FERC-regulated lines in the grid.

005-H-14

Despite how easy it was for CSEE to uncover the truth about this common-sense SCL alternative to EE, the writers of the Phase 2 draft EIS appear to have bought hook, line and sinker the PSE's lies about how hard they supposedly worked to get cooperation from SCL, and how supposedly insurmountable such a task would be. It is not, as former PSE VP for Power Planning, Richard Lauckhart, explains in the full CSEE submission. In fact, he says, the SCL lines alternative could be built much faster, safer and cheaper than the bloated EE that PSE would prefer to see built.

We hope the EIS consultants do a better job and do their own homework on this SCL lines alternative rather than simply rely on whatever PSE tells them.

**3. PSE has mounted an aggressive PR campaign, similar in kind and credibility to a political campaign, in order to mislead the public into thinking EE will fulfill a need to meet future Eastside growth that PSE claims is 10 times that of booming Seattle.**

That absurd falsehood is readily rebutted by SCL's Saphir Hamilton, Engineering and Technology Innovation Officer, who in 2014 laid out these facts, starting at 0:52 into the video:

005-H-15



"In the last four years nationwide, per-customer energy use has declined by 2%, both residential and

005-H -14 See response to comment 005-H-13.

005-H -15 See response to comment 005-A-4.

Four Big Lies in PSE's Hard-Sell of Energize Eastside | Citizens for... <https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-ps-es-har...>

005-H-15

non-residential. Here in Seattle it's declined 2.7% for non-residential, and it has declined 7.6% per customer for residential energy use. Even with all the growth that you see here in Seattle and south Lake Union, we're projecting total load growth of less than a half of a percent over the next five years. This is a huge change in the entire makeup of energy use industry in the United States, and especially here in Seattle where we're leading the way."

005-H-16

**4. PSE repeatedly and falsely advertises the lie that EE is needed as a "long overdue Eastside grid upgrade" despite several expansions of the Eastside grid in the past two decades.** We have already discussed this false advertising campaign in depth in a recent post here. The full CSEE submission on the Phase 2 draft EIS includes this discussion in Section 4 of that document.

**Public comment on the Phase 2 Draft EIS is now being taken from May 8 through June 21, 2017. You can make your comments by email to [info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org). To have your comment made part of the official record, you must include your name and physical mailing address. For more information, go to <http://www.energizeeastsideeis.org/participate.html>.**

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This entry was posted in Uncategorized on May 21, 2017 [<https://sane-eastside-energy.org/2017/05/21/four-big-lies-in-ps-es-hard-sell-of-energize-eastside-project/>].

005-H -16 While portions of the grid have been replaced or upgraded, the Eastside transmission grid has not had a major capacity increase since the 1960s.

**Citizens for Sane Eastside Energy (CSEE)**

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May 22, 2017

Ms. Heidi Bedwell  
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 City of Bellevue Development Services Dept.  
 450 110th Ave. NE  
 Bellevue, WA 98004

[submitted by email to info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org)

Re: Comments regarding Energize Eastside Phase 2 Draft EIS

005-H-17

According to section 1.3 of the Phase 2 Draft EIS, “the lead agency is responsible for ensuring that a proposal that is the subject of environmental review is properly defined. **The process of defining the proposal includes an understanding of the need for the project, to enable a thorough understanding of the project’s objectives**” (emphasis added). CENSE’s expert on Northwest regional power planning, Richard Lauckhart, submitted on May 17, 2017, a white paper detailing the complete failure of the EIS process and EIS drafts to address the fundamental issue of project need. His comments are attached hereto as Attachment A.

005-H-18

We agree. It is manifestly absurd to blindly push ahead with evaluating a proposed project’s potential environmental impacts if the project itself makes no sense. And certainly nothing could be more central to the project’s “No Action” “alternative” than proof that building Energize Eastside (“EE”) would satisfy no legitimate need.

005-H-19

Citizens for Sane Eastside Energy (CSEE) is composed chiefly of persons who are most directly threatened by the dangers to life and property if PSE’s proposed Energize Eastside project is allowed to go forward. While some may find it easy to dismiss CSEE as “NIMBY” (“Not In Our Back Yard”), the truth, no matter by whom spoken, still remains the truth. We submit EE is driven solely by PSE’s foreign investor owners who stand to make up to a handsome 9.8% return on EE if built. That is the real motivation for PSE’s wanting to build a boondoggle that should be in *no-one’s* back yard.

005-H-20

It is difficult to assess the many problems associated with EE, not only because of a number of complex technical issues involved, but also because PSE has been from the outset duplicitous and fraudulent in presenting a number of misleading justifications for the project.

There are at least four major areas of such deceit underlying PSE’s determined efforts to hard-sell Energize Eastside that will be addressed here. They are:

- 005-H -17 The purpose and need for the project are summarized in Section 1.3 of the Phase 1 and Phase 2 Draft EISs. Additionally, PSE prepared the Eastside Needs Assessment, which includes a more detailed explanation of the project need. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding the purpose and need for the project (See Topic OBJ). As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included.
- 005-H -18 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic P&N”).
- 005-H -19 Comment noted.
- 005-H -20 Comment noted.

Page 2

**1. EE is based on a failed ColumbiaGrid flow study that included exaggerated, false NERC criteria.**

The project’s foundational justification is a uniquely strange, failed load flow study conducted by ColumbiaGrid in 2013, the results of which (the studies did not “solve”) were dismissed by ColumbiaGrid then as something one could comfortably ignore since the studies bizarrely *exceeded* NERC requirements.<sup>1</sup> But those unnecessarily beefed-up, false criteria for that failed “informational” study nevertheless found their way into the Quanta flow studies that are fundamental to PSE’s argument for the supposed need for EE. For further details, see Attachment A.

In short, the core rationale for EE is based on a fairy tale.

The fact that PSE’s aggressive pitches for EE are founded in myth is further buttressed by the fact that PSE steadfastly refuses to release to CENSE’s expert the data inputs used in the Quanta studies done under PSE’s supervision and control, even though FERC has made it clear to PSE that CENSE’s expert is entitled to see and study that information.

The Lauckhart-Schiffman flow studies are the only untainted studies ever done for EE, and they show no need for EE. Yet an email from PSE’s Bradley Strauch to Mark Johnson of ESA, dated 3/25/2016, attached hereto as Attachment B, reveals that PSE still clings to the exaggerated “informational” ColumbiaGrid flow studies criteria beyond those required of NERC when criticizing the Lauckhart-Schiffman studies for not meeting those absurd criteria which Strauch mischaracterizes as “minimum:”

“...as we have already stated in PSEs Phase 1 DEIS comments, the Lauckhart and Schiffman document does not meet the minimum federally required planning standards necessary to provide or develop meaningful results; therefore, it has no relevance when evaluating PSE [sic] thoroughly vetted project proposal.”

<sup>1</sup> See page 12 of the ColumbiaGrid 2013 System Assessment Report, first full bulleted paragraph, which includes this language: “**This case is being studied for information purposes and mitigation is not required as it goes beyond what is required in the NERC Reliability Standards**” (emphasis added). That is to say, the study used three major failure events occurring in the scenario tested, or what NERC calls an “N-1-1-1 event,” when only two critical system component failures are required for NERC compliance, i.e. an “N-1-1 event.” ColumbiaGrid is not known to do studies for “information purposes” only, and we submit that PSE wanted these bizarre studies done in order to create a justification for EE. The ColumbiaGrid 2013 System Assessment Report is available online at <https://www.columbiagrid.org/Notices-detail.cfm?NoticeID=109>.

005-H-21

005-H -21 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”). See also response to comment I131-A-6.

Page 3

Ironically, it is rather the PSE/Quanta studies that are wrong and irrelevant, since their foundation is that failed, bogus ColumbiaGrid study.<sup>2</sup>

005-H-21

CSEE submits that a project of EE's magnitude, costing \$200 to \$300 million and portending catastrophic and irreversible consequences, should be solidly based on complete and totally transparent flow studies, trust, and clarity, involving simultaneously all stakeholders. If done fairly and openly, all parties affected by this controversial project stand to benefit.

005-H-22

**2. PSE has misrepresented its desire and efforts to seek an alternative route with Seattle City Light.**

One must conclude from the current EIS draft that PSE has apparently succeeded so far in selling the notion that PSE tried but failed to obtain Seattle City Light's (SCL's) permission to

<sup>2</sup>Probably aware that its rationale for EE as a reliability solution has become flimsy, PSE's justification for EE has morphed into one based on the need for a vague "system upgrade," discussed further in Item 4 in this document and Attachment F. A chronology:

- 1) October 2013. PSE/Quanta release their Eastside Needs Assessment. It states the need was identified with a power flow model (a/k/a load flow model). They indicate their input assumptions include 1,500 MW to Canada and a shut down of local generation from several peaker plants (built specifically to meet reliability emergencies!). This results in the very exaggerated NERC N-1-1-1 event that ColumbiaGrid found to be irrelevant and thus merely "informational."
- 2) December 2013. PSE (without Quanta) provides an Executive Summary of the Eastside Needs Assessment. That Executive Summary provides the infamous "Eastside Capacity and load line (The Problem)" graph where brownouts could start as soon 2017. The Executive Summary indicates that Quanta ran load flow studies, but the Executive Summary changes the justification for EE's need: the need to meet generic customer demand as shown in the "The Problem" graph (included in Attachment F-1 hereto). Note that Quanta did not sign on to this Executive Summary; it is a PSE-developed document.
- 3) 2014-2015: PSE draws a number of questions and criticisms regarding the assumptions in the Quanta load flow studies. Eventually, PSE's lead project consultant, Mark Williamson, goes on the record to admit that including the 1,500 MW to Canada in the Quanta studies was a mistake (YouTube video at <https://youtu.be/UixzxsOmPic>), yet PSE has never done anything to correct that mistake or counteract the wrong conclusions others have made from that mistake. PSE also cannot explain why it had Quanta shut down six local generators (peaker plants) in the load flow study. Not surprisingly, PSE has abandoned the myth that EE's need derives from a load flow study. Yet they refuse to re-run the load flow study without 1,500 MW to Canada or with all PSE generators running. The Lauckhart-Schiffman's studies do just that, however, resulting in their conclusion that there is no need for EE.  
  
For the PSE/Quanta 1,500 MW assumption, see page 8 of the Eastside Needs Assessment at [https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside\\_Needs\\_Assessment\\_Final\\_Draft\\_10-31-2013v2REDACTEDR1.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf).  
For the PSE/Quanta shut down of local generation, see Table 4-4 on page 32 of the same document.
- 4) 2016: PSE begins focusing on the aforementioned "Problem" graph that it published in its December 2013 Executive Summary. PSE revises that graph to include a mysterious "capacity" line at 700 MW and an exaggerated Eastside load growth that is some ten times greater than what Seattle City Light predicts for booming Seattle. See Attachment F-2. PSE removes the embarrassing 2013 graph from its website and abandons use of it as the basis for the need for EE.
- 5) 2017: PSE's selling point for EE is now: "Nothing has been done to update the Eastside grid for 50 years," a blatantly false claim refuted in Attachment F.

005-H -22 As described in the Phase 2 Draft EIS, the City of Bellevue and the EIS Consultant Team have contacted SCL, and the response to use of their transmission corridor for this project has continued to be that they will not give permission because they foresee a need for that line for SCL customers. The Partner Cities cannot compel SCL to share their transmission corridor with PSE.

Page 4

share SCL's Eastside line as a route for EE, a route PSE spokespersons repeatedly assured citizens at public meetings was PSE's "first choice" for EE.

A variant of this misleading narrative is found on the FAQ page of PSE's website dedicated to EE:

**"Routing**

"•Why can't PSE use the Seattle City Light corridor that runs from Redmond to Renton?

"PSE **looked into** using the Seattle City Light corridor and **yes, if rebuilt, the corridor could work to meet the Eastside's energy needs**. However, PSE has been told by Seattle City Light that this corridor is a key component of their transmission system and **is not available for our use**." (emphasis added; from <http://energizeeastside.com/faqs>)

The underlined words in the last sentence of that paragraph are a link to a June 2, 2014, letter from Uzma Siddiqi, SCL's System Planning Engineer, to the City of Bellevue's Mr. Nicholas Matz, Attachment C, where she writes:

"SCL foresees current and future uses of these existing east side facilities and **prefers not to utilize** SCL's transmission lines for PSE's native load service needs." (emphasis added).

"Prefers not to utilize" is hardly the same thing as "refuses to allow." And note that Ms. Siddiqi's letter is directed to a City of Bellevue employee and not to PSE, who in fact never even tried to make a formal request for sharing those lines. That conclusion is made crystal clear in an April 25, 2017, letter from SCL's Saphir Hamilton, Engineering and Technology Innovation Officer, to me, Attachment D:

"As your letter mentions, although PSE and Seattle City Light have had limited discussions about PSE's Energize Eastside Project, **PSE has never formally requested transmission service on Seattle City Light's Eastside transmission lines. Obviously, if PSE would make a formal request for transmission service on Seattle City Light's Eastside lines, Seattle City Light would respond appropriately.**" (emphasis added)

CSEE submits that PSE never tried to act on its "first choice" for an EE route because to have done so would have deprived its owners of a highly lucrative project, boondoggle though it be.

Further, virtually none of the information PSE has provided the authors of this latest draft EIS about the very real and superior SCL Eastside lines alternative to EE (assuming *arguendo*

005-H-22

005-H-22

Page 5  
 something like EE is needed) is accurate. In the May 11, 2017, letter of CENSE's expert, Richard Lauckhart, to Ms. Heidi Bedwell, Attachment E, there are paragraphs cited from the current draft EIS which in part or in whole contain incomplete or erroneous information, with his rebuttals of same. Those comments further buttress the conclusion that if PSE were to follow the steps as outlined in FERC Order 888, SCL would have little choice but to cooperate with PSE in coming up with a far more workable, less expensive, and above all, less dangerous solution than EE, assuming there is any objective need for EE.

The Phase 2 draft EIS is woefully inadequate and simply wrong when it comes to the SCL Eastside line alternative, and it needs to be completely done over again without PSE pressure or interference.

005-H-23

**3. PSE has mounted an aggressive PR campaign, similar in kind and credibility to a political campaign,<sup>3</sup> in order to mislead the public into thinking EE will fulfill a need to meet future Eastside growth that PSE claims is 10 times that of booming Seattle.**

For details, see Attachment F-1 and F-2.

005-H-24

**4. PSE repeatedly and falsely advertises the lie that EE is needed as a "long overdue Eastside grid upgrade" despite several expansions of the Eastside grid in the past two decades.**

For details, see Attachment F-2 through F-4.

Sincerely,



Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE)

cc: CENSE

<sup>3</sup> To head up PSE's aggressive PR campaign, it went as far as Wisconsin to hire lawyer Mark Williamson to act as its chief consultant for getting the project through the approval processes. Williamson's website brags about his prowess in getting projects like Energize Eastside approved by treating them the same way as a political campaign: "Williamson has developed a strategic communications technique patterned on 'election campaigning' – polling, message development and communication – tools that he employs, and has for years, to get utility projects approved, sited, built and on-line. He is a hands-on utility executive that gets the job done from day one." [http://prwcomm.com/now/?page\\_id=71](http://prwcomm.com/now/?page_id=71). PSE's strategy is all about winning rather than fairly arguing the merits of the project or considering possible options that would better serve the public interest.

005-H -23 Comment noted.

005-H -24 While portions of the grid have been replaced or upgraded, the Eastside transmission grid has not had a major capacity increase since the 1960s.

6/30/2017 Weebly Email Service Mail - Additional CSEE comments to Phase 2 draft EIS -- Energize Eastside: a Bridge to Nowhere



Energize Eastside EIS <info@energizeeastsideeis.org>

**Additional CSEE comments to Phase 2 draft EIS -- Energize Eastside: a Bridge to Nowhere**

1 message

Larry Johnson <larry.ede@gmail.com> Thu, Jun 1, 2017 at 5:44 PM

To: info@energizeeastsideeis.org  
 Cc: Rich Crispo <RichC@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindsay@ci.newcastle.wa.us, JohnD@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevette <lynnpre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>

Please find attached three documents transmitted today to the Washington Utilities and Transportation Commission and the Public Counsel of the Attorney General's office.

The letter to the WUTC includes a discussion of the fact that, if built, Energize Eastside would not achieve the purposes PSE claims for Energize Eastside. The project would be, in effect, "a bridge to nowhere." The letter explains why.

These documents are submitted herewith as evidence that the current EIS draft, as well as the entire EIS process as conducted to date, contain but are not limited to the following fatal deficiencies:

- 005-I-1 1. The EIS process was started prematurely before any applications for permits for Energize Eastside were submitted by PSE. Until those applications are submitted, we have no way of knowing specific project details and parameters — critical project data are missing, and other important data are simply ignored or incorrectly assumed in the current EIS draft. Phase 2 was supposed to drill down on project specifics. It does not and cannot do that in the current state of so many fundamental unknowns.
- 005-I-2 2. The persons responsible for researching and drafting the EIS to date have too often accepted without question or critical thinking a number of demonstrable misrepresentations by PSE regarding the need, scope, cost and environmental impacts of their proposed Energize Eastside project. This uncritical acceptance of PSE's input reflects either naiveté, negligence or corruption on the part of the EIS consultants, who are paid by PSE, that cast serious doubts about the EIS scribes' competence and independence. PSE's heavy hand in this process extends to PSE's being allowed to have access to drafts of documents affecting the EIS and making edits in the text of same, where those edits then become part of the final documents. This fact can be substantiated by several emails produced to CSEE as the result of previous and ongoing public records requests.
- 005-I-3 3. Alternatives such as the Seattle City Light Eastside line have been prematurely, arbitrarily and summarily dismissed in the current draft EIS on the basis of falsehoods made by PSE.

Sincerely,

Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
 8505 129th Ave SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
 email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

3 attachments

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15c6645ee640ab57&siml=15c6645ee640...> 1/2

- 005-I -1 See response to comment I114-B-3.
- 005-I -2 The comment makes no specific claims as to what parts of the EIS are incorrect. PSE was allowed opportunity to comment on the project description portion of the EIS only. Their edits were generally incorporated because they clarified what they were proposing. PSE did not have access to any of the impact analysis or mitigation recommendations being developed by the EIS consultant Team prior to publication.
- 005-I -3 Utilizing the Seattle City Light corridor was not brought forward for additional analysis in the Phase 2 Draft EIS for the reasons listed in Section 2.2.1 of the Phase 2 Draft EIS.

6/30/2017 Weebly Email Service Mail - Additional CSEE comments to Phase 2 draft EIS -- Energize Eastside: a Bridge to Nowhere

 **letter to utc re PSE 2017 IRP.pdf**  
103K

 **CSEE comments to Phase 2 draft EIS - 5:22:2017.pdf**  
10370K

 **Lauckhart-Schiffman Load Flow Study.pdf**  
2132K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15c6645ee640ab57&siml=15c6645ee640...> 2/2

6/30/2017 Weebly Email Service Mail - Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside**

1 message

**Larry Johnson** <larry.ede@gmail.com> Tue, Jun 6, 2017 at 2:09 PM

To: info@energizeeastsideeis.org  
 Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindsay@ci.newcastle.wa.us, Johnd@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevette <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>

To: EnergizeEastside EIS staff

005-J-1

Please include this email and the attached letter regarding the Phase 2 Draft EIS for the PSE Energize Eastside project. Also attached is a document referenced in my letter which should be included in the record as well.

Sincerely,

Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
 8505 129th Ave SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
 email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

**2 attachments**

CSEE comments to EIS re UV flashes.pdf  
 4406K

\_by\_bursts\_of\_light\_from\_power\_cables.pdf  
 99K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15c7f3f40472f24&siml=15c7f3f40472f24> 1/1

005-J -1 Comment noted. The document attached to the email are included in the record.

**Citizens for Sane Eastside Energy (CSEE)**

8505 129th Ave. SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
 email: larry.ede@gmail.com

June 6, 2017

Ms. Heidi Bedwell  
 Energize Eastside EIS Program Manager  
 City of Bellevue Development Services Dept.  
 450 110th Ave. NE  
 Bellevue, WA 98004

[submitted by email to info@energizeeastsideeis.org](mailto:info@energizeeastsideeis.org)

Re: Additional Comment regarding Energize Eastside Phase 2 Draft EIS

005-J-2

Please note that the Phase 2 draft EIS does not address the phenomena of increased UV flashes from power cables, harmful to animals, that would result from Energize Eastside's quadrupling of power by replacing current 115 kV lines with 230 kV lines. The absence of this discussion represents a defect in the draft EIS that needs to be remedied by further study and a revision of the EIS.

005-J-3

Attached to the email by which this letter is transmitted is an article from BBC News' Science & Environment division, entitled "Animals 'scared' by bursts of light from power cables," describing how animals other than humans and monkeys see UV light and can be frightened off by it. As one scientist quoted in the article states, because of UV flashing "forest animals will not cross clear-cuts...The animals keep as much as 5km (3 miles) from either side of the cables." Most of Energize Eastside's proposed route is through such clear-cuts.

Not only would Energize Eastside's mass destruction of up to 5,400 trees obliterate natural habitats for deer, coyotes, bobcats, raccoons, rabbits, squirrels, birds and other animals that need forested areas for food and shelter, their mating and migration patterns would be seriously disrupted by dramatic increases in UV flashes caused by Energize Eastside.

005-J-4

As explained at <http://wdfw.wa.gov/living/deer.html#shelter>, deer live in shelters bordering greenbelts they need for survival:

"Deer are sometimes referred to as 'edge' species, meaning they thrive at the interface of openings and cover patches. This allows deer to feed in productive openings while being close to escape cover. Many wooded suburban environments, such as parks, greenbelts, golf courses, and roadsides, meet the needs of deer."

005-J -2 Most of the project alignment occurs in areas that produce a variety of human-induced disturbances to animal species. As discussed in the EIS, vegetation removal and maintenance activities along transmission corridors result in modified habitat and the potential displacement of some species. Similar effects are expected for the operation of the facilities. As discussed in the EIS, the larger wire sizes for the 230 kV lines would be more visible to flying species, resulting in increased avoidance behavior, which is expected to reduce direct impacts from collision and electrocution. The 230 kV lines would also be higher above the ground, which would also minimize potential impacts to low-flying insects and other ground oriented species from increased light flashes or heat from the wires.

005-J -3 See the response to comment 005-J-2.

005-J -4 The transmission corridor would remain a greenbelt and continue to provide habitat to deer. Regarding UV flashes, see the response to comment 005-J-2.

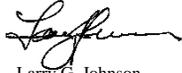
005-J-4

To see a UV-camera's capture of these flash phenomena, watch the video at <http://www.bbc.com/news/av/26548484>. The soundtrack notes that these UV flashes are like "a constant flashing fireworks, and the animals will simply not go near it."

005-J-5

Serious study and public comment on these threats to Eastside ecosystems need to be undertaken and thoroughly examined before something as dangerous, destructive and irrevocable as Energize Eastside is allowed to proceed.

Sincerely,



Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE)  
8505 129th Ave SE  
Newcastle, WA 98056  
tel.: 425 228-3786  
email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

cc: CENSE  
Affected city councils

005-J -5 Comment noted.

6/30/2017 Weebly Email Service Mail - Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside: ...



Energize Eastside EIS <info@energizeeastsideeis.org>

**Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside: BPA in contrast to PSE**

1 message

Larry Johnson <larry.ede@gmail.com> Wed, Jun 14, 2017 at 12:10 PM

To: info@energizeeastsideeis.org  
 Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindsay@ci.newcastle.wa.us, JohnD@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobVW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevette <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>

To: EnergizeEastside EIS staff, City Councils of Bellevue, Redmond, Renton, Kirkland and Newcastle

Please include this email and the attached letter of today's date, along with CSEE's letter of May 22, 2017, referenced in the letter of today's date, also attached, regarding the Phase 2 Draft EIS for the PSE Energize Eastside project.

OO5-K-1 This letter is offered in support of the "No Action" alternative for the reasons stated therein. It is also intended to support contentions that the draft EIS in its current state is inadequate, incomplete and flawed.

OO5-K-2 We note the decision by BPA not to build the 80-mile, 500-kilovolt transmission line from Castle Rock, Washington, to Troutdale, Oregon, at a cost of \$722 million, was announced on May 19, 2017, whereas the Phase 2 Draft EIS was published on May 8, 2017. We trust, however, that an updated future version of the EIS will take into account this momentous recent decision by BPA and its reasons for cancelling a project that bears remarkable similarities to PSE's Energize Eastside. The logic leading to the cancellation of the BPA project applies with equal if not greater force to cancelling Energize Eastside.

Sincerely,

Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
 8505 129th Ave SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
 email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

2 attachments

CSEE comment letter 6-14-2017.pdf  
 116K

CSEE comments to Phase 2 draft EIS - 5:22:2017.pdf  
 10370K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15ca8083eec43be0&siml=15ca8083eec4...> 1/1

OO5-K -1 Comment noted.  
 OO5-K -2 See response to comment OO1-C-8.

Citizens for Sane Eastside Energy (CSEE)

8505 129th Ave. SE  
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 tel.: 425 227-3352  
 www.sane-eastside-energy.org

June 14, 2017

Ms. Heidi Bedwell  
 Energize Eastside EIS Program Manager  
 City of Bellevue Development Services Dept.  
 450 110th Ave. NE  
 Bellevue, WA 98004

submitted by email to info@EnergizeEastsideEIS.org

Re: Comments regarding Energize Eastside Phase 2 Draft EIS

On May 19, 2017, the Bonneville Power Administration (BPA) decided not to build a proposed 80-mile, 500-kilovolt transmission line that would have stretched from Castle Rock, Washington, to Troutdale, Oregon, at an estimated cost of \$722 million.

According to the BPA's website,

"[t]he decision concludes a comprehensive public process to determine whether building a new transmission line was the best solution to address an electrical reliability issue along a transmission corridor in southwestern Washington and northwestern Oregon. The decision to not build the transmission line reflects BPA's commitment to implement new planning and management of its transmission system and commercial business practices."<sup>1</sup>

The BPA made this responsible decision after "we took nearly nine years to complete a comprehensive review of the project and its potential impacts."<sup>2</sup>

005-K-3

We submit there are substantial parallels between the cancelled BPA project and Energize Eastside (EE), a project that is equally deserving of being cancelled on at least two grounds: 1) there has been no credible showing EE is needed, or 2) any conceivable need is so minimal that a project of EE's scale is gross overkill.

005-K-4

We further submit the main difference between BPA's canceled project and PSE's Energize Eastside is PSE's motivation to maximize profits for its foreign investor owners regardless of need, whereas BPA's sole concern is to serve the public interest as a public utility.

005-K-5

BPA recognizes there are rapidly evolving technologies, such as battery storage, that offer more agile and scalable responses to possible future reliability challenges than projects such as the bloated and retrograde Energize Eastside:

<sup>1</sup> <https://www.bpa.gov/projects/projects/i-5/pages/default.aspx>

<sup>2</sup> Id.

- 005-K -3 See response to comment 001-C-8.
- 005-K -4 Comment noted.
- 005-K -5 Comment noted.

“My decision today reflects a shift for BPA — from the traditional approach of primarily relying on new construction to meet changing transmission needs, to embracing a more flexible, scalable, and economically and operationally efficient approach to managing our transmission system,” Mainzer wrote in a letter addressed to ‘parties interested in the I-5 Corridor Reinforcement Project.’

“In an interview with The Columbian, Mainzer said congestion is still a problem along the north-south corridor. However, *the agency will address congestion with a suite of tools, including a less conservative and more “risk informed” approach in its capacity calculations, the development of new tools to monitor the grid in real time, collaboration with other regional utilities, and will look to nonwire solutions such as battery storage and electrical flow control devices.*

“Traditionally, the solution to a problem like this is, “Let’s go build a line” — and lines are great — they provide a lot of certainty and capacity,’ he said. ‘But *the question was not necessarily what transmission line we have to build, but how do we have to solve the transmission problem.*’

“Mainzer said the death of the project doesn’t mean an end to transmission-line construction in the Pacific Northwest. But in the future, the agency plans to look at finding *more efficient ways to move power and to build at the smallest possible scale.*”

(emphasis added)

The EIS process and the cities that will decide whether EE deserves to be permitted should consider the foregoing information and recalibrate as needed. In determining whether EE is needed or at an appropriate scale, factors to consider include:

1. Does PSE make a commitment equal to BPA’s by taking a more flexible, scalable, economical and operationally efficient approach to managing its transmission system?

2. BPA stated that “[t]he scope, impact and increasing budget for this project became the catalyst for pushing us to reconsider our existing analytical processes, our commercial business practices and our implementation of federal reliability standards.”<sup>3</sup> The increasing budget for Energize Eastside (which started as \$70 Million in the ColumbiaGrid 2013 System Assessment<sup>4</sup> but has now ballooned to well over \$200 million) and the growing knowledge of the risks of locating this line along an existing pipeline should likewise cause PSE to reconsider its processes. Whether or not such a reconsideration takes place in the context of EE should be expressly noted in the final EIS and taken into account by the cities when and if PSE eventually submits permit applications.

<sup>3</sup> <https://www.bpa.gov/news/newsroom/Pages/BPA-will-not-build-I-5-Corridor-Reinforcement-Project.aspx>

<sup>4</sup> Downloadable at [https://www.google.com/url?sa=t&rect=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKFwihw4-igLzU/AAhUX5mMKHV1eD-nlOQFgkMAA&url=http%3A%2F%2Fwww.columbiagrid.org%2Fdownload.cfm%3FDVID%3D5200&usq=AFOJCNQq-vXKDe0DX67EmCdpVbn1ABD4g&sig2=JBloM7nfaKWHbGRb\\_70Jg](https://www.google.com/url?sa=t&rect=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKFwihw4-igLzU/AAhUX5mMKHV1eD-nlOQFgkMAA&url=http%3A%2F%2Fwww.columbiagrid.org%2Fdownload.cfm%3FDVID%3D5200&usq=AFOJCNQq-vXKDe0DX67EmCdpVbn1ABD4g&sig2=JBloM7nfaKWHbGRb_70Jg); See spreadsheet on page 8, referencing ColumbiaGrid’s name for Energize Eastside: “Lakeside 230/115 kV Transformer and Sammamish-Lakeside-Talbot line rebuild to 230 kV.”

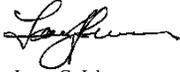
005-K -6 This is outside the scope of SEPA.

005-K -7 The comment begins with a reference to a quote about the BPA project, not the Energize Eastside project. BPA’s decision on its project is not relevant to this EIS. Comment noted.

005-K-8

3. BPA stated: “[f]or example, in reviewing its project assumptions with regional utilities, BPA identified that it used a conservative approach to risk that went beyond industry standards.”<sup>5</sup> As CSEE and CENSE have pointed out in several comments in the EIS process, PSE has used as its justification for Energize Eastside a scenario that vastly exceeds NERC reliability criteria.<sup>6</sup> PSE should likewise abandon this overly conservative approach to risk that goes beyond industry standards. If PSE persists in misleading the regulators, the city councils and the public in this regard, that fact should be expressly noted in the final EIS and taken into account by the cities when and if PSE eventually submits permit applications.

Sincerely,



Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE), [www.sane-eastside-energy.com](http://www.sane-eastside-energy.com)  
8505 129th Ave. SE  
Newcastle, WA 98056  
tel.: 425 227-3352  
[larry.ede@gmail.com](mailto:larry.ede@gmail.com)

cc: CENSE  
City Councils of Bellevue, Redmond, Renton, Kirkland and Newcastle

<sup>5</sup> <https://www.bpa.gov/news/newsroom/Pages/BPA-will-not-build-I-5-Corridor-Reinforcement-Project.aspx>

<sup>6</sup> See CSEE letter of May 22, 2017 submitted by email to the EIS Program Manager for the EE project, noting that PSE’s core rationale for EE rests on unnecessarily exceeding in its (i.e. Quanta’s) load flow studies the NERC reliability criteria, and PSE’s falsely labeling those exaggerated criteria as “minimum federally required planning standards.”

005-K -8 Comment noted.

6/30/2017 Weebly Email Service Mail - Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside: ...



Energize Eastside EIS <info@energizeeastsideeis.org>

**Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside: Mayor Stokes' slur as further evidence of COB bias towards PSE**

1 message

Larry Johnson <larry.ede@gmail.com> Wed, Jun 14, 2017 at 1:55 PM

To: info@energizeeastsideeis.org

Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindsay@ci.newcastle.wa.us, Johnd@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevette <lynnepre@comcast.net>, Christina Aron-Sycz <aronsyncz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>, Bellevue Reporter PSE Media <editor@bellevuereporter.com>, Renton Reporter PSE Media <editor@rentonreporter.com>

To: EnergizeEastside EIS staff, City Councils of Bellevue, Redmond, Renton, Kirkland and Newcastle

Please include this email and the attached letter of today's date, along with the attached CSEE's letter of May 23, 2017 referenced in my letter of today's date.

005-L-1

This letter is intended to support contentions that the draft EIS in its current state is inadequate, incomplete and flawed due to undue influence by PSE on COB, and COB's bias in favor of PSE, of which Mayor Stokes' public slur is but further proof.

Sincerely,

Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
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tel.: 425 227-3352  
email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

**2 attachments**

CSEE comment letter 6-14-2017 re Stokes' slur.pdf  
88K

Comment re COB bias.pdf  
327K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15ca8638aeb2b949&siml=15ca8638aeb2...> 1/1

005-L -1 Comment noted.

**Citizens for Sane Eastside Energy (CSEE)**

8505 129th Ave. SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
[www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)

June 14, 2017

Ms. Heidi Bedwell  
 Energize Eastside EIS Program Manager  
 City of Bellevue Development Services Dept.  
 450 110th Ave. NE  
 Bellevue, WA 98004

[submitted by email to info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org)

Re: Comments regarding Energize Eastside Phase 2 Draft EIS; Mayor Stokes' public slur

005-L-2

At a regularly scheduled public meeting of the Bellevue City Council yesterday, the Council took public comment from concerned citizens regarding their criticisms of PSE's Energize Eastside project. Since the EIS for this project is under Bellevue's primary supervision and control as EIS Lead Agency for the five affected Eastside cities, the Council has a special fiduciary duty to the residents of all five cities to listen to public comment on Energize Eastside in an attentive, fair, unbiased and respectful manner.

005-L-3

That did not occur yesterday. When Mr. Ken Workman, a descendant of Chief Seattle and council member for the Duwamish tribe, approached the speaker's seat to offer his testimony, over an open mic Bellevue Mayor John Stokes said to Deputy Mayor John Chelminiak, "They're shameless." Mr. Workman was dressed in a fashion reflective of his pride in his Native American heritage, including a unique hat and a pouch slung over his shoulder. The mayor's slur was heard by those present in the room, and it was recorded on the video of yesterday's proceedings at [http://bellevue.granicus.com/MediaPlayer.php?view\\_id=3&clip\\_id=5022](http://bellevue.granicus.com/MediaPlayer.php?view_id=3&clip_id=5022). The relevant excerpt from that video is posted on YouTube at <https://youtu.be/biEO1Eq126g>.

005-L-4

Now either Mr. Stokes was referring to Mr. Workman and his tribe as "they're shameless," or he intended to castigate CENSE for somehow fostering what Stokes thought was some kind of publicity stunt. In either case, there is no acceptable excuse for the language he used and the hostile attitude he expressed. This is Bellevue's mayor speaking to the deputy mayor in a way that could be heard by other Council Members and the public at large. Yet despite an apology sought for this misconduct by Mr. Don Marsh of CENSE, none has been forthcoming as of this writing.

The entire Bellevue City Council should be ashamed of themselves. As noted in my attached letter of May 23, 2017, there is already too much evidence of bias in COB's lopsided and cozy dealings with PSE, while the council offers only minor token input from the public and concerned experts who cannot possibly state their case in three-minute public comment sound bites. Last night's unguarded utterance from your top elected official is yet one more outrage in this pattern of misbehavior.

005-L -2 Comment noted. The City of Bellevue acknowledges a special duty under SEPA as the Lead Agency for the EIS process. This duty is not a specific fiduciary duty but is a duty to provide an unbiased evaluation of impacts of the proposed Energize Eastside project. The Bellevue City Council has delegated SEPA compliance and permit review to City staff, whom are aware of their duty under SEPA and the Bellevue City Code to provide a fair and unbiased opportunity for public comment.

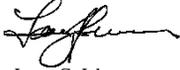
005-L -3 Comment noted. The comment does not appear to be about the Energize Eastside EIS.

005-L -4 Comment noted.

005-L-5

Bellevue needs to recuse itself as Lead Agency for the EIS and be replaced by a trustworthy entity capable of conducting the EIS process in an open, fair and unbiased manner. Any draft of the EIS, whether the current Phase 2 draft or the final EIS, will be otherwise hopelessly tainted by bias towards PSE.

Sincerely,



Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE), [www.sane-eastside-energy.com](http://www.sane-eastside-energy.com)  
8505 129th Ave. SE  
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[larry.ede@gmail.com](mailto:larry.ede@gmail.com)

cc: CENSE

City Councils of Bellevue, Redmond, Renton, Kirkland and Newcastle

005-L -5 Comment noted.

7/11/2017 Weebly Email Service Mail - A further CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

## A further CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside

1 message

Larry Johnson <larry.ede@gmail.com> Wed, Jul 5, 2017 at 8:37 PM

To: info@energizeeastsideeis.org  
 Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindan@ci.newcastle.wa.us, JohnD@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevetie <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>, Carrie Rodriguez <crodriguez@bellevuereporter.com>, rmurray@soundpublishing.com

To: EnergizeEastside EIS staff

Please include this email, the attached comments of CSEE and the attached report of Accufacts Inc., commissioned by the City of Newcastle, as part of the public comments record.

These comments are offered in support of the "No Action" alternative. They are also submitted to support contentions that the draft EIS in its current state is inadequate, incomplete and defective.

Sincerely,

Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
 8505 129th Ave SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
 email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

### 2 attachments

- CSEE comment letter 7-5-2017 .pdf  
1442K
- 6-20-17 Accufacts Final Report.pdf  
193K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15d15f97639c977d&siml=15d15f97639c9...> 1/1

### Citizens for Sane Eastside Energy (CSEE)

8505 129th Ave. SE  
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tel.: 425 227-3352  
www.sane-eastside-energy.org

July 5, 2017

Ms. Heidi Bedwell  
Energize Eastside EIS Program Manager  
City of Bellevue Development Services Dept.  
450 110th Ave. NE  
Bellevue, WA 98004

[submitted by email to info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org)

Re: Comments regarding Energize Eastside Phase 2 Draft EIS

Please find included with this letter the report from Accufacts Inc. to the City of Newcastle, dated June 20, 2017, incorporated by reference herein as if fully set forth. I also refer you to the City of Newcastle's comments to the Energize Eastside Phase 2 Draft EIS, which refers to and includes the Accufacts Inc.'s report.

The Accufacts report takes issue with several assertions stated in the DEIS, including misplaced reliance on portions of the DNV-GL Final Report. For example, Accufacts found one of the glaring omissions in the DNV-GL study was DNV-GL's failure to "provide sufficient details to assure Accufacts that appropriate precautions will be implemented or effective in protecting the pipelines during the construction phase." (p. 2). Further, DNV-GL "correctly indicates that Olympic [Pipeline Company] must provide additional field verifications to support key assumptions once EE goes operational." Id. Finally, "Appendix I-5 of the Phase 2 Draft EIS EE Pipeline Safety Technical Report ("Technical Report") risk assessment approach is not relevant nor does it represent the Olympic pipelines [risk], especially within the City." Id.

It is appalling how the City of Bellevue, entrusted with fiduciary duties to carry out the EIS process to ensure its integrity, and, more important, the safety of Eastside citizens, appears to be sleepwalking through the most critical hazardous aspects of Energize Eastside: the very real threat to human life and limb if the project is allowed to be built.

Apparently the scriveners of the DEIS have accepted without much critical thought the following advertisement from PSE referencing the DNV-GL report:



005-M -1 See responses to comments LL1-A-11, LL1-A-12, and LL1-A-13 regarding the findings of the Accufacts Report. Also see response to comment OO1-F-3 regarding comments from CENSE.

005-M-1

The conclusion stated in that ad is false and misleading. Don Marsh of CENSE explains in remarks he delivered recently in oral public comment to the Bellevue City Council:

“As you know, CENSE has raised significant questions about the safety of building a 230,000-volt transmission line next to two high-pressure petroleum pipelines, as PSE proposes to do in its Energize Eastside project. As a result of our concerns, PSE engaged a respected safety consultant, DNV-GL, to analyze their proposal. The consultant’s findings were published in December, and they are devastating.

“The top finding is that PSE’s preferred route, known as “Willow 2” fails 4 out of 4 safety criteria. The consultant says it “exceeds safety limits” and has an “unpredictable risk range.” A second conclusion is that PSE’s alternate route, “Willow 1,” also fails 2 of the 4 safety measurements. In order to bring this route into compliance, the consultant says the height of the poles will have to be increased up to 50% taller than the poles we have today. To reduce the risk of arcing into the pipeline, these poles will have to be placed at least 13 feet away from the pipeline, more than ten times the separation PSE had previously proposed.

“The consequences of these new requirements will be terrible for homeowners next to the corridor. PSE will have to put 75-foot poles within 30 feet of existing homes. That increases the likelihood that a falling pole will strike a home. Some homes are within striking range of two poles. That’s not just a safety concern for these homeowners and their loved ones, but it’s also a problem for mortgage underwriters who won’t back a mortgage for properties that have this level of risk.

“We are grateful that these safety risks are now known, but we wonder how it is that we have gotten three years into this process before these facts saw the light of day. We think this is the death knell for this project, and we aren’t the only ones. Within weeks of this report being published, Jens Nedrud, the senior program manager for Energize Eastside, suddenly found a new position within PSE. Leann Kostek, the lead engineer, left the company some time ago. Do these employees know something we don’t?

“This safety report helps us understand the hazards of operating this transmission line, but it doesn’t mention the risk of digging large holes near the pipeline, or what might happen during an earthquake that shears both the pipeline and the transmission line. We don’t want a man-made catastrophe on the heels of a natural disaster, when emergency responders will be busy and roads may be clogged. We hope this council will look out for the safety of your constituents for as long as this hazardous proposal remains on the table.”

CSEE endorses these comments and submits them to you for your review and inclusion in a needed new and revised DEIS.

The Accufacts Inc. report and the City of Newcastle’s concerns, including but not limited to the need for precise information about the existing pipelines’ depth values as they vary along the routes of these pipelines, need to be taken into full account and analyzed in a revised DEIS, with additional public comment period provided.

It is time for PSE and the Olympic Pipeline Company to come clean on the project details which supposedly this Phase 2 Draft was to address.<sup>1</sup> But the DEIS cannot address data which do not yet exist. Clear, specific and verifiable data are needed for such critical items as pole heights and

<sup>1</sup> This language from the DEIS is irresponsible and unacceptable: “... information about the project is approximate and subject to change and refinement as the design is developed. Where there is uncertainty about potential impacts, the Phase 2 Draft EIS uses conservatively high impact assumptions to ensure that any potential significant impacts are addressed. (p. 1-3).” If there are not sufficient design facts now available, that does not mean those facts cannot be made available when PSE and OPC get around to it. The EIS should not consist of “assumptions” but rather facts. The DEIS process needs to be suspended until those facts are provided. If OPC persists in withholding key data it deems sensitive or proprietary, then the proper response is not to allow the project to go forward. Guesswork is not an option when lives are at stake.

005-M-1

005-M-2

005-M -2 See response to comment II14-B-3.

Section 3.9 of the Phase 2 Draft EIS provides sufficient detail to understand the potential risks associated with pipeline safety. SEPA review is frequently conducted at an early stage of design to allow for the design to incorporate findings of the analysis before substantial resources have been expended on a particular design. The Energize Eastside project design continues to be refined. For the Phase 2 Draft EIS, while specific pole locations were provided by PSE, they were still making adjustments in those locations in response to property owner requests, wetland and stream buffer locations, and other information. For this reason, the assumptions used likely overstate the impacts of the project since PSE is working to reduce impacts as the design is refined. This is typical of the design process for a large project going through an EIS process.

005-M-2

their precise number and locations; the fall-distances of the proposed poles and the risk of striking nearby homes; the potential dislocation or harm to aging pipelines (some within less than 3 feet from the surface) caused by earth-moving, drilling, excavation, transport and other heavy construction equipment as they move near and over the pipelines; and the upper limits of seismic activity at which one can predict the existing pipelines will fail, leading to explosions and fire. "Seismic activity" means not only earthquakes, but also vibrations caused by construction equipment, especially from vertical boring using high-intensity vibrations when installing the concrete foundations for the monopoles.

Until PSE and OPC become forthcoming with such fundamental life-safety information, the EIS and subsequent permitting processes regarding Energize Eastside should and can not be based on guesswork.<sup>2</sup>

005-M-3

The "No Action" alternative is thus the only acceptable option for this project until PSE meets its burden of proving otherwise.

Sincerely,



Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE), [www.sane-eastside-energy.com](http://www.sane-eastside-energy.com)  
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tel.: 425 227-3352  
[larry.ede@gmail.com](mailto:larry.ede@gmail.com)

cc: CENSE

City Councils of Bellevue, Redmond, Renton, Kirkland and Newcastle

005-M-4

<sup>2</sup> CSEE is not convinced the City of Bellevue is fully aware of just how extremely high the risks are from even a "small" pipeline fire — a risk that far outweighs any conceivable benefit from Energize Eastside. Here, for example, is a newspaper account of an Olympic Pipeline Company pipeline fire that occurred in Renton in 2004:

**"A pinhole-sized leak caused by wear unleashed thousands of gallons of gasoline** that fueled the Olympic Pipe Line fire and explosion near Westfield Shoppingtown Southcenter early Sunday, investigators said yesterday [May 23, 2004]. But the source of the spark that ignited the gas remained unknown.

"The accident in Renton triggered an immediate shutdown of **the pipeline that carries more than 11 million gallons of fuel a day** in Western Washington..."

"Some critics said the accident demonstrated that Olympic, which sought protection from creditors in bankruptcy court last year, **can't be trusted when it comes to safety.**

**"A company spokesman responded** that Olympic's safety procedures have been beefed up considerably since oil giant BP began operating the company four years ago **but that no pipeline is risk-free.**

"The leak occurred in a half-inch-wide tube of stainless steel that Olympic operators occasionally use to extract fuel samples from the system's 16-inch-wide main line. Just after 6 a.m. Sunday, **flames erupted 20 feet high, engulfing a small building and sending three firefighters to the hospital. A mile-square area, which included a nearby fire station, was cordoned off.**" (emphasis added)

From : <http://www.seattlepi.com/local/article/Wear-caused-gas-leak-in-Olympic-pipeline-1145599.php>

005-M -3 Comment noted.

005-M -4 See responses to comments 004-A-5 and I18-A-1. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipelines. While local governments cannot use this SEPA process to compel Olympic to protect their pipelines as required by federal law, the EIS notes that PSE can help mitigate risks by providing Olympic with information that would help them understand corrosion risks to the pipelines that could be caused by the transmission line.

7/11/2017 Weebly Email Service Mail - Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

### Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside

1 message

Larry Johnson <larry.ede@gmail.com> Mon, Jun 19, 2017 at 3:37 PM

To: info@energizeeastsideeis.org  
 Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindan@ci.newcastle.wa.us, JohnD@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <council@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevetie <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>

To: EnergizeEastside EIS staff; City Councils of Bellevue, Redmond, Renton, Kirkland and Newcastle

Please include this email and the attached letter of today's date regarding the Phase 2 Draft EIS for the PSE Energize Eastside project.

This letter is offered in support of the "No Action" alternative for the reasons stated therein. It is also intended to support contentions that the draft EIS in its current state is inadequate, incomplete and flawed.

Sincerely,

Larry G. Johnson  
 Attorney at Law, WSBA #5682  
 Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org)  
 8505 129th Ave SE  
 Newcastle, WA 98056  
 tel.: 425 227-3352  
 email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com)

CSEE comment letter 6-19-2017.pdf  
 85K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15cc2810926c0e93&siml=15cc2810926c0...> 1/1

## Citizens for Sane Eastside Energy (CSEE)

8505 129th Ave. SE  
Newcastle, WA 98056  
tel.: 425 227-3352  
www.sane-eastside-energy.org

June 19, 2017

Ms. Heidi Bedwell  
Energize Eastside EIS Program Manager  
City of Bellevue Development Services Dept.  
450 110th Ave. NE  
Bellevue, WA 98004

submitted by email to [info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org)

Re: Comments regarding Energize Eastside Phase 2 Draft EIS

CSEE has already submitted several comments during the public comment period regarding the referenced draft EIS. These comments support the conclusion, among others, that the current and previous drafts of the EIS lack sufficient detail, ignore major issues, and are simply incomplete and biased due to the undue influence and dominance by Puget Sound Energy in the drafting of the DEIS.

PSE's pattern of persistently avoiding key issues is consistent with PSE's continued intransigence in failing to provide basic information requested by affected citizens and elected officials regarding the Energize Eastside project. For example, CENSE still is waiting for answers to 17 well-articulated and specific questions which PSE promised Bellevue Council Members months ago it would answer; but to date, PSE has either ignored or inadequately answered those questions.

This recalcitrance may change as a result of what appears may be an imminent change in the ownership of PSE as reported in financial media (see, e.g., <https://www.bloomberg.com/news/articles/2017-06-15/macquarie-said-to-explore-sale-of-stake-in-utility-puget-energy>). We are hopeful a change in ownership and management of PSE will finally lead to disclosure of the relevant load flow data and historical substation loading data to help determine whether there is in fact a need for Energize Eastside.

Until PSE finally becomes forthcoming with such information, the FEIS and subsequent permitting processes regarding Energize Eastside should not be based on guesswork. The "No Action" alternative is thus the only acceptable option for this project until PSE meets its burden of proving otherwise.

Sincerely,



Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE), [www.sane-eastside-energy.com](http://www.sane-eastside-energy.com)  
8505 129th Ave. SE  
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[larry.ede@gmail.com](mailto:larry.ede@gmail.com)

cc: CENSE  
City Councils of Bellevue, Redmond, Renton, Kirkland and Newcastle

005-N -1 See response to comment I137-A-1.

July 3, 2017

Ms. Heidi Bedwell, Senior Planner  
Land Use Division – Development Services  
450 110<sup>th</sup> Ave NE  
Bellevue, Washington 98004

Dear Ms. Bedwell:

**Re: Transcript of testimony, Bellevue City Hall “Energize Eastside Public Meeting”, May 25th**

Good evening. My name is Warren Halverson, 13701 ne 32<sup>nd</sup> place, Bellevue, Wa 98005. My wife and I have lived in Bridle Trails for over 40 years. I am here as President of the Canter Greens Homeowners Association. I too am a member of CENSE and we fully support earlier remarks by Don Marsh, President of CENSE.

As I begin my remarks I think it important to acknowledge the fact that there are significant changes occurring in the electrical industry and market place. Today continuous technology advances and customer awareness of the need for conservation are significantly impacting demand and provisioning of electricity. It has become a declining growth industry. Illustrative of this is the recent announcement by the BPA cancelling an 80 mile long 500 kilovolt transmission line project in Oregon. A project first announced in 2009 which has now been cancelled after the completion of studies, community involvement and Environmental Impact Statements has now been cancelled. This is certainly a current case study that should be reviewed in detail while making such significant decisions as Energize Eastside.

As to phase 2 of this EIS, I am deeply concerned that the **need** for this project has not been proven and I am deeply concerned that the **purpose** of Phase 2 of the EIS has not been met.

**first, need (Chapter 1 – Introduction & Summary: 1.3 Purpose of and Need for....)**

Phase 2 of the EIS states that there is a “need” for energize eastside “...to address a projected deficiency in transmission capacity resulting from growth in electrical demand which could affect the future reliability of electrical service for the eastside”. The Phase 1 and now Phase 2 EIS quotes a PSE forecast of a 2.4% growth rate (Phase 2) with a shortfall of 74mw (Phase 1) over the next ten years. However, there is no substantiation of these statements. Furthermore, over the months there have been many unanswered questions about the data projections and underlying assumptions. Because of this and the magnitude of this project, we **REQUEST 1** a load forecast for Eastside transformers showing the deficiencies and projected improvements.

The Phase 1 EIS substantiated need based upon an “Eastside Customer Demand Forecast”. There have been two of these very different forecasts, one used in the CAG (2013) and then one updated in the Phase 2 EIS (2015). Both raised many unanswered questions and were very conflicting. Then in Phase 2 this forecast is absent. This is very troublesome.

007-D -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”).

007-D-1

**P2 – Warren Halverson, President Canter Greens HOA Testimony (May 25h)**

007-D-1

We, too, **REQUEST 2** the EIS team substantiate growth forecasts with a current "Eastside Customer Demand Forecast" showing assumptions actual numbers for past 5 years and actual numbers for the next 10 years. This may sound like of work but it really isn't. This will validate need with current facts. Additionally, PSE is currently developing their 2017 Integrated Resources Plan. So, this data should be readily available. Please remember we are only looking for 74mw of power based upon a highly questionable 2.4% forecast.

Energize Eastside is a mammoth -- and for the Macquire Company a very lucrative -- project. The impact on neighborhoods will last for decades. The EIS's portrayal that any delay will potentially cause "the lights to go out" or "rolling blackouts" is not true. The facts simply do not support this PR spin and PR hyperbole. Let's get this right!. Let's get this right for ourselves and future generations! Attached are charts and EIS pages requiring an update.

**next, phase 2 EIS process (Chapter 1 Introduction & Summary; 1.3 Purpose of and Need for...."**

007-D-2

The purpose of the Phase 2 EIS is to provide "project level alternatives based upon more defined geographic locations and a more detailed analysis of potential environmental impacts"... "as required by SEPA, the No Action alternative must be evaluated as a baseline against which the action alternatives can be evaluated". We question how this process has evaluated alternatives and elements.

Throughout both Phase 1 and Phase 2, alternatives have never been adequately defined, including "No Action". Furthermore, the "No Action" alternative was never used as a baseline for comparison. The EIS team has then gone on to define and limit determinations to either significant or less significant. By defining the measurement system and then interpreting it the EIS team concludes that there are "No Significant Unavoidable Adverse Impacts" for all 10 elements. Really! Frankly, this simply belies common sense and shows that this EIS is not a serious analysis of the elements as it relates to Bellevue.

We **REQUEST 3** Phase 2 be rewritten to meet the stated objective of comparing Energize Eastside with the "No Action" alternative. We **REQUEST 4** all national criteria or generalized academic criteria be replaced with local studies of criteria pertinent to Bellevue residents and a complete rewrite of determination of significance.

The public has spent thousands of dollars and invested thousands of hours to help develop this EIS. Yet, it is impossible to fully understand this contribution. We **REQUEST 5** the EIS team provide an "Executive Summary Chapter" of public comments, including a 3-5 page summary of number of comments by chapter; changes made in the EIS; and the impact on the elements on "degree of significance".

007-D -2 See response to comment 007-A-5 in regards to the comparison to the No Action Alternative. For each element of the environment, the EIS Consultant Team developed significance criteria to assess the magnitude of impact, which were reviewed and approved by the Partner Cities. Please see response to comment 007-A-6 in regards to an Executive Summary. Potential significant impacts are described in several sections of the Phase 2 Draft EIS, and summarized in Chapter 8 (Significant Unavoidable Adverse Impacts) of this Final EIS.

**P3 - Warren Halverson, President Canter Greens HOA Testimony (May 25<sup>th</sup>)**

Let me now turn to two elements that are particularly concerning: First, Plants and Animals and then Economics.

It is interesting to all of us that we have to search through a chapter entitled Plants and Animals to find a discussion of Trees. TREES ARE IMPORTANT in the Pacific Northwest; Bellevue and Bridle Trails. They are SIGNIFICANT. Then, when an EIS concludes that cutting down or trimming 4000 to 10000 trees is less than significant and the impacts are easily mitigated, there is something really wrong. We completely support the **REQUEST 6** by many citizens that this EIS list **the NUMBER AND EXACT LOCATION OF TREES being removed and trimmed**. At a minimum this should be done for locations where property owners are directly impacted. Without this, the EIS is incomplete.

The EIS states that there is a different vegetation maintenance schedule for 115kv versus 230kv lines. It now speaks to additional TREE removal showing wire zones, managed right of way and danger zones but there is no analysis in the EIS. What is more troublesome is the City of Bellevue and Puget Sound Energy then passes off resolution of any issues to the property owner saying “...managed right of way will be coordinated with the property owner”; “restore vegetation to as like or better condition” .... in working with the property owner. This seems quite disingenuous that the city supports this project and then asks each property owner to work it out over the next 18 months. We **REQUEST 7** the EIS more clearly define exact tree and vegetation removal in each of these zones before approving this EIS or submitting it as part of an application process. We **REQUEST 8** the City of Bellevue hire and provide an ombudsman/mediator where there is a disagreement between PSE or vendors so that property owners can appeal decisions by PSE or vendors.

If I read the EIS correctly 3.4.1.2 trees bcc 20.20.900 “areas to be cleared for utilities are exempt from tree retention standards”. The City of Bellevue has an objective of reaching a 40% tree canopy. The Bridle Trails Sub Area plan is oriented to and completely supports a rural character. Bellevue proclaims itself to be “a city in the park”. Replacing thousands of mature trees with sibling just doesn't seem to support these characterizations. Many are concerned that the city has no plan to achieve this objective.

**industrial corridor,**

Living on the “Managed Right of Way” for 40 years, I do have first hand experience with the environment. Since I have lived in Bellevue, the city has enabled through their land use procedures and environmental statements the addition of a second pipeline; the addition of an electrical line on the poles and the allowance of telecommunications facilities to be built onto these poles. As you probably know legislation is being proposed to allow further use of these poles by vendors. This is an excellent example of how each individual project is being termed less than significant but the cumulative effect and interrelationship of this project and others is really significant creating “industrial blight”, an “industrial corridor”, a “dead zone” even a “wind tunnel” effect upon the environment.

007-D -3 See response to comment II139-A-3 and response to comment 007-B-3.

007-D -4 Please see the response to comment 007-E-4 with regard to allowing telecommunications facilities on the Energize Eastside project. Impacts from changes to regulations for small cell networks made by state legislators could affect the project. No industrial uses are proposed. Other terms mentioned in this comment (“dead zone” and “wind tunnel”) are not sufficiently explained to permit a response.

007-D-3

007-D-4

**P4 – Warren Halverson, President Canter Greens HOA Testimony (May 25<sup>th</sup>)**

**finally economics (Chapter on Economics, 3.10)**

Phase 2 did add a chapter termed economics, a mere 13 pages covering property tax values, revenue to the city, undergrounding and eco system valuations. Several pages are dedicated to New Castle. Here again, we see a lack of detail and analysis. Here again (P13) you conclude all costs are less than significant. I am troubled by the continued assertion that there is basically no impact on property values, when national studies show at minimum 2-9% and local assessor's have indicated 10%-30%. I am troubled by the ecological value of 9852 trees being \$37,858 when pse was offered nearly \$1,000,000 to remove 300 trees on 148th. I am troubled that there is no accounting for additional fixed costs associated with new roads; construction expenses; new stormwater and water retention facilities for the city. **We believe this chapter is basically a self justification of Energize Eastside.** To protect all stakeholders involved, we **REQUEST 9** this element be rewritten to consider the above and to more thoroughly analyze and chronicle all costs that will be incurred to implement "Energize Eastside", including a pro forma of PSE's budgeted expenditures in their capital plan.

Even at that, the most troubling strategic error in this EIS is this assertion "PSE has concluded that the most effective and **cost efficient** solution to meet its objectives is .... Energize Eastside (**Chapter 1, p1-4, Stantec, 2015**). This may sound good to a Hearing Examiner or the WUTC but there is no data to support this conclusion. There is no analysis to support this conclusion. There is nothing to support this conclusion.

We, therefore, **REQUEST 9** the EIS team to provide the cost data for all alternatives in Phase 1 and Phase 2 to support this conclusion.

**In conclusion, without many many serious and significant modifications to this EIS, we cannot accept this document as Bellevue's meaningful environmental review for the Energize Eastside project.**

Sincerely,

Warren E. Halverson  
President – Canter Greens HOA in Bridle Trails

007-D -5 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1. A full cost comparison of the various alternatives was not assessed because it is not required under SEPA (see Topic Econ - Key Theme 3). Section 3.10.4.3 of the Phase 2 Draft EIS describes the loss of ecosystem services and quantifies the loss of avoided runoff and pollution removal (Table 3.10-7). It is not anticipated that there would be significant costs associated with new roads because most of the project would be within an existing transmission corridor (that has access roads) or would be along existing roadways (see Chapter 14 of the Phase 1 Draft EIS). For more information regarding project cost and fairness of financial burden, see Topic Econ - Key Theme 4.

007-D-5

June 14, 2017

Ms. Heidi Bedwell, Senior Planner  
 Land Use Division – Development Services  
 450 110<sup>th</sup> Ave NE  
 Bellevue Washington, 98004

Re: Transcript of “Energize Eastside Public Meeting”, Rose Hill Elementary, June 3, 2017

Dear Ms. Bedwell,

My name is Warren Halverson and I live at 13701 ne 32<sup>nd</sup> place. I am a Board Member of CENSE. I am here, today, as President of the Canter Greens Homeowners Association in Bridle Trails. My neighbors in Bridle Trails have asked me to speak on their behalf and further augmenting previous testimony. I do this with caution and one caveat.

The EIS is required to substantiate purpose and need. Thus, as a good corporate citizen, you would think that PSE and the EIS team would want this analysis done in detail. Before adding to the record, my caveat is that unfortunately to date, neither PSE or the EIS team have proven that this project is **needed**. The fact that you have removed even the slightest analysis of this from Phase 2 and simply referred back to Phase 1 where virtually no analysis was done is very troublesome (**Chapter 1 Introduction & Summary: 1.3 Purpose and Need, p1-4&5**). Once again, we **REQUEST 1** your team provide a current Eastside Load Flow Study at the transformer level and a current “Eastside Customer Demand Forecast” with numerics and assumptions as part of this EIS. Until this is done, there can be no serious consideration of the alternatives or environmental impacts. Actually at this stage of the EIS, **one can only conclude that the most cost effective and efficient solution is the “No Action” alternative.**

Even at that, my neighbors shared with me their perspective concerning “Energize Eastside”. It will destroy nearly 4000+ up to 5000 trees (but even at this late date nobody knows how many); grade and level acres of land; and plant 100’ poles beside or on top of two major pipelines. They told me Energize Eastside creates both industrial blight and a high risk industrial corridor in our beautiful and rural Bridle trails Neighborhood. Yet, for every element in the EIS, the EIS team concludes that there are “No Long Term Significant Consequences” (Chapter 1; 1.11 Key findings p 1-11 thru 1-29). My neighbors want you to know that this conclusion defies any logic or common sense.

Secondly, my neighbors say you have not provided information and completely downplayed the analysis concerning the impact of trees and poles on **Visual and Aesthetic elements (Chapter 3.2 Scenic Views and the Aesthetic Environment)**. In fact, to date, field work has not been completed to place poles or list impacted trees. Nevertheless, PSE plans to plant 100’ tall; 21’ circumference and 7’ in diameter metallic poles buried in concrete in Bridle Trails. After many requests for information you refer us to your interactive map and still this information is not available. The tree count is incomplete.

007-E -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”).

007-E -2 Comment noted.

007-E -3 See response to comment II14-B-3. A tree inventory was also conducted for the project by The Watershed Company, which included field visits throughout the project corridor. The information from the inventory reports was used to inform the scenic views and aesthetic environment assessment. Updated pole location information is provided in Chapter 2 of the Final EIS.

007-E-1

007-E-2

007-E-3

**P2 – Warren Halverson, President Canter Greens HOA Testimony (June 3<sup>rd</sup>)**

007-E-3

Pole locations are the same placement that we were told three years ago at CAG meetings +/- 25'. Until this information is complete, there is no possible way except guessing to assess the Visual and Aesthetic Elements.

007-E-4

At a minimum then we **REQUEST 2** this EIS show exact pole locations and the actual trees that will be removed prior to the conclusion of this Phase2 of the EIS. Furthermore, your visual analysis does not account for or portray the current electrical line; the new safety line; and actual pole attachments. While the EIS doesn't even mention pole attachments, this issue is only going to get worse and further add to the industrial blight in our neighborhoods. We urge you to acknowledge and explore the implications of current wireless attachment programs such as AT&T's "AllRig" which promotes using shared power lines to replace fiber optic cable. We want you to consider recent legislation HB 1233; HB 1921 and HB 5711 which provides for more freedom and less regulatory control over poles. In effect, these poles will become an economic highway providing others with the economic opportunity to make money, while creating industrial blight for the city and the Bridle Trails community. We citizens will have no influence or control.

I might note that the issue of blight was raised when industrial sized poles were placed on 24<sup>th</sup> and 152<sup>nd</sup> (show picture – everything here is dwarfed). Ironically, when one of these was erected in the Lake Hills neighborhood, the City's Art Commission proposed putting art deco to mitigate the effect – of course at our expense. In spite of all of this, the EIS states there are basically "No Significant Long Term Impacts" (**Chapter 4.2 Scenic Views and the Aesthetic Environment**). Amazing! We, therefore, humbly but urgently **REQUEST 3** the visual analysis for locations include more views including nearby, distance and aerial showing the heights of poles related to tree canopy and the environment and more analysis concerning aesthetic impacts.

007-E-5

Third, while the EIS does consider trees in several of the chapters, my neighbors say the analysis is inadequate as to cumulative effect upon the environment, including CO2, stormwater drainage, height of trees and views, easements and right of ways and economic impacts upon the City and impacted landowners (**Chapter Plants and Animals 3.4 or Economics 3.10**). Therefore, we **REQUEST 4** a section in one of the chapters specifically summarizing the environmental and economic impact of trees based upon an actual tree count, the conspicuously absent tree count.

Fourth, my neighbors are very troubled by the many issues raised concerning Vegetation Management Zones i.e. tree removal (**Chapter 3.4 – Plants and Animals 3.4**) and the expansive nature of this based upon a "NERC standard" (It is highly questionable as to NERC's authority here but lets not go there). Herein, you say there is a significant difference in 115KV vs 230KV vegetation management programs. You introduce wire zones, managed right of way zones and an expansive category called danger zones. Yet this is buried in the EIS. Removal or trimming of mature trees is going to be particularly expansive in Bridle Trails where we have many beautiful 100' plus fir, cedar and hemlocks which incidentally you say should never be used for replacements. Without an actual count of trees being removed and then

007-E -4

See response to comment II14-B-3. Pole locations are identified in Appendix A of the Phase 2 Draft EIS. Datasets used are available online at [www.energizeeastsideeis.org](http://www.energizeeastsideeis.org). While the locations used for the analysis are approximate, they are sufficient for determining which impacts could be significant. A tree inventory was also conducted for the project by The Watershed Company. The information from the tree inventory reports was also used to inform the scenic views and aesthetic environment assessment.

For the Final EIS, an additional visual simulation was developed for the Bridle Trails area (in the Bellevue North Segment). In all simulations, the top wire shown in the simulations is the shield wire. The fiber optic lines would be coaxial cable within the shield wire (referred to as Optical Ground Wire). The total number of lines visible on a double-circuit pole configuration would be seven, as shown in the simulations. For a single-circuit pole configuration, the total lines visible would be four. For a detailed description of PSE's Proposed Alignment and how fiber optic cables would be integrated into the project, see Chapter 2 of the Final EIS. The Final EIS also provides more information about the likelihood of underbuild in the future based on the proposed legislation noted in this comment. Aerial shots were not taken because viewer sensitivity from the sky would be low.

007-E -5

Section 3.10.3 in the Phase 2 Draft EIS includes an evaluation of the economic impact of trees removed. See also response to comment 007-B-3.

**P3 – Warren Halverson, President Canter Greens HOA Testimony (June 3<sup>rd</sup>)**

007-E-5

those that are to be trimmed it is not possible to assess the significance to views and aesthetics. At this time field work is still being done to determine impacted trees. At this time field work is still being done to determine actual pole placements. At this time an interactive map, which is not at all user friendly or well publicized, has been put on the website with vague and totally incomplete information. And, I guess this supposedly fulfills your obligations. Until field work is done and until the public can truly understand Energize Eastside’s impacts on the environment, the “**No Action**” alternative is the only alternative that can be justified. We **REQUEST 5** another supplement to the EIS be provided to the public for comment after this information is compiled and can be adequately reviewed as to impacts to the city and Bridle Trails.

Furthermore, my Bridle Trails neighbors feel what is really being said here is PSE is to going to expand tree removal and trimming based upon their criteria and then my neighbors are going to be asked to “.... work it out with PSE ....”, the removal of vegetation; the trimming of trees; the removal of trees. My neighbors are further asked to work it out with PSE so the landscaping is “to a like or better condition”. So, if but not likely, PSE and the City approve this project, the property owner is now stuck with working out all the impacts on his/her property with PSE over the next 18 months (Make no mistake about it PSE has great people, but most of this work will be done with sub contractors under extreme pressure to get it done!).

007-E-6

Let’s follow this a little further. We know the costs associated with trees in the **Economic Chapter (3.10)** are incomplete and inadequate. PSE’s mitigation for 300 trees on 148<sup>th</sup> was \$1,000,000 dollars. Based upon this Energize Eastside’s mitigation costs will be \$10’s of millions. There will be a windfall of tens of millions of dollars going into the City coffers. As to trees, experts price a mature tree at \$1200 +/- . Is it really fair for this EIS team and PSE to mitigate Energize Eastside with the city and then ask my Bridle Trail neighbors to work it out it with a huge dominant corporation supported by the city.

To my Bridle Trails neighbors we find the issue of the city and PSE making a decision and then “sticking it to” the private property owner as **VERY SIGNIFICANT**. Therefore, if PSE actually applies for a permit we **REQUEST 6** the City of Bellevue provide mitigation guidelines similar to the city’s for PSE and property owners; and, we **REQUEST 7** the City appoint a third party ombudsman, at the city’s expense, to mediate situations where the property owner and PSE cannot agree. Mitigation guidelines should provide the dollar value for all fir, hemlock and cedar trees.

007-E-7

As an aside, I recently attended a King County Flood Control Executive Committee Meeting. Ironically, one of Puget Sound Energy’s Energize Eastside CAG contractors was submitting a proposal to do an EIS for King County. Like most citizens, I was naively surprised to hear her say in a sales pitch such things as: The EIS is basically a process to sell your proposal. The “No Action” alternative is there so participants reject it and then you can move onto your preferred alternative. And, the longer the process and the longer you simply listen to those not agreeing, the more successful you will be to get

007-E -6 The comment refers to compensation for City of Bellevue-owned trees within City right-of-way that PSE proposes to remove. Similar mitigation could be applicable only to any City-owned trees in City right-of-way that were being removed as part of this project. Compensation for trees being removed under the authority of a private easement is not regulated by the City. See response to comment 007-B-9 regarding the monetary value of trees. See response to comment I1121-A-9 regarding mitigation for loss of ecosystem services due to tree removal. See Section 3.4.6 of the Phase 2 Draft EIS for more information regarding required and potential mitigation for tree removal.

007-E -7 Comment noted.

007-E

COMMENT

RESPONSE

**P. 4 - Warren Halverson, President Canter Greens HOA Testimony (June 3<sup>rd</sup>)**

007-E-7

your solution approved. Earlier I mentioned a caveat to this, my current testimony. We hope this is not the case for PSE's and City of Bellevue's Environmental Statement for Puget Sound Energy.

007-E-8

In conclusion, both myself and our many Bridle Trails neighbors **REQUEST (1-7)** you make these significant changes requested in my testimony before proceeding even if this takes more time and not meeting your overly aggressive September timetable. **We, therefore, cannot agree that this Environmental Statement fulfills its purpose or is complete.** It, too, is important to note that this process has been very confusing to the public, many who have already responded to your project specific Phase 2 document in Phase 1. Many have not received a meaningful or written response and wonder why that would be?

Sincerely,

Warren E. Halverson, President  
Canter Greens Homeowners Association  
13701 NE 32<sup>nd</sup> Place  
Bellevue Washington 98005

007-E -8 Comment noted.

6/29/2017

Weebly Email Service Mail - Support for Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**Support for Energize Eastside**

1 message

**Devita, Melissa C** <devitam@bsd405.org>

Wed, Jun 28, 2017 at 10:55 AM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

To Whom it May Concern:

My name is Melissa deVita and I am the Deputy Superintendent of Finance and Operations for the Bellevue School District. I have been asked to provide comments on behalf of the school district regarding the Energize Eastside Project.

Bellevue School District has been experiencing significant student enrollment growth since 2005. In the past 3 years, enrollment has grown from 18,500 to over 20,000 students. This growth is equivalent to a new elementary school every year. We expect this growth to continue through 2025.

The increase in enrollment has resulted in the district building larger schools. Our average elementary school used to have a capacity of 600 students. Our newer elementary schools are being built with a capacity of 800 students. Our middle schools are going from a capacity of 800 students to a capacity of 1,200 to 1,400 students. While these schools are more energy efficient, they do contain more items that use energy such as computers and projectors in every classroom. In addition, all of our secondary students are now assigned a computer to use for the entire school year. We will begin assigning computers to 3<sup>rd</sup> – 5<sup>th</sup> grade students in the next few years.

OO10-A-1

Needless to say, reliable electricity is essential for the school district. Rolling blackouts would be devastating to student learning and achievement. I urge the City of Bellevue with its partner Eastside Cities to implement a permanent solution to this problem that will provide reliable electrical service to our schools and community.

Respectfully,

Melissa deVita

Deputy Superintendent – Finance and Operations

Bellevue School District

OO10-A -1 Comment noted.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15cefd7e0a76bf0e&siml=15cefd7e0a76bf0e> 1/1



June 29, 2017

Heidi Bedwell  
 Energize Eastside EIS Program Manager  
 City of Bellevue Office of Planning & Community Development  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

RE: Energize Eastside Phase 2 DEIS

Dear Ms. Bedwell:

Communities United for Reliable Energy (CURE) is a coalition of business owners, residents, social service providers, healthcare providers, property owners, schools, convention and tourism providers, business organizations, and colleges from East King County. We appreciate the opportunity to submit comments for Phase 2 of the DEIS for the Energize Eastside project.

OO11-A-1

Energize Eastside represents a critical economic infrastructure project for our community. Our members depend on reliable power – to operate our businesses, keep our homes warm, take care of our community’s most vulnerable citizens, operate our hospitals and schools, and keep our economy strong – so we need to make sure that the Energize Eastside project is studied, permitted and built in a timely manner.

OO11-A-2

We have grave concerns regarding the “no action” alternative as discussed in the Phase 2 DEIS. Operating our electrical system with rolling blackouts is NOT an acceptable plan for our growing region. The devastating impact on our economy, our community, and our residents is unfathomable. We must work toward a solution that will reliably solve our transmission deficiency problem using proven methods, and we must do so in a timely manner.

The Energize Eastside Phase 2 DEIS addresses both a no action alternative as well as the consequences of delay, as discussed in the following sections:

OO11-A -1    Comment noted.  
 OO11-A -2    Comment noted.

OO11-A-2

Chapter 2: Project Alternatives

- The disadvantages of delaying the project are that the risks of power outages (described in Chapter 1 of the Phase 1 Draft EIS) that would be associated with the No Action Alternative could develop over time.
- It is also possible that the awareness of the risk of outages could discourage development within the Eastside that would place the Partner Cities at an economic disadvantage to other jurisdictions in the region.

OO11-A-3

Chapter 6: Significant Unavoidable Adverse Impacts

- The No Action Alternative would not be consistent with city comprehensive plan policies, as discussed in the Phase 1 Draft EIS. The No Action Alternative could lead to unavoidable significant adverse land use impacts in the long term if unreliable power supply were to outweigh the regional factors amenable to growth and development, leading to development inconsistent with regional growth plans and targets.

OO11-A-4

As supporters of CURE (see attached), we know that for our region to continue to prosper, we must have electrical infrastructure that is built on time using proven technologies. Building on the existing utility corridor allows for the project to be built quickly (no additional right of way needed), safely, and with minimal environmental impacts.

Thank you for the opportunity to comment and we look forward to moving Energize Eastside into the permitting and construction phases very soon.

Sincerely,



Bernie Dochnahl, Spokesperson  
CURE

OO11-A -3 Comment noted. Also see response to comment II141-A-85.  
OO11-A -4 Comment noted.



***The Eastside Needs Reliable Power  
for a Bright Future***



**Communities United for Reliable Energy (CURE)**

CURE is a grassroots coalition of residents, civic leaders, businesses, schools, human service agencies and healthcare providers. We know that for our region to continue to prosper, we must have electrical infrastructure that is built on time (to avoid rolling blackouts) using proven technologies, preferably on the existing utility corridor, to deliver dependable power to our community for the years to come.

*We support Puget Sound Energy's Energize Eastside project.*

**Sign Up to Support CURE!**

I'm signing up as a:  Community Supporter  Business Supporter  Both

Name \_\_\_\_\_ Community of Residence \_\_\_\_\_

Business Name \_\_\_\_\_ Business Location \_\_\_\_\_

Number of Employees on the Eastside \_\_\_\_\_ Email address \_\_\_\_\_

Sign on to support CURE at <http://www.communitiesunitedforreliableenergy.org/add-your-voice.html>

## CURE Steering Committee\*

**Patrick Bannon**  
Bellevue Downtown  
Association  
Kirkland Resident

**Stacy Graven**  
Meydenbauer Center  
Clyde Hill Resident

**Bart Phillips**  
One Redmond  
Redmond Resident

**Brittany Barker**  
The Fortin Group  
Bellevue Resident

**Jim Hill**  
Kemper Development  
Bellevue Resident

**Susan Stead**  
Parker Smith and Feek  
Seattle Resident

**Sam Baxter**  
Overlake Medical Center  
Woodinville Resident

**David Hoffman**  
Master Builders Association  
Renton Resident

**Bob Wallace**  
Civic Leader  
Bellevue Resident

**Bill Biggs**  
Kaiser Permanente  
Woodinville Resident

**Ross Jacobson**  
Civic Leader  
Bellevue Resident

**Ray White**  
Bellevue College  
Bellevue Resident

**Bernie Dochnahl**  
DENBE of Renton, LLC  
Renton Resident

**Jim Long**  
Urban Renaissance Group  
Redmond Resident

**Rich White**  
Boeing  
Everett Resident

**Jennifer Fischer**  
Bellevue LifeSpring  
Bellevue Resident

**Tom Martin**  
EvergreenHealth  
Lake Forest Park Resident

**Tom Gilchrist**  
SRO  
Sammamish Resident

**Gloria Northcroft**  
Civic Leader  
Bellevue Resident

\* All Steering Committee members either work or live on the Eastside.

[www.communitiesunitedforreliableenergy.org](http://www.communitiesunitedforreliableenergy.org)

 <b>Support from Businesses and Community Organizations (to Date)</b>		
Alpine One, LLC	Hopelink	Renton Technical College
Arthsystems	HRKinecton	Republic Services
Bastyr University	Issaquah Chamber of Commerce	Rowley Properties
Bellevue Chamber of Commerce	Kaiser Permanente	Schmitz & Associated
Bellevue College	Kemper Development Company	Screaming Flea Creative Media
Bellevue Downtown Association	KidsQuest Children's Museum	Seattle Children's
Bellevue LifeSpring	King and Bunny's Appliances	Seattle King County REALTORS®
Boeing	King County Library System	Seattle Marriott Redmond
Bothell Chamber of Commerce	King County Sexual Assault Resource Center	SRM Development
C2 Education	Kirkland Chamber of Commerce	SRO
Capstone Partners	Lake Washington Institute of Technology	Sunset Square Shopping Center, LLC
Cascadia College	Langton Spieth, LLC	Swedish Issaquah Medical Center
Cater 4 You	Life Enrichment Options	Sweeney Conrad
City of Kenmore	Master Builders Association	Symetra Life Insurance Company
CityFish Marketing, LLC	Meydenbauer Center	Tetra Tech
Concur	Minuteman Press of Redmond	The Spring District
Cycle Bar	NAI Puget Sound Properties	Top Tier Training and Development
DCI Engineers	Nelson Legacy Group, LLC	University of Washington
DENBE of Renton, LLC	One Redmond	University of Washington - Bothell
Disk Eyes Productions	Overlake Medical Center and Clinics	Urban Renaissance Group
Ditty Properties	PACCAR	Valley Medical Center
Etiquett For You	Radford & Co	Visit Bellevue Washington
EvergreenHealth	Rental Housing Association of Washington	Wine Diva Lifestyle
Evergreen Market - Renton Airport	Renton Chamber of Commerce	White Horse Promotional Products, LLC
Fortin Group		
Falco Sult		
GLY Construction		
Hal Woosley Properties, Inc.		

 <b>Residential Supporters (to Date)</b>		
James Alberson - Renton	Dorothy Graham - Redmond	Bart Phillips - Redmond
Jeff Anderson - Issaquah	Stacy Graven - Clyde Hill	Shawna Pitts - Bothell
Dan Angellar - Redmond	Kevin Guieb - Maple Valley	Keri Pravitz - Bellevue
Meghan Altimore - Issaquah	Jim Hill - Bellevue	James Price - Newcastle
Heidi Archer - Redmond	David Hoffman - Renton	Malia Radford - Bellevue
Cornell Atwater - Newcastle	Kiwi Ijiomah - Seattle	Kelly Richardson - Issaquah
Ron Bailey - Bellevue	Ross Jacobson - Bellevue	Skip Rowley - Sammamish
Brittany Barker - Bellevue	Haley Jacobson - Bellevue	Donna Russell - Renton
Shiv Batra - Mercer Island	Denise Jannusch - Lynnwood	David Rule - Issaquah
Vicky Baxter - Renton	JD Klein - Redmond	Lauren Sanchez - Newcastle
Sam Baxter - Woodinville	Todd Langton - Sammamish	Peggy Schmitz - Bellevue
Putter Bert - Bellevue	Julie LaPrarie - Issaquah	Steve Schmitz - Bellevue
Bill Biggs - Woodinville	Jim Long - Redmond	Mark Schwartz - Renton
Nancy Bowman - Issaquah	Nicole Lukaris - Bellevue	Robert Shay - Bellevue
Brian Brand - Kirkland	Sandi MacCalla - Redmond	Kelly Snyder - Bothell
Melany Brown - Seattle	John Madden - Redmond	Susan E. Stead - Seattle
Minerva Butler - Redmond	Andrew Magill - Bellevue	Samantha St. John - Kirkland
Scott Coombs - Bellevue	Kari Magill - Bellevue	Diann Strom - Bellevue
Jeni Craswell - Redmond	Thomas Markl - Seattle	Gary Swofford - Redmond
Mark D'Amato - Bellevue	Carla Marrow - Medina	Christopher Thomas - Kirkland
Bernie Dochnahl - Renton	Campbell Mathewson - Kirkland	Dave Tomson - Kirkland
Denny Dochnahl - Renton	Sue McLaian - Issaquah	Frank Tonkin - Clyde Hill
Brett Durbin - Kirkland	Shona Milne - Woodinville	Heather Trescases - Bellevue
Gerry Eagle - Bothell	Mary Morrow - Bellevue	Kristi Tripple - Issaquah
Bill Finkbeiner - Kirkland	Edward Muna - Renton	Pat Vache - Redmond
Jennifer Fischer - Bellevue	Jens Nedrud - Woodinville	Raj Varma - Redmond
Syd France - Kirkland	Gloria Northcroft - Bellevue	Giles Velte - Newcastle
Alan Fulp - Mercer Island	Fred Nystrom - Issaquah	John Viacava - Bothell
Holly Gao - Redmond	John Oftebro - Redmond	Bob Wallace - Bellevue
Rick Gaines - Issaquah	Morgan Olson - Kirkland	Paul Wiegand - Bellevue
Tori Gaines - Issaquah	King Parker - Renton	T.J. Woosley - Bellevue



June 30, 2017

Heidi Bedwell  
 Energize Eastside EIS Program Manager  
 City of Bellevue Office of Planning & Community Development  
 450 110<sup>th</sup> Ave NE  
 Bellevue, WA 98004

Dear Ms. Bedwell:

I am a Bellevue resident and I also serve as the Executive Director of Bellevue LifeSpring. I am writing to submit comments regarding the Phase 2 DEIS for Energize Eastside.

OO12-A-1

In my capacity as the Executive Director, I serve the 3,700 children and their families living in poverty in Bellevue. I am very concerned with the "no action" alternative that is discussed in the DEIS. Our clients are often living paycheck to paycheck. They are constantly having to make decisions between paying rent and feeding their children. They are truly the most vulnerable in our community. If their power goes off, they lose what food they have in their refrigerator. They are unable to work because their children cannot attend day care or school. Rolling blackouts and/or a larger blackout due to a transformer failure (which we understand could take weeks to repair) would be devastating to our clients. A "no action" alternative is an irresponsible decision and would adversely impact our community.

I urge you to move forward with the least impactful, easiest to build alignment for this project.

OO12-A-2

Reliable power is a must have for all of us. For our clients, it is even more so. Energize Eastside is necessary to accommodate the growth we have had in our region and the growth to come. It is also necessary so that we can continue to provide valuable services to those in our community who most need our help.

Thank you for the opportunity to provide these comments.

Sincerely,

Jennifer Fischer  
 Executive Director, Bellevue LifeSpring  
 Bellevue Resident, 18021 SE 40<sup>th</sup> Place

OO12-A -1 Comment noted.  
 OO12-A -2 Comment noted.



June 29, 2017

Heidi Bedwell  
 Environmental Planning Manager  
 City of Bellevue Development Services Department  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

RE: Energize Eastside Phase 2 Draft EIS Comments

Dear Ms. Bedwell:

On behalf of the hospitals, health care facilities and medical providers on the Eastside, we are writing to share brief comments for the Energize Eastside Phase 2 Draft EIS.

Collectively, our organizations protect and provide for the health and well-being of our community's residents. Hospitals are the anchors that ensure medical expertise is accessible whenever needed. Operating a round-the-clock facility with an extensive array of services, staff, and technology prepared for any medical or disaster situation requires a sizeable infrastructure and reliable power. Indeed, power is the cornerstone with which we provide the safest care – most of our infrastructure in health care today is dependent upon power. Every day, thousands of people in our care are kept safe through ventilators, telemetry units, imaging machines, IV pumps, and so much more that all require consistent power to operate.

Furthermore, with the advent of the requirement to maintain electronic medical record systems, we need reliable power to ensure that we meet both the immediate and long-term regulatory requirements of our government and insurance providers, all while delivering a higher level of coordinated, quality medical care to our Eastside community members.

Though we plan and prepare extensively for downtime procedures in the event of an outage, and obviously maintain emergency power sources to keep the most critical services and technology operating during downtimes, the quality of care, safety and service to our patients is put a significant risk when such measures must be taken. No amount of preparation can replace the dependability of an automated process or machine to keep our community safe and healthy.

As outlined in the Phase 2 DEIS, the "no action" alternative – including delaying the project – would result in the potential for rolling blackouts for the greater Eastside. This action is not acceptable. Rolling blackouts would create a crippling effect on our ability to provide for the

OO13-A -1 Comment noted.

OO13-A -2 Comment noted.

OO13-A-1

OO13-A-2

OO13-A-2

care and safety of both those in facilities and the greater community at large. Hospitals are one of the few truly 24/7 businesses. We do not get to turn off our lights...every day, every minute we depend on the steady delivery of power to our buildings to save lives.

Without a reliable electrical infrastructure, that powers our hospitals and medical facilities in a consistent and reliable way, we will be unable to ensure that residents of the Eastside have access to the health care services they need in the most critical moments.

Health care systems have embarked for many years on emergency preparedness; however ongoing power outages will present a burden on our already overstretched organizations, creating undue work for our staff and providers, potential gaps in care for patients due to cancellations, and safety risks.

OO13-A-3

We support moving forward with the Energize Eastside project as a solution to our Eastside's electrical transmission deficiency and request we do so in a most timely manner. We must have reliable power to be able to continue to provide consistent and critical care, ensure we remain the safety net for the community's health and continue to advance the Eastside as one of the nation's premier regions in which to receive care, do business and live.

We appreciate the opportunity to provide these comments and look forward to the Energize Eastside project proceeding to construction as soon as possible.

Sincerely,



William Biggs  
Vice President, Administrative Services  
Kaiser Permanente



Robert H. Malte  
Chief Executive Officer  
EvergreenHealth



Caitlin Hillary Moulding  
Chief Strategy Officer  
Overlake Medical Center and Clinics



Todd Johnson  
Vice President, Facilities & Supply Chain  
Seattle Children's



Jeffery Robert  
Chief Operating Officer  
Swedish Issaquah

OO13-A -3 Comment noted.



RECEIVED

JUN 23 REC'D

Development Services

Attn: Heidi Bedwell, Environmental Planning Manager  
 City of Bellevue  
 Development Services Department  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

Re: Energize Eastside Phase 2 Draft EIS

Dear Ms. Bedwell,

There is no doubt that the Puget Sound Region is enjoying continued growth and a new level of business, corporations and manufacturing moving into the area. The city of Renton in the last 12 years has doubled its population from 57,000 to 117,000 in 2017. This growth is unprecedented and all indications are that it will continue to climb.

The power lines serving the cities of Renton and Bellevue were installed back in the sixties when our leading manufacturer Boeing was producing their first 727 airplanes. The rate of production continues to climb and Boeing is gearing up assembly to produce fifty-two 737 commercial airplanes by 2020. We also have seen the advent of 22 aerospace industries move into Renton to accommodate Boeing. In 2016 PACCAR introduced their 176,000-square-foot parts distribution center replacing an existing truck parts center half the size. This year we will see the addition of a Hyatt Regency Hotel along with 737,000 square feet of "class A" office space along Lake Washington and an additional two hotels in close proximity.

The last ten years has brought prosperity and jobs to our city along with new residents. The Renton Chamber is also a visitor center and daily we are sending relocation kits all over North America as people inquire about the quality of life in the northwest.

We are concerned about the future and the existing power lines that have not been upgraded to address the growth on the Eastside and the continued growth projected in the future. The Energize Eastside Phase 2 DEIS addresses both a no action alternative as well as the consequences of delay.

The disadvantages of delaying the project are that the risks of power outages that would be associated with the No Action Alternative could develop over time. It's also possible that the awareness of the risk of outages could discourage development within the Eastside that would place the Partner Cities at an economic disadvantage to other jurisdictions in the region.

In speaking with the General Manager of the Hyatt Hotel, he told me that a power outage would not only hurt the hotel with an existing event on site, but risk their future as no one will book a convention if power outages occur. This does not include the amount of money they would be liable for as hosts. The manufacturers also must pay wages and salaries to employees who may be unable to perform their assembly or testing due to a power outage. Delivery timelines and production schedules would be at risk, along with the effect on the community reliant on energy. These are huge risks and certainly would have immediate consequences and long term as well. A No Action alternative would not be consistent

625 So. 4th Street • Renton, WA 98057 • 425.226.4560 • fax: 425.226.4287 • email: info@GoRenton.com • www.GoRenton.com

OO14-A -1 Comment noted.

OO14-A-1

OO14-A-2

with city comprehensive plan policies and could lead to unavoidable significant adverse land use impacts in the long term. If unreliable power supply were to outweigh the regional factors amenable to growth and development leading to development inconsistent with regional growth plans and targets.

The Renton Chamber along with our 650 business members and stakeholders, urge the EIS team to finalize its work and proceed without delay so that this critical infrastructure project can be built and built on time. We need a technically feasible solution that will provide reliable power for all of us for the future.

We appreciate the opportunity to provide our feedback and comments.

Sincerely,

  
Vicky Baxter  
CEO

OO14-A -2 Comment noted.



June 20, 2017

Heidi Bedwell  
 Energize Eastside EIS Program Manager  
 City of Bellevue Office of Planning & Community Development  
 450 110<sup>th</sup> Ave NE  
 Bellevue, WA 98004

**RE: Energize Eastside Phase 2 DEIS Comments**

Dear Heidi:

On behalf of the Meydenbauer Center, thank you for the opportunity to submit comments for the Energize Eastside Phase 2 DEIS.

As I mentioned in our scoping letter and in our comment letter for Phase 1, Meydenbauer Center serves as the convention center for Bellevue and the Eastside region. Meydenbauer Center opened in 1993 as the Greater Seattle area's second largest convention facility and was built to grow and sustain Bellevue's economic vitality. The Center includes 54,000 square-feet of event space including 36,000 square foot Center Hall, and nine meeting rooms totaling 12,000 square-feet. Also included is a 2,500 square-foot Executive Conference Suite as well as a 410 seat performing arts theatre. In 2016 Meydenbauer Center hosted 265 conventions and events which brought over 150,000 attendees and provided over \$60 million in economic impact to the community and 2017 looks to be another strong year.

Our customers – the hotel community on the Eastside, community organizations, corporations and arts groups – rely on us to provide the highest in customer service and quality in the work we do and the events we host. To do that it is essential we have full confidence in our ability to provide reliable power for all of these events.

We are very concerned about the “no action/delay scenario” as discussed in the draft. Specifically, the Energize Eastside Phase 2 DEIS addresses both a no action alternative as well as the consequences of delay, as discussed in the following sections:

Chapter 2: Project Alternatives

- The disadvantages of delaying the project are that the risks of power outages (described in Chapter 1 of the Phase 1 Draft EIS) that would be associated with the No Action Alternative could develop over time.
- It is also possible that the awareness of the risk of outages could discourage development within the Eastside that would place the Partner Cities at an economic disadvantage to other jurisdictions in the region.

OO16-A -1 Comment noted.  
 OO16-A -2 Comment noted.

OO16-A-1

OO16-A-2



Chapter 6: Significant Unavoidable Adverse Impacts

- The No Action Alternative would not be consistent with city comprehensive plan policies, as discussed in the Phase 1 Draft EIS. The No Action Alternative could lead to unavoidable significant adverse land use impacts in the long term if unreliable power supply were to outweigh the regional factors amenable to growth and development, leading to development inconsistent with regional growth plans and targets.

OO16-A-3

In our business, we plan years in advance when booking conventions and events and we need to be able to communicate to our customers with 100% certainty that they will have everything they need if they choose our facility – including reliable power. With that in mind, the no action alternative is unacceptable. Even the prospect of rolling blackouts will negatively affect our ability to attract conventions and visitors to our facility and community. We must proceed with the solution that is least impactful and most certain to get built on time so that we are able to continue to meet the needs of our facility and our customers.

Thank you again for the opportunity to provide comments.

Sincerely,

Stacy Graven  
Chief Executive Officer  
[sgraven@meydenbauer.com](mailto:sgraven@meydenbauer.com)  
(425) 450-3780

OO16-A -3 While the EIS acknowledges inconsistencies with some comprehensive plan policies, it does not find that the land use impacts of the No Action Alternative would be significant.



May 9, 2017

Mayor Stokes and Members of the Council.

My name is Randy Bannecker and I am here on behalf of the Seattle King County Realtors to encourage your support for PSE's Energize Eastside project.

Our members place a very high value on the opportunity to work with home buyers and sellers in the City of Bellevue. The quality of life Bellevue residents enjoy is extraordinary.

It didn't just happen. This council and prior councils set the bar high on livability and economic vitality. It's worked and Bellevue continues to grow as technology and innovation center that attracts employers and employees from around the world.

OO17-A-1

We are concerned that not adding transmission capacity in our growing region threatens all of our good work.

The notion forced outages or rolling blackouts touching more than 200,000 customers is not consistent with a technology and innovation center. Nor is it consistent with great schools and great neighborhoods.

The transmission system has not been upgraded since the 1960s. It's time a thorough upgrade is made. Bellevue residents and businesses deserve reliable power.

Thank you for your attention to this important issue.

Sincerely,

Randy Bannecker

OO17-A -1 Comment noted.



June 21, 2017

Re: Energize Eastside Phase 2 Draft EIS

City of Bellevue  
 Development Services Department  
 Attn: Heidi Bedwell  
 450 110<sup>th</sup> Avenue NE  
 Bellevue, WA 98004

Ms. Bedwell,

Now that the Phase 2 Draft EIS for the Energize Project has been published, we are pleased to offer our comments for the public record. The Chamber represents businesses of all sizes and across all sectors, many of which consider reliable and predictably priced electricity, as a factor in determining whether Bellevue is the right place to locate and maintain their businesses over the long term.

Similarly, as a citywide organization, we believe uninterrupted access to electric power across all city neighborhoods, makes Bellevue a place where business owners and employees alike, will choose to work, live and play.

OO18-A-1

As a part of our correspondence regarding the Phase 1 Draft EIS, the Chamber offered unequivocal support for Alternative 1(a), providing a new substation (Richards Creek) and approximately 18 miles of new 230 kV electrical transmission lines. Upon review of the Phase 2 Draft EIS, particularly Chapter 2 PROJECT ALTERNATIVES, our position remains unchanged.

We believe Alternative 1 is the only alternative that provides the power infrastructure necessary to provide reliability to Bellevue businesses, over the near and long-term horizons. While the Chamber does not have a position on a preferred alignment, either through the Central or South Bellevue segments, we do prefer utilization of existing right of way, as we believe this will result in the least cost over the life of the project.

With respect to the No Action Alternative, we simply do not believe this will meet the projected demand for electricity in our community, as population and job growth continue. More specifically, we concur with the following statement from the Phase 2 DEIS, Chapter 2, Section 2.1.1:

OO18-A-2

“Implementation of the No Action Alternative would not meet PSE’s objectives for the proposed project, which are to maintain a reliable electrical system and to address a deficiency in transmission capacity on the Eastside. Implementation of the No Action Alternative would increase the risk to the Eastside of power outages or system damage during peak power events.”

Furthermore, while we agree that PSE should continue to lead the way in development of alternative energy sources and encourage conservation, we take strong exception to the notion that conservation alone will generate adequate supply or distribution capacity along PSE’s existing right-of-way.

OO18-A -1 PSE's Proposed Alignment as analyzed in the Final EIS is similar to the route followed by the Willow 1 Option as analyzed in the Phase 2 Draft EIS, and is entirely within the existing corridor.

OO18-A -2 Comment noted.

OO18-A-2

Again, the Phase 2 DEIS captures this reality quite well in Chapter 2, Section 2.3:

“At this time, there are no currently known, widely accepted technologies that PSE would employ that could feasibly and reliably address the transmission capacity deficiency on the Eastside.”

Finally, we note that for the Chamber and its member businesses, the preservation of public safety and health should always be given top priority, when implementing any large infrastructure projects. However, as we review Chapter 3, Section 3.9 ENVIRONMENTAL HEALTH – PIPELINE SAFETY, we find no evidence that colocation of 230 kV electrical transmission lines, alongside the Olympic Pipeline within the existing right-of-way, would pose an increased safety risk without opportunities for mitigation.

OO18-A-3

We believe it is time to move forward on this project, so that our community may enjoy its projected benefits and the project applicant may provide alternative-specific mitigation to individual property owners, as appropriate.

David Masin, Board Chair

Betty Capestany, President & CEO

Cc: Bellevue City Council  
Brad Miyake, City Manager

OO18-A -3 Comment noted.



June 20, 2017

Heidi Bedwell  
Environmental Planning Manager  
Development Services Department  
City of Bellevue  
P.O. Box 90012  
Bellevue, WA 98009 - 9012

**RE: BDA Comments for Energize Eastside Phase 2 Draft EIS**

Dear Ms. Bedwell:

On behalf of the Bellevue Downtown Association, we wish to share our comments on Energize Eastside Phase 2 Draft EIS.

Our members are greatly concerned about the projected deficiency in transmission capacity under the current system. Businesses and residents in Downtown Bellevue depend on reliable energy to sustain growth and fully operate. Updating the 50-year-old transmission line with proven infrastructure is paramount for the Eastside's economy. Rolling blackouts, possible as early as 2018 without the project, must be avoided.

We have strongly supported the environmental review process and the full reporting of potential impacts. Alternative 1: New Substation and 230 kV Transmission Lines is the only viable alternative. The BDA stands by our conclusion that the "No Action Alternative" would be detrimental to our economy and community as a whole. Alternative 1 is the responsible option to pursue. In addition to updating the system, the benefits of Alternative 1 include its use of the existing 115 kV transmission corridor, thereby reducing cases of eminent domain and vegetation loss.

We're encouraged to see mitigation measures listed for this Alternative and expect potential environmental impacts and pipeline safety to be addressed through the permitting process with the five Eastside cities. Permitting should be conducted in a timely manner, so Puget Sound Energy can adhere to its timeline of beginning construction by the summer of 2018.

Thank you for offering this public comment period and considering our feedback on this critical issue.

Sincerely,

Irene Plenefisch, BDA Board Chair

Patrick Bannon, BDA President

OO19-A-1

OO19-A-2

OO19-A -1    Comment noted.  
OO19-A -2    Comment noted.

7/6/2017

Weebly Email Service Mail - Support of Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**Support of Energize Eastside**

1 message

**Bart Phillips** <bartp@oneredmond.org>

Fri, Jun 16, 2017 at 2:28 PM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

Cc: "council@bellevuewa.gov" <council@bellevuewa.gov>

OneRedmond is a public-private partnership of over 85 leading businesses and the City of Redmond promoting the expansion of the Redmond and Eastside economy. We do that by recruiting new firms to the region, expanding and retaining existing firms and promoting public policy that supports both a vibrant business environment and healthy community within which to live and work.

There is no more important infrastructure project to the health of the Redmond and Eastside economy than Energize Eastside. Our technology businesses, the engine of our economy, can only operate in a region that has a robust quantity AND quality electric supply. PSE has estimated that both are at risk without the preferred alternative of Energize Eastside. OneRedmond has participated in the public process that identified the preferred alternative and is convinced that PSE has designed a project that provides the maximum benefit while minimizing impacts.

Time is of the essence if we are to avoid the load shedding, rolling blackouts and quality problems that would be devastating to our economy. We look forward to a timely conclusion of the review process and the start of construction of the project.

Thank you for your considerations of the comments.



**BART PHILLIPS, CEcD | CEO**

P: 425.885.4014 x101 | M: 360.607.3610

8383 158<sup>th</sup> Ave NE Suite 225 | Redmond, WA 98052

[www.oneredmond.org](http://www.oneredmond.org)



<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15cb2cee86a85605&siml=15cb2cee86a8...> 1/1

OO20-A -1 Comment noted.

OO20-A-1



**Greater Issaquah Chamber of Commerce**  
 Visitor Information Center & Salmon Days  
 155 NW Gilman Blvd.  
 Issaquah, WA 98027  
 IssaquahChamber.com  
 425-392-7024  
 425-392-0661-Salmon Days  
**Executive Director**  
 Kathy McCorry

**Mission Statement**  
*To cultivate a strong, competitive and innovative local economy for the benefit of the greater Issaquah community.*

**Board of Directors**  
**Chairman of the Board**  
 David Bletweiss  
**Past Chairman**  
 Alan Finkelstein  
**Chairman Elect**  
 Kari Magill  
**Vice Chairman**  
 William Shaw  
**Board Secretary**  
 Shannon Jallow  
**Treasurer**  
 Michael Bowers

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 Tori Gaines  
 Jennifer Hagge  
 Mike Hayes  
 Hamilton McCulloh  
 Erin McCullough  
 Wright Noel  
 Svetla Tzekov  
 Shannon Jallow  
 Tony Rehn

**Chairman's Circle**  
 Costco Wholesale  
 Evergreen Ford/Incoln/Chevrolet  
 Issaquah & Sammamish Reporter  
 Overlake Medical Clinics  
 Recology CleanScapes  
 Rowley Properties  
 Swedish Hospital  
 Umpqua Bank  
 Virginia Mason

June 14, 2016

Heidi Bedwell, Energize Eastside EIS Program Manager  
 City of Bellevue  
 Development Services Department  
 450 110th Ave NE  
 Bellevue, WA 98004

Dear Heidi:

**RE: Comment on Energize Eastside DEIS Phase 2**

The Greater Issaquah Chamber of Commerce would like to like to reiterate its support for *Energize Eastside* and its timely completion. In the Chamber's opinion, PSE's preferred alternative as outlined in the DEIS 2 continues to make the most sense for our members and the community. Efficient use of utility systems already in place will limit impact. Further, using an existing corridor should allow for PSE to expedite the project's permitting, construction and completion.

We have expressed our concerns in the past regarding power redundancy and the cost to our business community when we face power outages on a recurring basis. We cannot afford for our businesses nor want Issaquah as a whole to be placed in a situation similar to an outage due to inclement weather or accident in the future given the potential for rolling blackouts. Without action to upgrade the electrical transmission line, we fear real implications to our local economy. We have heard far too many times over the years about the painful loss of merchandise, workforce hours, revenue reduction and the inconvenience/cost to purchase and maintain a generator. Grocery stores, retail, office, service providers, and even some of our medical offices/hospitals have been negatively impacted when the power goes out. There have also been times when gas stations also suffered from the ability to provide as so many needed to rely upon a generator. Lastly and most importantly, an aging or incomplete electrical system impacts future development and growth when potential new businesses are making location decisions in a competitive environment.

The significance of *Energize Eastside* to provide infrastructure to our growing community is imperative. It is vital that additional power supply be brought to the Eastside without delay. Thank you for your efforts to this regard.

Respectfully,

Kathy McCorry  
 Executive Director

OO21-A -1 Comment noted.

OO21-A-1

6/13/2017

Weekly Email Service Mail - Energize Eastside EIS Phase 2 feedback from Somerset Recreation Club



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Phase 2 feedback from Somerset Recreation Club**

1 message

**Somerset Recreation Club** <somersetrecclub@gmail.com> Sun, Jun 11, 2017 at 9:52 PM  
 To: info@energizeeastsideeis.org  
 Cc: Eric Bidstrup <ericbidstrup@hotmail.com>, Rick Gratzler <rigratzler@comcast.net>

City of Bellevue  
 Development Services Department  
 450 110th Ave NE  
 Bellevue, WA 98004

Attn: Heidi Bedwell

Re: Energize Eastside Phase 2 EIS Feedback

The Somerset Recreation Club (SRC) is a 501(c)(3) public charity and has been a community hub for Somerset and surrounding neighborhoods since 1963. The current Puget Sound Energy (PSE) 115Kv transmission lines and proposed expanded energy transmission lines from the Energize Eastside (EE) project pass directly over SRC property. The current PSE power lines bisect the northwest corner of our property, run slightly to the west of our swimming pool and pass directly over our 2 tennis courts. Additionally, there are 4 PSE poles (in pairs of two) located on our property that support the current power lines.

0023-A-1 Somerset Recreation Club is extremely concerned about the impact of the EE project to both the economic viability of SRC's ability to continue to serve the public, and to SRC facilities. SRC previously submitted written feedback on the Energize Eastside Phase 1 EIS documents, and has not to date received any response to those questions and concerns. After a review of the Phase 2 EIS documents, it sadly appears that the questions and concerns raised during Phase 1 feedback were still not addressed and remain.

The SRC Board of Directors have reviewed the Phase 2 Draft EIS and are providing the City of Bellevue and PSE with our comments in this letter on the EIS documents for the key and relevant sections as they pertain to SRC.

0023-A-2 **Chapter 1 Section 1.3 - Need**

In Section 1.3, no data is provided to justify the need for the EE project. Inspection of PSE 10-K filings and other sources of information describing power consumption show that actual demand for power has dropped, not increased. PSE needs to be forthcoming with actual hard data and facts to justify the need for the EE project.

0023-A-3 **Chapter 3 Section 3.6 – Recreation (Long term operational Impacts and Potential mitigation)**

SRC is appropriately listed in the "Bellevue South Segment" list of sites in the EIS. It is worth noting that SRC is a 501(c)(3) public charity but does not currently receive federal, state, or local funds from governmental agencies. SRC operates on a modest budget, and is dependent on membership and usage fees for revenue. In addition, SRC receives rental income for leasing space to a telecommunications company for cellular equipment that is attached to one of the existing PSE transmission lines. PSE also receives income from this same company. Any negative impacts on SRC revenue sources due to EE project construction or lasting changes to SRC facilities would be fatal and catastrophic and put SRC out of business.

In section 3.6.5.10 (Oak 1 option), it's noted that for SRC: "One 65-foot H-frame would replace the two existing H-frames in a similar location. The poles would look different and five to 10 trees would be removed, but there would be no change to recreation uses. For

0023-A -1 See response to comment 0022-A-1.  
 0023-A -2 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included.

It is not within the scope of SEPA to require PSE to disclose their modeling assumptions. It is up to PSE to determine to whom they will release their proprietary data. The planning model, however, was reviewed by the EIS Consultant Team and found that PSE had used standard planning practices and had not modified any regional transmission planning assumptions beyond those recommended by ColumbiaGrid.

0023-A -3 Please see response to comment 0022-A-5 regarding reinstalling telecommunications equipment. The loss of revenue due to the displacement of telecom equipment that leases space on SRC land is outside the scope of the SEPA process and is not covered in the Final EIS.

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&view=pt&search=inbox&th=15c9aa52352405e1&siml=15c9aa52352405e1

1/3



6/13/2017

Weekly Email Service Mail - Energize Eastside EIS Phase 2 feedback from Somerset Recreation Club

0023-A-3

this reason, impacts would be less-than-significant. (Impacts would be the same for the Oak 2 and Willow 2 Options.)". SRC has the following questions and concerns:

- Any loss of rental income for cellar lease rental income would be significant and potentially catastrophic. SRC seeks binding written commitments from PSE to seamlessly partner with SRC and the telecommunication company to ensure a smooth transition of equipment (at PSE's expense) from existing poles to the new poles, and to fully reimburse SRC for any and all loss of revenue during this transition process. If the removal of old poles results in the current tenant canceling their lease with SRC, SRC requires full compensation for the remaining duration of the lease.
- The aesthetics of the SRC facility, which includes the vegetation, is a key component that attracts our members and drives membership. The removal of 5-10 trees will negatively impact this element. The EIS does not speak to what compensation would be offered to SRC for the loss of 5-10 trees, and SRC requests both a more detailed analysis of which specific trees would be removed and what compensation would be offered to SRC.

0023-A-4

In section 3.6.5.11 (Oak 2 option), it's noted that for SRC: "Two 85-foot poles would be placed in a similar location to the existing two H-frame structures on the site, and approximately five to 10 trees would be removed. The new poles would be taller, but there would be no change to recreational uses, and impacts would be less-than-significant." SRC has the same concerns noted above, but the specifics would be different given the different in poles.

**Chapter 3 Section 3.10 – Economics (Long term operational Impacts and Potential mitigation)**

The Phase 2 EIS document primarily focuses upon loss of property tax revenue to local cities impacted by the EE project, acknowledging that installation of larger transmission lines will have an impact on property values. On behalf of our members, SRC has strong objections to harming the economic interests of our members without any form of compensation. In addition, SRC has a direct vested interest in reduction of property values to SRC property. SRC was founded in 1963, and as an aging facility the Board of Directors is currently planning to renovate and modernize the facilities. These renovations will be funded from a variety sources: charitable donations, fund raising activities, and additional financing via loans. Negative impact on property values will have a direct impact on the amount of financing SRC will be able to produce.

0023-A-5

Additionally, SRC believes that the research cited in the Phase 2 EIS (Tatos et al 2016) is misleading and that other research that better reflects local market conditions relevant to EE should be used. The Tatos study that examined a broad range of property values in the Salt Lake City area from 2001-2014 cites a ~5% negative impact to property values for those properties immediately adjacent to 138kv lines, and a ~3% negative impact to those 50-100 meters away. However, research done on Seattle area homes (Bottemiller & Wolverson 2013) found a 11.2% negative impact on higher priced homes (such as are found in the areas impacted by EE) immediately adjacent to high voltage lines such as 230Kv. It's unclear and a bit suspicious why this data was not cited in the EIS.

**Chapter 4 Section 4.6 – Recreation (Short term operational Impacts and Potential mitigation)**

In section 4.6.2.2 (Impacts Common to All Segments and Options, it's noted: "Activities within a recreation site in the vicinity of construction may be limited for the duration of active construction (see Section 2.1.3, Construction, for details). For example, where a pole site is located within a park, the portion of the park nearby could be inaccessible for 3 to 7 days while work is being done." SRC is a seasonal business that operates from May thru September/October (renting the facility after the membership season end mid-September). If the construction occurred during our season, this would be significant and have a potentially fatal impact on revenue. SRC would require any construction to be done from November and finished before May to avoid significant impact.

0023-A-6

Also in section 4.6.2.2, Table 4.6-1 (Impacts to Recreation Sites in the Study Area by Segment) notes for the SRC:

- Oak 1 (page 4.6-9) "The Oak 1 Option is not near these sites." Based on the changes described in 3.6.5.10 noted above this would appear to be factually inaccurate. SRC requests clarifying information on what the short-term impact would be if Oak 1 was chosen.
- Willow 1 (page 4.6-11) "PSE would access the poles from Somerset PI SE. Construction would be visible, and access to the area near the poles may be limited. Although unlikely, it is possible that the club may be temporarily closed for up to 1 day during restringing of wires. PSE would work with the club to avoid disturbance to recreation activities. (Impacts would be the same for the Oak 2, Willow 1, and Willow 2 Options.)" As mentioned in our response to 4.6.2.2 SRC is a seasonal business that operates from May thru September/October (renting the facility after the membership season ends in mid-September). If the construction occurred during our season, this would be significant and have a potentially fatal impact on revenue. SRC would require any construction to be done from November and finished before May to avoid significant impact.

0023-A-7

**Additional note - Outreach and Coordination**

PSE met once with the SRC Board of Directors regarding the EE project in April 2016. PSE representatives were unprepared to discuss specific impacts and mitigation measures (e.g. potential reimbursement) that we would receive from PSE due to the impacts to our

0023-A -4

PSE will replace trees removed for the project based on tree protection ordinance for the City of Bellevue. The discussion of compensation is outside of the scope of SEPA. Please contact PSE directly.

0023-A -5

See response to comment II121-A-10.

0023-A -6

Although it is possible that the number of recreational visitors would be less than average during the 3 to 7 days construction would occur on the SRC property, it is unlikely that such a short-term reduction would result in significant impacts to SRC. Access to the property would be maintained during construction; therefore, reductions in use would more likely be the result of noise, dust, and other construction-related nuisances. Please see response to comment OO22-A-4.

With regard to Oak 1, Section 3.6.5.10 of the Phase 2 Draft EIS describes impacts associated with the Oak 2 Option. As stated in Section 3.6.5.9, "there would be no changes to PSE's existing corridor with the Oak 1 Option; thus, these recreation sites would not be affected and there would be no impact." PSE's Proposed Alignment as analyzed in the Final EIS is entirely within the existing corridor.

0023-A -7

See response to comment OO22-A-1.

OO23-A

COMMENT

RESPONSE

6/13/2017

Weekly Email Service Mail - Energize Eastside EIS Phase 2 feedback from Somerset Recreation Club

OO23-A-7

Club. The questions and concerns noted in SRC feedback on the Phase 1 EIS are still outstanding, and we now add the comments and questions here to that. SRC is disappointed and surprised PSE has not engaged SRC on these topics.

Thank you for reviewing this comment letter. We look forward to receiving comments through the EIS process that adequately address our questions and concerns.

Regards,

Somerset Recreational Club and its Members

4445 Somerset Blvd SE

Bellevue, WA 98006

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&view=pt&search=inbox&th=15c9aa52352405e1&siml=15c9aa52352405e1>

3/3



7/6/2017

Weebly Email Service Mail - Energize Eastside phase 2 comments



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside phase 2 comments**

1 message

**Pam Johnston** <pamjjo@msn.com>

Thu, Jul 6, 2017 at 3:16 AM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

City of Bellevue  
 Development Services Department  
 Attn: Heidi Bedwell, Environmental Planning Manager  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

- OO24-A-1 | Choose the no build option.
- OO24-A-2 | The BelRed area is no longer industrial. The new comprehensive plan calls for an Urban area. Bellevue neighborhoods are unfairly impacted.  
 POLICY S-BR-1. Implement the Bel-Red Subarea Plan in a manner that integrates the three dimensions of sustainability: sustainable economy, society, and environment; meeting the needs of the present without compromising the needs of future generations.  
 Energize Eastside is compromising the environment and shortening unnecessary resources that compromise future generations.
- OO24-A-3 | POLICY S-BR-4. Develop and implement a phased approach to new commercial development, so that transportation, open space, and other infrastructure is in place or committed to serve the needs of growth. This may include establishment of a year 2030 commercial development limitation consistent with the terms of an interlocal agreement with the city of Redmond, for the purpose of coordinating land use and mitigation between the two cities.  
 Energize Eastside does not account for this phased approach
- OO24-A-4 | UT-60. Work with Puget Sound Energy, telecom providers, state regulatory agencies, and other responsible parties to develop funding tools that enable full mitigation of the neighborhood impacts of deploying electrical and telecommunications infrastructure.  
 Neighborhood impacts are not being addressed. There are significant adverse impacts to scenic views.
- OO24-A-5 | UT-61. Allow new aerial telecommunication lines on existing systems provided that they shall be designed to address visual impacts and are required to be placed underground at the time of undergrounding electrical distribution lines.  
 Energize Eastside does not adequately address the visual impacts. There would be significant adverse impacts to scenic views.
- OO24-A-6 | UT-69. Avoid, when reasonably possible, locating overhead lines in greenbelt and open spaces as identified in the Parks and Open Space System Plan.  
 These areas have not been avoided. They have not been planned to underground.
- OO24-A-7 | UT-74. Encourage system practices intended to minimize the number and duration of interruptions to customer service.  
 Energize Eastside does not address the neighborhood problems
- OO24-A-8 | UT-75. Prior to seeking city approval for facilities, encourage utilities service providers to solicit community input on the siting of proposed facilities which may have a significant adverse impact on the surrounding community  
 Outreach was inadequate. Meetings without listening to the public is not outreach.
- OO24-A-9 | UT-94. Require in the planning, siting, and construction of all electrical facilities, systems, lines, and substations that the electrical utility strike a reasonable balance between potential health effects and the cost and impacts of mitigating those effects by taking reasonable cost-effective steps.  
 The balance is not reasonable.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d1766d29af639d&siml=15d1766d29af6...> 1/2

- OO24-A -1 | Comment noted.
- OO24-A -2 | See Section 3.1.2 of the Phase 2 Draft EIS for an analysis of the Bel-Red Subarea Plan.
- OO24-A -3 | Only policies relevant to the project were evaluated. For additional analysis on the Bel-Red Subarea plan, see Table 3.1-1 (specifically, the Bellevue Central Segment, Bypass Option 1 column) in the Phase 2 Draft EIS; and for analysis on the proposed project's consistency with applicable plans and policies, including the city comprehensive plans and any subarea policies in the study area, see Appendix B of the Phase 2 Draft EIS.
- OO24-A -4 | Impacts to neighborhood character are evaluated as part of the aesthetic environment analysis (see Section 3.2 of the Phase 2 Draft EIS). Consistency with UT-60 was not evaluated because it is intended to be used by the City to develop funding tools for mitigation. Potential mitigation measures are listed in Section 3.2.6 of the Phase 2 Draft EIS, and Section 4.2.6 and Appendix M of the Final EIS.
- OO24-A -5 | UT-61 is referring to telecommunication lines. See the response to comment I177-A-41 regarding telecommunications equipment on transmission lines. The project would not be inconsistent with UT-61. Impacts to scenic views were determined to be less-than-significant because of the low degree of additional new obstruction; see Section 4.2.5 of the Final EIS.
- OO24-A -6 | PSE's Proposed Alignment as analyzed in the Final EIS is entirely within the existing corridor, and no poles or transmission lines would be placed in locations where they currently do not exist.
- OO24-A -7 | The purpose of the project is to address a transmission deficiency, which would allow for improved redundancy throughout the Eastside. PSE predicted that the Eastside could face rolling blackouts by the winter of 2017/2018 if the transmission deficiency is not addressed. An increase in transmission capacity could lead to a decrease in the probability of rolling blackouts that would cause service interruptions, thereby staying consistent with this policy. In addition, Policy UT-74 has been added to Appendix B-3 of the Final EIS.
- OO24-A -8 | See response to comment I190-BB-3.
- OO24-A -9 | Based on the analysis in the EIS, health effects have been found to be less-than-significant, and appropriate mitigation measures have been identified that are not cost-prohibitive (see Sections 3.8 and 3.9 of the Phase 2 Draft EIS).

7/6/2017

Weebly Email Service Mail - Energize Eastside phase 2 comments

OO24-A-10

UT-95. Work with Puget Sound Energy to implement the electrical service system serving Bellevue in such a manner that new and expanded transmission and substation facilities are compatible and consistent with the local context and the land use pattern established in the Comprehensive Plan.  
 Discussion: Where feasible, electrical facilities should be sited within the area requiring additional service. Electrical facilities primarily serving commercial and mixed use areas should be located in commercial and mixed use areas, and not in areas that are primarily residential. Further, the siting and design of these facilities should incorporate measures to mitigate the visual impact on nearby residential areas. These considerations must be balanced with the community's need to have an adequate and reliable power supply.  
 Neighborhood are overly impacted

UT-96. Require siting analysis through the development review process for new facilities, and expanded facilities at sensitive sites, including a consideration of alternative sites and locations.  
 Discussion: Sensitive facility sites are those new facilities and existing facilities proposed to be expanded where located in or in close proximity to residentially-zoned districts such that there is potential for visual impacts absent appropriate siting and mitigation. The city will update Map UT-7 to the extent needed to stay current with changes in Puget Sound Energy's system planning.  
 Energize Eastside has failed to mitigate the impact to residential property

UT-99. Work with and encourage Puget Sound Energy to plan, site, build and maintain an electrical system that meets the needs of existing and future development, and provides highly reliable service for Bellevue customers.  
 Discussion: Providing highly reliable service is a critical expectation for the service provider, given the importance of reliable and uninterrupted electrical service for public safety and health, as well as convenience. Highly reliable service means there are few and infrequent outages, and when an unavoidable outage occurs it is of short duration and customers are frequently updated as to when power is likely to be restored. A highly reliable system will be designed, operated and maintained to keep pace with the expectations and needs of residents and businesses as well as evolving technologies and operating standards as they advance over  
 Energize Eastside does not address the specific reliability problems of neighborhoods

OO24-A-11

EN-12. Work toward a citywide tree canopy target of at least 40% canopy coverage that reflects our "City in a Park" character and maintain an action plan for meeting the target across multiple land use types including right-of-way, public lands, and residential and commercial uses.  
 Too much impact without mitigation in full

EN-13. Minimize the loss of tree canopy and natural areas due to transportation and infrastructure projects and mitigate for losses, where impacts are unavoidable.  
 Mitigation is inadequate.

Samela Johnston  
 3741 122nd Ave NE,  
 Bellevue 98005  
 Cense member

OO24-A -10 For the Phase 2 Draft EIS analysis, specific alignments were chosen for the alternatives, allowing an examination of impacts to the specific neighborhoods that would be crossed by the 230 kV transmission lines. As described in the Phase 2 Draft EIS, none of the alternatives considered in Phase 2 would require the condemnation or removal of homes in any neighborhood. For all alternatives, the transmission lines would be placed predominantly within PSE's existing right-of-way that already includes 115 kV lines. The same land uses would be present once the project was built as at present. For PSE's Proposed Alignment in the Final EIS, the entire project would be within the existing 115 kV corridor.

Visual impacts would vary among the communities that the project would traverse. These are described in the Phase 2 Draft EIS, Section 3.2. Design and siting factors that would decrease the visual impact to specific communities would be a part of the mitigation considered through the permit process, including the decision whether to underground the transmission lines in areas where the applicable plans discourage aerial facilities.

As described in the Phase 1 Draft EIS, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The Phase 1 Draft EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. Therefore, it is out of the scope of the EIS to address specific reliability problems in individual neighborhoods.

With regard to reliability, the project is focused on transmission reliability, which affect the region as well as the neighborhood; see response to comment OO1-C-3.

OO24-A -11 Comment noted.

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6/13/2017

Weebly Email Service Mail - I do NOT agree with the proposed 230 kV Transmission Lines



Energize Eastside EIS <info@energizeeastsideis.org>

**I do NOT agree with the proposed 230 kV Transmission Lines**

1 message

Jane Kim <janekimrealty@gmail.com>  
To: info@energizeeastsideis.org

Mon, May 8, 2017 at 9:55 PM

- II1-A-1 I just received your Notice of Public Hearings. In your "EIS Required" section, it states that "this proposal could have a significant adverse impact on the environment." Could? No, this WILL have a SIGNIFICANT NEGATIVE and detrimental impact on the community, our neighborhoods, and our home values.
- II1-A-2 I am not an Environmental Specialist or someone who studies how much electricity is needed. I think there are very few people who are. You are continually asking the public to comment on this project and we are vehemently opposed to it yet it feels like you just want to continually wear us down until we give in.
- II1-A-3 I am a Mom and I work full-time. We are busy trying to raise our children. We are not in the business of attending hearing after hearing and trying to analyze lengthy reports.
- II1-A-4 These huge lines that are being proposed WILL BUZZ 24 hours a day, 7 days a week, 365 days a year will completely ruin these neighborhoods. You are asking us to just live with that? A "few" suffer so that many can benefit? Really? This is the best you can do?
- II1-A-5 I see lots of research and numbers regarding how much energy is necessary in the coming years but I really don't see any numbers that show energy produced from households who are generating energy, energy being put back in the grid. We added solar panels to our home, I see many other neighbors doing the same. Where are the numbers for that? Did you know that in Vancouver BC, the consumption of energy is decreasing there from previous years due to consumers using more energy efficient products and installing solar panels?
- II1-A-6 This project is ugly and will be detrimental and dangerous in construction. If a worker hits the pipeline or knicks the line, it would cause a very large explosion and there would be MASSIVE loss of lives since this area is so concentrated with a large number of people.
- II1-A-6 I do not want this project built on the Eastside. There needs to be a better route AWAY from so many homes and people. The risk is too great to build this project here.

—  
Jane Kim  
Coldwell Banker Danforth  
Phone: 206-293-5263  
[www.janekimrealty.com](http://www.janekimrealty.com)

- II1-A -1 Comment noted.
- II1-A -2 Comment noted.
- II1-A -3 See response to comment II90-K-1.
- II1-A -4 PSE determined the need for the Energize Eastside project based on regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers. Ongoing conservation efforts implemented by PSE, including distributed generation facilities installed by their customers, was factored into the projected demand in the Eastside.
- II1-A -5 See response to comment II8-A-1.
- II1-A -6 Comment noted.

May 11, 2017

Heidi Bedwell  
City of Bellevue Development Services Department  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Comment for Energize Eastside Phase 2 Draft EIS

Dear Ms. Bedwell:

I am writing to submit comment on the Energize Eastside Phase 2 Draft EIS.

**This comment relates to pages 2-52 of the Phase 2 Draft EIS. In particular section 2.2.1 "Seattle City Light Transmission Line" option.**

In order to understand how this option works, one needs to be familiar with FERC's ProForma Open Access Transmission Tariff (OATT). The FERC ProForma Open Access Transmission Tariff can be found at: <https://www.ferc.gov/industries/electric/indus-act/oatt-reform/order-890-B/pro-forma-open-access.pdf>

Section 6 of the OATT discusses "Reciprocity". If SCL uses the lines of one or more FERC directly regulated utilities, then SCL will have agreed to these terms when they use those lines. Meaning under reciprocity, SCL agrees to also deal with requests for use of their transmission grid under the FERC OATT approach.

Other sections of interest to this SCL Transmission Line option are:

Section 15. Service Availability

Section 16. Transmission Customer Responsibility

Section 17. Procedures for arranging for Firm Point to Point transmission service

*[This section is particularly relevant to how PSE needs to ask SCL for use of its line to serve a new 230/115 KV transformer at Lakeside. There is a requirement to make a formal application in the format that is described in the OATT. PSE has never made such an application. An informal request does not meet the required format for making a request to use the SCL line. PSE needs to make this formal request to SCL].*

Section 19. Additional studies procedures for Firm Transmission

With an understanding of how FERC's OATT works, it is clear that just about every sentence in the discussion of the SCL option is incorrect, meaning these sentences are not consistent with the OATT.

First sentence:

*"SCL has indicated to the City of Bellevue that they expect to need the corridor for their own purposes and are not interested in sharing the corridor with PSE (SCL, 2014)."*

I12-A -1 Seattle City Light was contacted and provided the following response via email on May 23, 2017:

"Seattle is a non-jurisdictional utility under section 201(f) of the Federal Power Act, so Seattle is not required to file a ProForma Open Access Transmission Tariff (Tariff) with FERC. The reciprocity principle allows FERC jurisdictional utilities to decline to provide transmission service under their Tariff to a customer that fails to provide reciprocal service in return. Reciprocity does not require Seattle to file a Tariff with FERC. Seattle meets the reciprocity principle through its willingness to offer transmission service" (Leone-Woods, personal communication, 2017).

As stated in the Phase 2 Draft EIS Section 2.2.1, Seattle City Light has indicated previously that it does not have capacity to share.

I12-A-1

I12-A-1 The EIS staff should already be aware that FERC does not allow a utility like SCL to "hoard" its transmission capability. Further, the FERC OATT requires a utility like SCL to increase the rating of its infrastructure (with needed construction) if that is what it takes to honor a request for transmission and the requesting utility agrees to pay what FERC requires them to pay. No one has performed a System Impact Study (as required by the OATT) to see what it would take to honor a PSE request to use the SCL line to serve a new 230/115 KV transformer at Lakeside.

Second sentence:  
*"The existing SCL line would have to be rebuilt to provide a feasible solution for the Energize Eastside project, because the current rating of the SCL line is insufficient to meet PSE's needs (Strauch, personal communication, 2015)."*

I12-A-2 If it can be shown that the existing SCL line would need to be rebuilt to provide a feasible solution for the Energize Eastside project, then that is what the FERC OATT would require be done as long as PSE agrees to pay what FERC would require them to pay for that construction. Until a study is done, one cannot tell for sure what the rebuild cost would be. But it certainly would be less than the cost of Energize Eastside. Further, it should be clear that the request to use the SCL line is only for purposes of serving a new 230/115 KV transformer at Lakeside. The study to determine what this cost must not include a requirement to deliver 1,500 MW to Canada unless BPA makes that request and BPA would pay the bulk of the needed cost if the SCL line is also being used to increase the ability of BPA to deliver power to Canada.

Third Sentence:  
*"PSE has estimated that rebuilding the SCL line would provide sufficient capacity for a period of less than 10 years, which does not comply with PSE's electrical criteria (as described in Section 2.2.1 of the Phase 1 Draft EIS) to meet performance criteria for 10 years or more after construction."*

I12-A-3 Under the FERC OATT rules that SCL needs to comply with, SCL does not get to stop serving Lakeside after ten years even if SCL has a legitimate need for more use of its SCL line at that time. The FERC OATT has clear rules on how a utility like PSE can assure its transmission service from SCL can be retained even after SCL decides it needs the line for its own use. The FERC OATT protects a utility like PSE from SCL stopping to provide them transmission service.

Fourth Sentence:  
*"Neither the City nor PSE can compel SCL to allow the use of this corridor; therefore, this option is not feasible and was not carried forward."*

I12-A-4 This statement is wrong. PSE can compel SCL to use its line to serve a new 230/115 KV transformer by making a FERC Order 888 request (under the FERC OATT) for such transmission service. If SCL refuses, FERC will compel them to do so. FERC uses its "reciprocity" ruling to compel SCL. If SCL refuses, FERC will refuse to let SCL use any transmission lines that are under direct FERC jurisdiction. SCL could not meaningfully its service obligations to its own customers without using the transmission lines of FERC directly jurisdictional utilities.

I12-A-5 Fifth Sentence:

I12-A -2 Alternative 1, Option B, was not brought forward for additional analysis in the Phase 2 Draft EIS for the reasons described in Section 2.2 of the Phase 2 Draft EIS. A full cost comparison of the various alternatives was not assessed because it is not required under SEPA. As the electric utility provider for the Eastside, PSE is responsible for determining the most cost-effective method for delivering reliable electric power. PSE has concluded that the most effective and cost-effective solution to meet its objectives is to site a new 230 kV transformer in the center of the Eastside (Stantec, 2015) (see Section 1.3 of the Phase 1 and 2 Draft EISs). Regarding the FERC OATT issue, see response to comment I12-A-1.

I12-A -3 See response to comment I12-A-1.

I12-A -4 See response to comment I12-A-1.

I12-A -5 See response to comment I12-A-1. Also, as described in the Phase 2 Draft EIS, PSE has stated that the conditions driving the need for the new transformer could arise by winter of 2017-2018 or summer of 2018. Even if the SCL lines were available, permitting for the substation and transmission connections would be needed prior to construction. To the extent the comments indicate FERC requirements are premised on applicability of FERC rules regarding sharing of service, FERC has not exercised jurisdiction when, as here, the Energize Eastside project is located wholly within PSE's service territory and PSE does not seek cost allocation from other regional utilities (FERC, 2015).

I12-A-5

"Even if compelled use of the corridor were allowed, the negotiations would likely prove lengthy, and would likely preclude completion of the project within the required timeline to meet project objectives."

The FERC OATT has tight timelines for dealing with requests for transmission service. FERC intentionally put in these tight timelines to prohibit a utility like SCL from denying service by delaying service. Further, PSE currently is not saying when it thinks it needs a new 230/115 KV transformer to be in service at Lakeside. Any needed construction on the existing SCL line will take considerably less time than permitting and building EE. Further, according to the only reasonable load flow study done regarding serving the east side (the Lauckhart-Schiffman Load Flow study), there is plenty of time before any new 230/115 KV transformer is needed at Lakeside.

Thank you for the opportunity to clarify how this SCL Transmission Line option would work.

Sincerely,



Richard Lauckhart  
Energy Consultant  
Davis, California  
530-759-9390  
lauckjr@hotmail.com

May 12, 2017

Heidi Bedwell  
 City of Bellevue Development Services Department  
 450 110<sup>th</sup> Avenue NE  
 Bellevue, WA 98004

Re: Comment for Energize Eastside Phase 2 Draft EIS

Dear Ms. Bedwell:

I am writing to submit comments on the Energize Eastside Phase 2 Draft EIS.

These comments relate to section 2-2 of the Phase 2 Draft EIS. In particular section 2.1.1 “No Action Alternative”.

**The Phase 2 Draft EIS Contains Technically Unsound Information**

Summary

I12-B-1 As indicated in a number of places in the EIS record<sup>1</sup>, Energize Eastside will provide no increased reliability benefit to the Eastside. When a utility is determining the need for a new transmission line, they perform a load flow study. This is present day industry standard. The load flow study serves as the primary basis for the decision of whether or not a transmission project is needed.

I12-B-2 The assumptions used in the load flow study that PSE claims to have run would result in power outages in the entire Puget Sound Region whether or not Energize Eastside is built. A load flow study that is run with proper grid operation assumptions demonstrates there is no need for Energize Eastside to avoid outages on the Eastside. **Therefore, under the “no action” alternative, the Phase 2 Draft EIS should conclude that a decision not to build Energize Eastside will not result in any more blackouts on the Eastside than if Energize Eastside were to be built. Yet this is not what the Phase 2 Draft EIS states.**

Background

I12-B-3 The May 8, 2017 Phase 2 Draft EIS includes a discussion of the “No Action” alternative. The following language is included in that discussion:

*“Implementation of the No Action Alternative would not meet PSE’s objectives for the proposed project, which are to maintain a reliable electrical system and to address a deficiency in transmission capacity on the Eastside. Implementation of the No Action Alternative would increase the risk to the Eastside of power outages or system damage during peak power events.”*

<sup>1</sup> See (1) Lauckhart-Schiffmann load flow study dated February 28, 2016, (2) August 1, 2016 document referenced in 2a on bottom of page 2 and top of page 3 of this paper, and (3) May 31, 2016 document reference at 2 on page 4 of this paper.

I12-B -1 Comment noted. As discussed in the Phase 1 and Phase 2 DEISs, the EIS Consultant Team did review the planning model and found that PSE had used standard planning practices. In determining the capacity deficiency for 2024, PSE used best available data and industry-standard utility planning modeling.

I12-B -2 See response to comment I12-B-1.

I12-B -3 PSE identified a capacity deficiency for 2024, which is summarized in the *Energize Eastside Needs Assessment*. Implementation of the No Action Alternative would not address the stated transmission capacity deficiency while also meeting the project objectives identified by PSE. Details on the project objectives, including PSE’s electrical and non-electrical criteria, are described in detail in Chapters 1 and 2 of the Phase 1 Draft EIS.

The potential for rolling blackouts caused by a shortfall in transmission capacity in the Eastside was estimated to occur in winter 2017/2018 or by summer 2018. This estimate does not mean that rolling blackouts would absolutely occur by that timeframe, but rather that PSE has seen that the potential for rolling blackouts could arise by then, which is why PSE began planning for the Energize Eastside project years before the potential shortfall would occur. Due to the uncertainty with timing of permits and the EIS process, the project could begin construction before the potential for rolling blackouts starts, but would not be completed until after the estimated winter 2017/2018 or summer 2018 timeframe. This does not preclude the selection of PSE’s Proposed Alignment, however, as it is still the alternative that PSE maintains will accomplish the objectives that it has identified for the project.

I12-B-3 As pointed out in the many documents in the EIS record, there is no legitimate evidence on the record that this statement is true. In fact, the evidence in the record indicates that this statement is false.

**Facts**

The Eastside has had numerous power outages in the past and will continue to have power outages in the future. These outages are primarily caused by wind blowing trees and limbs into the local overhead 12 KV distribution lines. Energize Eastside will do nothing to decrease these outages in the future.

I12-B-4 PSE claims that Energize Eastside will avoid outages on the Eastside under a scenario where:

- 1) Very cold weather (i.e. 23 degrees or lower) occurs on the Eastside during morning or evening peak load hours - an event that normally occurs only once every few years
- 2) At that same time, 1,500 MW is being delivered to Canada. This is a tremendous amount of power. However:

I12-B-5 a. There is no firm requirement to deliver 1,500 MW to Canada under such an event. [See comments filed to the EIS by Christina Aron-Sycz dated August 1, 2016 which includes a white paper entitled "Evidence that there is no requirement to deliver 1,500 MW to Canada on a Firm Basis-Resulting Conclusion is that Energize Eastside is not needed."], and

b. The entire Puget Sound Region would experience blackouts caused by insufficient voltage levels if 1,500 MW is delivered to Canada during such a cold weather event. *There simply isn't enough power currently available that can be moved into the Puget Sound Region to serve all the load in the region (including serving all of PSE's 1.1 million customers) during peak winter load conditions and to send 1500 MW of power to Canada. Building a new transmission line (Energize Eastside) does not bring more power into the Puget Sound Region.*

3) According to PSE's needs assessment, at the same time as the above (very cold weather, 1,500 MW being sent to Canada) PSE/Quanta's Load Flow Study assumed that six of PSE's Puget Sound Area generators would be shut down. This is something that PSE would never do during such a cold event. Here is why:

I12-B-6 a. Energize Eastside is a transmission line. Transmission lines need generation to have power to transmit. Without these six generators running, PSE would not be able to meet its own Total System Load and would be in violation of their duties.

b. The entire Puget Sound Region (including the service territory of PSE, Seattle City Light, Snohomish PUD, Tacoma City Light and other small utilities in the region, not just the Eastside) would experience blackouts caused by low system voltage if six Puget Sound Area generators are shut down during such a cold weather event even if 1,500 MW isn't being sent to Canada.

I12-B -4 PSE has proposed the Energize Eastside project as a way to address a transmission capacity deficiency in the Eastside. It is acknowledged that power outages can be caused by a number of factors, including damage caused by tree limbs during storm events striking distribution lines. Distribution lines are both more numerous and more susceptible to storm damage than transmission lines, and are not the subject of the Energize Eastside project. Attempting to specifically predict or estimate the probability of events that could lead to load shedding is nearly impossible because of the number of potential scenarios and permutations.

I12-B -5 PSE used the 1,500 MW value set in its agreements with the regional planning authorities, specifically from the ColumbiaGrid Biennial Plan. PSE also found that they could have a deficiency within the Eastside even without this load being placed on the transmission grid.

The Energize Eastside project is not designed to address a generation shortfall but rather a transmission shortfall in the Eastside service area. Therefore, there has been no verification for this EIS of the statement regarding insufficient power to serve all the load in the Puget Sound Region while also delivering 1500 MW to Canada.

I12-B -6 This scenario is covered in the response to Lauckhart/Schiffman study finding #2 (under Key Theme OBJ-3) in the Comments and Responses for the Phase 1 Draft EIS, which is included as Appendix J of the Final EIS.

I12-B-7 4) Lastly, in addition to 1) cold weather, 2) 1,500 MW being sent to Canada, and 3) six generators being offline, PSE assumes two major 230/115 KV transformers would be out of service. This is a preposterous scenario. *Since all these other things cannot happen at the same time without there being blackouts throughout PSE's entire service territory caused by too low of voltage. This scenario makes no sense.*

I12-B-8 **The most important thing for you to know is that the PSE scenario (described above) is a hypothetical scenario that will never occur because system operators would not allow it to happen.** If system operators allowed the system to operate in the manner that PSE postulates it used in its load flow study, the Puget Sound region in total would experience blackouts caused by low voltage. **The above facts refute PSE's statement that Energize Eastside will increase the reliability of power supply to the Eastside.**

Both myself and CENSE.org entered a number of documents into the EIS record that provide evidence that Energize Eastside will not reduce the number of outages on the Eastside. These documents include:

I12-B-9 1) The Lauckhart-Schiffman Load Flow Study and the report associated with that load flow study. The report is titled "*Load Flow Modeling for Energize Eastside*". It is dated February 18, 2016.

a. While PSE and Stantec have criticized the Lauckhart-Schiffman load flow study, these criticisms have been fully rebutted. [See attachment in email from myself to EnergizeEastsideEIS dated April 29, 2016]

b. In the April 29, 2016 document referenced above, I asked PSE, Stantec (the outside consulted PSE hired to perform their load flow study) and the EIS staff to provide documentation to support their attempt to discredit my load flow study. To this date neither PSE, Stantec, nor the EIS staff have produced such documentation. All indications are that such supporting documentation does not exist and that my load flow study is fully credible.

I12-B-10 2) A document submitted by Christina Aron-Sycz on May 31, 2016 entitled "*Environmental Impacts if Energize Eastside (EE) is not built (i.e. "No Action" on EE)*". This document provides a thorough analysis of the actions that would be taken if grid system operators attempted to run the system the way that PSE claims as the basis for Energize Eastside (peak demand on a very cold winter day, 1,500 MW being sent to Canada, six local generators offline, and failure of two transformers). My document fully explains that system operators would not allow the system to be run the way PSE postulates it would need to be run in order for Energize Eastside to have reliability value. **That document makes it clear that Energize Eastside provides no measurable reliability benefit to the Eastside and that blackouts will not occur if Energize Eastside is not built.**

I12-B -7 See response to comment I12B-6.

I12-B -8 It is acknowledged that failure of components of PSE's system simultaneously with a high demand period due to high or low temperatures is not a common event. NERC standards require PSE models to "stress the system" to ensure that PSE's system would operate without damaging other parts of the grid when such stresses occur.

I12-B -9 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The Lead Agency has limited authority under SEPA to question an applicant's stated objectives. SEPA does not authorize agencies to determine whether or not the project is needed. The EIS does take into account the project objectives in establishing what alternatives should be included. PSE's Eastside Needs Assessment Report prepared by PSE, the Supplemental Eastside Needs Assessment Report prepared by Quanta Technology and PSE, and the City of Bellevue's Independent Technical Analysis prepared by Utility System Efficiencies, Inc. each found the project is needed. Stantec reviewed those analyses and found them to be in accord with standard industry practice for electrical system planning. Stantec did not perform a load flow study as stated in the comment. For the EIS, this was a reasonable approach to define alternatives to be evaluated.

With regard to the Lauckhart-Schiffman Load Flow Study, PSE provided responses that were reviewed by Stantec and found to be consistent with Stantec's previous review of the Needs Assessment. Further analysis of the need for the project is not necessary for SEPA purposes.

I12-B -10 See response to Key Theme OBJ-3 (Lauckhart/Schiffman study finding #2) in Appendix J of the Final EIS for an explanation of why a scenario that includes failure of components of PSE's system simultaneously with a high demand period due to high or low temperatures was chosen for PSE's planning model. Also see response to comment O01-C-3 regarding reliability measurement.

Conclusion

II2-B-11

The scenario that PSE claims as the basis for Energize Eastside could never happen because it violates the “laws of grid operation”. Therefore PSE has no legitimate claim to build an eighteen mile, 230 kV transmission line through the heart of your communities. PSE claims that this high voltage power line is needed to increase the electrical reliability of the Eastside. These claims are false because the basis used to justify its need is impossible. The Lauckhart-Schiffman Load Flow Study (which uses PSE’s own Base Case data set for heavy winter loading in the winter of 2017-18) demonstrates that Energize Eastside will provide no measurable reliability benefit to the Eastside.

II2-B-12

**Therefore, the No Action alternative will not result in any blackouts (caused by load shedding or otherwise) on the Eastside or elsewhere on the grid and the Phase 2 Draft EIS statement is incorrect.**

Thank you for the opportunity to comment on the No Action Alternative.

Sincerely,



Richard Lauckhart  
Energy Consultant  
Davis, California  
530-759-9390  
lauckjr@hotmail.com

II2-B -11 See response to comment II-B-10.

II2-B -12 Comment noted.

6/13/2017

Weebly Email Service Mail - Comment on Energize Eastside Phase 2 Draft EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Comment on Energize Eastside Phase 2 Draft EIS**

1 message

Richard <rlauckjr@hotmail.com>

Fri, Jun 2, 2017 at 9:40 AM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

Dear Energize Eastside EIS...

I12-C-1 | Please include the attached letter as a comment on the Energize Eastside Phase 2 Draft EIS. Also include the attached copy of the FERC ProForma Open Access Transmission Tariff in the record of the Energize Eastside Phase 2 Draft EIS.

I12-C-2 | These comments and associated attachment supplement my May 11 comments related to the Seattle City Light Transmission Line Option.

Richard Lauckhart

**2 attachments**

Comment providing full OATT.pdf  
306K

Pro-Forma Open Access Transmissino Tariff.pdf  
385K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&view=pt&search=inbox&th=15c69ae67d7833e6&siml=15c69ae67d7833e6>

1/1

I12-C -1 Comment noted.

I12-C -2 Comment noted.

June 2, 2017

Heidi Bedwell  
City of Bellevue Development Services Department  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Comment for Energize Eastside Phase 2 Draft EIS

Dear Ms. Bedwell:

I am writing to submit comment on the Energize Eastside Phase 2 Draft EIS.

On May 11, 2017 I sent you comments on the Phase 2 Draft EIS. In particular I commented on section 2.2.1 "Seattle City Light Transmission Line" option.

In those comments I provided a "link" to the FERC ProForm Open Access Transmission Tarriff (OATT).

For completeness in the Energize Eastside EIS record, **by this comment I am providing that FERC ProForma Open Access Transmission Tariff in its entirety**. It is attached to the email sending this comment to you. Please include this entire FERC ProForma Open Access Transmission Tariff in the record of comments filed in the Energize Eastside Phase 2 Draft EIS.

Thank you.

Sincerely,



Richard Lauckhart  
Energy Consultant  
44475 Clubhouse Drive  
Davis, California  
530-759-9390  
lauckjr@hotmail.com

May 17, 2017

Heidi Bedwell  
 City of Bellevue Development Services Department  
 450 110<sup>th</sup> Avenue NE  
 Bellevue, WA 98004

Re: Comment for Energize Eastside Phase 2 Draft EIS

Dear Ms. Bedwell:

I am writing to submit comments on the Energize Eastside Phase 2 Draft EIS.

**These comments relate to the “need” for Energize Eastside**

I12-D-1 As I have mentioned in previous submissions, the need for Energize Eastside has never been established. I have provided significant documentation which supports the idea that it is not only not needed, but that PSE is attempting to push this project through using multiple baseless justifications.

I12-D-2 The debate on need is rooted in a dispute about a proper load flow study. What keeps us from an open and honest discussion of the facts on which this entire project is based is PSE’s refusal to allow any kind of scrutiny into the assumptions used by Quanta in load flow studies which they conducted for PSE. These studies, along with the studies conducted by USE, are the centerpieces of the justification for Energize Eastside.

I12-D-3 PSE continues to refuse to show the details of the Quanta load flow study despite multiple requests and despite the fact that the Federal Energy Regulatory Commission (FERC) says I have a legitimate need to see this information. Yet the EIS process continues to march forward, presumably to its completion, while multiple red flags exist concerning how Quanta did their load flow study. The EIS staff continues to sidestep any real resolution of these red flags.

I12-D-4 A \$200-\$300 million project with devastating and irrevocable consequences cannot be subject of guess work. No permit for Energize Eastside should be issued until a truly transparent, scientific process has been completed.

I12-D-5 A new load flow study needs to be done in an open and transparent fashion with input from all stakeholders. That is what I asked FERC to require ColumbiaGrid to do. But FERC said that since PSE had not asked for Energize Eastside to be a part of the Regional Plan, then Energize Eastside is not subject to Order 1000. If PSE had asked for Energize Eastside to be part of the regional plan, this would have required ColumbiaGrid to do the studies in an open and transparent fashion with full stakeholder input. The ColumbiaGrid Regional Plan looks out over a ten-year planning horizon and identifies the transmission additions necessary to ensure that the parties to the ColumbiaGrid Planning and Expansion Functional Agreement can meet their commitments to serve regional load and meet firm transmission service commitments.

I12-D -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”).

I12-D -2 See response to comment I131-A-6.

I12-D -3 See response to comment I131-A-6.

I12-D -4 Comment noted.

I12-D -5 This is outside the scope of the SEPA process. The Partner Cities cannot compel PSE, FERC, or Columbia Grid to consider the project to be part of a regional Plan.

I12-D-5 It appears there were many reasons that PSE chose not to ask for Energize Eastside to be a part of a Regional Plan. I believe this was a deliberate step on their part.

I12-D-6 • If Energize Eastside were part of a regional plan, then FERC would say how much BPA would pay for Energize Eastside BPA would pay PSE. By doing that, PSE pays less out of its own pocket. And that would mean a smaller increase in the PSE ratebase. Which means smaller PSE investment that will be given the 9.8% return by the WUTC. Macquarie wants to invest more money in PSE new ratebase. It does not help if BPA pays a lot of that money because that reduces what Macquarie spends and therefore the amount of the return on the investment.

I12-D-7 • If part of a Regional Plan, ColumbiaGrid would have been required to do the studies (not Quanta) and ColumbiaGrid studies would have to be done in an open and transparent fashion with stakeholder input, and

I12-D-8 • If part of a Regional Plan, then stakeholders would also get to identify alternatives. Those alternatives would include, for example,

- Meeting any identified needs with DSM
- Simply increasing the capacity of the Talbot Hill transformer
- Building a small peaker plant somewhere on the Eastside
- Utilizing the SCL Transmission line option.

I12-D-9 According to section 1.3 of the EIS, *“the lead agency is responsible for ensuring that a proposal that is the subject of environmental review is properly defined. The process of defining the proposal includes an understanding of the need for the project, to enable a thorough understanding of the project’s objectives.”* Without an open and transparent load flow study with stakeholder input, there can be no shared understanding of the need for the project. The EIS staff needs to ensure full accordance with this statement before the EIS is finalized.

Sincerely,



Richard Lauckhart  
Energy Consultant  
44475 Clubhouse Drive  
Davis, California 95618  
530-759-9390  
[lauckjr@hotmail.com](mailto:lauckjr@hotmail.com)

I12-D -6 See response to comment I16-A-2.

I12-D -7 Comment noted.

I12-D -8 Comment noted.

I12-D -9 As discussed in the Phase 1 and Phase 2 DEISs, the EIS Consultant Team did review the planning model and found that PSE had used standard planning practices. In determining the capacity deficiency for 2024, PSE used best available data and industry-standard utility planning methods and modeling. Also see response to comment I12-D-1.

6/29/2017

Weebly Email Service Mail - Fw: BLOWING THE WHISTLE on PSE's Energize Eastside Project



Energize Eastside EIS <info@energizeeastsideeis.org>

**Fw: BLOWING THE WHISTLE on PSE's Energize Eastside Project**

2 messages

Richard <lauckjr@hotmail.com>

Mon, May 8, 2017 at 11:45 AM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

Dear EnergizeEastside EIS staff-

Please include the email below and the three attachments with the comments you receive in the public comment period on the Phase 2 Draft EIS.

Thanks.

Richard Lauckhart  
Energy Consultant  
Davis, California

**From:** Richard <lauckjr@hotmail.com>

**Sent:** Wednesday, March 8, 2017 9:10 PM

**To:** jstokes@bellevuewa.gov; jhelminiak@bellevuewa.gov; cleo@bellevuewa.gov; j.robertson@bellevuewa.gov; lrobinson@bellevuewa.gov; krwallace@bellevuewa.gov; jpascal@kirklandwa.gov; psweet@kirklandwa.gov; tnixon@kirklandwa.gov; dasher@kirklandwa.gov; dmarchione@kirklandwa.gov; richc@ci.newcastle.wa.us; gordonb@ci.newcastle.wa.us; lindan@ci.newcastle.wa.us; carols@ci.newcastle.wa.us; allend@ci.newcastle.wa.us; johndr@ci.newcastle.wa.us; johnd@ci.newcastle.wa.us; abimey@redmond.gov; dcarson@redmond.gov; hmargeson@redmond.gov; hmyers@redmond.gov; bcshutz@redmond.gov; jstilin@redmond.gov; council@rentonwa.gov; EBCC@bellevuewa.gov

**Subject:** BLOWING THE WHISTLE on PSE's Energize Eastside Project

City Council Members and staff -

Over the past two years, I have spent considerable time and energy investigating PSE's proposed Energize Eastside project. I am an energy consultant who worked for Puget for 22 years, most notably as vice president of power planning. I keep abreast of all new projects in the Pacific Northwest, and two years ago I learned that PSE wishes to build 18 miles of new, high voltage transmission lines through the Eastside. I assumed when I read through the documentation surrounding this project that everything would check out. Instead, I came to quite the opposite conclusion.

I have investigated this project on a deeply technical level, for no compensation whatsoever, because I am compelled by my conscience. I am shocked and dismayed that the company where

<https://mail.google.com/mail/u/1/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15ca82af44c82ce6&siml=15be9612fd62...> 1/3

I12-E -1 See response to comment I132-A-1 and response to comment I12-D-1.

I12-E-1



6/29/2017

Weebly Email Service Mail - Fw: BLOWING THE WHISTLE on PSE's Energize Eastside Project

I spent the bulk of my career would try to put forth a project that at its best is baseless, and at its worst, a deceptive attempt by PSE to get a deeply flawed, yet highly profitable project into their rate base.

I'm reaching out to you today because I recognize that PSE is putting you in a difficult position. As much as I respect the important role you play in your community, you are not experienced transmission planners. Yet due to the way transmission projects are permitted in the state of Washington, you are being expected to fully vet a highly complex transmission project that, if permitted, will have a devastating impact on your community. I know that PSE's motto is "just trust us, it's too complicated for you." However, your constituents are counting on you to represent their concerns and to force PSE to be transparent about things that up until now have been opaque. PSE is counting on the fact that you will not do a deep dive into this project. It is a sad truth that a project of this cost and magnitude could be built through your communities with no vetting by anyone highly experienced in Pacific Northwest transmission planning other than PSE, which stands to gain financially from this project.

I12-E-1

Based on my thorough investigation, I must conclude that PSE's main goal in building this line is to reap the generous 9.8% rate of return allowed on projects like this. This will yield PSE over a billion dollars over the next 40-50 years. The project will not measurably improve reliability on the Eastside and may in fact significantly increase other risks, like those of a catastrophic pipeline fire. However disappointing this is, it is not unusual in our country. The media is full of reports on the "death spiral" of old fashioned utilities, and despite its seemingly progressive nature, Washington is not one of the states that has made significant overhauls to its incentive programs for utilities to invest in smart, clean tech.

In order to "blow the whistle" on this project, I have written two detailed papers. I have also prepared a slideshow that provides an overview of what is in the two papers and enhances the message with graphics. I have attached all three to this message.

I would be happy to talk to you individually or in a work session if you are interested. I'm also happy to answer any questions you have about my documents. You can reach me by responding to this email.

Sincerely,

Richard Lauckhart

Energy Consultant

Davis, California

3 attachments

 **Blowing the Whistle slide show.pdf**

<https://mail.google.com/mail/u/1/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15ca82af44c82ce6&siml=15be9612fd62...> 2/3

6/29/2017 Weebly Email Service Mail - Fw: BLOWING THE WHISTLE on PSE's Energize Eastside Project

1532K

 **Motive.pdf**  
582K

 **Setting the record straight on Energize Eastside Technical Facts.pdf**  
522K

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**Energize Eastside EIS** <info@energizeeastsideeis.org>  
Draft To: lbenson@esassoc.com

Wed, Jun 14, 2017 at 12:53 PM

[Quoted text hidden]

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**3 attachments**

 **Blowing the Whistle slide show.pdf**  
1532K

 **Motive.pdf**  
582K

 **Setting the record straight on Energize Eastside Technical Facts.pdf**  
522K

<https://mail.google.com/mail/u/1/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15ca82af44c82ce6&siml=15be9612fdd62...> 3/3

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I13-A-1	I am completely against the Phase 2, Bellevue Central Segment Bypass Option 2. There is no reason this should be the new route. The existing route is already accepted as a "Utility" path and the easement is already established. The impact of bypass option 2 is terrible!	5/11/2017 9:45:02	Tom	McGoff
I13-A-2	It would visually pollute the Lake Hills Connector road and Kelsey Park nature area and be an awful eyesore along Richards Road.			

I13-A -1 The Bellevue Central Segment Bypass Option 2 route was analyzed in the Phase 2 Draft EIS. The route, however, was not brought forward for additional analysis and is not part of PSE's Proposed Alignment, as presented in the Final EIS.

I13-A -2 Section 3.2.5.7 of the Phase 2 Draft EIS states that Bypass 2 would have significant impacts to the aesthetic environment because of the high degree of contrast created by the addition of a new transmission line corridor and high viewer sensitivity. In addition, please note that Bypass Options 1 and 2 are not brought forward for additional analysis in the Final EIS. PSE's Proposed Alignment as analyzed in the Final EIS is entirely within the existing corridor.

Comment	Timestamp	First Name	Last Name
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I'm really trying to comprehend why you are choosing an alternate route to go down Lake Hills connector and route down Richards Road! Its such a peaceful natural landscape that doesn't need to be disturbed. Keeping the existing route make much more economical sense and leaving the existing area aesthetically pleasing. Have you considered producing a 3D animated visual of how this will look? I'm sure it would shock most citizens in the community. Or maybe that's why you wouldn't produce one! The home value impact this will have on the high density housing on the Richards Road corridor would be affected immensely!!

6/27/2017  
8:55:31

Tom McGoff

COMMENTS LOCATION



I13-B-1

I13-B-2

- I13-B -1 The Bypass Option routes were developed as feasible alternatives to avoid the East Bellevue Community Council jurisdiction. No 3D renderings were produced, but a number of simulations are provided (see Attachment 2 of Appendix C in the Phase 2 Draft EIS). Photo simulations are a common tool used to assess visual impacts, and the EIS Consultant Team feels they are sufficient for this EIS. Please note that the Bypass Options as presented in the Phase 2 Draft EIS were not brought forward for additional analysis in the Final EIS; PSE's Proposed Alignment as analyzed in the Final EIS is entirely within the existing corridor.
- I13-B -2 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1. In addition, please note that the Bypass Options (which run along Richards Road) have not been brought forward for additional analysis in the Final EIS; PSE's Proposed Alignment, as evaluated in the Final EIS, is entirely within the existing corridor.

COMMENT

RESPONSE

I14-A-1

Comment	Timestamp	First Name	Last Name
I believe that once the project is completed there will be minimal impacts to views and the aesthetics of the right of way as a result of the project. People, in general, won't really notice the project and the old wood supports that are hardly appealing will be gone. The corridor is fairly wide and there should be no problem in co-locating with the existing pipelines. An attractive trail could be constructed in the right of way that would add to the amenities of the neighborhood and quality of life in Newcastle. We need the electricity to meet our service needs for the future.	5/15/2017 14:32:23	James	Price

I14-A -1 Comment noted.

6/13/2017

Weebly Email Service Mail - Energize Eastside EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS**

1 message

**LESLIE TUBBS** <leslielovesrunning@msn.com>

Mon, May 15, 2017 at 8:06 PM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

I live in the Woodridge neighborhood, and though not directly impacted by the routes being considered for the new transmission poles, I am NOT in favor of placing new lines associated with the Richards Creek option.

I15-A-1

Why would we mar additional skyline within the city with new transmission lines when the original option would merely follow the existing corridor.

The Richards Creek option would also border closely the wetlands along the Lake Hills connector.

Regards, Leslie Tubbs

Sent from my iPhone

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&view=pt&search=inbox&th=15c0f391319ba2c1&siml=15c0f391319ba2c1>

1/1

I15-A -1 The Bellevue Central Segment Bypass Option routes were analyzed in the Phase 2 Draft EIS. The routes, however, were not brought forward for additional analysis and are not part of PSE's Proposed Alignment, as presented in the Final EIS. PSE's Proposed Alignment as analyzed in the Final EIS is entirely within the existing corridor.

6/13/2017

Weebly Email Service Mail - Bury those lines!



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Bury those lines!**

1 message

DeGennaro, Joe &lt;Joseph.deGennaro@t-mobile.com&gt;

Tue, May 16, 2017 at 3:03 PM

To: "info@EnergizeEastsideEIS.org" &lt;info@energizeeastsideeis.org&gt;

I16-A-1 | Look, the only response I've received when I ask why they can't bury the lines is that it's too expensive.

I16-A-2,3,4 | Well I'm sure the upgrade that they are trying to get accomplished isn't cheap either. And, there is so much risk involved. Please....bury the lines. It'd be a lot easier to swallow an increase to my bill if I knew it was going toward making the power system more safe and efficient. Right now, they are just trying to increase the capacity. Make it safer and future proof it. If we have to go through all the pain and ugliness involved let's make it better.

I16-A-5

BURY IT. Bury.

Thanks,

Joe De Gennaro

T-Mobile USA

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&view=pt&search=inbox&th=15c1349c8a300f5f&siml=15c1349c8a300f5f>

1/1

I16-A -1 The option of placing the new 230 kV transmission lines entirely underground was evaluated in the Phase 1 Draft EIS (see Section 2.3.2.4). This option was not brought forward for additional analysis in the Phase 2 Draft EIS due to several concerns. See Section 2.2.2 of the Phase 2 Draft EIS for a more detailed explanation of why this option was not carried forward. Undergrounding of transmission lines, however, was included as a potential mitigation measure in some areas for several elements of the environment for the Phase 2 analysis. The decision to underground portions of the transmission lines would be made by PSE and/or the jurisdictions during a later phase in the project. Additionally, PSE has interpreted the utility rate tariff rule to require the parties requesting the undergrounding, or the "requesting party," to pay for the marginal or additional cost above what it would have cost for overhead lines. Please see Section 3.10.2 of the Phase 2 Draft EIS, which provides further analysis of the cost of undergrounding a transmission line.

Moreover, PSE has identified a number of additional challenges regarding undergrounding the project in segments as mitigation. These challenges include the removal of trees, shrubs, and landscaping; relocation of existing utilities; and the 30 foot to 50 foot wide easements required for underground concrete duct banks. See the discussion of these issues in Section 4.2.6 of the Final EIS.

I16-A-2,3,4 Although the exact cost of the project is unknown, PSE's estimates for its proposed alignment are between \$150 million and \$300 million (see PSE's web page <https://energizeeastside.com/faqs>). According to PSE, the costs for regular upgrades or additions to the electric infrastructure are shared by all of PSE's customers and are paid for over time. PSE has indicated that customers would not see an increase in their monthly bill directly as a result of the project because PSE funds electric infrastructure upgrades and additions through its annual capital budget, which is already covered in current customer rates. PSE plans its capital investments several years in advance and spreads them out so the annual capital budget covers numerous projects each year. The project would be paid for like most transmission and distribution projects, with PSE including the cost of the project in future annual capital budgets. Once the project is built and added to the annual capital budget, PSE expects that \$1 to \$2 of the average monthly bill for residential customers will go toward paying for the project.

The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding project cost and fairness of financial burden. For more information, see Topic Econ - Key Theme 4.

I16-A -5 Comment noted.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I17-A-1	The Olympic Pipeline and power lines run right through the middle of established neighborhoods adjacent to many homes and even schools. In fact, my home is within 75ft. of the pipeline. I have not yet seen a fully independent and thorough assessment of the real risks of running a high voltage line in tandem with the pipeline - or having construction in the vicinity. This is not an inconsequential risk factor both in the short term during the construction and in the long-term with the impact of the magnetic impacts on the aging pipeline. As a parent, homeowner, neighbor and community member, do I not have a right to be adequately advised to the risks that I live with each and every day?	5/17/2017 8:39:50	Jeanne	Warne
I17-A-2	In addition, I have not seen substantial data that supports either the need for this specific location for the powerline - if in fact it is needed at all.			
I17-A-3	Furthermore, I'd like to know who PSE is regulated by and accountable to.			

I17-A -1 To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers construction risks, and electrical interference risks related to corrosion, fault conditions, and arcing. Section 4.9 of the Phase 2 Draft EIS describes potential pipeline safety risks related to construction activities. With PSE's awareness of the pipelines within the corridor, Washington State's Damage Prevention Law and "one-call" locator service, and Olympic's procedures to prevent third party damage, the increased risk posed to the pipelines during construction is relatively low. Even with reasonable worst-case assumptions, the results of the risk assessment completed for the Phase 2 Draft EIS indicated that there would be a very small increase in total risk during construction. With the implementation of measures to mitigate potential construction risks described in Section 4.9.4 (and updated Section 5.9.4 of the Final EIS), these risks would be even lower.

Section 3.9 of the Phase 2 Draft EIS considered electrical interference risks related to corrosion, fault conditions, and arcing. Even with the reasonable worst-case assumptions used in the risk assessment, the results indicated that there would be a small increase in total risk during operation. With the implementation of measures to mitigate potential risks described in Section 3.9.7 (and updated Section 4.9.8 in the Final EIS), these risks would be even lower. Both the DNV GL report and an independent, technical analysis completed by Stantec Consulting Services Inc. concluded that the pipeline and proposed transmission line could coexist safely with proper engineering and safety precautions by PSE and Olympic. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipeline; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipeline from corrosion lies with Olympic.

I17-A -2 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

117-A -3 PSE is regulated by the FERC, NERC, and Washington UTC and is a member of regional utility planning organizations, such as Columbia Grid. PSE is also subject to local codes and regulations in the jurisdiction in which it operates.

COMMENT

RESPONSE

I18-A-1

Comment	Timestamp	First Name	Last Name
Our home is adjacent to the power lines and pipe line.	5/21/2017	Karla and	Herman
Our primary concern is safety due to the age of the pipeline and the additional population that has been added all along this corridor. It was fine for them to put the pipeline and power lines in over 60 years ago--no one was living here. Today is a different story. How can you possibly justify the existence of high voltage power line over jet fuel pipelines running through a residential neighborhood? What is your highest priority?	13:56:59	Dave	

I18-A -1 As the commenter notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks.

Marcia LeVeque  
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 Bellevue, WA 98006  
 425.644.1483  
[marcialeveque@comcast.net](mailto:marcialeveque@comcast.net)

Re: Comments on the Energize Eastside EIS – Focus of concern: Safety

I19-A-1 My comments in this note focus on one area of the EIS statement provided by the Energize Eastside Project concerning the construction and building of utility poles above the Olympic Pipeline. My concerns aren't technical, but come from the heart of being a mother, wife and teacher. Our safety as a community in Bellevue should be our number one priority. The Energize Eastside project and the EIS are of course focused on the project, but not prioritizing the effect on the safety of our Bellevue community and the other cities involved in the project. The EIS report has considered safety issues, but I believe when it comes to the safety of our lives the EIS needs more review to explore the effects of this project on safety to the people in our neighborhoods. Our city needs to protect our citizens safety.

I19-A-2

The easiest way for me to explain my concerns is to reference specific sections of the EIS report, bold the wording that is concerning to me, and then write my concern.

Reference: 3.95.1 Methodology (EIS Statement)

I19-A-3 As described in the Phase 1 Draft EIS, and as addressed in numerous scoping comment letters for the Phase 2 Draft EIS, the Energize Eastside project **could pose additional risks to the public**. For example, if the Energize Eastside project **were to damage one or both of the Olympic Pipelines, refined petroleum product could be released. If the fluid reached a combustible mixture and an ignition source were present, a fire could occur, resulting in possible injuries and/or fatalities.**

My concern:  
 Our Bellevue Community's safety deserves more consideration than the words, "could pose", "could be released", "fire could occur", "resulting in possible injuries and/or fatalities". Are we safe if the words "could" or "possible" were changed to "would" and that injuries and/or fatalities "did" occur? All studies and decisions made should be definitive that safety for the citizens is a fact and not an unknown.

Reference: 3.9.4 Risks to Public from Unintentional Pipeline Release

I19-A-4 **Major risks to the public from unintentional pipeline releases** relate to the characteristics of the pipeline product, the presence of ignition sources, and the release setting.

I19-A -1 As the commenter notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.

I19-A -2 Potential impacts on public safety are evaluated in the Phase 1 Draft EIS (see Chapter 8), the Phase 2 Draft EIS (see Sections 3.8, 3.9, 4.8, and 4.9), and in the Final EIS (see Sections 4.8, 4.9, 5.8, and 5.9).

I19-A -3 To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which summarizes the findings of a risk assessment completed by EDM Services (a firm retained by the EIS Consultant Team) that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks. The purpose of a risk assessment is to identify, describe, and estimate risk, in recognition of the potential hazards and with a focus on describing risk in terms of consequences (severity of a pipeline incident) and the likelihood of occurrence. The risk assessment used available information and reasonable worst-case assumptions to provide a reasonable examination of this risk to help the public and decision-makers understand potential impacts.

Depending on these characteristics and conditions, **pipeline releases can result in a pool fire, flash fire, or explosion**, as described below.  
**Pool Fire**  
 A pool fire occurs when flammable liquid pools on the ground and comes in contact with an outside ignition source.

I19-A-4 My concern:  
 Major risks to the public would be unintentional, but risks due to human error are definitely possible considering construction is so close to an active pipeline. Is "unintentional" a word we could use as a reasonable explanation to people in our community that were hurt or family members killed because of a pool fire, flash fire or explosion?

Reference: 3.9.3 Hazardous Liquid Pipeline Incident Data

I19-A-5 **Although the probability of a leak or fire caused by the project is low, the potential damage from such an incident could be high, given the population density in the study area. The potential magnitude of such an event, if it did occur, would be the same regardless if it were the result of construction or operation of the project.**

My concern:  
 The bold words in the above statement are concerning. The last sentence seems to leave the impression that it's okay to continue with the plan because regardless there will still be a danger to the community. Does that seem reasonable?

**Pipeline Offsets**

I19-A-6 **Requirements for minimum offsets** (or clearance) between any underground structures and **hazardous liquid pipelines are 12 inches** (49 CFR 195.250). Olympic Pipe Line's practice is to require a minimum of **24 inches of clearance between underground structures and the pipeline**, and **10 feet of clearance aboveground**, to facilitate access to the pipeline for maintenance purposes

My concern:  
 The requirements for construction above an active gas pipeline are very minimal. Large construction equipment will be working within inches. Is the city of Bellevue or PSE willing to hope that all parameters are completed within these inches to keep our city safe? Are these requirements the same in other cities or is further review needed?

The DNV-GL pipeline safety report says that PSE's preferred route has "unpredictable risk range." It is imperative that more safety studies be completed.

Respectfully submitted,  
 Marcia LeVeque

I19-A -4 As the commenter notes, pipeline damage as a result of construction activities near a pipeline is always a concern. When accidents do occur along pipelines, they often occur because of a failure to properly locate buried utilities prior to construction, or failure to follow proper procedures during construction. These risks were analyzed in the Phase 2 Draft EIS (Section 4.9). In the case of PSE's and Olympic's shared corridor, PSE and Olympic have worked together in the corridor for 40 years, and communicate regularly to coordinate activities related to pole replacement and other maintenance work. In addition to State Damage Prevention Law (RCW 19.122) compliance, Olympic has a list of requirements for all work proposed near the pipelines (see Appendix I-2 of the Phase 2 Draft EIS). These include specific notification and monitoring requirements, requirements related to excavation near the pipelines, and transport of construction materials or equipment over the pipelines. As company practice, if a project is within 100 feet of the pipeline, Olympic's Damage Prevention Team will meet with the construction crew on-site at the beginning of the project and weekly thereafter. If excavation continuously has the potential to be within 10 feet of the pipeline, the Damage Prevention Team would be on-site to monitor excavation. Section 5.9.4 of the Final EIS identifies mitigation measures during construction. For additional information on how construction risks were analyzed in the Phase 2 Draft EIS, see the response to comment I17-A-1.

I19-A -5 The statement from the Phase 2 Draft EIS referenced by the commenter acknowledges that impacts of a spill depend on the magnitude of the spill (i.e., the volume of material released and extent of area affected); the type of material released; and the location. Because the Energize Eastside project would not affect the operation of the Olympic Pipeline system, such as pipeline pressure and flow rates, the potential characteristics of a spill or fire would be the same regardless if it occurred during construction or operation under either the No Action Alternative or Alternative 1.

II9-A -6 Section 4.9.4 of the Phase 2 Draft EIS lists construction-specific mitigation measures identified based on a review of regulations, construction BMPs, and Olympic requirements for work proposed near their pipelines. These include specific notification and monitoring requirements, and requirements related to excavation near the pipelines. As company practice, if a project is within 100 feet of the pipeline, Olympic's Damage Prevention Team will meet with the construction crew on-site at the beginning of the project and weekly thereafter. If excavation has the potential to be within 10 feet of the pipelines, the Damage Prevention Team would be on-site to monitor excavation. Additional mitigation measures were proposed to further reduce the potential for construction-related impacts. Some of the required and potential mitigation measures listed in Section 3.9.7 (such as integrating the results and recommendations of the *AC Interference Study* [DNV GL, 2016] where applicable to the design of pole locations and layout) also have the potential to mitigate construction-related impacts. As part of ongoing coordination between PSE and Olympic, additional mitigation measures may be identified during final design and permitting.

II10-A

COMMENT

RESPONSE

II10-A -1 Comment noted.

II10-A-1

<u>Comment</u>	<u>Timestamp</u>	<u>First Name</u>	<u>Last Name</u>
Why 'railroad' a project into existence and degrade property values in scenic view neighborhoods when CENSE has shown the need is questionable at best. I am definitely against any change in present Somerset portion of the existing transmission line. I support CENSE.	5/23/2017 7:32:23	Roger	Orth

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
II11-A-1	I am opposed to PSE's proposal for Bridal trails. They do not have our best interests at heart and are in it for profit or the almighty bottom line. Do not like using our land in an unnecessary way that put us in danger.	5/25/2017 8:04:03	Margaret	Makar
II11-A-2	Don't want anything like this remotely near the Olympic pipeline as was illustrated in Bellingham. Also a hiker that loves our trees and the beauty of our surroundings.			
II11-A-3	Their proposal does not insure reliability and our electric needs our decreasing so the lights will not go out! Paying 1 billion for something that is not necessary			
II11-A-4	it stupid! Margaret Makar			

- II11-A -1 Comment noted.
- II11-A -2 When accidents do occur along pipelines, they often occur because of a failure to properly determine the location of buried utilities prior to construction, or failure to follow proper procedures during construction, as was the case in the incident in Bellingham (1999). These risks are analyzed in Section 4.9 of the Phase 2 Draft EIS. Also see response to comment II7-A-1. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.
- II11-A -4 Comment noted. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Project Objectives Topic).

II12-A

COMMENT

RESPONSE

II12-A -1 Comment noted.

	<u>Comment</u>	<u>Timestamp</u>	<u>First Name</u>	<u>Last Name</u>
II12-A-1	We do not want these power lines going through our city!!!	5/25/2017 9:54:45	Sam	Fetchero

COMMENT

RESPONSE

I113-A-1

Comment	Timestamp	First Name	Last Name
We prefer the original route/corridor that goes through the Central Bellevue area. It doesn't make sense to bypass the most direct route. In addition, the alternative bypass route would affect existing and new residential communities on SE 5th and 118th in Bellevue. Please consider the direct route only. Thank you!	5/26/2017 15:31:05	Amos	Chen

I113-A -1 The Bellevue Central Segment Bypass Option routes were analyzed in the Phase 2 Draft EIS. The routes, however, were not brought forward for additional analysis and are not part of PSE's Proposed Alignment, as presented in the Final EIS. PSE's Proposed Alignment as analyzed in the Final EIS is entirely within the existing corridor.

Comment	Timestamp	First Name	Last Name
Sangeetha Rajendra 8613 129th Court SE Newcastle, WA 98056	5/30/2017 9:41:24	Sangeetha	Rajendra

Comments on Energize Eastside Environmental Impact Study – Phase 2.

Firstly, I would like to say I feel a little redundant bringing up my concerns with issues that should have already been addressed during phase 1. I have two topics.

One of the primary issue of the EIS Phase 2 is that it is supposed to be an environmental study. But how can an environmental impact study be conducted without these following important details.

- 1) The selection of the specific route
- 2) pole designs
- 3) pole locations
- 4) Or the list of trees that are to be removed or trimmed

You would expect this specific details to be listed in at least Phase 2. There are no pole designs that specify length or the width. Where are they going to be placed? In the existing spots or someplace farther or closer to my home, since I live adjacent to the power lines. Without these basic specific details, the validity and reliability of an environmental impact study is highly questionable.

Without the pole design or locations it is an inaccurate estimate as to how many trees are going to be cut or trimmed. The EIS has just thrown out a number of trees that could potentially be cut, but nothing about the types and locations of those trees, which can have a huge effect on the aesthetic and layout of neighborhoods and

I114-A -1 In compliance with SEPA, the Phase 2 Draft EIS presented a project-level analysis based on project design details available at the time of publication, as well as alternative routes considered. It included information at an appropriate level of detail for consideration by decision-makers when evaluating potential impacts. This includes the proposed pole types and locations for each segment and option. The Final EIS includes more site-specific information based on refined design of PSE’s Proposed Alignment, including information on pole type, pole location, and tree removal. In addition, the Final EIS analysis focuses on PSE’s Proposed Alignment, which is entirely within the existing corridor.

The EIS Consultant Team has also provided the data relied upon for the EIS and an interactive map in the Energize Eastside EIS website library that shows approximate pole locations and trees that would potentially be removed, including tree species: <http://www.energizeeastsideeis.org/library.html>. For the Phase 2 Draft EIS, the pole locations were considered approximate within 25 feet of the locations shown. Data for the Final EIS have been refined by PSE through its design engineering, and therefore more accurately display the final layout proposed.

I114-A -2 See response to comment I1139-A-3.

I114-A-1

I114-A-2

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
II14-A-3	homes. In all, the lack of specifics and structure in the EIS-Phase 2 makes it hard to analyze exactly what the environmental impact is.			
II14-A-4	My second, but more stressing, concern is the unbalanced need vs effect. PSE has predicted that energy usage will increase rapidly in the next few years, however, in actuality, energy usage has NOT been increasing. This "need" for more electrical energy as massive as PSE claims should be presented with accurate data. It baffles me that we are even			
II14-A-5	considering risking lives in possible explosions and fires that could result from instituting this project. The "need" for this project does not outweigh its possible			
II14-A-6	consequences.			

- II14-A -3 See response to comment II14-B-3.
- II14-A -4 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").
- II14-A -5 See response to comment II8-A-1.
- II14-A -6 Comment noted.

6/13/2017

Weebly Email Service Mail - Phase 2 EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Phase 2 EIS**

1 message

**Barbra Chevalier** <barbra.n.chevalier@gmail.com>  
To: info@energizeeastsideeis.org

Wed, May 31, 2017 at 8:53 PM

To whom it may concern,

I am writing to voice my concerns about the Energize Eastside project. My criticisms are manifold:

- I115-A-1 | 1. No demonstrable need. Quite simply, PSE has failed to show that there's a need for infrastructure of the type and scope proposed. Although the population of the Eastside has grown, the overall load on the electricity infrastructure has not. PSE needs to address the issue, first and foremost, of why this project is even under consideration.
- I115-A-2 | 2. Myriad alternatives. Other jurisdictions and utilities, notably in California, have found novel, financially responsible, and technologically savvy solutions to the increasing loads on their electrical grid. Batteries and new substations are both cheaper, more flexible, and faster to implement. PSE needs to answer why these alternatives aren't viable, especially as the technology appears to be advancing at remarkable speed.
- I115-A-3 | 3. No improvement for customers. PSE has admitted that Energize Eastside will not improve reliability. They need to explain why customers should be required to pay extra for a project that will not demonstrably improve their service.
- I115-A-4 | 4. Serious safety risks. The proposed transmission lines are intended to run along the same corridor as an aging pipeline that carries high pressure jet fuel to SeaTac airport. That pipeline runs less than 500 feet from two schools and crosses through multiple neighborhoods. Should those pipelines rupture, proximity to high voltage power lines would be catastrophic. If any of the transmission lines fall, as a result of earthquake, accident or weather event, they could actually cause a rupture in the pipeline. PSE needs to explain why such a risk is acceptable.
- I115-A-5 | 5. Significant environmental impact. As proposed, the transmission lines could require the removal of thousands of mature trees. Without an overwhelming reason, this outcome is simply unacceptable. Trees are not only essential for our mental and physical health, but they are an integral part of the local ecosystem. It is not sufficient to provide for replanting. Mature trees are indispensable and require decades to truly be replaced. PSE must justify this almost unimaginable loss of plant and wildlife.
- I115-A-6 | 6. Degradation of quality of life. Removal of trees, installation of huge metal poles, increased risk of catastrophe and loss of life, destruction of views. PSE must show why their project overwhelmingly justifies these negative impacts.
- I115-A-7 | 7. No specific proposal. It is impossible to make more specific criticisms because PSE has yet to present a final proposal. Any EIS that is completed without definite routes and scale is inherently lacking a full understanding of the issues.

Thank you.

Regards,

Barbra Chevalier  
6541 126th Ave SE  
Bellevue, WA 98006  
425-445-2281

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d39e4ds2&view=pt&search=inbox&th=15c61c97567f6998&siml=15c61c97567f6999>

1/1

I115-A -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

I115-A -2 The Phase 1 Draft EIS explored a range of reasonable alternatives, as required by the SEPA process. Alternative 2 in the Phase 1 Draft EIS included energy conservation and the use of technologies other than transmission lines to accomplish the project objectives. Alternative 2 was not carried forward for analysis in the Phase 2 Draft EIS or the Final EIS. PSE determined that these solutions either did not meet the project objectives, or they offer a short-term solution that would not meet PSE's performance criterion for serving 10 years or more after construction. Please see Section 2.2.7 of the Phase 2 Draft EIS for a detailed explanation of why Alternative 2 was not carried forward for analysis.

I115-A -3 See response to comment I16-A-2.

I115-A -4 The purpose of a SEPA EIS is to provide information for agency decision-makers and the public regarding the potential environmental impacts associated with a proposal, and the mitigation measures that could be implemented to reduce those impacts. As the commenter notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To provide information on these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction.

Regarding the potential for transmission lines to fall as a result of an earthquake, accident, or weather event, the final structural design would comply with NESC 2017 as adopted by the UTC, which address wind/ice loads and seismic standards. For additional information on seismic risks, see response to comment I120-A-1.

I115-A -5 See response to comment I1139-A-3.

- II15-A -6 Under SEPA, the goal of an EIS is not to show that an alternative is justified, but rather to present the anticipated environmental impacts of the proponent's project and a range of reasonable alternatives. The EIS is used by the permitting agencies during their decision-making processes. It is up to the permitting jurisdictions to determine whether the project meets the regulatory requirements in their code.
- II15-A -7 See response to comment II14-B-3.

COMMENT

RESPONSE

I116-A-1

Comment	Timestamp	First Name	Last Name
Have you made any action to move the line through Redmond and Bellevue along the new light rail line.	5/31/2017 16:36:50	Ian	Scott
With all the work they are doing you would be able to get a buried line all way to Factoria without much effort just a couple of buried power line.			

I116-A -1 The Phase 1 Draft EIS explored a range of reasonable alternatives, as required by SEPA. Numerous options, including various undergrounding routes, were explored in the Phase 1 Draft EIS. Also see response to comment I16-A-1. Sound Transit has already begun site work in portions of the rail that will parallel SR 520 in Redmond.

6/13/2017

Weebly Email Service Mail - Energize Eastside EIS comment



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS comment**

1 message

**Bruce Williams** <docwilliams1@comcast.net>  
To: info@energizeeastsideeis.org

Thu, Jun 1, 2017 at 9:59 PM

To Whom it may Concern:

After spending some time reading the EIS, I have several comments.

- II17-A-1 | I live in the Olympus neighborhood of Newcastle immediately next to the Olympic Pipeline. This EIS does not specifically identify a route for the transmission line. How can this statement describe an environmental impact when there is no route identified? With no route described, no one has any idea of how the environment will be impacted.
  - II17-A-2 | There is no description of the location of the new poles. And, there is no description of the new poles themselves. How is it possible for anyone to understand the impact of the new poles without knowing where they will be and how they will appear?
  - II17-A-3 | During the earlier public comment phase, I asked several pointed questions concerning the number, species and location of the trees to be removed. At one point, there was an estimate of the number of trees to be destroyed to be near 8000. Surely that is an issue that will have a huge impact on our environment. Where is the list of trees to be removed with their species?
  - II17-A-4 | In addition, the removal of even one tree will have an impact on the wildlife who depend on that tree for shelter and food. Where is the list of the species of wildlife impacted?
  - II17-A-5 | The people who wrote this thing should be ashamed! This project is in an earthquake zone and next to a pipeline with aviation fuel under pressure. Where is the safety report?
  - II17-A-6 | This EIS is incomplete and unacceptable.
  - II17-A-7 | I am a member of CENSE. I live immediately adjacent to the pipeline, that has been proposed as the route for this boondoggle. I and my family will directly be put at risk and have our property values significantly reduced by this project.
  - II17-A-8
  - II17-A-9 | I haven't begun to write of how the entire project is unnecessary and built on a lie. No one has considered the Lauckhart-Schiffman Load Flow Study, dated February 18, 2016. It should be reviewed in light of whether this project is necessary at all.
- Thank you,
- Bruce T Williams  
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<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&view=pt&search=inbox&th=15c672cb5f8858fc&siml=15c672cb5f8858fc>

1/1

- II17-A -1 See response to comment II14-A-1.
- II17-A -2 See response to comment II14-A-1. Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review.
- II17-A -3 See response to comment II139-A-3. The Phase 2 Draft EIS, Section 3.4.5, includes information on vegetation clearing based on design details available at that time; the Final EIS includes additional information on tree clearing based on refined project design details (see Section 4.4).
- II17-A -4 See Section 3.4.2.2, Fish and Wildlife, and Section 3.4.2.3, Sensitive or Protected Fish and Wildlife, in the Phase 2 Draft EIS. Further details are included in Section 6.4 of the Phase 1 Draft EIS, and lists of species that could potentially be found in the study area are in Appendix C of the Phase 1 Draft EIS.
- II17-A -5 As the commenter notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks. Also see response to comment II20-A-1 for information on how seismic risks were addressed.
- II17-A -6 Comment noted. The Partner Cities believe that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA. This comment does not include enough detail to provide any specific response.
- II17-A -8 For more information regarding pipeline safety, refer to the Phase 2 Draft EIS (Sections 3.9 and 4.9). The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme ECON-1.
- II17-A -9 The Lauckhart/Schiffman study was reviewed by the EIS Consultant Team. The comment summary included as Appendix J of the Final EIS includes responses to comments regarding the Lauckhart/Schiffman study (See Topic OBJ).

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
II18-A-1	p3.1.1-Potential impacts to land use, shorelines, and housing. The study area includes parcels that are included in or abutting PSE right of ways well as those adjoining parcels—within a reasonable distance. If abutting parcel is large, then adjoining parcel to the abutting parcel was not included. The greatest potential to be impacted is the new easement acquisition (especially on option routes not currently in the existing PSE right of way corridor) and associated structure removal on PSE current or acquired easement property.	6/1/2017 11:21:21	Dave & Denise	Mickelson
II18-A-2	p3.1.3-Impact of property values was referred back to Phase 1 EIS: which said in section 10.7.1.4 (that home values are economic not an environmental issue. Reviewing 25 articles, the EIS chose to quote from Mullins in 2003 because over 50 studies were included which stated in some cases a small decrease in values with proximity to a transmission line, in other cases no change, in some cases increased property values. Quoting From Kinnard 1990- potential to decrease value is small-6.3% or lower—lots next to line often benefit, where lots next to adjacent lots often have value reductions. Higher end properties are more likely to be value affected. KC Assessor does consider views of power lines in assessing property values. A 2012 study concluded 3-6% of value. Any effects seems to disappear at 200-300 feet.) Referring to EIS Phase 2 in section 3.10, Economics, p3.10-1 thru 3, Newcastle was studied for potential tax revenue loss due to property tax reduction. Of all EE cities, Newcastle would suffer most in property tax and lost ecosystem due to reduced tree cover because it is the smallest of the affected cities. Under grounding was studied as mitigation, but stated the replacement of higher voltage			
II18-A-3				

- II18-A -1 Comment noted. Please note that the Bypass Options as evaluated in the Phase 2 Draft EIS have not been brought forward for additional analysis in the Final EIS. PSE's Proposed Alignment as analyzed in the Final EIS is entirely within the existing corridor.
- II18-A -2 Comment noted.
- II18-A -3 See responses to comments II121-A-8 and II121-A-10.

COMMENT

RESPONSE

II18-A -4 Comment noted.  
 II18-A -5 Comment noted.

	Comment	Timestamp	First Name	Last Name
II18-A-3	lines when lower voltage lines are already present would not result in a greater negative effect than the existing lines at present. PSE estimates cost differential to underground would be between \$16-\$25 million per mile and any city or property owner requesting undergrounding would be required to pay for it as interpreted by PSE in the utility rate tariff rule. Development in proximity to utility infrastructure must comply not only with local municipalities comprehensive plans but also with PSE guidelines —which are shaped by the National Electrical Safety Code (NESC) standards. It noted Newcastle includes a new Utilities Element with policies that address collocations, limiting vegetation disturbance, and promoting conservation efforts. In the appendix B-2 it notes all four cities required a conditional use permit.			
II18-A-4	The cities of Bellevue and Renton have Shorelines of the State within their boundaries. Any project inconsistencies are described in appendix B-Section 3.1.3. Under zoning districts, it is noted Newcastle has a required setback of 5 feet for all buildings and structures including transmission towers outside a defined typically 50 foot wide Olympic Pipeline easement which is generally centered down the PSE easement but does vary in location.			
II18-A-5				

COMMENT

RESPONSE

II19-A-1

Comment	Timestamp	First Name	Last Name
I don't believe that PSE seriously considered alternatives to the proposed project. The only other options allowed were pre-selected and dismissed out of hand.	6/1/2017 16:48:18	Thomas	Cezeaux

II19-A -1 Comment noted. Section 2.2 of the Phase 2 Draft EIS includes a discussion of alternatives that were not included for analysis in the EIS, generally based on not meeting PSE's project objectives.

II19-B

COMMENT

RESPONSE

II19-B -1 See response to comment II14-A-1.

	<u>Comment</u>	<u>Timestamp</u>	<u>First Name</u>	<u>Last Name</u>
II19-B-1	I believe the EIS process has been flawed from the beginning. How can you do an EIS if there are no concrete plans to evaluate?	6/1/2017 16:49:37	Thomas	Cezeaux

II19-C-1

Comment	Timestamp	First Name	Last Name
Based on PSE's own numbers, there has been a decrease in the amount of electricity demand while the population of Bellevue has increased. The need for this project seems contrived and unnecessary.	6/1/2017 16:51:14	Thomas	Cezeaux

II19-C -1 Comment noted. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Project Objectives Topic).

6/13/2017

Weebly Email Service Mail - EIS Phase 2 Comment on PSE EE



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

### EIS Phase 2 Comment on PSE EE

1 message

KEsayian@aol.com <KEsayian@aol.com>  
To: info@energizeeastsideeis.org

Sun, Jun 4, 2017 at 9:36 AM

#### Hindsight can be remarkable!

*What if* the original 115kV transmission lines were *not* built through what would become primary residential neighborhoods of Bellevue and Newcastle?

*What if* the Olympic Pipe Line had not been given the okay to collocate along that transmission line easement?

But...here we are in 2017, with extensive research into the seismic hazards of the earthquake fault line that runs across Puget Sound and along the I-90 corridor. That's the same corridor that bisects several of the infrastructure lifelines of the Eastside. This is the same corridor that bisects liquefied pipelines and the current PSE 115kV transmission line.

See Attached "USGS Earthquake Hazards Map"

Reference: <http://mitigation.eeri.org/files/CREWCascadiaFinal.pdf>

#### Two wrongs do not make a right.

The current 115kV transmission line along with the OPL pipeline should **not** be located running alongside schools and through residential neighborhoods.

And for the future - the PSE Energized Eastside transmission line should definitely **not** be built as proposed - through residential neighborhoods and alongside schools.

I120-A-1

I120-A-2

This is where *WE*, the residents of Bellevue and Newcastle and Renton and Redmond *live*. There are **21st century alternatives** that can and will address any future **need** in the electrical grid infrastructure.

I120-A-3

*The question that needs to be answered:* why was it decided to NOT include nor analyze the seismic hazards mentioned in Phase 1 Draft EIS. Why were the references to seismic

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I120-A -1

In this seismically active region, a Cascadia subduction earthquake or an earthquake on the Seattle Fault could rupture gas lines in the region, such as the Olympic Pipeline system, which would result in a fire if an ignition source is present. The Phase 2 Draft EIS acknowledges that earthquakes present risks of fault conditions or arcing from the transmission lines to the pipelines. As part of the risk assessment completed for Phase 2 Draft EIS, natural forces (e.g., seismicity, lightning strikes, and extreme weather) were considered as potential causes of pipeline damage (see Section 3.9.3.3). The risk assessment took into account historical incident rates for natural force-caused pipeline incidents on similar systems nationwide, and current risks in the corridor in consideration of fuel type/flammability, pipe parameters, safety features, and other factors.

Additional information on seismic hazards is included in Section 4.11 of the Final EIS. The final structural design would comply with NESC 2017 as adopted by the UTC. For the transmission lines, NESC 2017 states that the structural requirements necessary for wind/ice loadings are more stringent than seismic requirements and sufficient to resist anticipated earthquake ground motion. In addition, according to ASCE Manual No. 74, "transmission structures need not be designed for ground-induced vibrations caused by earthquake motion because historically, transmission structures have performed well under earthquake events, and transmission structure loadings caused by wind/ice combinations and broken wire forces exceed earthquake loads." The structural performance of transmission structures are less affected by ground motion since it is a flexible system. Historically, transmission structures have performed well during seismic events. Nonetheless, PSE retained a Washington-licensed geotechnical engineer to evaluate seismic hazards and compare the design of the project facilities to withstand probable seismically induced ground shaking at each location. It is anticipated that the poles would withstand such conditions and would not fall as a result of an earthquake or other natural forces, including extreme weather.

Given the existing seismic risks in the corridor, potential impacts from a seismic event involving a simultaneous pipeline rupture and downed transmission line would be similar to impacts that could occur under existing conditions or the No Action Alternative. The Energize Eastside project is not expected to increase the likelihood of damage or soil instability due to seismic activity.

6/13/2017

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[hazards, earthquake-induced ground rupture, liquefaction, geologic risks](#) determined as not significant? (Following is text from both Phase 1 and Phase 2)

I120-A-3

It states in **Chapter 1.10 ELEMENTS OF THE ENVIRONMENT NOT ANALYZED IN THE PHASE 2 EIS**

"As required by SEPA (WAC 197-11-440(6)), elements of the environment that are not significantly affected do not need to be included in an EIS. The following are elements of the environment evaluated in the Phase 1 Draft EIS that would not be significantly affected by the proposed project, and were therefore not analyzed in this Phase 2 Draft EIS.

**Earth** – Soils and geology were analyzed in the Phase 1 Draft EIS because seismic and geotechnical hazards (including ground shaking, liquefaction, landslides, coal mines and other hazards) are present throughout the area. However, *impacts under all alternatives would be less-than-significant* with regulatory compliance, and implementation of industry standards, geotechnical recommendations, and best management practices (BMPs)."

**Chapter 3.9.5.4** discusses Environmental Health - **pipeline safety** and the impact of: "*Extreme Weather Events and Seismic Hazards. (page 45)* If the overhead transmission lines were damaged during an extreme weather event or *natural disaster, there could be risks to public safety if the poles fall and damage the buried pipelines.* Safety measures would be incorporated into the project design to address the extreme weather and seismic conditions that occur in western Washington."

I120-A-3 **BUT..... this is the text from the *PHASE 1 Draft EIS* Document Chapter 3 - EARTH**

#### **Chapter 3.3.3 Geologic Hazards**

An important consideration for the construction and operation of the alternatives would be the potential to encounter geologic hazards, including steep slopes, erosion, landslides, seismic hazards, and other hazards such as soft soils.

#### **Chapter 3.3.3.4 Seismic Hazards**

The Puget Sound basin is located within a seismically active area dominated by the Cascadia *subduction zone*, which forms the boundary between two tectonic plates: the North American plate and the Juan de Fuca plate. The project vicinity has been subject to earthquakes in the historic past and will undoubtedly undergo shaking again in the future.

Earthquakes in the Puget Sound region result from one of three sources: the Cascadia subduction zone off the coast of Washington, the deep intraslab subduction zone located approximately 20 to 40 miles below the Puget Sound area, or shallow *crustal faults*.

1. The Cascadia subduction2. The closest active crustal source is the **Seattle Fault Zone which runs roughly eastwest in south Bellevue and roughly parallel to Interstate 90** (see Figure 3-2). A fault

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I120-A -2 See response to comment I115-A-2.

I120-A -3 As required by SEPA (WAC 197-11-440(6)), elements of the environment that are not significantly affected do not need to be included in an EIS. Soils and geology were analyzed in the Phase 1 Draft EIS because seismic and geotechnical hazards (including ground shaking, liquefaction, landslides, coal mines, and other hazards) are present throughout the area. However, the project is not expected to increase such risks, and impacts under all alternatives would be less-than-significant with regulatory compliance, including implementation of referenced standards, geotechnical recommendations, and best management practices (BMPs). As described in Section 1.10 of the Phase 2 Draft EIS, such elements were therefore not carried forward for project-level analysis in the Phase 2 Draft EIS. The Final EIS discusses seismic hazards in relation to pipeline safety. See Section 4.9 of the Final EIS.

6/13/2017

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is considered active when it has shown evidence of displacement within the last 11,000 years. An earthquake on the Seattle Fault poses the greatest risk to the Seattle

urban region (City of Seattle, 2015).

3. Deep quakes are the most common large earthquakes that have occurred in the Puget Sound region. Quakes larger than magnitude 6.0 occurred in 1909, 1939, 1946, 1949, 1965, and 2001

(City of Seattle, 2015). However, shallow quakes are the type expected on the Seattle Fault Zone, which can create more damage than deep quakes because of the proximity to the epicenter. Damage from earthquakes depends on many factors including distance to epicenter, soil and bedrock properties, and duration of shaking.

*Seismic hazards* include the primary effects of earthquakes, such as ground displacement from fault rupture and ground shaking, as well as secondary effects including liquefaction, *settlement*, tsunamis, and *seiche waves*. These scenarios are defined below.

#### Chapter 3.3.3.4.1 Earthquake-induced ground rupture

Defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. The magnitude, characteristics, and nature of fault rupture can vary for different faults or even along different strands of the same fault. Strong ground shaking from a major earthquake can produce a range of intensities experienced at any one location.

#### Chapter 3.3.3.4.2 Liquefaction

Of particular concern because it has often been the cause of damage to structures during past earthquakes. Liquefaction occurs where soils are primarily loose and granular in consistency and located below the water table. Saturated loose soils that are found within 50 feet of the ground surface are considered at most risk of liquefaction. The consequences of liquefaction include loss in the strength and settlement of the soil. The loss of strength can result in lateral spreading, bearing failures, or flotation of buried utility vaults and pipes. Seismic hazard areas identified in Figure 3-2 are those areas where the foundation soils are considered to be subject to liquefaction or lateral spreading during an earthquake (but could also be susceptible to seismically induced settlement). Typically, these soils are found in low-lying areas near bodies of water, such as along the larger streams and around lakes where is a high probability of loose saturated alluvial soils. In the combined study area, areas such as lowland lakeside areas of the northern and southern tips of Lake Sammamish, as well as the floodplains of the Cedar River and Evans Creek, contain areas considered susceptible to liquefaction.

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6/13/2017

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**Chapter 3.4 page 11: What Geologic Risks are present for Existing Electrical Infrastructure?**

Although it is possible that the Cascadia subduction zone could move in a way that causes a series of large earthquakes (each measuring magnitude 8.0 to 8.5) over a period of years, the earthquake that many scientists and emergency planners anticipate is modeled on the zone's last major quake in 1700 that caused ruptures from end to end, causing one great earthquake measuring magnitude 9.0 (CREW, 2013). The shaking that results from this type of abrupt shifting of the earth's crust would be felt throughout the Pacific Northwest, causing shaking for 4 to 6 minutes. In general, the intensity and destructiveness of the shaking will be greater at locations closer to the plate interface, with coastal areas experiencing the highest intensities and the level of shaking diminishing farther inland. Distance, however, is not the only factor: local geologic conditions, including soil type, can increase or decrease the intensity of the shaking and produce a range of secondary effects, including landslides and liquefaction (the latter occurs when certain types of soil lose cohesion and behave like a liquid). Widespread power outages are expected throughout the Pacific Northwest, including the combined study area, from downed power lines or damage to substations as a result of an earthquake. Slope failure, soil erosion, etc. could also impact electrical infrastructure by causing downed power lines or other damage to infrastructure that would interrupt service.

**Chapter 3.6.1.3 Seismic Hazards**

An earthquake could occur during construction, resulting in embankment slope failures, liquefaction, ground settlement, or equipment destabilization. The risk of seismic hazards to construction is considered low because of the relatively *low probability* that an earthquake would coincide with the actual limited construction period. If a large earthquake were to occur, the major risk would be to the ongoing construction activities although injury to workers is also possible

Karen Esayan

CENSE Board member

4601 - 135th Ave SE

Bellevue, WA 98006

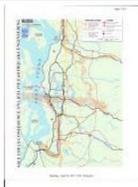
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[425.641.5609](#)



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6/29/2017

Weebly Email Service Mail - Phase 2 DEIS Comment: Views and Aesthetic Environment/Environmental Impact



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

### Phase 2 DEIS Comment: Views and Aesthetic Environment/Environmental Impact

1 message

Karen Esayan <kesayan@aol.com>  
To: info@energizeeastsideeis.org

Fri, Jun 16, 2017 at 11:15 PM

Let's talk about *Scenic Views and Aesthetic Environment* as defined in Appendix C of Phase 2 DEIS:

**Scenic views** : This view is the "observation of a visual resource from a particular location, with visual resources generally defined as natural and constructed features of a landscape that are viewed by the public and contribute to the overall visual quality and character of an area."

**Aesthetic Environment**: "This is the portion of the environment that influences human perception of the world. It is comprised of the natural (topography, presence of trees, water bodies) and built (buildings, utility infrastructure) environments that provide a sense of place."

**Note: SEPA requires scenic views and aesthetic environment be given due weight in decision making**, as stated in Chapter 3.2 of Phase 2 DEIS.

I120-B-1

SEPA (State Environmental Administrative Act) ,WAC 197-11 (Washington Administrative Code) requires all major actions sponsored, funded, permitted, or approved by state and/or local agencies to undergo planning to ensure that environmental considerations, such as impacts related to scenic views and the aesthetic environment, are given due weight in decision-making.

**Note: it is acknowledged there would be significant adverse impacts to the aesthetic environment in Chapter 6 of Phase 2 DEIS:**

I120-B-2

**Stated on Page 1 of 6.2:** "The project could have significant adverse impacts to the aesthetic environment as a result of the Bypass Options 1 and 2, the Willow 1 Option, and the Newcastle Segment. There would be no significant adverse impacts to scenic views (Figure 6-1)"

It is *incorrect* to state "there would be no significant adverse impact to scenic views". From some residential neighborhoods along the Eastside the view toward Lake Washington and the Olympic Mountains would be **severely** impacted. This compounded with the stated significant adverse impact to the aesthetic environment in these neighborhoods should stop any consideration of construction of 230kV transmission lines through these residential neighborhoods.

I120-B-3

**Note: the Background documents for Alternative 1 discuss span length and pole height.** On page 2 it is explained that when taller poles are used, the pole diameter is increased - from 3 - 5 feet, and that this would also result in a larger and possibly reinforced foundations. It continues to state that taller poles are heavier than short poles and may need to be larger in diameter and require more robust foundations.

But - the **ground level impact** on the aesthetic environment is not sufficiently addressed in Phase 2 of the DEIS. The ground level impact during a construction phase is not sufficiently discussed, nor is the devastating aesthetic impact left for years to come with construction of industrial sized power poles. Industrial sized power poles do **not** belong in any residential neighborhood.

I120-B-4

**Note:** A letter written on behalf of the Bellevue City Council dated May 16, 2016 stresses minimizing the bulk and scale of a transmission line and to use the best possible alternatives or measures to minimize visual impacts. This letter continues to suggest using undergrounding for some or all of the transmission line.

I120-B-5

**Note: the 230kV transmission lines contradict the stated values in Comprehensive Plans of Bellevue and Newcastle.** This is stated in Chapter 3.2-29.

**Page C-23:** The Bellevue Comprehensive Plan 2015 which emphasizes a "City in a Park". Listed under protected views and visual resources are: views of mountains, skylines and water (Plan Policy UD-62) , and

"**distinctive neighborhood character within Bellevue's diverse neighborhoods**". (Plan Policy N-9) It is recommended to avoid overhead lines in greenbelts or open spaces and to minimize impact on surrounding neighborhoods" (Plan Policy UT-8 and UT 69) Plan policy UD-70states "streetscape design should promote a safe and comfortable park-like experience" and includes reference to Bel-Red Road, Lake Hills Connector, Richards Road, Factoria Blvd SE, Coal Creek Parkway and SE Newport Way.

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I120-B -1 Comment noted.

I120-B -2 As presented in this EIS analysis and agreed upon by the Partner Cities, impacts to scenic views were assessed using the following significance threshold:

The area with scenic views impacted includes a substantial number of sensitive viewers, including residential viewers, viewers from parks and trail, or viewers from outdoor recreational facilities; and the degree of additional obstruction of views compared to existing conditions would be substantial.

Although there would be adverse impacts to scenic views, the impacts did not meet the threshold to be considered significant. For more information, see Section 3.2.5 of the Phase 2 Draft EIS.

I120-B -3

The analysis did not focus on ground level views (which we interpret to mean views looking down at the base of the poles) because such views would only be had by those immediately adjacent to the corridor. The EIS Consultant Team recognizes that larger foundations would be noticeable, particularly when they are first installed; however, they are not expected to contribute greatly to the overall aesthetic change produced by the project. Changes associated with replacing existing H-frame structures with steel monopoles are described, and it is noted that the pole diameter would increase. Although this increase would likely be more noticeable the closer one is to the corridor, the difference in the level of impact did not warrant a separate discussion in the EIS. Construction impacts (including clearing, grading, and other construction activities) were described programmatically in the Phase 1 Draft EIS (see Section 11.5.3.1) and were found to be less-than-significant.

I120-B -4

Such measures are included as potential mitigation measures (see Section 3.2.6 of the Phase 2 Draft EIS, as well as Section 4.2.6 and Appendix M of the Final EIS).

I120-B -5

These policies were reviewed and considered as part of the scenic views and aesthetic environment assessment in the Phase 2 Draft EIS. Based on study area plans and policies, views of mountains, skylines, and water were evaluated as scenic views (Page 3.2-1). The Willow 1 Option was found to be inconsistent with Bellevue Plan Policy N-9 where it traverses the Somerset Neighborhood. Newcastle Plan Policies that encourage certain vegetation strategies, etc. were proposed as potential mitigation (see Section 3.2.6 of the Phase 2 Draft EIS and Section 4.2.6 and Appendix M of the Final EIS). For more information about policy inconsistency, see Section 3.2.5 of the Phase 2 Draft EIS.

6/29/2017

Weebly Email Service Mail - Phase 2 DEIS Comment: Views and Aesthetic Environment/Environmental Impact

- I120-B-5 | **Page C-27:** The Newcastle 2035 Comprehensive Plan "encourages utility providers to limit disturbance to vegetation within major utility transmission corridors".
- I120-B-6 | **Note:** Chapter 3 and Table 3.2-4 pages 3.2-29 outline potential *Inconsistencies between City Planning statement, policy or regulation and Energize Eastside.* These inconsistencies should *not* be ignored.
- I120-B-7 | **Note:** 327 acres of vegetation and 131 acres of tree canopy tree canopy is expected to be lost with the construction of **Energize Eastside.** (Phase 1 EIS Chapter 6.6.3.1.1) This contradicts the designation, by the City of Bellevue, for the *Coal Creek Natural area* as an area supporting the habits for Chinook, Rainbow and cutthroat trout, Coho, Sockeye and Steelhead. Coal Creek would no longer provide "valuable fish and wildlife habitat, with dense forest protecting water quality and erosion."
- I120-B-8 | It is ludicrous to believe, as is stated in Chapter 3.3 and Chapter 3.4, that the loss of trees and other vegetation would have a "less-than-significant" impact upon the streams and fish habitat. **Question:** by whose guidelines are the cities along the Eastside to be governed? Are the cities governed by elected representatives of the residents or are the cities governed by a private company (PSE/Macquarie) concerned about corporate profits?)
- I120-B-9 | In Chapter 3.4-16 it is stated that Energize Eastside would result in the "removal of more than 5,400 trees", amounting to 17-26% of trees removed per acre surveyed. Also stated in Chapter 3.4-14: 5,000 inventoried trees will be retained. **Question: does this mean that if the "inventoried" trees include both those to be removed and those to be retained - does this say that 5,400 out of 10,400 inventoried trees would be removed?** If so - that would be 52% of inventoried trees removed!
- I120-B-10 | **Note:** PSE/Energize Eastside ignores King County's designation of Coal Creek as a "**Core Summer Salmonid Habitat**" for aquatic life use, as designated in the King County Stream Report dated November 2016. PSE/Energize Eastside also ignores the fact that lower Coal Creek has been assigned additional "Supplemental Spawning and Incubation Protection". Phase 1 of the EIS, Section 6.4 describes the fish species protected by federal, state and local environmental laws and regulations (e.g.: federal or state listed endangered or threatened species). **Note:** in this designation, any project is subject to the requirements of the Endangered Species Act. The 115kV lines and the collocation of the Olympic Pipeline should not have been built crossing nearly 20 stream crossings (Chapter 3.3-21) in the first place. This hindsight recognition should not be compounded with construction of industrial sized 230kV transmission lines in the near or distant future.
- I120-B-11 | **Note:** The subject of the *environmental impact* (purportedly the purpose of the *Environmental Impact Statement*) - that the construction of the proposed Energize Eastside could easily unleash is not fully recognized nor acknowledged in this EIS by PSE. The potential devastating consequences of the construction are not sufficiently addressed.
- I120-B-12 | **Note:** This EIS does *not* fulfill its stated purpose. There are too many issues and questions not fully researched nor acknowledged. As a concerned resident of the City of Bellevue, I expect these issues to be addressed.

Karen Esayan  
CENSE Board member  
4601 135th Ave SE  
Bellevue, WA 98006  
425.641.5609

Sent from my iPad

- I120-B -6 | Potential inconsistencies with existing plans and policies were considered as a part of the impact analysis. As described in Section 3.1.3.2 (Magnitude of Impact) of the Phase 2 Draft EIS, a change in the study area land uses would be considered a significant impact as they would be inconsistent with existing plans and policies.
- I120-B -7 | Additional details on expected impacts have been provided in the Phase 2 Draft EIS. As described in Section 3.4.5 of the Phase 2 Draft EIS, compliance with critical areas regulations will minimize tree loss in habitat areas such as the Coal Creek Natural Area and provide a mechanism for mitigating any such loss, including effects on erosion and water quality.
- I120-B -8 | Section 3.4.3.1 in the Phase 2 Draft EIS describe the criteria used to determine if an impact would be significant. These significance criteria were approved by the Partner Cities and are based on the ability for impacts to be mitigated using existing codes and standards adopted by elected officials for each city.
- I120-B -9 | The Phase 2 Draft EIS stated that 3,600 to 5,400 trees would be removed depending on the option chosen. PSE's Proposed Alignment is similar to the alignment which includes the Willow 1 Option, which would potentially remove approximately 3,600 trees. Refer to Section 4.4. in the Final EIS for details.

Figure 3.4-6 in the Phase 2 Draft EIS gives the percentage of inventoried trees that could be removed by segment and option; it shows that 40 to 80 percent of the inventoried trees could be removed, depending on which option is chosen. Thus, looking at the entire corridor it is correct that approximately half of the inventoried trees would have been removed if Bypass Option 1 and Willow 2 Option were constructed. PSE's Proposed Alignment as evaluated in the Final EIS is entirely within the existing corridor.

[https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=HEZPUTRTfL\\_en.&view=pt&search=inbox&th=15cb4bbc93c2e835&siml=15cb4bbc93c2...](https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=HEZPUTRTfL_en.&view=pt&search=inbox&th=15cb4bbc93c2e835&siml=15cb4bbc93c2...) 2/2

I120-B -10 Coal Creek is a Type-F stream and will be protected following the regulations listed in Section 5.2 of the Phase 1 Draft EIS.

Information related to designation of Coal Creek, May Creek, and the Cedar River has been added to the Final EIS (see Section 4.4); however, the project would have little or no effect on the stream characteristics covered by these designations. The following text has been added: "The lower reaches of May Creek, Coal Creek, and the Cedar River are now categorized as "Core Summer Salmonid Habitat" for aquatic life use. The key uses under this classification are summer (June 15 – September 15) salmonid spawning or emergence, or adult holding; use as important summer rearing habitat by one or more salmonids; or foraging by adult and sub-adult native char. Other common characteristic aquatic life uses for waters in this category include spawning outside of the summer season, rearing, and migration by salmonids. As part of the updated water quality standards, these stream reaches have also been assigned an additional "Supplemental Spawning and Incubation Protection" , which specifies temperature criteria of 13 °C to be applied from September 15th through May 15th."

I120-B -11 New development is generally not required to mitigate for previous development. Stream crossings would not result in long-term impacts to streams. PSE will not place poles in streams; however, there would be impacts to stream buffers, see Section 3.4.5 in the Phase 2 Draft EIS. To the extent practicable, the number of trees removed from sensitive habitats would be minimized, and any removal would be mitigated as required by local critical area ordinances. With mitigation, the effects of impacts to critical areas would be less-than-significant.

I120-B -12 Comment noted. The comment does not provide sufficient detail to allow response.

I120-B -13 Comment noted.

7/11/2017

Weebly Email Service Mail - Phase 2 DEIS Comment: Impact on Schools, Children and Tree canopy



Energize Eastside EIS <info@energizeeastsideis.org>

**Phase 2 DEIS Comment: Impact on Schools, Children and Tree canopy**

1 message

KEsayian@aol.com <KEsayian@aol.com>  
To: info@energizeeastsideis.org

Thu, Jun 29, 2017 at 3:47 PM

I120-C-1

This comment letter is about the EIS coverage of *Plants and Animals* in the study area vs the lack of discussion on *schools and children attending schools* in the study area.  
**Note: a dozen or more schools are located along proposed Energize Eastside transmission line routes on the Eastside.**

Chapter 3.4 in Phase 2 of the EIS is titled *Plants and Animals*, with emphasis on vegetation clearing, wildlife habitat and sensitive species.  
Chapter 3.2 in Phase 2 of the EIS is titled *Scenic Views and the Aesthetic Environment*, with emphasis on how we the residents are affected by our environmental surroundings.

I120-C-2

**Note: what is not considered nor acknowledged in this EIS is the impact Energize Eastside would have on the school properties located along the Eastside.**

**Note: what is not acknowledged in this EIS is the impact the removal of well over 80% of trees (noted in this EIS) would have on the children attending these schools.**

**Note: what is not acknowledged in this EIS is the impact Energize Eastside would have on future expansion of these same schools.**

I120-C-3

Chapter 3.4 covers the percentage of trees for each potential transmission line segment that could be removed as follows: Oak 1 - 88%, Oak 2 - 73%, Willow 1 - 80%, Willow 2 - 84%, Bellevue Central 85%, 86% or 81%, Bellevue North 66%, Redmond segment 81%, Renton 70%, Newcastle 82%.

**Note: with this potential percentage of tree canopy lost it is ludicrous to believe that the mitigation suggested ("in-lieu fee to the City of Bellevue for trees removed in the city right of way to offset the loss of public amenity" or the "development of off-site mitigation areas"; Chapter 3.4.6.2) would benefit the children attending the schools that are located along the suggested transmission line routes on the Eastside.**

Monies paid to the City do not improve air quality where our children attend school. An off-site planting of shrubs will not benefit children attending school a mile or two away.

I120-C-4

The attached photos show the current location of the Olympic Pipeline and the current PSE 115kV transmission line and *Tyee Middle School* in south Bellevue near the intersection of Allen Road and Newport Way.

I120-C-1

Plants and animals are both required to be studied under the State Environmental Policy Act (WAC 197-11-444). Together, all elements of the environment evaluate the potential impact on people (including children); it is inherent in the SEPA evaluation. Schools are listed and specifically included in the analyses of land use, scenic views, recreation, environmental health, and economics, as well as identified throughout as "unique uses" (e.g., see Section 3.1 of the Phase 2 Draft EIS).

I120-C-2

PSE's Proposed Alignment as analyzed in the Final EIS follows the existing corridor, which is adjacent to Rose Hill Elementary in Redmond, and Tyee Middle School in Bellevue; no new easements would be obtained for the project, including none on school property. Vegetation clearing for these schools is described in Section 3.6 Recreation, in Section 3.6.5.3, Redmond Segment and 3.6.5.12 Bellevue South Segment, Willow 2 Option in the Phase 2 Draft EIS. Vegetation clearing at Rose Hill would be similar to existing conditions, as the area already has low-growing vegetation, primarily lawn, in the existing corridor. At Tyee Middle School, most of the area is already maintained with low-growing vegetation, and vegetation management would be similar to existing conditions. However, approximately 12 trees north of SE Allen Road (immediately south of the school property) may need to be removed. See also Section 4.4 of the Final EIS.

I120-C-3

Comment noted.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15cf60a1484edba9&siml=15cf60a1484ed...> 1/4

7/11/2017

Weebly Email Service Mail - Phase 2 DEIS Comment: Impact on Schools, Children and Tree canopy



I120-C -4 As the commenter notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks.

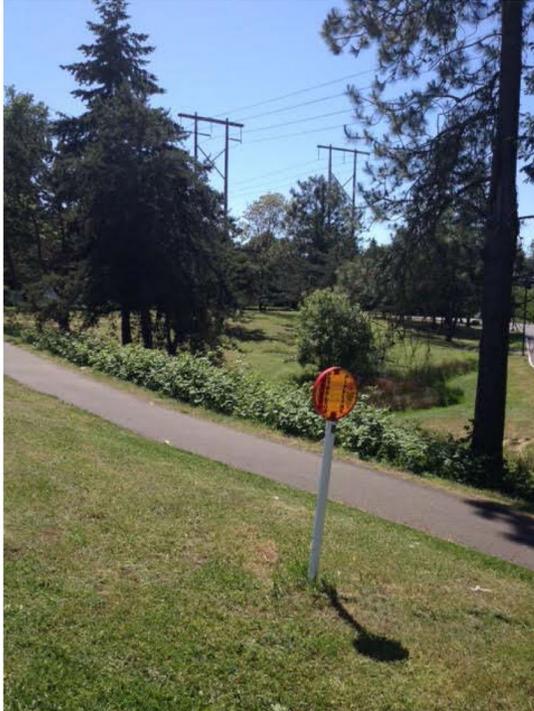
It is not clear from this comment what the concern is to the EIS related to clearing of tree canopy. However, Sections 3.1 (Land Use and Housing), 3.2 (Scenic Views and the Aesthetic Environment), and 3.4 (Plants and Animals) of the Phase 2 Draft EIS considered impacts to the environment resulting from potential tree removal.

The Phase 2 Draft EIS acknowledged that earthquakes present risks of fault conditions or arcing from the transmission lines to the pipelines. As part of the risk assessment completed for Phase 2 Draft EIS, natural forces (e.g., seismicity, lightning strikes, and extreme weather) were considered as potential causes of pipeline damage (see Section 3.9.3.3). The risk assessment took into account historical incident rates for natural force-caused pipeline incidents on similar systems nationwide, and current risks in the corridor in consideration of fuel type/flammability, pipe parameters, safety features, and other factors. See response to comment I120-A-1 for additional information on how seismic risks were addressed in the Phase 2 Draft EIS and Final EIS.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZH.en.&view=pt&search=inbox&th=15cf60a1484edba9&siml=15cf60a1484ed...> 2/4

7/11/2017

Weebly Email Service Mail - Phase 2 DEIS Comment: Impact on Schools, Children and Tree canopy



I120-C-4 This is just one example of the proximity of the current PSE 115kV transmission line and the Olympic Pipeline which are already too close to a school where our children spend their days. Adding to the danger and possibility of disaster of the collocation of transmission lines and flammable fuel pipelines with construction of industrial sized power poles and 230KV transmission lines is **not** acceptable

**Missing in this EIS:** acknowledgement of the impact on the children attending the schools along the Eastside and on the school properties with the clearing of tree canopy. Nor is the potential consequence of earthquake related damage with the collocation of transmission line and pipeline near Eastside schools properly discussed. It should not be ignored that the Seattle Fault line bisects the proposed Energize Eastside.

I120-C-5 What would be the potential consequence of an "average" spill of 12,900 gallons of fuel igniting outside Tree Middle School during a construction mishap? Applying the same statistical analysis of the risks for pipeline damage in unpopulated areas with a populated area like the Eastside should not be relied on. (Chapter 3.9-18,19)

I120-C-6 Chapter 3.4.3 - Long Term (Operating) Impacts Considered: this chapter mentions "potential long term impacts to plant and animal resources in the study area" but does **not** mention the impact to our children attending the impacted schools located in this study area.

As a parent whose children attended Tyee Middle School and Newport High School, as a resident of Bellevue for over 40 years, and as a citizen concerned about the future of this city - I expect these topics to be researched and resolved.

Karen Esayan

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZH.en.&view=pt&search=inbox&th=15cf60a1484edba9&siml=15cf60a1484ed...> 3/4

I120-C -5 The purpose of a risk assessment is to identify, describe, and estimate risk, in recognition of the potential hazards and with a focus on describing risk in terms of consequences (severity of a pipeline incident) and the likelihood of occurrence. The risk assessment summarized in Sections 3.9 and 4.9 of the Phase 2 Draft EIS (and included in Appendix I-5) used available information and reasonable worst-case assumptions to analyze this risk to help the public and decision-makers understand potential impacts. Given that it is not practicable to specify every situation along an 18-mile corridor, the EIS team believes the pipeline safety risk assessment took a reasonable approach to characterizing possible consequences of a pipeline incident in order to identify potential impacts of the project. The risk assessment results were compared to risk thresholds adopted by the California Department of Education, among others, and were found to be below the threshold of unacceptable risk (for the individual risk criteria) and below the threshold of intolerable risk (for the societal risk criteria).

As the commenter notes, the baseline frequency of incidents was developed using national data. These data do not allow one to differentiate between leaks that occurred in densely versus sparsely populated areas. However, population density was considered in the consequence analysis in determining societal risk. The risk assessment considered three different population densities. The results varied significantly, from the zero fatality estimate at a minimum population density of 568 persons per square mile, to 17 fatalities for the maximum population density of 23,169 persons per square mile. Section 3.9 of the Phase 2 Draft EIS considered the maximum population density in estimating societal risk.

Population density does not affect the assessment of individual risk. As defined in Appendix I-5 (Pipeline Safety Technical Report) of the Phase 2 Draft EIS, individual risk was determined for the maximal exposed individual; in other words, it assumed that a person was present within the potential impact area of the pipeline continuously – 24 hours per day, 365 days per year.

I120-C -6 See response to comment I120-C-1.

COMMENT

RESPONSE

7/11/2017

Weebly Email Service Mail - Phase 2 DEIS Comment: Impact on Schools, Children and Tree canopy

4601 135th Ave SE  
Bellevue, Wa.  
CENSE Board member  
[425.641.5609](tel:425.641.5609)

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZI4.en.&view=pt&search=inbox&th=15cf60a1484edba9&siml=15cf60a1484ed...> 4/4

Comment	Timestamp	First Name	Last Name
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Dear EIS review authorities.	6/6/2017 11:26:42	R. Court	Olson
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I am an engineer and construction management professional. I am a long time resident of Bellevue and I have long worked in the commercial building industry. I provide project management consulting services to commercial building clients seeking to build high performance green buildings, or renovate existing buildings. Previous clients have included private and public clients, including several Washington municipalities. Related to this work, I have significant expertise in how we can make buildings highly energy efficient. Recently, for the past year, I've have been regularly attending the monthly meetings of the PSE 2017 Integrated Resource Plan Advisory Group. At these meetings PSE presents the details of their next developing 20 year resource plan that is scheduled to be issued at the end of this year.

As I verbally commented in the June 3rd Energize East Side EIS public hearing at Bellevue City Hall, the justification for the Energize East Side project by PSE is in serious question.

My primary comment related to the unsubstantiated PSE electrical demand projections. When I've projected PSE system wide electrical demand forward for twenty years at the same rate as population growth projections and then subtracted PSE's 2015 Integrated Resource Plan targeted energy efficiency savings, I have found the net electrical demand curve to be flat. There is no net demand increase. Here are a couple of calculation details:

II21-A -1 As described in the Phase 1 Draft EIS, the growth rate within the Eastside has been and is expected to continue to be greater than the growth rate in PSE's overall service area. PSE accounted for known growth expectations of its major customers in addition to relying on regional planning employment and population projections provided by the Puget Sound Regional Council to determine future demand. It is plausible, due to the concentration of employment in the Eastside, and the nature of the businesses, that energy demand could grow faster than population or employment individually would suggest. The EIS, however, is not intended to determine if there is a need for the project. See response to comment II2-B-9.

II21-A-1

	Comment	Timestamp	First Name	Last Name
II21-A-1	<p>-- For the current PSE system wide electrical demand I used a calculated average demand from the most recent ten years, since PSE says that demand fluctuates yearly with the weather.</p> <p>--For the population growth rate projection I used the Puget Sound Regional Council's population growth rate percentage. (FYI, this growth rate percentage is larger than the growth rate projected by King County). Using population growth as a rate of electrical demand increase is highly credible and probably a slight overstatement, since for more than a decade now PSE per capita usage of electricity has been dropping. (FYI, PSE has admitted this steady drop in per capita electrical consumption in a recent 2017 IRP Advisory Group meeting).</p>			
II21-A-2	<p>In my testimony I also commented that if there actually was a local future demand concern in the East Side, it could be easily remedied by PSE ramping up its energy efficiency program. Studies by the federal Department of Energy and by the New Building Institute (sponsored in part by the Northwest Energy Efficiency Alliance) show that the average potential for saving energy in our current building stock is about 50%. PSE's current energy efficiency savings plan targets approximately a 10% energy efficiency savings over twenty years. Much more could be done.</p>			
II21-A-3	<p>Also in my hearing testimony I commented that I have been extensively reading and studying the climate change problem and solutions for the past 15 years. I said in testimony that we need to be planting many more trees, not extensively cutting them down as PSE's Energize East Side project proposes to do. Trees are</p>			

- II21-A -2 See response to comment II15-A-2.
- II21-A -3 Please refer to Section 3.5, Greenhouse Gases, in the Phase 2 Draft EIS which discusses the potential impacts from tree removal.

	Comment	Timestamp	First Name	Last Name
II21-A-3	our only proven CO2 sequestering tool, so they are our first line of defense to reduce greenhouse gases in the atmosphere.			
II21-A-4	<p>In conclusion, there has been no proven demand justification for PSE's Energize East Side project. If there was a real proven projection of demand increase (which I seriously doubt is possible), the most environmentally friendly option to accommodate such a demand increase would be to increase energy efficiency savings targets. Such an efficiency increase plan would require no new transmission lines and no destruction of precious trees.</p> <p>I therefore urge rejection of the PSE Energize East Side project for lack of need justification and for serious environmental impact consequences . If requested, I can provide more information to back up my testimony.</p> <p>Thank you for listening.</p>			

II21-A -4 The purpose and need for the project are summarized in Section 1.3 of the Phase 1 and Phase 2 Draft EISs. Additionally, PSE prepared the Eastside Needs Assessment, which includes a more detailed explanation of the project need. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding the purpose and need for the project (See Topic P&N). Also see response to comment II15-A-2 regarding alternatives that focus on energy efficiency and new technologies.

I122-A

COMMENT

RESPONSE

6/13/2017

Weebly Email Service Mail - PSE upgrades Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**PSE upgrades Energize Eastside**

1 message

Howard Stoppelman <hstoppelman@comcast.net>

Wed, Jun 7, 2017 at 11:29 AM

To: info@energizeeastsideeis.org

I122-A-1

Do what you have to do to keep the grid up to speed and meet the demands of the population increases. All other concerns are secondary.

Howard Stoppelman  
14026 113<sup>th</sup> Ave. NE  
Kirkland, WA. 98034

I122-A -1 Comment noted.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4ds2&view=pt&search=inbox&th=15c83d185216e386&siml=15c83d185216e386>

1/1



6/13/2017

Weebly Email Service Mail - Comment on Energize Eastside draft EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Comment on Energize Eastside draft EIS**

1 message

**ANN E FLETCHER** <fletcherann@msn.com>

Fri, Jun 9, 2017 at 3:56 PM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

I am against the approval of this project. PSE has not provided sufficient data to show that the energy needs of this area will increase enough to make this project necessary. In fact, other independent data is showing that energy needs will not increase very much. Add to that the fact that citizens are working to reduce our energy consumption both personally and through public policy. Clean energy modifications and renewable sources for both transportation and buildings are in place and will be built upon further through our state and local legislation, policy and regulations, which will reduce both energy consumption and carbon emissions. Has all of this been taken into consideration by PSE? How do they counter the independent data? Although growth may be a good business strategy for them, it is not useful for a sustainable earth and way of life here. The impacts of this unnecessary project are not worth the highly questionable benefits PSE says it would bring. I would like to be a party of record. Ann Fletcher, 255 SE Andrews Street, WA 98027, [425-392-3571](tel:425-392-3571)

I123-A-1

I123-A -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4ds2&view=pt&search=inbox&th=15c8f12a28c3696a&siml=15c8f12a28c3696a>

1/1



6/13/2017

Weebly Email Service Mail - Phase 2 DEIS - Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**Phase 2 DEIS - Energize Eastside**

1 message

Eldon Graham <eldon.graham@hotmail.com>

Sun, Jun 11, 2017 at 9:30 AM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

**Phase 2 DEIS Comments – Energize Eastside**

June 11, 2017

Chapter 3.8, Environmental Health – Electric and Magnetic Fields, of Puget Sound Energy's (PSE) Phase 2 Draft Environmental Impact Statement (EIS) does not address "corona discharge" and the radio frequency interference that such discharges create.

To understand why corona discharge would be an adverse consequence of PSE's Energize Eastside proposal and my qualifications to comment on this matter, please see my previous comments dated March 13, 2016 and July 26, 2016.

Corona is a phenomenon associated with all electric transmission lines. During wet conditions, water drops collect on power line conductors, and then the localized electric field at energized power line components and conductors causes the surrounding air molecules to ionize and produce an electric discharge called corona. Corona in turn produces radio frequency interference. Corona is more noticeable at higher voltages (above 110 KV).

The Puget Sound climate is perfect for corona discharges.

POWER Engineers, Inc. did an Electric and Magnetic Field (EMF) study for the Energize Eastside project. The title of Appendix D of POWER's report suggests that it is capable of evaluating corona discharge but nowhere in the report is corona discussed. Why did Puget Sound Energy not ask POWER to address corona and design considerations that would minimize corona?

Because corona discharges are a design issue, it is most important for PSE to focus on the matter now before it starts developing specifications, selecting material and letting contracts for construction.

Design and construction with corona in mind would go a long way toward reducing the radio interference that corona would otherwise cause.

Eldon H Graham

13629 SE 20<sup>th</sup> Street

Bellevue, WA 98005

425-644-4282

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d39e4da2&view=pt&search=inbox&th=15c97fe54728db1a&siml=15c97fe54728db1a>

1/1

I124-A -1 The Phase 1 Draft EIS acknowledges that transmission lines can cause corona discharge. Based on reviewed and available publications, there is no scientific consensus that corona ionization poses a health risk; therefore, the Phase 1 Draft EIS concluded that there were no probable significant impacts (see Section 8.6.1.4 of the Phase 1 Draft EIS). Available studies and research, including those in Section 8.3.6 of the Phase 1 Draft EIS, are considered inconclusive and do not suggest a probable health impact associated with corona ionization, either during the construction or the operation of PSE's proposed project.

Regarding radio frequency interference, Section 15.6.2 of the Phase 1 Draft EIS states that overhead transmission lines do not generally interfere with radio or television reception. Whenever corona is a problem, it is usually for amplitude modulation (AM) radio and not the higher frequencies associated with frequency modulation (FM) radio or TV/satellite signals. Therefore, it is possible that some residents near the transmission lines would notice interference with AM stations, although it is not expected to exceed limits set by the FCC. Section 15.6.4.1.3 of the Phase 1 Draft EIS states that corona interference is not considered a problem for transmission lines rated at 230 kV and below.

I124-A -2 Corona discharge was evaluated in the Phase 1 Draft EIS and was not found to be significant (see Section 8.6.1.4 for EMF and corona ionization impacts, and Section 9.6.3.1.1 of the Phase 1 Draft EIS for noise impacts). Therefore, it was not evaluated in more detail in the Phase 2 Draft EIS. See also response to comment I124-A-1.

I124-A-1

I124-A-2

Comment	Timestamp	First Name	Last Name
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Chapter 3.8, Environmental Health – Electric and Magnetic Fields, of Puget Sound Energy's (PSE) Phase 2 Draft Environmental Impact Statement (EIS) does not address "corona discharge" and the radio frequency interference that such discharges create.	6/11/2017 9:20:06	Eldon H	Graham
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To understand why corona discharge would be an adverse consequence of PSE's Energize Eastside proposal and my qualifications to comment on this matter, please see my previous comments dated March 13, 2016 and July 26, 2016.

II24-B-1

Corona is a phenomenon associated with all electric transmission lines. During wet conditions, water drops collect on power line conductors, and then the localized electric field at energized power line components and conductors causes the surrounding air molecules to ionize and produce an electric discharge called corona. Corona in turn produces radio frequency interference. Corona is more noticeable at higher voltages (above 110 KV).

The Puget Sound climate is perfect for corona discharges.

II24-B-2

POWER Engineers, Inc. did an Electric and Magnetic Field (EMF) study for the Energize Eastside project. The title of Appendix D of POWER's report suggests that it is capable of evaluating corona discharge but nowhere in the report is corona discussed. Why did Puget Sound Energy not ask POWER to address corona and design considerations that would minimize corona?

II24-B -1 See response to comment II24-A-1.

II24-B -2 See response to comment II24-A-2.

I124-B-3

Comment	Timestamp	First Name	Last Name
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Because corona discharges are a design issue, it is most important for PSE to focus on the matter now before it starts developing specifications, selecting material and letting contracts for construction.

Design and construction with corona in mind would go a long way toward reducing the radio interference that corona would otherwise cause.

Eldon H Graham  
 13629 SE 20th Street  
 Bellevue, WA 98005  
 425-644-4282

I124-B -3 See response to comment I124-A-2.

6/13/2017

Weebly Email Service Mail - PSE's Energize Eastside Phase 2 DEIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**PSE's Energize Eastside Phase 2 DEIS**

1 message

**Prichard, Janet** <JPrichard@republicservices.com>

Mon, Jun 12, 2017 at 9:47 AM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

Cc: "council@bellevuewa.gov" <council@bellevuewa.gov>

Republic Services continues to support Energize Eastside's Alternative 1A because:

- The project has been analyzed thoroughly by nearly a half dozen third-party subject-matter experts; there need has clearly been established (current infrastructure is at the end of its useful life and PSRC data underscores the growth coming to the service area);
- We are impressed with the innovative and proven technology to supply essential power to the current and future population;
- If the project is stalled or rolling blackouts are instituted, we would be forced to use a gas-powered generator to operate our Compressed Natural Gas fueling station, which would add noise and pollution in the emerging Bel-Red corridor, thereby reducing the environmental value of our CNG fleet.
- Additionally, per the Phase 2 DEIS, the Eastside would be at an economic disadvantage if the project is delayed or if the no action alternative is pursued.

1125-A-1

**Janet Prichard**

Municipal Manager

1600 127<sup>th</sup> Avenue Northeast

Bellevue, Washington 98005

e [jprichard@republicservices.com](mailto:jprichard@republicservices.com)

o 425-646-2541 c 425-221-0766

f 425-646-2440 w [www.republicservices.com](http://www.republicservices.com)



We'll handle it from here.™

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4ds2&view=pt&search=inbox&th=15c9d33f48a55c30&siml=15c9d33f48a55c30>

1/2

1125-A -1 Comment noted.

6/14/2017

Weekly Email Service Mail - Re: Energize Eastside EIS // Phase 2 Draft EIS and Public Hearings/Open Houses



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Re: Energize Eastside EIS // Phase 2 Draft EIS and Public Hearings/Open Houses**

1 message

**Rahul Kapoor** <rkapoor1973@yahoo.com>  
 Reply-To: Rahul Kapoor <rkapoor1973@yahoo.com>  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>

Fri, May 5, 2017 at 9:24 AM

I noticed that PSE has quietly removed the "Preferred Route" indication from Willow 2 from among the 4 routes being considered.

Ideally this Energize Eastside project should be replaced by alternate methods like the ones proposed by CENSE but if it is allowed as PSE is proposing, I would like to convey my preference order for the PSE routes (criterion being to minimize the pole heights in Somerset neighborhood, the most beautiful residential area in Puget Sound)

I126-A-1

Route preference from the most preferred to least preferred

1. Oak 1 (most preferred)
2. Oak 2
3. Willow 2
4. Willow 1 (least preferred)

Thanks,  
 Rahul Kapoor  
 Resident: Somerset, Bellevue, WA

**From:** Energize Eastside EIS <info@energizeeastsideeis.org>  
**To:** Energize Eastside EIS <info@energizeeastsideeis.org>  
**Sent:** Thursday, May 4, 2017 10:54 AM  
**Subject:** Energize Eastside EIS // Phase 2 Draft EIS and Public Hearings/Open Houses

**NOTICE OF AVAILABILITY OF PHASE 2 DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)  
 NOTICE OF PUBLIC HEARINGS / OPEN HOUSES**

**Project Name:** Energize Eastside

**Project Proponent:** Puget Sound Energy (PSE)

**Location:** Portions of Bellevue, Newcastle, Redmond, Renton, and unincorporated King County between the Sammamish Substation at 9221 Willow Road NE, Redmond, WA 98052, and the Talbot Hill Substation at 2400 South Puget Drive, Renton, WA 98055.

**City of Bellevue EIS File Number:** 14-139122-LE

**Description:** Construct approximately 18 miles of new 230 kilovolt (kV) electrical transmission lines and a new substation (Richards Creek in Bellevue) connecting two existing bulk energy systems (one to the north in Redmond and one to the south in Renton) to supply future electrical capacity and improve electrical grid reliability for Eastside communities. Project details and plans are available in the project file and on the project website at [www.EnergizeEastsideEIS.org](http://www.EnergizeEastsideEIS.org).

**EIS Required:** On April 30, 2015, the Environmental Coordinator of the City of Bellevue, serving as lead agency, published a Notice of Determination of Significance, indicating that this proposal could have a significant adverse impact upon the environment and required preparation of an Environmental Impact Statement (EIS) under Revised

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4ds2&view=pt&search=inbox&th=15bd970f1fa715d8&siml=15bd970f1fa715d8>

1/2

I126-A -1 Comment noted.

6/14/2017

Weebly Email Service Mail - Re: Energize Eastside EIS // Phase 2 Draft EIS and Public Hearings/Open Houses

Code of Washington (RCW) 43.21C.030(2)(c). On January 28, 2016 the Lead Agency issued the Phase 1 Programmatic Draft EIS, which evaluated alternative methods to achieve PSE's project objectives. A Phase 2 Draft EIS has been completed and evaluates project-level alternatives.

**Approvals Required:** Local permit review and approval within each affected jurisdiction.

**Availability of the Draft EIS:** The Draft EIS may be viewed online or downloaded from the project website [www.EnergizeEastsideEIS.org](http://www.EnergizeEastsideEIS.org). Copies of the EIS on CD are available at no charge. Printed copies are available to purchase for cost of reproduction (\$300). Email [info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org) for more information.

**SEPA EIS Public Comment:** Agencies, affected tribes, and members of the public are invited to comment on the Phase 2 Draft EIS which will be available on May 8, 2017. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and permits or other approvals that may be required. An extended comment period of 45 days is being provided pursuant to Washington Administrative Code (WAC) 197-11-455, and will include three public hearings at the times and locations listed below.

**Public Hearings/Open House Dates, Times, and Locations**

**Tuesday, May 23, 2017 6:00 - 8:30 PM:** Oliver Hazen High School - 1101 Hoquiam Ave NE, Renton, WA 98059

**Thursday, May 25, 2017 6:00 - 9:00 PM:** Bellevue City Hall - 450 110th Ave NE, Bellevue, WA 98004

**Saturday, June 3, 2017 2:00 - 4:30 PM:** Rose Hill Elementary - 8110 128th Ave NE, Kirkland, WA 98033

**Public Comment Period:** The comment period opens May 8, 2017. The deadline for submitting comments is Wednesday, June 21, 2017. All comments related to the Draft EIS must be received by this date. Mailed items that are postmarked by Wednesday, June 21, 2017 will be accepted. Comments may be submitted orally at the public hearings or in writing. A valid physical mailing address is required to establish status as an official party of record.

**Written comments may be submitted**

Online at [www.EnergizeEastsideEIS.org](http://www.EnergizeEastsideEIS.org)

By email to [info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org)

By mail to:

City of Bellevue

Development Services Department

Attn: Heidi Bedwell, Environmental Planning Manager

P.O. Box 90012

Bellevue, WA 98009-9012

**Applicant Contact:** Bradley Strauch, Puget Sound Energy

**Applicant Contact Email:** [bradley.strauch@pse.com](mailto:bradley.strauch@pse.com)

**Lead Agency Contact:** Heidi Bedwell, City of Bellevue

**Lead Agency Contact Phone:** 425-452-4862

**Lead Agency Contact Email:** [hbedwell@bellevuewa.gov](mailto:hbedwell@bellevuewa.gov)



Note: You are receiving this email because you are on the email update list for the Energize Eastside EIS. If you would prefer to be removed from this list, please reply to this email with "unsubscribe" in the subject line.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d39e4ds2&view=pt&search=inbox&th=15bd970f1fa715d8&siml=15bd970f1fa715d8>

2/2

6/14/2017

Weebly Email Service Mail - Energize east side questions



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Energize east side questions**

1 message

Edward Yahoo <an\_eddie@yahoo.com>  
To: info@energizeeastsideeis.org

Thu, May 18, 2017 at 6:57 AM

A few questions:

- I127-A-1 | What areas will the new towers be erected?
- I127-A-2 | What is the need for such large and invasive towers throughout the east side region? Is it to prevent power outages due to fallen tree branches?
- I127-A-3 | As a PSE customer, how much of an increase in fees/ bills are we talking about to raise a billion dollars?  
How on earth is the total bill a billion dollars??  
Would there be anything to prevent a slow, steady increase in the fees/bills as time progresses?
- I127-A-4 | What are the health risks for those residing around the proposed new infrastructure?

Thanks,  
-Edward

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d39e4da2&view=pt&search=inbox&th=15c1bd910617dee7&siml=15c1bd910617dee7>

1/1

- I127-A -1 PSE's Proposed Alignment as presented and analyzed in the Final EIS is entirely within the existing corridor. Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review.
- I127-A -2 Information about the project objectives can be found in Chapter 1 of the Final EIS, Section 1.3 (Applicant's Objectives for the Energize Eastside Project). Additional discussion is included in Appendix J (see the Project Objectives Topic).
- I127-A -3 The EIS does not evaluate project costs. Although the exact cost of the project is unknown, PSE's estimates for its proposed alignment are between \$150 million and \$300 million. Regular upgrades or additions to the electric infrastructure are shared by all of PSE's customers and are paid for over time. PSE has indicated that customers would not see an increase in their monthly bill directly as a result of the project because PSE funds electric infrastructure upgrades and additions through customer rates based on its annual capital budget. At any given time, the PSE rates cover numerous capital investments made in past years; thus, the Energize Eastside project would be one of many being funded in this way. The Energize Eastside project would be paid for like most transmission and distribution projects, with PSE including the cost of the project in future annual capital budgets. Once the project is built and added to the annual capital budget, PSE expects that \$1 to \$2 of the average monthly bill for residential customers will go toward paying for the project.
- I127-A -4 Issues associated with environmental health and associated risk are addressed in the Phase 1 Draft EIS, Chapter 8, Section 3.8 of the Phase 2 Draft EIS, and updated in Sections 4.9 and 5.9 of the Final EIS.

6/14/2017

Weebly Email Service Mail - Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside**

1 message

Mary Mathis <Mary.Mathis@constructconnect.com>

Thu, May 18, 2017 at 8:57 AM

To: "info@energizeeastsideeis.org" <info@energizeeastsideeis.org>

Hi Heidi,

I128-A-1

Can you tell me when construction is anticipated to begin on the Energize Eastside project and how much the project is anticipated to cost? Is Puget Sound Energy the Owner of the project or is the Owner the City of Bellevue or Redmond?

Thank you so much as always for your very generous time and help!

Sincerely,

**Mary Mathis**

Content Team, Public Researcher



28 N. Clark St. Suite 450  
Chicago, IL 60602

phone: 770-209-3816

fax: 678-680-0624

[www.ConstructConnect.com](http://www.ConstructConnect.com)

3854955

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4ds2&view=pt&search=inbox&th=15c1c479b5b9c76a&siml=15c1c479b5b9c76a>

1/1

I128-A -1 This is a PSE project, and PSE plans to begin construction in 2018 assuming that all permits are issued. Permits would be issued by the four jurisdictions (Redmond, Bellevue, Newcastle, and Renton) where the transmission corridor is proposed to be located, as described in Section 1.9 of the Phase 2 Draft EIS.

Date: 6 July 2017  
 To: Heidi Bedwell, Environmental Planning Manager  
 From: Curtis Allred  
 13609 SE 43rd Pl  
 Bellevue, WA 98006

Please submit the following comments into the EIS Phase 2 Draft public review.

I am a member of CENSE. I grant CENSE the right to use my comments as they wish.

3 Issues supporting the "No Action" Alternative

So far we have 700 pages of Phase 1 EIS and additional 900 pages in this Phase 2 draft for a total of 1600 pages. And yet, as we have heard in the testimony of citizens during public comment meetings, the document is still not sufficient to cover all the problems and risks with the proposed Energize Eastside transmission line.

II29-C-1

However I'd like to focus on 3 major issues that I think provide sufficient grounds to say the only rational option at this time is the No Action Alternative.

The 3 issues are:

- The danger
- The environmental damage
- The lack of need

The Danger

You've heard other testimony and comments describing several pipeline explosions in recent years. There have been at least 2 incidences of PSE power lines falling on the Olympic pipeline. In these cases electrical arcing drilled holes into the pipeline.

II29-C-2

The new transmission line will quadruple the energy carrying capacity of the existing line, providing much more energy to drill into the pipeline. And it will replace the wooden poles with metal poles, providing additional conductive paths when and if sections of the line collapse.

Seismologists say there is a 10-15% probability that there will be a magnitude 9 or larger earthquake during the lifetime of this transmission line, i.e. the next 50 years. A quake of this size will certainly rupture pipelines and bring down power lines.

I'd like to propose we cancel this EIS and start discussing plans to remove the existing transmission lines from the pipeline corridor rather than amping them up.

The Environmental Damage

II29-C-3

You have read and heard many comments protesting the loss of thousands of trees, the unsightly poles and wires that will rise above the tree tops, and the ugly gash that will cut through the eastside and be visible for miles around. I agree with and second those sentiments.

The Need

II29-C-4

Justification of the project is not part of the EIS analysis, and unfortunately there is no regulatory process in Washington that requires PSE to justify the project in a transparent and truly independent manner. PSE cites 5 independent studies that validate the need, 3 of which were contracted by PSE and likely biased. The other 2 were commissioned by the City of Bellevue and only validated the process PSE followed, they did not run the simulations to validate the numbers.

II29-C -1 Comment noted.  
 II29-C -2 See response to comment II29-B-3. Also, see the response to comment II20-A-1 for information on how seismic risks were considered in the Phase 2 Draft EIS and Final EIS.  
 II29-C -3 Comment noted.  
 II29-C -4 It is acknowledged that failure of components of PSE's system simultaneously with a high demand period due to high or low temperatures is not a common event. NERC standards require PSE models to "stress the system" to ensure that PSE's system would operate without damaging other parts of the grid when such stresses occur. PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers to forecast demand.

I129-C-4

So what is the need? PSE Claims that a new transmission line is needed to address a transient and unlikely scenario...

- coldest day of winter
- 6 local power generation sources are offline
- 1500 MW of power going to Canada

This scenario is based on a 2.4% growth rate, which is much higher than other utilities and city planners are currently using in their forecasting.

This is an improbable and short- duration scenario. If we really needed to protect against this near-impossible case (which I believe we dont) then there are modern technologies for solving it that are lower cost, safer, and less environmentally destructive. Some are implemented in downtown Bellevue and others are described in alternative 2B.

But PSE dismisses modern solutions that dont provide profits for their shareholders and foreign executives' bonuses, and insists that they must build a massive 230kV transmission line on top of a petroleum pipeline.

So, in summary, energize eastside's transmission line is...

- dangerous,
- environmentally destructive, and
- is not needed

I129-C-5

In section 1.3, the EIS states: The EIS is intended to identify reasonable alternatives that could attain or approximate PSE's objectives at a lower environmental cost ...

I believe that given the 3 points I discussed, the only sensible choice to attain the lowest environmental cost is the No Action alternative. If an independent analysis says we need additional capacity in the future, Alternative 2B should be studied.

PSE must be denied the right to build this transmission line and punished for their deception of our citizens and exploitation of our weak regulatory system.

Thank you.  
Curtis Allred

I129-C -5 Comment noted.

Date: 6 July 2017  
 To: Heidi Bedwell, Environmental Planning Manager  
 From: Curtis Allred  
 13609 SE 43rd Pl  
 Bellevue, WA 98006

Please submit the following comments into the EIS Phase 2 Draft public review.

I am a member of CENSE. I grant CENSE the right to use my comments as they wish.

**Olympic Pipeline damage Impact to Transportation**

The EIS underestimates the impact to transportation if the pipeline is damaged during construction or operation, and does not get the facts correct.

Excerpt:

1.10 ELEMENTS OF THE ENVIRONMENT NOT ANALYZED IN THE PHASE 2 EIS

**Transportation** – *The only potential for significant transportation impacts that was described in the Phase 1 Draft EIS was the possibility of building the transmission line underground in a street right-of-way. Since this alternative is not being carried forward, there was no need to further analyze transportation impacts from the project in the Phase 2 Draft EIS. Transportation impacts resulting from construction of Alternative 1 would be below the level of significance and addressed through regulatory requirements as part of the right-of-way use permit.*

II29-D-1

This section also understates the impact of pipeline damage to local and air transportation:

*"if significant damage to the pipeline were to occur, or if there is a planned temporary disruption during project construction, petroleum products normally transported in the pipeline would be transported by other means, primarily by trucks using interstate highways. This would be expected to generate up to a few hundred truck trips per day, resulting in a minor impact when distributed throughout the day and across the interstate highway system."*

This is not accurate, the actual case is much worse. According to the 2004 document referenced below, the pipeline carries the equivalent of 1800 tanker truck per day. This is the only distribution route for refineries from northwest Washington to Portland and interim destinations. One of those destinations is Sea-Tac airport which relies on the pipeline for 100% of its jet fuel.

Besides there being six times more trucks than the EIS estimates, those trucks would not be "distributed ... across the interstate highway system" as stated. These trucks would all be on the I-5 corridor between Whatcom county and Portland, the most congested corridor in the region. Further, the transport direction is 100% southbound, so there would need to be 1800 trucks per day heading southbound, plus 1800 trucks per day returning north for refill. This would have a major highway transportation impact in the region.

The following statement also underestimates the risk to air travel:

*"No disruption in petroleum product supply to airports or other customers of the Olympic Pipeline would be anticipated for any planned temporary shutdown or relocation. If there were an accidental shutdown, short-term disruption could occur until trucking could be arranged."*

II29-D-2

In the case of an unplanned accidental shutdown, this "short-term disruption" could be many days to weeks to mobilize a tanker-truck fleet sufficient fill the gap. This would be a significant disruption in air travel as Sea-Tac airport gets 100% of its jet fuel from the pipeline.

II29-D -1 This comment references Section 14.5.3.2.9 of the Phase 1 Draft EIS. We acknowledge that there were inaccuracies in the truck trip numbers presented in this section and have included corrections in the Final EIS, Errata.

II29-D -2 The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.

## References

City of Kent's Hazardous Materials Emergency Response Plan

- <https://www.kentwa.gov/content.aspx?id=9466>
  - which contains this link:  
the City of Kent Comprehensive Emergency Management Plan (CEMP)  
<https://www.kentwa.gov/WorkArea/linkit.aspx?LinkIdentifier=id&ItemID=3924>
- The Pipeline-specific section is also available here:  
<https://www.kentwa.gov/WorkArea/DownloadAsset.aspx?id=8096>

Excerpt:

*August 2004*

**HAZARDOUS LIQUID PIPELINE**

*Definition of Hazard*

*The Olympic Pipe Line Company consists of over 400 miles of pipelines extending from refineries in northwest Washington to Portland Oregon. These pipelines carry refined liquid petroleum products: diesel, aviation fuel, (basically a form of kerosene) and gasoline. Underground high pressure pipelines remove the equivalent of 1,800 tanker trucks from the regions roadways each day and carry 441,000 barrels or 18,700,000 gallons of fuel each day.*

Additional Olympic Pipeline info is available on the website of the State of Washington Energy Facility Site Evaluation Council: [www.efsec.wa.gov/oplarchive/proj-sum.pdf](http://www.efsec.wa.gov/oplarchive/proj-sum.pdf)

Excerpt:

*May 1998*

**OLYMPIC PIPE LINE COMPANY**

*For 30 years, OPL has operated 400 miles of underground petroleum product pipelines in western Washington that were constructed prior to the creation of EFSEC. This existing pipeline system begins at the four oil refineries in Skagit and Whatcom Counties, transports refined petroleum products south to Seattle, then continues to Portland, Oregon. The OPL system consists of two parallel lines, a 16-inch and a 20-inch, starting near the refineries and running south to Renton. After delivering fuel to Seattle and Sea-Tac International Airport, the two lines combine into one 14-inch line that proceeds south to Portland. Virtually all of the gasoline, diesel, and jet fuel consumed in western Washington is transported by OPL. Today, OPL transports over 4 billion gallons a year of refined fuels through its western Washington system.*

Thank you.  
Curtis Allred

Date: 6 July 2017  
 To: Heidi Bedwell, Environmental Planning Manager  
 From: Curtis Allred  
 13609 SE 43rd Pl  
 Bellevue, WA 98006

Please submit the following comments into the EIS Phase 2 Draft public review.

I am a member of CENSE. I grant CENSE the right to use my comments as they wish.

**Energize Eastside Phase 2 Draft EIS Analysis:  
 Pipeline Safety and Construction Impacts**

Pipeline Safety during construction is a major issue for Energize Eastside. The transmission line will run along the Olympic Pipeline for most of its 18 miles. The pipeline carries approximately 10 million gallons of jet fuel and other petroleum products per day from refineries in the north to SeaTac airport and on to Oregon.

The 230kV transmission line poles are much larger and require a much larger foundation than the existing 120 kV wooden poles. Since most of the transmission line path is in residential and business zones, there will be compromises made in pole location and construction activity to maximize distance from structures and public areas. This will put pressure on engineers to minimize clearance between power poles and the pipeline in many places. This means a lot of drilling, digging, and heavy equipment close to the pipeline.

Pipeline safety is covered in the following sections of the Phase 2 Draft EIS:

- During construction: Chapter 4, section 4.9 (Environmental Health – Pipeline Safety).
- After construction: Chapter 3, section 3.9 (Environmental Health – Pipeline Safety).
  - 3.9.5.1: Risk assessment Methodology
- Construction method details, equipment used, and sequencing for the Energize Eastside project is included in Appendix A, as well as in the Phase 1 Draft EIS (Section 2.3.5, Construction Summary; Section 2.3.2.2.3, Construction).

Section 4.9 (short-term effects section) analyzes the risk of damage to the Olympic Pipeline during construction and concludes that the risk is low:

**4.9.3 -> Alternative 1 Impacts Conclusions:**

*Based on the results of the risk assessment, there could be an increased risk of a pipeline release and fire during construction when compared with the No Action Alternative (see Section 4.9.1.2). Based on the results, and in consideration of project safeguards, the probability of a pipeline release and fire remains low under Alternative 1. However, the potential environmental health and safety impacts are significant if this unlikely event were to occur.*

This conclusion is the result of an estimation method based on historical rates of "release or fire" of the entire pipeline system, much of which is in rural areas, and not co-located with a 230 kV transmission line. In fact, section 3.9.5.1 states: "...the available data sources on release incidents do not distinguish between co-located and non-co-located pipelines."

Energize Eastside's 18 mile stretch of Pipeline + Transmission line passes through or very close to:

- schools
- parks
- churches
- shopping areas
- neighborhoods

I129-E -1 As the commenter notes, the baseline frequency of incidents was developed using national data. These data do not allow one to differentiate between leaks that occurred in densely versus sparsely populated areas.

However, population density was considered in the consequence analysis in determining societal risk. The risk assessment considered three different population densities. The results varied significantly, from the zero fatality at a minimum population density of 568 persons per square mile to 17 fatalities for the maximum population density of 23,169 persons per square mile. Section 3.9 of the Phase 2 Draft EIS considered the maximum population density in estimating societal risk.

Population density does not affect the estimation of individual risk. As defined in Appendix I-5 of the Phase 2 Draft EIS (Pipeline Safety Technical Report), individual risk was determined for the maximally exposed individual; in other words, it assumed that a person was present next to the pipeline continuously – 24 hours per day, 365 days per year.

Regarding the lack of national data distinguishing between co-located and non-co-located transmission lines, see response to comment 001-F-3.

Regarding site-specific conditions along the corridor, including slopes, and how that might affect the consequences of a pipeline leak, see response to comment I130-A-4.

I129-E-1

I129-E-1

It also traverses slopes above these places. If there were to be a failure of the pipeline and a major spill occurred, there could be a cascade of fuel down the slope which would almost certainly catch fire. This would burn a large swath of neighborhoods and/or public places.

#### Delayed Catastrophe

I129-E-2

A major concern is damage caused during construction but the effects are not seen until after construction. Many disastrous pipeline accidents are caused by damage that was caused during construction but the failure did not occur for months or years later. As the EIS states, crews will be vigilant and responsive to accidents during construction. However months or years after construction, monitoring and response times will likely become lax.

#### Construction Intensity

The risk estimation in the EIS estimates "release or fire" incident risk based on historical accidents caused by construction activity. However it is not clear that these numbers were adjusted to reflect the extent, intensity, and duration of construction of the Energize Eastside project. The following activities will be ongoing for one to two years along the entire 18 mile length of the project:

- Drilling and excavation for pole bases
- Pole installation
- Wire stringing

This activity will be of higher intensity and longer duration than "normal" construction activities. It will involve drilling and excavation as close as 24 inches from the pipeline (see ref), and heavy equipment passing over the pipeline.

#### Ref: 3.9.1.1 > Pipeline Offsets

*Requirements for minimum offsets (or clearance) between any underground structures and hazardous liquid pipelines are 12 inches (49 CFR 195.250). Olympic Pipe Line's practice is to require a minimum of 24 inches of clearance between underground structures and the pipeline*

#### Conclusion

I129-E-3

The EIS must account for the above risk factors, and increased potential devastation due to the location of the project through neighborhoods and public places.

#### References

City of Kent's Hazardous Materials Emergency Response Plan

- <https://www.kentwa.gov/content.aspx?id=9466>
  - which contains this link:
    - the City of Kent Comprehensive Emergency Management Plan (CEMP)
    - <https://www.kentwa.gov/WorkArea/linkit.aspx?LinkIdentifier=id&ItemID=3924>
- The Pipeline-specific section is also available here:
  - <https://www.kentwa.gov/WorkArea/DownloadAsset.aspx?id=8096>

#### Excerpt:

##### August 2004: HAZARDOUS LIQUID PIPELINE

*Definition of Hazard: The Olympic Pipe Line Company consists of over 400 miles of pipelines extending from refineries in northwest Washington to Portland Oregon. These pipelines carry refined liquid petroleum products: diesel, aviation fuel, (basically a form of kerosene) and gasoline. Underground high pressure pipelines remove the equivalent of 1,800 tanker trucks from the regions roadways each day and carry 441,000 barrels or 18,700,000 gallons of fuel each day.*

I129-E -2

It is correct that some amount of risk is inherent with construction near pipeline systems. The pipeline safety risk assessment considered national incident data on similar pipeline systems to estimate the probability of pipeline failures, both under existing conditions (115 kV transmission lines) and with new 230 kV transmission lines. In many cases, and in particular for pipeline damage caused by construction activities, incidents in the national database occurred as a result of failure to follow proper procedures. Even with reasonable worst-case assumptions used in the risk assessment, and in consideration of rates of pipeline incidents from all causes of damage, the results indicated there would be a very small increase in total risk while the project is being constructed. With implementation of the mitigation measures described in Section 5.9.4 of the Final EIS, impacts would be even lower. This does not dispute the fact that the potential public safety impacts could be significant in the unlikely event a pipeline incident were to occur as a result of construction damage.

It is important to note that as a result of the Bellingham and other pipeline incidents, the National Transportation Safety Board (NTSB) made a number of recommendations that resulted in new pipeline regulations requiring improvements in pipeline integrity management. As a result of this new federal legislation, the State of Washington passed the Underground Utilities Damage Prevention Act in 2011 that increased requirements for pipeline operators operating in the State of Washington. See Section 3.9.1.2 of the Phase 2 Draft EIS for additional information.

I129-E-3

Additional Olympic Pipeline info is available on the website of the State of Washington Energy Facility Site Evaluation Council: [www.efsec.wa.gov/oplarchive/proj-sum.pdf](http://www.efsec.wa.gov/oplarchive/proj-sum.pdf)

Excerpt:

*May 1998: OLYMPIC PIPE LINE COMPANY*

*For 30 years, OPL has operated 400 miles of underground petroleum product pipelines in western Washington that were constructed prior to the creation of EFSEC. This existing pipeline system begins at the four oil refineries in Skagit and Whatcom Counties, transports refined petroleum products south to Seattle, then continues to Portland, Oregon. The OPL system consists of two parallel lines, a 16-inch and a 20-inch, starting near the refineries and running south to Renton. After delivering fuel to Seattle and Sea-Tac International Airport, the two lines combine into one 14-inch line that proceeds south to Portland. Virtually all of the gasoline, diesel, and jet fuel consumed in western Washington is transported by OPL. Today, OPL transports over 4 billion gallons a year of refined fuels through its western Washington system.*

Thank you.  
Curtis Allred

I129-E -3 Risks during construction were assessed by EDM Services using the same risk assessment methodology described in Section 3.9.5.1 of the Phase 2 Draft EIS (and described further in Appendix I-5) to assess the temporary increase in potential risks of pipeline damage and pool or flash fires associated with project construction activities. As described in Section 3.9.3.3, “outside force/excavation” caused 20 percent of the refined petroleum product releases (nationally) from January 2010 through December 2015. In many cases, damage from outside/force excavation occurs because a contractor or other third party fails to notify the utility locator service, or the utility improperly locates the buried pipeline. With PSE’s awareness of the pipelines within the corridor, Washington State’s Damage Prevention Law and “one-call” locator service, and Olympic’s procedures to prevent third party damage described in Section 4.9.4, the increased risk posed to the pipelines during construction of the Energize Eastside project is relatively low.

Despite procedures in place to prevent third party damage, the estimates for individual and societal risk incident frequencies were developed using reasonable worst-case assumptions about the potential increase in risk during construction. The national database used as baseline data for the risk assessment includes pipelines in extremely high-density areas and very rural areas. However, the national database is not set up to allow for analysis of high-density areas vs. low-density areas. The California State Fire Marshall’s Hazardous Liquid Pipeline Risk assessment analyzed 10 years of the state’s hazardous liquid pipeline data. It found that the frequency of unintentional releases caused by third party damage by construction equipment was roughly two times more likely in urban areas (Standard Metropolitan Statistical Areas) than outside urban areas. However, the incident rate was only 8% higher than the overall average incident rate for third party damage caused by construction equipment for all pipelines, both within and outside urban areas. In consideration of the increased construction equipment activity associated with PSE’s proposal, the assessment assumed that the potential for third party damage during construction would increase by 50 percent over the frequencies compiled from the national database (EDM Services, 2017).

This comment has been reviewed by EDM Services (the consultant that conducted the pipeline safety risk assessment) and it is their opinion that the 50% increase in the baseline risks is a reasonable worst-case scenario for this project. First, Olympic is well aware of the proposed construction activities, and PSE is well aware of the

pipelines. Secondly, there is ongoing coordination between PSE and Olympic on the proposed construction activities. In EDM's experience, third party incidents most often occur when knowledge of the pipeline location and construction notification is lacking. Even with the reasonable worst-case assumptions related to the increased risk during construction, the risk assessment found that the likelihood of a pipeline release and fire would remain low with the implementation of measures to mitigate potential excavation and surcharge loading risks, and no substantial change in risk compared to the existing condition (No Action Alternative) has been identified. As a result, the potential risk is not considered significant. For additional details about the analysis of construction risks under Alternative 1, see Section 4.9 of the Phase 2 Draft EIS and the *Pipeline Safety Technical Report* (Appendix I-5).

This commenter also references Olympic's practice to require a minimum of 24 inches of clearance between underground structures and the pipelines. While this is Olympic's practice, PSE has indicated that the proposed poles would be located at least 13 feet from the pipelines.

Jeanne DeMund  
 2811 Mountain View Ave. N.  
 Renton, WA 98056  
 206-898-9818  
 jcdemund@gmail.com

July 6, 2017

City of Bellevue  
 Development Services Department  
 Attn: Heidi Bedwell, Environmental Planning Manager  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

Dear Ms. Bedwell;

The following are my comments on the Phase 2 Draft EIS for the proposed Energize Eastside (EE) project. Please note that my address is not contiguous with any of the currently proposed routes for the project, nor is it near any of the currently proposed routes.

I130-C-1

In 2016, in comments on the Phase 1 Draft EIS, I pointed out that Olympic Pipeline company was under a final order to fix deficiencies related to corrosion resistance. OP didn't find the problems in any of their routine maintenance or inspection activities, the same activities we are being asked to rely on for safety under EE.

I130-C-2

The regulatory system that we rely on to keep us safe is not a speedy one at the best of times. The conditions that led to the Office of Pipeline Safety issuing a notice of probable violation and Final Order for correction to Olympic Pipeline company were discovered in August of 2014. The Final Order to correct the condition was not issued until January of 2016, and the work does not have to be completed until June of 2017. Has anyone checked to see that the work has, in fact been completed? It doesn't appear that OP has worked more quickly than the required deadline to correct these potentially hazardous conditions, as the case was still open as of May 2017. And the EIS now expects us to trust that OP will work diligently, quickly and completely with PSE to identify and implement new mitigations for increased electrical interference, in the absence of any ability by PSE to require cooperation.

Can Olympic Pipeline company be relied upon to carry out all required inspections and repairs on time and in full. Table 3.9-4 raises serious questions in that regard. Table 3.9-4 indicates that

I130-C -1 See response to comment I130-A-2.

I130-C -2 See response to comment I130-A-2.

- I130-C-2
1. required procedures were not provided,
  2. required inspections related to corrosion, a known risk with proximity to electric transmission lines, were conducted 9 months late,
  3. Defective test sites were found, and no indication that the defects were repaired
  4. Yet another corrosion inspection issue, with no indication that the inspections were conducted, and are now being conducted within the required time frames.
- The EIS states and restates: PSE has no recourse to compel any mitigation or safety activities of OP. Can we trust OP? Their record even in table 3.9-4 says not.
- Other deficiencies in pipeline safety include:
- I130-C-5
- Page 3.9-16 Pipeline Leak Detection System and Controls. "Leak detection systems must be able to detect 8% of maximum flow leak within 15 minutes." We are not provided with information about how much jet fuel in absolute terms that would be, or the extent of the potential risk to human life and property might occur if a leak just smaller than the leak detection system can detect should occur. And we have no information about shut off systems, how they work, what the actual maximum leak might be. This is unacceptable.
- I130-C-6
- Page 3.9-18 Hazardous Liquid Pipeline Failures. 2,362 incidents were reported in 5 years, over many miles of pipeline. The problem with this type of statistical analysis is that unpopulated miles vs. densely populated miles are not distinguished in any way. The risk may be very low for any particular mile of pipeline, but we should not be casual about rolling the dice in considering the consequences of a failure in a densely populated area like Renton, Newcastle, Bellevue and Redmond. The absolute risk may be low but the potential consequences so high that this increased risk is not acceptable to our community.
- I130-C-7
- Page 3.9-19  
What would be the potential consequence of an "average" spill of 12,900 gallons igniting outside Renton Technical Institute, Tye Middle School or any of the other schools or daycares near the proposed route for example? This is the way we need to think about risk in an urban area, not comforting abstractions like deaths per 1000 mile years.
- I130-C-8
- Page 3.9-45 Extreme Weather Events and Seismic Hazards. The EIS states, "If the overhead transmission lines were damaged during an extreme weather event or natural disaster, there could be risks to public safety if the poles fall and damage the buried pipelines." A vague assurance that safety measures will be included in the final design are inadequate.
- I130-C-9
- 3.9-46 Load comparisons between seismic events and extreme weather conditions may be able to ensure structural designs withstanding these conditions, but there is absolutely no analysis or even any mention of the potential consequences of a simultaneous pipeline rupture and downed transmission wires in the event of an earthquake. The project crosses the Seattle Fault. This omission is unacceptable.

I130-C -5 Appendix I-5 of the Phase 2 Draft EIS, Section 1.1.2 indicates that the normal flow rate of the 20-inch OPL line is 7,900 barrels per hour (333,000 gallons per hour). This section does not discuss the leak detection thresholds of Olympic's system; such information was requested but not provided. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.

Appendix I-5 of the Phase 2 Draft EIS, Section 1.1.3 states, "OPL's PLDS meets or exceeds State and Federal requirements for pipeline leak detection including WAC 480-75-300." WAC 480-75-300 requires that each pipeline operator's leak detection system be capable of detecting a leak equivalent to 8% of the maximum flow in 15 minutes. As a result, a 26,000 gallon spill must be identified in less than 15 minutes. PSE's proposal will not change the Olympic leak detection system, which is currently in place.

There are a number of components to a pipeline operator's leak detection system. Olympic's Pipeline Leak Detection System (PLDS) is just one such component. Should a very slow unintentional release occur, below the threshold of this system, there are other methods of detection. Some of these include:

- Pipeline Patrols – 49 CFR 195.412 requires pipeline operators to inspect their pipeline rights-of-way at intervals not exceeding 3 weeks, but at least 26 times per calendar year. Very small leaks such as this can be identified during these inspections. For example, discolored vegetation is often indicative of such a small release.
- Over-Short Accounting – In addition to the real time leak detection, such as OPL's PLDS, pipeline operators maintain over-short accounting of pipeline gains and losses; these are cumulative accountings over longer periods of time (e.g., 24 hours, 7 days, monthly, etc.). A small, long-term release can be identified by continued losses in these accountings.

It should also be noted that such slow, long-term releases seldom pose a fire or explosion risk to the public; the released contents are most often dispersed into the air (evaporation) or into the soil. Also, this risk is present in the current situation.

I130-C-10 Page 3.9-46 The vague assurances of additional engineering analysis and mitigation measures to reduce risk from arcing in areas where pipelines are within 13 feet of transmission line pole grounds are unacceptable. Even the consultants report does not provide any concrete details. More detail is required.

I130-C-11 Page 3.9-29 The diagram showing a small yellow circle representing the center of a pool fire tidily enclosed within the borders of the right of way seems to indicate that outside the green band, consequences would be minor. The following page, 3.9-30, says that the green band has only 1% mortality after 30 second exposure. What happens after 30 seconds? The fire does not go out. This diagram is very misleading. A more useful diagram would have a circle that shows the border of 570°F temperature, the auto-ignition point of wood, to show people how wide the area where their 2 x 4 construction, shake roofed homes and surrounding vegetation will combust. We can assume that gasoline in automobiles parked on the street will have already caught fire at 495°F. The diagram also does not indicate the variable slopes in the landscape, which would cause the fire to pour in the downhill direction.

I130-C-12 Page 3.9-52-53 The split responsibility for inspection, repair, mitigation, and other safety activities between PSE and Olympic Pipeline is a cause for grave concern. The EIS states unequivocally that PSE has little or no authority to impose specific mitigation, operating or monitoring requirements on OP. It is easy to envision the mutual finger pointing that could easily ensue. Leaving the health and safety of citizens and the protection of private and public property essentially up in the air: "potential mitigation measures"..."additional mitigation measures may be identified during the final design.", "other mitigation measures necessarily would need to be identified and implemented after the project is energized or during peak winter load conditions..." is neither reassuring nor acceptable.

I130-C-13 POTENTIAL MITIGATION MEASURES:  
The title of this section says it all. We have no firm assurance about what measures will be implemented by PSE and/or Olympic Pipeline. PSE has no authority to compel OP to do anything. We are expected to just trust that these two companies will do the right thing. I'm not that trusting.

I130-C-14 Page 3.9-55-56 The EIS says that during operation PSE will "Inform Olympic when the electrical system is operating at, or near, winter peak loading so that Olympic can conduct testing to ensure that AC current densities do not exceed 20 amps per square meter", where it has been predicted by a study that it would exceed that number. And, "Inform Olympic when loading scenarios are expected to be at their greatest to ensure that Olympic conducts field monitoring and/or mitigation for AC potential greater than 15 voles and AC current density greater than 20 amps/square meter throughout the project.

These specific risk reduction measures are recommended by the PSE-hired consultant, EDM Services, in their Pipeline Safety Technical Report.

I130-C -6 See response to comment I155-A-4.

I130-C -7 See response to comment I19-A-3. Given it is not practicable to specify every situation along an 18-mile corridor, the EIS Consultant Team believes that the pipeline safety risk assessment took a reasonable approach to characterizing possible consequences of a pipeline incident in order to identify potential impacts of the project.

I130-C -8 See response to comment I177-A-27.

I130-C -9 See response to comment I177-A-28.

I130-C -10 See response to comment I136-C-8.

I130-C -11 See response to comment I130-A-4.

I130-C -12 See response to comment I130-A-2. Cathodic protection and electrical interference (including a discussion of AC current density and AC-induced corrosion) are addressed in Sections 3.9.3.3 and 3.9.5 of the Phase 2 Draft EIS and updated Sections 4.9.4 and 4.9.5 of the Final EIS. Mitigation measures to support Olympic's determination of cathodic protection requirements for its pipelines are included in Section 4.9.8 of the Final EIS.

I130-C -13 Comment noted. The EIS lists potential mitigation measures that can be used by the permittee to tailor their project design to decrease environmental impacts and by a permitting agencies (in this case, the Partner Cities) in setting conditions for the permit approval.

I130-C -14 The mitigation measure referenced by the commenter was developed based on the results and recommendations of PSE's consultant's, DNV GL, *AC Interference Study* [2016]. The study references a NACE International report ("AC Corrosion State-of-the-Art: Corrosion Rate, Mechanisms, and Mitigation Requirements"), which found that AC-induced corrosion does not occur at AC current densities of 20 amps per square meter or less. The DNV GL study provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering by PSE. The Phase 2 Draft EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational (Stantec, 2017). As clarification on the comment, EDM Services is part of the EIS Consultant Team, and not hired by PSE.

I130-C-15

Note that there is no requirement that Olympic do this monitoring and/or mitigation, no time line for it, and only a vague assurance that PSE will inform Partner Cities upon completion of the monitoring and/or mitigation. If these activities need to be conducted during the peak loading times, prior alerts of anticipating winter peak loading should be provided both to the partner cities and the relevant state monitoring agencies, to ensure that Olympic and PSE carry out the activities in a timely fashion, and should be reported openly to the citizens of the partner cities. The monitoring and/or mitigation should be required by the partner cities in their respective operating agreements.

I130-C-16

The EIS also says PSE will notify Olympic of planned outages, as AC induction effects on the pipeline may be magnified. However, no monitoring or mitigation is even discussed. This point needs to be addressed and action specified.

I130-C-17

Although all of the above are critical safety issues, the key issue is much more basic:

From the beginning of Energize Eastside, we rate-payers, we citizens, we voters were not trusted with an honest discussion of the most fundamental issue: IS THIS PROJECT NEEDED? The absolute denial of any discussion of need was a huge red flag. Anytime someone or some organization figuratively pats me on the head and says "believe me" I get very skeptical.

PSE has refused to engage in an honest discussion of need or alternatives. If they are so sure they are right, what are they afraid of? Why won't they discuss their assumptions, their underlying needs data, or any alternatives.

I130-C-18

I challenge the elected officials of the 4 partner cities, backed up by their planning departments to demand PSE talk to the citizens' groups who have been working on this, demand PSE be transparent about the assumptions and data behind their needs assessment, and demand they engage in a discussion about the community's analysis and alternatives. You can do this, if you have the political will.

Sincerely,

Jeanne DeMund

I130-C -15 See response to comment I130-A-2. The Partner Cities will use the Final EIS to support any required permit decisions. The Partner Cities, in issuing permits, can decide that additional conditions are required, such as reporting of compliance efforts by PSE.

I130-C -16 Neither PSE nor the Partner Cities can require action of Olympic to protect their pipelines, although they are required by federal law to do so when they are aware of potential risks. To ensure that Olympic is aware of risks resulting from planned outages and demonstrating to the Partner Cities that notification with Olympic has occurred as indicated, Section 4.9.8.2 of the Final EIS includes the following recommended mitigation measure:

- File a mitigation and monitoring report with the Partner Cities demonstrating that sufficient safety factors have been incorporated into design, and documenting all consultations with Olympic, including the sharing of modeling and engineering information with Olympic to assist Olympic in its monitoring and mitigation responsibilities. The report should include a plan that identifies the process for conducting additional field surveys and data collection for identifying mitigation measures following project start-up, and proposed monitoring to ensure that mitigation related to operational issues is followed.

I130-C -17 See response to comment I131-A-6.

I130-C -18 Comment noted. See response to comment I132-A-1.

7/11/2017

Weebly Email Service Mail - Comments Phase 2 EIS/PSE project



Energize Eastside EIS <info@energizeeastsideeis.org>

**Comments Phase 2 EIS/PSE project**

1 message

Loretta Lopez <llopez@mstarlabs.com>  
 To: info@energizeeastsideeis.org  
 Cc: HBedwell@bellevuewa.gov

Thu, Jul 6, 2017 at 5:18 PM

I attended all three of the Phase 2 Draft EIS comment meetings and set forth my comments at each meeting. In addition to the comments I made at the public meetings, I submit the following comments:

II31-D-1

1. **Specific details required.** According to Phase 1 EIS, section 1.2, page 1-4, "The Phase 1 Draft EIS broadly evaluates the general impacts and implications associated with feasible and reasonable options available to address PSE's identified objectives for the project. The evaluations conducted during Phase 1 will be used to narrow the range of alternatives for consideration in the Phase 2 Draft EIS. The Phase 2 Draft EIS will be a project-level evaluation, describing impacts at a site specific and project specific level."

I expected site specific details in light of the statement set forth above in the Phase 1 EIS. The Phase 2 Draft EIS is not specific.

The Phase 2 Draft EIS does not contain site specific and project specific details which are sufficient for citizens to be able to visualize and understand the impacts of the project. In particular, it is not obvious where the poles will be located. It is not clear how tall the poles will be. It is not clear from the EIS, how the 18 mile area route will be forever transformed since there are insufficient photos and details of exactly where construction will occur.

II31-D-2

The vegetation management information raises many issues. There is insufficient information to determine whether all trees in the damage zone outside of the easement will be removed or trimmed. It is not clear which trees, within the easement, will be removed or trimmed.

II31-D-3

In the case of the Bridle Trails area, there is only one photo of the area. This is not sufficient to inform the residents of the Bridle Trails area of the specific impacts of the proposed project. Other neighborhoods are similarly situated in that there are not sufficient photos to inform residents exactly what the project will "look like" upon completion.

II31-D-4

There is no visual simulation of the entire project. The result is that there is a piece by piece, segment by segment, partial "snapshot" of the proposed project, it is the totality of the project that must be assessed. The current Phase 2 Draft EIS fails to set forth the details necessary to assess the totality of the visual impact of the project.

II31-D-5

2. **Comprehensive Plan.** The Phase 2 Draft EIS refers to Comprehensive Plan policies in board statements such as on page 3.1-37." The project would be consistent with the Bellevue Comprehensive Plan and the Richards Valley, Factoria Eastgate and Newport Hills ...". The Phase 2 Draft EIS includes the same type of broad statement for each segment. These types of statements are misleading. The Phase 2 EIS should include citations to the specific Comprehensive Plan Policies for each segment in each city.

II31-D-6

3. **Supplemental EIS.** As I stated at one of the public meetings, I request a Supplemental EIS to address the deficiencies in the Phase 2 Draft EIS.

Loretta :Lopez  
 13419 NE 33rd Lane

Bellevue Wa 98005

Vice President, Bridle Trails Community Club  
 Member of CENSE

II31-D -1 See response to comment II14-B-3. Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review.

II31-D -2 See response to comment II139-A-3 regarding trees within the easement. Trees that would be trimmed or removed outside of the easement are discussed in more detail in the Final EIS, Section 4.4.

II31-D -3 See response to comment II95-B-2.

II31-D -4 It is not common practice to do simulations of an entire linear project, but rather to select a variety of key viewpoints that adequately show the diversity of natural and built environments the project traverses. For the Phase 2 Draft EIS, 46 key viewpoints were selected and evaluated to assess the potential impacts.

II31-D -5 The Phase 2 Draft EIS did include citations to the specific policies for segments in each city; see Appendix B-3 for applicable policies by study area city. Potentially applicable comprehensive plan and shoreline master program goals and policies were included in the Phase 1 Draft EIS, Appendix F.

II31-D -6 The Partner Cities believe that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA.

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15d1a32d7035877b&siml=15d1a32d7035... 1/1

Lori Elworth  
8605 129th Ct SE  
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July 4, 2017

Ms Heidi Bedwell  
Energize Eastside EIS Program Manager  
City of Bellevue Development Services Department  
450 110th Ave NE  
Bellevue, WA 98004

RE: Public Comment Energize Eastside Phase 2 Draft EIS

I132-B-1

This two phase process is confusing and frustrating. During Phase 1, I was told Phase 2 would have "project specific" details. How do I respond with comments on a document lacking the information pertaining to my property, or that of my community? Without this specific information my comments will be incomplete. For now, I expect all the previous comments, reports, documents, and materials submitted by CENSE (Coalition of Eastside Neighbors for Sensible Energy), members of CENSE, Brian Elworth, and myself in the Phase 1 DEIS public comment period will remain valid and current as part of the complete record. I am a member of CENSE and agree with all comments submitted by CENSE.

I132-B-2

NEED: EIS Phase 2 Volume 1 Chapter 1 Section 1.3: The only way to determine NEED is by running a Load Flow Study. It is the responsibility of the lead agency to ensure this proposal is properly defined. Understanding the NEED is paramount to define PSE's proposed Energize Eastside. During the CAG process, PSE explained that the Energize Eastside project to replace 115kV High Voltage Transmission Lines with 230kV lines would increase the power handling capacity of those lines by 25% when asked how much additional power is needed. PSE said the reason was because everyone needed more power for their smart phones, lap tops, and computers. PSE's assessment was absolute nonsense. At a monthly Olympians Homeowners Association meeting on February 24, 2014, attended by the association board, neighborhood residents, Olympic Pipeline representatives, and PSE, the question was raised yet again. How much power does PSE need to meet the energy demand? Why does PSE continue to provide the same wrong answer? Energize Eastside will provide 4 times the amount of power that the current line can carry so why does PSE tell us the power will increase 25%? A lead electrical engineer for PSE explained their incompetence during that meeting by stating PSE was a "little rusty" regarding power calculations. The basis for the proposal is bogus. The energy demand has gone down on the Eastside. With the help of new technologies such as LEDs, smart phones, lap tops, and computers, all using batteries, energy efficiency has increased. This has occurred even with new growth. PSE's theory that new technologies are taking more energy is wrong. Almost three and a half years later I am still questioning this NEED. The "Eastside Customer Demand Forecast" (attachment 2/24/14 page 7) graph from PSE is questionable and the false basis for threatening black outs, power outages and supporting PSE's imaginary energy crisis.

At the May 23, 2017 public comment meeting, I spoke about the question of need. The purpose and need of this project has not been adequately or independently verified. I propose the city of Bellevue verify this independently. Your staff has been negligent in not verifying need. The city of Bellevue must take responsibility to make a decision concluding a comprehensive public process to determine whether allowing PSE to continue with their "preferred plan" of Energize Eastside. It is NOT in the best interest of the Eastside cities to use old technology of this magnitude when safer, cheaper, greener, and less destructive modern alternatives are available. BPA recently cancelled a project which was under review for nine years. Seattle City Light is another example that even with growth in Seattle the energy usage has gone down. The same is true for Bellevue and the Eastside. The citizens will be paying a very high price for a project that isn't needed. PSE hasn't shared the data they used to determine NEED. The city of Bellevue's hired consultant was only checking the methodology used by PSE not the variables. PSE provided those values.

My 12 years of education in the Bellevue School District was good enough to make me question PSE's numbers. Calculations can be manipulated to derive the desired result. PSE's numbers going into such an equation will inevitably require careful and critical examination by the lead agency to determine need. PSE would not cooperate in providing their data used to run their load flow study to Don Marsh, President of CENSE even with his proper CEI clearance and permission from the WUTC. PSE is clearly hiding something. If a need exists after an independent review then a project should be scaled to satisfy the need by using

I132-B -1

See response to comment I114-B-3.

I132-B -2

As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project, including responses to the Lauckhart-Schiffman study (see "Topic OBJ"). The Lead Agency has limited authority to question an applicant's motives and cannot use SEPA authority to alter the objectives of an applicant for purposes of review under SEPA.

See response to comment I16-A-2 in regards to the cost to ratepayers.

PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers. Ongoing conservation efforts implemented by PSE were factored into the projected demand in the Eastside.

It is not within the scope of SEPA to require PSE to disclose their modeling assumptions. It is up to PSE to determine to whom they will release their proprietary data. The planning model, however, was reviewed by the EIS Consultant Team and found that PSE had used standard planning practices and had not modified any regional transmission planning assumptions beyond those recommended by ColumbiaGrid.

The Phase 1 Draft EIS acknowledges that the project would provide more than adequate capacity to meet the projected need in the 10-year planning horizon. However, as discussed in the Phase 1 Draft EIS, there is no intermediate size of transmission facility that would work within the regional grid. See Section 2.2.1.15 for discussion of 115 and 230 kV transmission lines.

I132-B-2 modern technology. You must remember my husband, Brian, referring to "measured response" in his public comments. He has used some analogies to explain this concept and how it relates to PSE's project size to solve a projected energy need. PSE has determined a power shortfall will occur unless this project is built. PSE's solution to build Energize Eastside compares to a stack of pennies next to the Space Needle or bringing home a truckload of carrots when your wife asks for some carrots at the store. Energize Eastside is PSE's project to solve a projected need that should be questioned by the city of Bellevue because it is not a "measured response". It is completely over scale. There isn't an energy demand large enough on the Eastside to fit PSE's project. The ONLY way to determine NEED is by running a Load Flow Study. In a conversation with Bellevue's employee Nicholas Matz, we were told that the city wouldn't pay for a Load Flow Study because it would be costly, he said the cost would be a million dollars. Our homes and properties are worth that expense. I know Energize Eastside will be far more costly, and an unnecessary expense to the consumer without actual NEED. I am a supporter of CENSE. CENSE paid for a load flow study. It was determined Energize Eastside is not needed. CENSE has entered their study into the public comment for the Phase 1 DEIS, you have this in the record. Refer to the Lauckhart-Schiffman Load Flow study paid for by CENSE. Purpose and need has not been adequately or independently determined by the city of Bellevue. Why hasn't this been done?

I132-B-3 RELIABILITY: This project will not improve electrical reliability on the Eastside. The EIS should show the data on reliability in relation to the risk of co-locating with OPL (Olympic Pipeline Company). Reliability metrics should be included to see cost effectiveness compared to alternatives. If Energize Eastside doesn't improve reliability in comparison to alternatives that are cheaper, greener, and safer. Bellevue should be aware of this.

I132-B-4 SAFETY: EIS Phase 2: Safety has been ignored. My concerns about the safety of installing and using new 230kV transmission in the same narrow 100 foot easement shared with the aging OPL high pressure petroleum pipelines remain unchanged. Page A-11 Phase 2 DEIS Preliminary Construction Access Routes Newcastle Segment shows dots indicating pole location. This is not adequate "project specific" information. PSE has not determined in this Phase 2 EIS where the poles will be installed in the shared easement. On Thursday, June 8, 2017 PSE sent a field study crew to my neighborhood to locate the two OPL pipelines. The location of the new poles, and the two OPL pipelines are some of the project specific detail this phase fails to document. Why hasn't this information in this EIS? My neighbors have been asking the same questions. I am introducing a list of questions and information from PSE's presentation on this project when it was being introduced to us in February 2014. Questions we need to have answers to now.

Using metal poles, essentially lightning rods next to the same OPL pipelines that exploded in Bellingham is not safe. The current wooden poles aren't conductive. The 230kV transmission lines are almost 4 times the power of 115kV transmission lines. This is not an increase of 25%, PSE's reason to build Energize Eastside. The 230kV transmission lines are designed to be used to transmit power over long distances and not for highly populated areas like segment M in Newcastle. There are alternatives being used around the world that would be more suitable for Bellevue. Refer to the CENSE alternative submitted in Phase 1 DEIS. There are a combination of alternatives which could safely supply the electricity to meet any additional future energy need of Bellevue. Page 1-11 Phase 2 DEIS PSE claims safety is their top priority. PSE was not safe with managing their own gas-lines in Greenwood. Refer to the Greenwood explosion in 2016 articles submitted during Phase 1 comments. PSE didn't take responsibility for causing this explosion. Their negligence was not safe. What will happen when there is a high pressure jet fuel explosion in Newcastle or anywhere the power-lines are co-located with the pipelines? What additional insurance will the property owners living near segment M in Newcastle need? Our local fire department will not be able to extinguish petroleum fire caused by an explosion but will only be able to help with the evacuation. Our firemen are unable to do anything else because the foam they need to fight a petroleum fire is stored at SeaTac airport miles away. The fire caused by the explosion will not be extinguished by water. Using water to extinguish fire under these electric transmission lines will be too dangerous for the firefighters with great risk of causing electrocution and death. CENSE hired an expert, Dr Frank Cheng. Refer to his report in Phase 1 DEIS record. His report says the parallel co-location of 230kV power-lines with high-pressure petroleum pipelines causes corrosion. This is not safe. Another safety report by DNV GL indicates this co-location is not safe. PSE ignores the expert conclusions of DNV GL. The EIS doesn't clarify the significant design changes needed for safety. There are safety standards being violated causing unpredictable risk. The Newcastle city Mayor made public comments at the meeting of May 23, 2017 and he does not believe Energize Eastside can be built safely. Again, PSE claims safety is their number one priority. In the DNV GL report I read the new poles need to be 13 feet away from the pipelines. In Newcastle our easement is only 100 feet. PSE says there will be two poles 100 feet high to run wires. They had originally said one pole for the six wires. When a pole falls it will strike

I132-B -3 The EIS is not intended to establish the cost-effectiveness of the solution proposed by PSE for the transmission capacity deficiency PSE has projected, or of any other alternative analyzed in the EIS. Also see response to comment 001-C-3 regarding reliability measurement.

I132-B -4 Regarding site-specific pole locations, the figure referenced on page A-11 is showing preliminary access routes for construction and maintenance, and general pole locations. Specific pole locations would be determined based on site engineering. In areas near co-located underground utilities, such as the Olympic Pipeline system, the proposed pole location is reviewed in the field with BP/Olympic, the pipeline operator. Please see Chapter 2 of the Final EIS for additional details about pole location and construction.

Regarding the use of steel poles as opposed to wood poles, steel poles act as a grounding rod and direct lightning current into the ground where it dissipates into the earth. This is due to the conducting characteristics of steel and the surface area in contact with the soil. Replacement of wood poles with steel poles and a shield wire would actually help to decrease or mitigate AC interference on the pipelines, as the fault current would be distributed via multiple structures (paths) instead of all the fault current discharging via one path to earth.

Regarding the commenter's reference to the CENSE alternative submitted in Phase 1 Draft EIS, see response to comment I115-A-2.

Regarding the commenter's concerns about PSE's compliance and safety record, refer to response to comment I1122-A-14.

Regarding the commenter's concerns about emergency response, if a pipeline incident were to occur, emergency response would be implemented as required by federal and state law and in accordance with established response plans as described in Section 3.9.2.2 of the Phase 2 Draft EIS and updated Section 4.9.2.2 of the Final EIS. See response to comment I190-F-7 for additional information on emergency response capabilities in the corridor.

Regarding the commenter's concerns related to the DNV GL report and corrosion, Section 3.9 of the Phase 2 Draft EIS considered electrical interference risks related to corrosion, fault conditions, and arcing. As described in Section 3.9.1.4, PSE retained DNV GL (the author of the report "Criteria for Pipelines Co-Existing with Electric Power Lines") to develop a detailed analysis of risks and

recommendations for the Energize Eastside project. This study (“A Detailed Approach to Assess AC Interference Levels Between the Energize Eastside Transmission Line Project and the Existing Olympic Pipelines, OLP16 & OPL20”), referred to in the EIS as the AC Interference Study, was used in preparing the analysis for the Phase 2 Draft EIS. The study included recommendations related to design of pole locations, layout, and configuration to mitigate potential electrical interference-related impacts on the pipelines (see Section 3.9.7.2). As noted in the comment, several industry guidance documents have presented general parameters for locating transmission lines and pipelines in shared corridors, which are used to determine when an engineering assessment, such as the one prepared by DNV GL for the project, may be required. The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering by PSE, as described in Section 3.9.7.2 of the Phase 2 Draft EIS and updated Section 4.9.8.2 of the Final EIS. The EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational.

Even with the reasonable worst-case assumptions used in the risk assessment completed for the Phase 2 Draft EIS, the results of the assessment indicate that there would be a small increase in total risk during operation. With the implementation of measures to mitigate potential risks described in Section 4.9.8 of the Final EIS, these risks would be even lower. The DNV GL report concluded that the pipelines and proposed transmission lines could coexist safely with proper engineering and safety precautions by PSE and Olympic. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipeline; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipeline from corrosion lies with Olympic.

Regarding the commenter's concern of a lack of independent analysis, the Phase 1 and 2 Draft EISs were prepared under the direction of Environmental Coordinator for the City of Bellevue, in consultation with the co-lead agencies, the Partner Cities of Kirkland, Newcastle, Redmond, and Renton. As the Lead Agency under SEPA,

I132-B-4 my house, or my neighbor's house. What if I can't insure my house or property because of the pole height and location? The EIS lacks the study of the 100 foot radius of each pole to determine what houses are at risk. Is there someone with technical expertise employed by the city of Bellevue to examine the safety independent of PSE? Has the city of Bellevue fully digested the DNV GL report independently of PSE using a technical expert? Note that DNV GL was recently fired from Michigan on a safety study because of conflict of interest. If PSE pays for a safety report how do we know it is unbiased? DNV GL or any other company being paid by PSE is questionable and can't be unbiased because their goal is to satisfy their customer. Attached is a copy of a page from the Phase 2 EIS. Please provide me with a more accurate location of where the PSE 230kV transmission poles in Newcastle will be located. Currently we do not have a pole within our property. We have a fully landscaped yard. The two OPL pipelines are next to our property in the easement owned by Olympus Homeowners Association. Will the electric wires be crossing over the two Olympic Pipeline Company pipelines in the 100 foot easement in Olympus neighborhood of Newcastle? The electric wires crossing over the pipelines is a safety concern because of the corrosion. Corrosion will accelerate wherever this occurs. If the wires cross these pipelines, at what angle will the wires be crossing these pipelines? Has this been discussed with the Olympic Pipeline Company by the city of Bellevue and PSE? The evaluation of corrosion must be done properly and independently of PSE. The city should have an independent expert evaluation. How can safety be properly addressed without specifics? The majority of the EIS is PSE's input. An EIS should be unbiased and factual. This information must be in the EIS!

I132-B-5 Note there is a much safer route option in Newcastle. The Seattle City Light (SCL) corridor is 150 feet wide. The SCL easement is a much safer route to locate above ground 230kV lines if necessary in Newcastle. PSE doesn't own this but utilities are required to work together by law to solve energy need. PSE must pursue this option. Seattle City Light easement is 50 feet wider than the shared PSE and OPL easement. Why co-locate these utilities, electric transmission lines and petroleum pipelines, when it isn't necessary? PSE did not formally inquire about using the SCL corridor. We have been asking PSE why they aren't considering this route. When asked about this PSE couldn't supply or document the discussion occurred. Refer to PSE's answer when questioned about using SCL corridor in the email to CAG Rep on 2/11/14 attached. The city of Bellevue as the lead agency must require PSE to work with SCL. The 18 miles of Energize Eastside is densely populated. Safety is the number one priority of the citizens and city of Newcastle.

I132-B-6 An independent review must be done. An objective review should easily flush out the truth. Bellevue should recuse itself. I am appalled this process has continued when it is failing the citizens. Can you imagine having surgery done without consulting a second, or third medical opinion? I can't believe PSE has continued to say "safety is our number one priority" when in truth it is not a safe company. It isn't too late to start again. The citizens and the city of Newcastle put safety first. The risk to public safety must be evaluated thoroughly and independent from PSE. PSE does not have a clean safety record. PSE is not a safe company. OPL does not have a clean safety record. The citizens deserve to know the two utilities are abiding by the law and have clean safety records before we can trust them to work together and guarantee public safety.

I132-B-7 VIEWS: EIS Phase 2 Volume 1 Chapter 3: Bellevue is named for beautiful view. I have lived, and worked here my whole life. The Eastside is beautiful. One of the reasons it is beautiful is because we have wonderful views, tall trees, and abundant green vegetation. All of my trees are tagged by PSE. I was at the Bellevue meeting on June 12, 2017 when Mayor Stokes talked about replacing each tree. What is the value of a large tree when compared to a small tree? The EIS hasn't addressed the true value of trees and vegetation. The loss of trees both large and small will have a profound effect on our landscape and view. We planted each of the trees surrounding our property 29 years ago. Each tree was personally selected and planted by my husband and myself. Does the EIS take this into account? If all our trees in our backyard are gone the only afternoon shade we will have will be from the two 100 foot Energize Eastside power-poles. Another most unfortunate and significant change in view is obvious to me. The 40 foot taller poles in Newcastle will block the views of Mt Rainier for properties farther away from the line. In the EIS the pictures do not show a view of the mountain. Shouldn't the EIS show pictures of the change in view of Mt Rainier? Most of the homes in my neighborhood along the line of power-poles will notice a change in their view of the mountain. That is a significant view. It is obvious this is not unbiased and PSE has pictures which do not show anything significant. This view has been manipulated to appear "insignificant." Is the photographer biased to PSE? We are unclear of pole location, and size of foundation base. These are "project specific" details we intended to comment on at this phase. Once the trees are gone and the vegetation is cleared for a 230kV power transmission project there will be a devastating effect on our view. This will effect housing values. Locating a pole, a 230kV transmission line closer to our houses will effect view and value. Make no comparison of 115kV and 230kV. Make no comparison of taking out large trees and replanting small trees. These trees are not the same. PSE won't be planting large trees near this corridor and that will have a devastating effect on views.

the City of Bellevue's responsibilities are to provide full disclosure of the expected environmental impacts of the Energize Eastside project and to document objective analysis of those impacts, so that decision-makers have adequate environmental information for the permitting and decision-making process. The City of Bellevue hired a consultant team comprised of qualified firms with extensive experience conducting independent analysis and preparing SEPA EISs. The EIS Consultant Team is comprised of subject matter experts that are qualified to analyze the elements of the environment that are included in the EIS. For specialized analysis related to electrical transmission and pipeline safety, the EIS Consultant Team has involved engineers, scientists, and scholars in appropriate fields. The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study prepared by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used in the analysis is consistent with industry practice.

I132-B-5 See Section 2.2.1 of the Phase 2 Draft EIS for an explanation of why the SCL corridor option was not brought forward for analysis in the Phase 2 Draft EIS. See response to comment I12-A-1 in regards to the statement about requiring PSE to work with SCL. Additionally, see response to comment I1121-A-7 in regards to project details.

I132-B-6 The EIS provides an objective view of the potential safety issues that have been identified, including disclosure of the safety violations. Section 3.9 of the Phase 2 Draft EIS contains a detailed analysis of pipeline safety for the Energize Eastside project.

I132-B-7 Large trees have been a large part of the Eastside landscape and the absence of these trees will be notable across the landscape effecting everyones view. The photo simulations fail to accurately show views. Look at the pictures taken in Newcastle, notice there is not one picture showing Mt. Rainier when almost every home along EE's route through Olympus neighborhood has a view of the mountain. The DEIS needs to be factual. A view obstructed by wires and poles, a fence of wires, will change the character of Olympus. Property values will reflect the changes to the landscape. Whether or not properties are located along the route, there will be a ripple effect of depleting property values relating to the view of taller poles and thicker wires. There will also be a negative effect associated with giant towering poles and wires seen from property within sight of the tops of the poles. There is a correlation that should also be addressed and that is the implied risk to safety because there are times when real risk vs implied risk makes no difference. There are properties where the 115kV 60 foot power-lines aren't visible but with 230kV 100 foot power-lines placed at the same distance will be visible. These properties values will be negatively affected because of the change in views. Views will change due to the missing tall trees and abundant green vegetation. Good bye to the beautiful view of segment M in Newcastle.

I132-B-8 AESTHETICS: EIS Phase 2 Volume 1 Chapter 3: Living in the Pacific Northwest we have moisture in the air. At times the PSE 115kV power-lines will buzz (corona discharge) from an interaction between the electric wires and rain, fog, or snow. This can be annoying to humans, birds and animals. I am bothered by this noise. I often walk along the easement shared with the power-lines and have encountered the buzzing. Many people use this route for recreation. Corona discharge occurs on the Seattle City Light (SCL) power-lines in Newcastle, they are a higher transmission voltage line. Both utilities are located in Newcastle where I walk. Some people avoid recreation, walking, biking, horseback riding, or living near these 230kV and higher voltage lines because of the buzzing noise. Will the occurrence of buzzing increase with the increased voltage along the PSE easement near my home? The answer is most definite, yes it will. The higher voltages at which todays transmission lines operate have increased the noise problem. Humans, birds, and animals living near the buzzing will be impacted.

I132-B-9 EARTHQUAKES: EIS Phase 2 Volume 1: Why is this being dismissed and overlooked in Phase 2 EIS? We live in an area known for earthquakes. Energize Eastside crosses over a earthquake fault-line. This could potentially lead to further catastrophe with the collocation of the high pressure petroleum liquid pipeline. The taller poles would strike homes in Olympus if they fall during an earthquake. There is danger that these electric wires could ignite one or both pipelines if they were to fail. Locating 230kV electric power transmission lines next to two high pressure petroleum pipelines is not safe. Earthquakes could be devastating along the EE route.

I132-B-10 ALTERNATIVES: EIS Phase 2 Volume 1 Chapter 2: Utilities are required to work together (FERC order 888). PSE did not properly address using the SCL corridor. The segment in Newcastle would work for an alternative route. It is wider and available, and doesn't have the Olympic Pipelines to co-locate with. PSE did not provide sufficient reason for not considering this route in Phase 1. There is a safer, cheaper, greener alternative to PSE's preferred plan. By using modern technology PSE can achieve this.

I132-B-11 PSE has exaggerated data to justify Energize Eastside. PSE misrepresented efforts to work with SCL to secure a PSE favorable route for Energize Eastside. PSE continues to blast an aggressive PR campaign to convince the public Energize Eastside is going to keep the lights on to meet the growing need. PSE is falsely claiming that Energize Eastside is an upgrade of an old 115kV system that has had no maintenance since it was built. That is untrue, PSE continues to use propaganda that is false. They should be truthful yet they continue to blast false advertising to the public. Energize Eastside is a piece of the regional electrical grid, it serves the grid, this is not just a "local" Eastside portion once it is delivering 230kV of power to the grid. Unfortunately the WUTC has no oversight and FERC has denied any intervention claiming it is a local issue and leaving decision up to Bellevue and the Eastside cities to determine. CENSE depends on the city of Bellevue to review and determine. If the EIS isn't factual and unbiased of PSE how can Bellevue come to the best decision?

I132-B-12 By not filing the project application PSE has failed to disclose information necessary for EIS public comment. Again I want to comment how this EIS is failing, I urge the city of Bellevue, the lead agency to pause. Safety should be everyones priority here. Co-locating Energize Eastside with OPL is not safe. Review your vision for the Eastside. Look at PSE as the private business. The citizens of the Eastside are the stakeholders. Take a look at BPA's decision to cancel a project that is very much like PSE's Energize Eastside. Seattle City Light reported energy use is down. The energy trend is declining even with growth. Realize there are much more appropriate actions to meet the Eastside electrical demand using modern technology. This Phase 1 and

I132-B -7 Impacts to trees and vegetation are described in Section 3.4 of the Phase 2 Draft EIS. While mature trees do provide more environmental benefits than small trees, this is taken into account as part of the Partner Cities' tree ordinances. The trees that were tagged were likely tagged during the tree inventory assessment conducted by The Watershed Company. The fact that a tree is tagged indicates it was part of the inventory, and not that it is selected for removal. Tree removal was also part of the visual impact analysis (see Section 3.2.5.1 of the Phase 2 Draft EIS).

Section 3.2.5.14 of the Phase 2 Draft EIS states that most views from the Olympus neighborhood are of the Cascades, the Olympics, and in some places Mount Rainier. There is the potential for residential views of the Cascades, Cougar Mountain, and potentially Mount Rainier to be impacted, some of which could occur in places with high population density (see Appendix C). However, the degree of scenic view obstruction is expected to be low due to the presence of other obstructions, such as trees and buildings, and the limited number of pole locations. No scenic views from parks, trails, or outdoor recreation facilities would be impacted. Impacts to scenic views would be less-than-significant.

Homes along 128th Place SE in Olympus with views of Mount Rainier could experience scenic view obstruction as a result of the project (see Figure C-6). However, mitigation such as reduced pole height would result in reduced impacts. Under the 100-foot-tall pole scenario, up to 1/3 mile of residences immediately west of the transmission line could be impacted by the project, as well as homes west of the transmission line on 129th Avenue SE. During site visits to Olympus, no views of Mount Rainier could be seen from public rights-of-way. For this analysis, simulations were only taken from public places. This is the reason why a simulation with views of Mount Rainier was not produced.

Visual simulations of the project were developed for each of the viewpoints by Power Engineers (Power Engineers, 2016). Methods for preparing visual simulations are detailed in Appendix C of the Phase 2 Draft EIS. VIA, a subconsultant used by the EIS Consultant Team, conducted a review of the Power Engineers methodology and found it to be consistent with standard practice.

Property values were evaluated programmatically in the Phase 1 Draft EIS (see Chapters 10 and 11). Additional analysis was done for Phase 2 of the Draft EIS in Section 3.10. Studies on the perception of

I132-B-12

Phase 2 EIS is confusing and is PSE biased, it does not follow the guidelines by definition and therefore should not be allowed. Unless the lead agency independently understands the purpose and need for Energize Eastside then the NO Action alternative is the only outcome.

Public Comments (5 pages)

4 Attachments:

2/11/14 Energize Eastside Questions and Answers to Newcastle CAG Representative (5 pages)

2/24/14 Energize Eastside Olympus Homeowners Association PSE VP Andy Wappler (24 pages)

USGS Lifelines and earthquake hazards in the greater Seattle area (1page)

Phase 2 DEIS page A-11 Newcastle Segment Map (1 page)

health effects associated with EMF did not find a measureable influence on sales prices (see Section 10.7.1.4 of the Phase 1 Draft EIS). Pole foundation base size is described in Chapter 2 of the Phase 2 Draft EIS. Updated pole locations are provided in Chapter 2 of the Final EIS and are also located on the project website ([www.energizeeastsideeis.org/](http://www.energizeeastsideeis.org/), in the Library tab).

I132-B -8 Noise impacts were assessed programmatically in the Phase 1 Draft EIS (see Chapter 9). It was determined that impacts to noise would less-than-significant. Therefore, potential noise impacts were not evaluated further in the Phase 2 Draft EIS or the Final EIS.

EMF/corona impacts to wildlife species are generally unknown or inconclusive; see the response to Key Theme P&A-3 in Appendix J of the Final EIS.

I132-B -9 See response to comment I120-A-1.

I132-B -10 See response to comment I12-A-1.

I132-B -11 Comment noted.

I132-B -12 See response to comment I114-B-3 in regards to specifics of project design.

Section 3.8 of the Phase 2 Draft EIS covers EMF and Section 3.9 of the Phase 2 Draft EIS contains a detailed analysis of pipeline safety for the Energize Eastside project.

See response to comment O01-C-8 in regards to the BPA project.

The City of Bellevue, as the lead agency for the SEPA review, is not required to evaluate project need, but rather is tasked with ensuring that the EIS presents a thorough analysis of potential environmental impacts from the proposed project.

Energize Eastside Phase 2 Draft Environmental Impact Statement Comment

Required Information: For your comment to become a party of record, you must submit your physical mailing address with your comment. Being a party of record is necessary for any appeals to the adequacy of the EIS.

Name: RICHARD A. KANER, MO
Street Address: 6025 HAZELWOOD LN SE
City: BELLEVUE
State: WA
Zip: 98006

Comment topic from EIS (Cite page number when possible)

Your Comment

I FEEL THE EIS IS FLAWED IN SEVERAL AREAS:

1135-B-1

1 It is my understanding that the EIS PHASE 2 is to comment on the specifics of the proposed project. However, there is no permit application to outline the specific route. The impact varies depending on the specifics of pole placement, design, trees taken etc. We are left to comment based on conjecture and generalities rather than specifics. THE EIS TALKS OF OAK, WILLOW 1 + WILLOW 2.

1135-B-2

2 How can the EIS NOT mention the safety risks outlined by DNV-GL in their report on PSE's preferred route?

1135-B-3

3 How can you propose a powerline built on top of 2 high pressure jet fuel pipelines that crosses an established earthquake fault (I-90 corridor) -> CONTINUED

Signature [Handwritten Signature]

I am a CENSE member
I am NOT a CENSE member

- 1135-B -1 See response to comment 1114-B-3. Refined pole location data are presented in Chapter 2 and Appendix A of the Final EIS for PSE's Proposed Alignment, as well as on the project website (www.energizeeastsideeis.org/), in the Library tab.
1135-B -2 See response to comment 001-A-4.
1135-B -3 See response to comment 1120-A-1.

- (3-CONTINUED)
- I135-B-3 and publish an EIS that has NO discussion of seismic factors and NO Earthquake analysis.
- I135-B-4 ④ While this phase of EIS is supposed to look at the route itself, the EIS says it is important to understand the need for the project. Towards that end:
- I135-B-4 A) The Eastside needs assessment is out of date and the data has been removed from the Emerging Eastside Website. Demand decreased when the assumption was it would increase.
- I135-B-5 B) Batteries, once viewed as experimental, are now mainstream. TESLA built a battery for Southern CA that protects them from rolling blackouts. What is the population and energy demand difference between the Eastside and SOUTHERN CALIFORNIA !? This can easily work here and isn't addressed in the EIS.
- I135-B-6 C) BPA cancelled a \$1.2 Billion transmission line in South WA meant to carry electricity to CA. BPA says the current trend reduced the need for the line, why doesn't this justify re-examination of PSE's claim for need on the Eastside. Their data, like their proposed project, is OUTDATED
- PLA/ANG MO

I135-B -4 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The EIS consultant team reviewed the planning model and found that PSE had used standard planning practices and had not modified any regional transmission planning assumptions beyond those recommended by ColumbiaGrid. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Project Objectives Topic).

I135-B -5 See response to comment I1120-A-1.

I135-B -6 See response to comment 001-C-8.

6/28/2017

Weebly Email Service Mail - Submitting Comments for Phase 2 EIS/Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

Submitting Comments for Phase 2 EIS/Energize Eastside

1 message

Sue Stronk <ssbuds@comcast.net> To: Energize Eastside EIS <info@energizeeastsideeis.org>

Wed, Jun 14, 2017 at 11:26 PM

Please submit this letter I sent via e-mail to Bellevue City Council and the City Manager to be included in the Phase 2 EIS comments. Thank You.

Submitted by: Sue Stronk 12917 SE 86th Place Newcastle, WA 98056

E-mail sent to Bellevue City Council and Bellevue City Manager—June 14, 2017:

At the Monday Bellevue council meeting June 12, again you let your staff walk all over you with your direct questions

you wanted answered to home devaluation in the Phase 1 EIS. NO your answers were not met by Nicholas Matz in his presentation to you. He gave again his snow job and again you just dismissed your questions without persistence.

For your info:

1) This EIS is flawed by using PSE paid contractors for the input. You cannot have an "independent and transparent" EIS like Matz portrays when you have PSE paid contractors supplying that information. Example: Power Engineers

was hired by PSE in the CAG process. They are also hired by the EIS

contractor to do the photo simulations—before and after pictures. You cannot tell me that is a coincidence with all the photographers available for such work! There are no view obstructions simulated, in Newcastle our poles were to be 85' tall in Phase 1 EIS—now in Phase 2 they are to be 100' tall poles—no photo upgrades to show the difference.

2) Old data is given for under-grounding techniques and pricing—all provided by the PSE contractor Power Engineers to benefit PSE to dismiss under grounding. It has been 3 1/2 years since EE was proposed—there is proven technology now that will relieve the small power deficit PSE states could happen on a few cold mornings. This project is an overkill for profit—and you just turn your heads to those facts.

3) There must be "project" alternatives in this EIS—which are totally different from "routing" alternatives—which take the same project down different streets. These must be included or the "no action plan" is the only option to this EIS.

4) Matz says that pole locations are shown in Phase 2 EIS—dots on a small scaled page do not locate the poles for the public to understand the location near them to make comments!

5) Housing values—are dismissed P2-10 where alternate routes will require new easements—"taking of property—where some will loose sheds and garages"—not only limit the size of plant material but could limit a house remodel or expansion. "Less that significant"—because they are not removing your house! Tell that to the homeowners affected!

6) P2-54 "115Kv transmission corridors can be narrower than 230Kv corridors"—Seattle City Light 230Kv corridor is 150' wide, AEP Ohio requires 120'-150'—yet PSE thinks they can build 2-230Kv lines along two hazardous material pipelines in a 100' space—home to home?

7) Still no seismic study has been provided for safety of this project located by the pipelines along a major fault line in this area. You cannot ignore that!

8) P 3.9-46 The DNV-GL study that PSE commissioned about the pipelines says that the poles must be 13' away from the pipelines. The EIS states—"PSE will integrate their recommendations where applicable"—not a sufficient safety reply from PSE who says "safety is their number one priority"!

8) P 3.9-53 "The final design of the project has not been completed—therefore the exact specs and standards that would be incorporated in the project have not been identified". Really—so how are we to comment when we don't know what the end result will be? A total waste of time and \$26 million PSE has spent on this project to date without any specifics!

9) As Matz stated, the example of Newcastle's potential loss of city tax revenue was based on a \$10 million decrease in property value overall for the city. It would be "less than significant " for Newcastle—because the city could just reduce

I136-C-1

I136-C-2

I136-C-3

I136-C-4

I136-C-5

I136-C-6

I136-C-7

I136-C-8

I136-C-9

I136-C-10

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1/2

I136-C -1 See response to comment I136-A-5. Power Engineers was not hired by the EIS contractor. PSE hired Power Engineers to prepare the simulations. The EIS consultant reviewed the methodology used by Power Engineers to ensure that it would produce sufficiently accurate representations. The EIS consultant also specified where simulations should be developed, in areas where PSE had not previously ordered simulations.

I136-C -2 The Phase 1 Draft EIS used best available data to analyze the technology available and the costs associated with undergrounding. See response to comment I16-A-1 for more details on costs and requirements associated with undergrounding.

I136-C -3 The Phase 1 Draft EIS analyzed various ways to accomplish the project objectives. See Chapter 2 of the Phase 2 Draft EIS for a detailed description of the alternatives considered in the EIS. Alternative 1 (Option A) was brought forward for analysis in Phase 2, and different routes were chosen for the project-level analysis. Please see Chapter 2 of the Phase 2 Draft EIS for a detailed description of the project and alternatives. In addition, Section 2.2 of the Phase 2 Draft EIS describes alternatives not analyzed, generally because they did not meet PSE's project objectives.

I136-C -4 See response to comment I114-B-3. Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website (www.energizeeastsideeis.org) for the public to review.

I136-C -5 PSE's Proposed Alignment as presented in the Final EIS would be located entirely within the existing corridor and can be developed without the need for displacement of accessory structures, houses, or businesses.

I136-C -6 The easement required for 230 kV lines is dependent on the pole configuration and height. PSE has determined that the existing 100-foot easement would not need to be extended for any of the segments within the existing corridor based on the proposed pole location, configuration, and height (despite co-location with the Olympic Pipeline system). With regards to structures in the vicinity of high capacity transmission line, PSE complies with NESC guidelines, which are summarized in Section 3.1.1.1 of the Phase 2 Draft EIS. Pipeline safety is discussed in Sections 3.9 and 4.9 of the Phase 2 Draft EIS.

I136-C -7 See response to comment I120-A-1.



6/28/2017

Weekly Email Service Mail - Submitting Comments for Phase 2 EIS/Energize Eastside

our services or easily raise taxes to cover the deficit—but what he failed to mention P 3.10-8 was that of the 86 adjacent

single family residences next to the power line in Newcastle—**each home would be de-valued \$116K in property value to reach that city shortfall!—Tell me that is not significant to a homeowner. That is the kind of answer you were looking for—that was totally glossed over by Matz and this EIS! There are no studies done to home de-valuation!**

**Press your staff for your answers—do your jobs.**

Sue Stronk  
Olympus Neighborhood/ Newcastle

I136-C-10

I136-C -8 The DNV GL AC Interference Study recommended that in cases where the transmission line pole grounding rods would be located within 13 feet of the pipelines, additional engineering analysis would be conducted and mitigation measures implemented to reduce fault risks (e.g., arc shielding protection). The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. Based on the DNV GL recommendations, PSE revised the design from that presented in the Phase 2 Draft EIS to ensure that all poles would be at least 13 feet from the pipelines, because this was the maximum calculated arc distance necessary to prevent arcing between the poles and the pipelines, based on soil conditions in the corridor. If the modeled conditions are correct, there would be no risk of arcing damage. However, soil conditions are quite variable; therefore, actual arc distances could vary. Actual arc distances will be measured at each pole once the poles are installed. Where necessary, pole grounds would be installed to provide adequate separation from the pipelines. An additional mitigation measure, requiring modeling prior to installation, would ensure that pole grounding meets NACE standards. See Final EIS Section 4.9.8, *Mitigation Measures*.

I136-C -9 See response to comment I114-B-3.

I136-C -10 See the response to comment I136-A-8.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL&n.&view=pt&search=inbox&th=15caa6ebbc55b8b3&siml=15caa6ebbc55b8b3>

2/2

7/11/2017

Weebly Email Service Mail - Comments to Phase 2 EIS --PSE EE



Energize Eastside EIS <info@energizeeastsideeis.org>

Comments to Phase 2 EIS --PSE EE

1 message

Sue Stronk <ssbuds@comcast.net>

Tue, Jun 27, 2017 at 11:03 PM

To: Energize Eastside EIS <info@energizeeastsideeis.org>

Heidi Bedwell—Please enter this article and comments into Phase 2 EIS for the record:

Thank you-

Sue Stronk—I am a proud member of CENSE. Submitted by email 6/27/2017  
12917 SE 86th Place  
Newcastle, WA 98056

Seattle Times  
"Neighborhood of the Week"  
Olympus:10 Yrs. Ago



"The upscale Olympus neighborhood in Newcastle lives up to the grandeur its name implies" so says the 2007 article in the Neighborhood of the Week section of the Seattle Times. The article went on to say: "The well-maintained yards and homes are a hallmark of Olympus with its wide streets and pedestrian friendly trails. The proximity to Bellevue and Seattle makes for a convenient commute. As one neighbor said, "It's not just a neighborhood, it's a community."

PSE Energize Eastside will destroy our wonderful neighborhood recognized in 2007 by the Seattle Times as Neighborhood of the Week. This project with 100 foot tall steel poles, unsafely placed along two Olympic hazardous fuel gas pipe lines, all splitting our neighborhood in half along only a 100' right of way space between homes is totally fraud by PSE to profit for their shareholders when there are other safer, cheaper, more environmentally friendly, 21st century solutions being utilized today in other cities across the US. This project is over-scaled only to profit by the WUTC 10% return allowed on infrastructure construction.

I136-D-1

Shame on PSE for not being open and honest.

Shame on the City of Bellevue for turning their heads to the truth and allowing a crooked EIS and process from the start.

Praise to "little Newcastle" who is going to deny this project in our city—because it is unsafe, it does not benefit our city,

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15ced4c653974896&siml=15ced4c65397... 1/2

I136-D -1 Comment noted.

I136-D

COMMENT

RESPONSE

7/11/2017

Weebly Email Service Mail - Comments to Phase 2 EIS --PSE EE

I136-D-1

it is proven there is not a "need" for the project by CENSE, the independent technical review of pipeline safety wants answers Olympic is unwilling to provide, and 3 alternative sites have not been presented for this project. All these must be fulfilled in Newcastle codes and Comp Plan—where the scale and character of this project strongly contrasts with the existing built environment and does not minimize visual impacts to adjacent land uses. All stated as "significant" in this EIS book for this area!

I love my Olympus Neighborhood, and I love my city of Newcastle for standing up for our safety and not let the giant PSE bully us.

Luck, safety, and sensibility be with us!!



<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZH.en.&view=pt&search=inbox&th=15ced4c653974896&siml=15ced4c65397...> 2/2

Heidi Bedwell  
Environmental Planning Manager  
City of Bellevue  
PO Box 90012  
Bellevue, WA 98009-9012

June 20, 2017

Hi Heidi—Please submit these comments for Phase 2 EIS for Energize Eastside. I am a Cense member for the record. Thank you-  
Submitted by:  
Sue Stronk  
12917 SE 86th Place  
Newcastle, Wa 98056

RE: Scaled Mapping Request /Newcastle Codes /AC Current Density

I136-E-1

Should PSE proceed with Energize Eastside, I would like a scaled drawing of the pole that will be on my property behind my house at the address above as well as the pole across from it on the other side of the pipelines. In that drawing, I want to see defined the 60' unbuildable space that our Newcastle Land Use Codes require as defined as a 50' Olympic Pipeline "corridor", plus 5' on each side of that corridor that is unbuildable. I want to see the pole placements, diameter size indicated, the size of hole that will be dug and the method used to secure the pole in the ground, pipeline locations, and the other sewer and water pipes PSE has located recently in surveys of this area. (P4.3-2 Says foundation holes will be 4-8' in diameter and 25'-50' deep) Also be sure the poles are not within 13 feet of the pipelines per PSE's own hired study from the DNV-GL report. Keep in mind—there is only 100' distance here from house roof to house roof.

I136-E-2

Just south off this area, the Olympic Pipeline splits away and goes 45 degrees southwest—making separation of each pipeline about 60'-70' apart. This area will not be safe, nor is probably safe now because the power lines are not crossing the pipeline at 90 degrees per DNV-GL study which can cause corrosion of the pipelines.

As it states P3.8-9—If pipeline inspections are only "pigged" for problems every 5 five years—stating the last inspection was April 2014 and the next scheduled for early 2019—it seems inspections and safety review should be done more often than 5 years as there is potential for corrosion in this area.

I136-E -1 See response to comment I114-B-3. Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review.

I136-E -2 As described in Section 3.9.1.4, PSE retained DNV GL (the author of the report "Criteria for Pipelines Co-Existing with Electric Power Lines") to develop a detailed analysis of risks and recommendations for the Energize Eastside project. This study ("A Detailed Approach to Assess AC Interference Levels Between the Energize Eastside Transmission Line Project and the Existing Olympic Pipelines, OLP16 & OPL20"), referred to in the EIS as the AC Interference Study, was used in preparing the analysis for the Phase 2 Draft EIS. The study considered a number of geometry characteristics that influence electrical interference-related effects, including the angle between the pipelines and the transmission lines. The study included recommendations related to the design of pole locations, layout, and configuration to mitigate potential electrical interference-related impacts on the pipelines. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering by PSE, as described in Section 4.9.8 of the Final EIS. The EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational. The DNV GL report concluded that the pipelines and proposed transmission lines could coexist safely with proper engineering and safety precautions by PSE and Olympic. The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study prepared by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used in the analysis is consistent with industry practice.

Per federal law, Olympic is responsible for the maintenance and safe operation of the pipelines; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission lines and providing information to Olympic, the responsibility for protecting the pipelines from corrosion, including conducting pipeline inspections, lies with Olympic.

Sue Stronk \*12917 SE 86th Place\* Newcastle Wa 98056 5/25/17 EIS

I136-E-3 | I am a CENSE member and support the “No Action Alternative.

This EIS is flawed and tainted by PSE’s influence and should be stopped now and re-started. I realized this myself—but it is conveniently stated in writing in Chapter 2-page 20: in describing PSE’s public outreach it says: —“In 2014 PSE convened the Energize Eastside Community Advisory Group (often) referred to as the “CAG” “. One of those PSE contractors hired, in that CAG process, has it’s name throughout this EIS document. They are credited on every “before and after” photo simulation, gave data on EMF, and quoted outdated under-grounding costs. This company was hired and paid by PSE in the CAG process, and then hired and paid again by ESA who prepares this document—which ultimately is paid for by PSE. This data needs to be unbiased and fair in the content or it becomes invalid for analysis.

I136-E-4

The word “significant describing impacts” is rarely used in this document. However, under the “scenic views section” describing Newcastle (page 3.2-77), it states the impacts would be “significant” right beside my house. It says- “the poles would almost double in height and be closer to neighboring residences making a strong contrast with the existing. It would also be in conflict of the Newcastle Comprehensive Plan that calls for transmission lines to be sited and designed to minimize visual impacts to adjacent land uses.” I would like to note, these same “significant” impacts that I will experience beside my house- will be true for so many others along this project. But here, where “significant impacts” are described—you don’t see any “before and after” photos. The photos simulations for Newcastle have not been updated to represent the 100 foot tall poles now proposed for our area.

I136-E-5

I have 2 other requests:

“AC current density”—above 20 amps can cause pipe corrosion. The EIS says there are “2 short segments” with readings of 22-35 amps currently. Define these locations where pipelines could be corroding today.

I136-E-6

What exactly is the use of the fiber optic cable and does PSE profit from it?

I136-E-7

I136-E -3 | Comment noted.

I136-E -4 | See response to comment I136-A-5 and I136-C-1.

I136-E -5 | See response to comment I136-B-2. Significance criteria for scenic views and the aesthetic environment are described in Section 3.2.3.4 of the Phase 2 Draft EIS.

I136-E -6 | See response to comment I136-B-3.

I136-E -7 | See response to comment I136-B-4.

Sue Stronk \*12917 SE 86th Place\* Newcastle Wa 98056 5/25/17 EIS

I am a CENSE member and support the "No Action Alternative".

- 1) I have to say that I did learn something interesting from this EIS document. You hear the importance of saving trees and this quote helped me see the big picture— "Each year an acre of trees absorbs the amount of carbon produced by driving a car for 26,000 miles". So I ask— how many acres does the 5,000 trees represent that are estimated to be removed? Then, I can relate to the damage this causes the environment.
- 2) Now to my critical comments:  
This EIS is flawed and tainted by PSE's influence and should be stopped now and thrown in the trash. Not only did I pick up on this myself—but it is conveniently stated in writing in Chapter 2-page 20: describing PSE's public outreach it says —"In 2014 PSE convened the Energize Eastside Community Advisory Group (often) referred to as the "CAG" to inform the development of the proposed alignment alternative and associated route options". One of those PSE contractors hired, in that CAG process, has it's name throughout this EIS document. They are credited on every "before and after" photo simulation, gave data on EMF, and quoted outdated under-grounding costs. This company was hired and paid by PSE in the CAG process, and then again hired and paid by ESA who prepared this EIS document. This data needs to be unbiased and fair in the content or it becomes invalid for analysis.
- 3) In the EIS, describing "AC current density"— any readings above 20 amps can cause pipe corrosion. The EIS says there are "2 short segments" that are estimated to be between 22-35 amps currently. Where are these areas that could be corroding the pipelines today?
- 4) Does PSE profit from the fiber optic cable? Exactly what it is used for?
- 5) PSE hired DNV-GL that recommends the power towers be at least 13' away from the pipelines and that both lines operate at 230kV from the start. PSE says "it will integrate this report where applicable". If "safety" is PSE's number one concern, they should abide by the report they commissioned themselves.

- I136-E -8 Each person in the U.S. generates approximately 2.3 tons of CO2 each year. A healthy tree stores about 13 pounds of carbon annually -- or 2.6 tons per acre each year. An acre of trees absorbs enough CO2 over one year to equal the amount produced by driving a car 26,000 miles. An estimate of carbon emitted per vehicle mile is between 0.88 lb. CO2/mi. – 1.06 lb. CO2/mi. (Nowak, 1993). Thus, a car driven 26,000 miles will emit between 22,880 lbs CO2 and 27,647 lbs. CO2. Thus, one acre of tree cover in Brooklyn can compensate for automobile fuel use equivalent to driving a car between 7,200 and 8,700 miles.
- I136-E -9 See response to comment I136-A-5 and I136-C-1.
- I136-E -10 See response to comment I136-B-3.
- I136-E -11 See response to comment I136-B-4.
- I136-E -12 See response to comment I136-C-8.

Sue Stronk  
12917 SE 86th Place, Newcastle, WA 98056

I am Sue Stronk, a Cense member, and a 30 year resident of Olympus in Newcastle, supporting the "No Action Alternative".

I136-E-13

(1) I submit tonight, a scaled drawing of a typical 230kV project as described in the EIS by AEP-Ohio—with 120-150' right of way. And, I also show the Energize Eastside solution—using the existing 100' ROW—where the project cannot be centered because of the 2 Olympic pipelines. EE puts the 100' tall poles within 20 feet of our homes following the Newcastle Code requirements. The EIS states: PSE could apply for a variance, as PSE admits it may not be feasible to build it here— or they could underground the lines—which better NOT be at the citizens' expense.

I136-E-14

(2) PSE replaced a wooden pole behind my house and suggested I not be home that day. Each new pole requires 3-7 days for installation over a 2 month time frame. What mitigation is there to homeowners who "should evacuate for safety" during construction? As you see, these poles are well within falling distance of homes as well as the foundations could fracture the pipeline.

I136-E-15

(3) How can PSE's paid consultants also be the authors of the EIS documents? Is that not a conflict of interest?

I136-E-16

(4) PSE says we face "rolling blackouts" soon—yet 1 or 2 of the 5 existing transmission lines can be shut down for 12-18 months during the construction of EE without any "scary" consequences?

I136-E-17

(5) Photo simulations were not updated showing the 100' tall poles now proposed in Newcastle, and many photos are not accurately scaled in the EIS. Locations do NOT represent the true visual impacts of the project and do not show the other 2 wires that will be on each pole—the fiber optic and shield wires— a total of 4 or 5 wires on each pole not just 3.

I136-E-18

(6) The consequence of a 10% home devaluation was a "hypothetical study" of Newcastle's 89 homes adjacent to the project resulting in an value decrease of \$116K per home and a \$20K tax deficit for our city. The EIS says that is "less than significant" because Newcastle could easily raise taxes \$5.27 annually from each Newcastle home, or the city could reduce budgets. Tell us again—that a \$100K loss in home value is "not significant" when PSE profits over a billion dollars at our expense building this project!

I136-E -13 See response to comment I136-A-2. Per PSE's interpretation of state-approved tariff rules, the requesting party (such as the local jurisdiction, or an affected party or group) may be responsible for paying the difference between overhead and underground costs, including design, construction, and maintenance.

I136-E -14 See response to comment I136-A-4.

I136-E -15 See response to comment I136-A-5.

I136-E -16 See response to comment I136-A-6.

I136-E -17 See response to comment I136-A-7.

I136-E -18 See response to comment I136-A-8.

Heidi Bedwell  
Environmental Planning Manager  
City of Bellevue  
PO Box 90012  
Bellevue, WA 98009-9012

June 20, 2017

Hi Heidi—Please submit these comments for Phase 2 EIS for Energize Eastside.

I am a Cense member for the record. Thank you-

Submitted by:

Sue Stronk  
12917 SE 86th Place  
Newcastle, Wa 98056

Questions I have for the Phase 2 EIS I would like answers:

I136-E-19

1) If we are so close to rolling blackouts, how can you shut off 1 or 2 of the 5 -115kV power lines in our area to build this project over a 12-18 month time frame? That alone tells me this project is NOT needed.

2) Is PSE not approaching the original projected time frame for rolling blackouts discussed by PSE—3 1/2 years ago? Thus voiding their own project parameters? We need to restart with 21st century solutions!

I136-E-20

3) "Routing options" —placing poles on different streets is not the same as Project Alternatives. Doesn't both Bellevue and Newcastle require in the codes to have 3 other power alternatives to a project like this —whether inside or outside their cities? All project alternatives have been dropped in Phase 2—thus the No Action Alternative —seems to be the only viable one there is. Why does PSE think they can get away with ignoring this? There are many valid solutions to poles and wires—since 1500MW of power is not needed to be sent to Canada on these transmission lines. (PSE said that!) That leaves only 54MW of power even if this project was needed—a whole other discussion that any power is NEEDED!

I136-E-21

4) P1-10—under public services deemed "no significant impact" —how about a catastrophic pipeline explosion fire? Don't tell us public services won't be critical.

I136-E-22

5) Seems everything under housing is "no adverse impact". Your response is that because a neighborhood is still there and no houses are taken. What a joke!

I136-E -19 See response to comment I136-A-6. PSE's project objectives stated in the EIS describe a concern that extends further in the future than winter of 2017-2018. That time period was described as the earliest date when corrective actions could be needed that would place large portions of the Eastside at risk of load shedding.

I136-E -20 The alternative siting analysis required for land use permits in Bellevue and Newcastle is not necessarily synonymous with the alternatives required under SEPA. PSE must comply with those requirements as part of its permit application process. SEPA requires that the EIS explore a range of reasonable alternatives that could meet the project objectives. Phase 1 of the Draft EIS included a programmatic review of the project, and included a variety of alternatives, which included an alternative that consisted of a new substation and 230 kV transmission lines, as well as an integrated resource approach, and an alternative that included new 115 kV lines and transformers. See Chapter 2 of the Phase 1 Draft EIS for a more detailed explanation of the alternatives analysis process. Section 2.2 of the Phase 2 Draft EIS contains a detailed explanation of why these other alternatives were not carried forward for analysis in the project-level EIS.

The Phase 1 Draft EIS analysis is a voluntary expansion of the EIS process to better inform decision-makers and the public about the environmental consequences of various approaches that could be taken to address PSE's objectives. The Phase 1 Draft EIS helped to focus the scope of the Phase 2 Draft EIS, and to ensure that the decision-making process is transparent and consistent with the commitment made by the Partner Cities to the public.

I136-E -21 See response to comment I148-A-3.

I136-E -22 The "no adverse impact" was based on thresholds of significance; see Section 3.1.3.2 of the Phase 2 Draft EIS, which defines the magnitude of impact for land use and housing.

Heidi Bedwell  
Environmental Planning Manager  
City of Bellevue  
PO Box 90012  
Bellevue, WA 98009-9012

June 18, 2017

Hi Heidi—Please submit these comments for Phase 2 EIS for Energize Eastside. I am a Gense member for the record. Thank you-  
Submitted by:  
Sue Stronk  
12917 SE 86th Place  
Newcastle, Wa 98056

### How much do we have to pay for PSE to profit on a bogus Project?

This entire EIS process is flawed as there is no project yet defined to comment about. Also, there is no need—whether you want to dismiss it or not—**The EIS must define the need.** Without a need for the project—there should be no project! Until PSE shares their numbers for a proper load flow study to be done—open and transparent — to prove the need—using real parameters, this project is worthless in time and money. And it will be fraud—if the ratepayers are charged for an unnecessary project where PSE profits over a \$billion dollars for the life of this project at our expense. With project costs already over \$26 million to date—PSE may have to justify these costs to the WUTC if is not needed. This project a few years ago was \$70 million, now ballooned to \$200 million or more. If stopped today, the \$26 million spent to date and passed to the ratepayers with 10% return— is a nice profitable return without digging a hole or buying a pole! Another PSE scam if it stops today!

The EIS is flawed by using PSE paid contractors for the input—the same ones hired by PSE in the CAG process—submitting tainted information and not updating photography, not showing the change in pole heights to what is now proposed in Phase 2, nor showing pictures of view hindrances and obstructions with Mt. Rainier views from our neighborhood. Also PSE's paid contractors are using outdated methods and pricing for under-grounding costs—all to favor PSE and are quoting EMF information.

How can you have an honest EIS with PSE footprints all over it? Is this a coincidence? I think not. There are plenty of unbiased contractors to choose.

So to humor this EIS process—I will speak to: Land Use and Housing—**The red highlights are verbiage from the EIS books.**

I136-E -23 The EIS is not required to evaluate who would profit from a project. See response to comment I16-A-2 regarding the cost to ratepayers.

As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”).

I136-E -24 Power Engineers is a contractor hired by PSE to prepare the visual simulations and report on EMF. They are not part of the EIS Consultant Team.

The EIS was prepared under the direction of Environmental Coordinator for the City of Bellevue, in consultation with the co-lead agencies, the Partner Cities of Kirkland, Newcastle, Redmond, and Renton. As the Lead Agency under SEPA, the City of Bellevue's responsibilities are to provide full disclosure of the expected environmental impacts of the Energize Eastside project and to document objective analysis of those impacts, so that decision-makers have adequate environmental information for the permitting and decision-making process. The City of Bellevue hired a consultant team comprised of qualified firms with extensive experience conducting independent analysis and preparing SEPA EISs. The EIS Consultant Team is working with the City of Bellevue on its behalf to evaluate the proposal according to the City of Bellevue's adopted SEPA policies. No member of the team is currently working for PSE or has a personal or financial interest in the outcome of the project. For all firms working on the EIS Consultant Team, disclosures were made to the City of Bellevue about any past work for PSE. The City of Bellevue determined that this past work did not constitute a conflict of interest for reviewing this project. ESA conducted a peer review of Power Engineers' methodology and found that it is consistent with industry standards. Key viewpoints were reviewed and selected by ESA.

I136-E-23

I136-E-24

Please submit as Phase 2 EIS PSE Energize Eastside comment by: June 21, 2017  
 Sue Stronk—A CENSE member  
 12917 SE 86th Place  
 Newcastle, WA 98056

**How can the EIS call this not Significant?**  
**Would you like this dividing your neighborhood?**  
 Well, we don't like it either.  
 Here again —the EIS book says the poles in Olympus/  
 Newcastle will be 100' tall—yet these are only shown at  
 95' as described. Would the picture not allow the true  
 height to be scaled in? Or is it too threatening to portray  
 the true height of the towers?  
 The industrialization of a residential neighborhood.

I136-E-25



I136-E -25 The Phase 2 Draft EIS states that there would be significant aesthetic impacts along the Newcastle Segment. Along most of the Newcastle Segment, the poles would be 95 feet in height; however, there is the potential that individual pole configurations could be up to 100 feet. As noted on the simulations, simulated pole heights are site-specific. Additional simulations for 100-foot poles were not developed because it would not change the findings of the Phase 2 Draft EIS. The EIS Consultant Team has already determined there would be significant aesthetic impacts for the segment, and this finding was carried forward for the No Variance Option for the Final EIS. Updated simulations were created for the No Variance and Variance Newcastle Options. These are provided in Sections 4.2.5.7 and 4.2.5.8 of the Final EIS, as well as Appendix C. Significance criteria for scenic views and the aesthetic environment are described in Section 3.2.3.4 of the Phase 2 Draft EIS.

June 29, 2017

Heidi Bedwell, Environmental Planning Manager  
City of Bellevue  
PO Box 90012  
Bellevue, WA 98009-9012

RECEIVED

JUL 05 REC'D

Development Services

Dear Heidi—

Please submit this article and comments into the EIS Phase 2 for PSE EE.

This article says power usage peaked in 2007. Why would it be any different for the Eastside? Trends all over the country say the same thing. This article originated from KIRO.

PSE is not telling the truth. They need to be transparent with a proper load flow study for us to believe they have a need for this much power. Prove it PSE. Or it will be fraud for charging us for an unneeded project.

Submitted by:

Sue Stronk—A CENSE Member  
12917 SE 86th Place  
Newcastle, WA 98056

I136-F -1 PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers when forecasting demand. Also see response to comment I131-A-6.

I136-F-1

7/12/2017 Weebly Email Service Mail - Energize Eastside Spring 2017 Update



Energize Eastside EIS <info@energizeeastsideeis.org>

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**Energize Eastside Spring 2017 Update**  
1 message

**Sue Stronk** <ssbuds@comcast.net> Sat, Jun 17, 2017 at 6:14 PM  
To: Energize Eastside EIS <info@energizeeastsideeis.org>

I136-G-1 Please submit this and the attached PSE Energize Eastside Spring Project Update into the EIS Phase 2 comments. I am a CENSE member and this advertising is full of non-truths—and PSE should not be able to re-coup these costs from the WUTC for rate payers to pay in raised utility bills. This is shameful for a company to think they can get away with dishonesty and misleading the public. So glad Macquarie is thinking of selling Puget Energy!! Hopefully, we can get a PUD for our area with some honesty and integrity.

**From:** Sue Stronk  
12917 SE 86th Place  
Newcastle WA 98056  
June 17, 2017

**MY Spring Update to PSE/ Energize Eastside:**

What lies you tell the public! You should be ashamed. I hope this story explodes like the ENRON scandal. Why NOT be open and transparent and show your numbers for a PROPER load flow study if you want to be a great electrical provider? Or happily use 21st century power solutions like many many other cities currently in the US?

WHAT ARE YOU HIDING? (We know!)

If you are not hiding the truth—then bring it on proudly! When you charge us for a not needed project—you will be committing fraud! This will never be safe along the two Olympic gas pipelines in a 100' space between homes. Other power companies mandate 120'-150' right of way for a 230kV project—run down the middle of that right of way distance. What makes PSE "special" that they can do what they want? Show us where this has been done before? Safety is your thing?—what a joke with all your gas line safety penalties! Tell that to Greenwood!! Ashamed you should be!!

How many times has the current 115kV line been knocked off the pole by trees and caused damage to the gas pipeline? I have talked to two homeowners—how many more are there we don't know about? You have been lucky to date!! Luck is not SAFETY!

Not to mention we are in an earthquake fault zone!

Sue Stronk

On Apr 20, 2017, at 10:12 AM, Energize Eastside <energizeeastside@pse.com> wrote:

[View this email in your browser](#)

energizeEASTSIDE



**Spring 2017 Project Update**



https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=iuFS2U4Cs3s.en.&view=pt&search=inbox&th=15cb8c36408564a9&siml=15cb8c364085... 1/4

I136-G -1 Comment noted.

I136-G -2 It is not within the scope of SEPA to require PSE to disclose their modeling assumptions. It is up to PSE to determine to whom they will release their proprietary data. The planning model, however, was reviewed by the EIS Consultant Team and found that PSE had used standard planning practices.

Sections 3.9 of the Phase 2 Draft EIS considers electrical interference risks related to corrosion, fault conditions, and arcing. As described in Section 3.9.1.4, PSE retained DNV GL (the author of the report "Criteria for Pipelines Co-Existing with Electric Power Lines") to develop a detailed analysis of risks and recommendations for the Energize Eastside project. This study ("A Detailed Approach to Assess AC Interference Levels Between the Energize Eastside Transmission Line Project and the Existing Olympic Pipelines, OLP16 & OPL20"), referred to in the EIS as the AC Interference Study, was used in preparing the analysis for the Phase 2 Draft EIS. The study included recommendations related to the design of pole locations, layout, and configuration to mitigate potential electrical interference-related impacts on the pipelines. As noted in the comment, several industry guidance documents have presented general parameters for locating transmission lines and pipelines in shared corridors, which are conservatively high limits used to determine when an engineering assessment, such as the one prepared by DNV GL for the project, may be required. The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering by PSE, as described in Section 4.9.8 of the Final EIS. The EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational.

See response to comment I120-A-1 for information on how seismic risks were considered in the pipeline safety risk assessment.

7/12/2017

Weebly Email Service Mail - Energize Eastside Spring 2017 Update

## Where we stand today

The Eastside is outgrowing the backbone of the area's electric grid. Energize Eastside will build a new substation and upgrade approximately 18 miles of existing transmission lines from Renton to Redmond in the same transmission line corridor that has served Eastside communities for more than 80 years. Combined with continued aggressive electric conservation, Energize Eastside will keep the lights on in our communities for years to come.

### Get involved!

You will have an opportunity to comment on the Cities' Phase 2 Draft Environmental Impact Statement (EIS) once it is published later this spring. The Phase 2 Draft EIS will consider the potential impacts and mitigation associated with the project. For more details on the Cities' EIS and comment opportunities, visit [EnergizeEastsideEIS.org](http://EnergizeEastsideEIS.org).

### Upcoming fieldwork surveys

This year, Energize Eastside project members are conducting additional "fieldwork" surveys to refine our design and inform future permit submittals. You may see crews visiting properties along the existing corridor and conducting utility and archaeological resource surveys. In addition, we're at a point that we can begin developing property-specific landscaping and tree replacement plans with property owners. We'll be reaching out to affected property owners about these efforts.

## We're not all old enough to remember...

FIFTY YEARS! That's how long it's been since we last did a major upgrade of the backbone of the Eastside's electric grid. During that span, the Eastside's population has grown eight-fold, leading Northwest companies have been launched in our communities, and the need for electricity to power our homes and economy has grown. We've also learned how to conserve energy and become increasingly more energy efficient. **But it's not enough. We need Energize Eastside now.**



The Eastside has grown and it's time for our infrastructure to catch up.

## Electricity is not just a convenience...

...it's a necessity. It helps us live comfortably in our homes year-round, regardless of the weather. Safe and reliable electricity is essential for businesses, hospitals, schools, industry and homes. Electricity arrives at its destination at almost the same

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=iuFS2U4Cs3s.en.&view=pt&search=inbox&th=15cb8c36408564a9&siml=15cb8c364085...> 2/4

7/12/2017

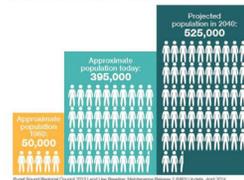
**Weebly Email Service Mail - Energize Eastside Spring 2017 Update**

moment it is produced. When you flip a switch, the electric power is there for your use.

Behind the scenes, PSE employees are hard at work planning, operating and maintaining the complex electric transmission grid so it can reliably provide power to the homes and businesses that need it. **Electric system reliability contributes to our quality of life and economic wellbeing, and is essential for economic growth.**

**Is demand for energy really growing?**

Yes! On the Eastside, customer electric power demand – the amount of energy used at one moment – has been growing dramatically in recent years. We see demand peaks daily, especially on winter evenings when customers get home, turn on their appliances and plug in their electronics, and during the summer when more customers use air conditioning. And we have more customers than ever before driving those demand peaks. Energize Eastside will ensure the electric grid can handle this growth into the future.

**Electric demand has changed****Eastside population has grown**  
(people shown in increments of 10,000)**Four questions for the Energize Eastside project team**

Read the [full newsletter](#), including four questions with the project team's answers to learn more about improving reliability, safety, community involvement and more!

**For more information**

- For the latest news, photo simulations of the upgraded poles, maps, and more, visit [pse.com/energizeeastside](http://pse.com/energizeeastside).
- To learn more about the Bellevue, Newcastle, Redmond and Renton Environmental Impact Statement (EIS) process and participate in the upcoming comment period, visit [EnergizeEastsideEIS.org](http://EnergizeEastsideEIS.org).

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Website: [pse.com/energizeeastside](http://pse.com/energizeeastside) Email: [energizeeastside@pse.com](mailto:energizeeastside@pse.com) Voicemail: 1-800-548-2614

Our mailing address is:  
Puget Sound Energy  
P.O. Box 97034, EST03W  
Bellevue, WA 98009-9734

You are receiving this email because you signed up to receive project updates and notifications.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=luFS2U4Cs3s.en.&view=pt&search=inbox&th=15cb8c36408564a9&siml=15cb8c364085...> 3/4

7/11/2017

Weebly Email Service Mail - Fw: Economic Chapter - Eco-System Value Assessment



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Fw: Economic Chapter - Eco-System Value Assessment**

1 message

whalvrsn1@frontier.com <whalvrsn1@frontier.com>  
 Reply-To: "whalvrsn1@frontier.com" <whalvrsn1@frontier.com>  
 To: info@energizeeastsideeis.org

Thu, Jul 6, 2017 at 3:25 PM

Sorry this is a resend due to email failure.

Warren Halverson

--- On Thu, 7/6/17, whalvrsn1@frontier.com <whalvrsn1@frontier.com> wrote:

> From: whalvrsn1@frontier.com <whalvrsn1@frontier.com>  
 > Subject: Economic Chapter - Eco-System Value Assessment  
 > To: info@EnergizeEastsideEIS.org  
 > Date: Thursday, July 6, 2017, 3:23 PM  
 >  
 > Ms. Heidi Bedwell, Senior Planner  
 > Land Use Division - Development  
 > Services  
 > 450 110th Ave NE  
 > Bellevue, Washington  
 >  
 > Dear Ms. Bedwell,  
 >  
 >

> In my testimony at the Bellevue EE  
 > Public Meeting, I submitted significant concerns about your  
 > assessment of Economic impacts and a request for additional  
 > information about the Phase 2 DEIS, Economic Chapter  
 > 3.10. This correspondence augments that testimony,  
 > particularly as it relates to "Ecosystem Service Value  
 > Assessments".

> Here are my concerns: 1)  
 > Your assessment does not provide studies or references e.g.  
 > footnotes that can verify this information; 2)  
 > Your conclusion that the fixed value is \$18,952,599 and then  
 > yearly services value of \$37,858 is highly problematic and  
 > raises a number of serious issues that are not  
 > addressed; 3) Since a tree inventory (of those  
 > to be removed and those that will need trimming) has not  
 > been completed, the numbers need to be finalized before  
 > deciding "less than significant impacts"; 4) We  
 > know a tree is not a tree. We have heard statements  
 > that PSE will replace every tree with two trees BUT nobody  
 > defines the size and types of trees to be removed and  
 > replaced. Your study needs to define the types of  
 > trees to be removed and THE SIZE OF THE TREES.  
 > Hemlock, Fir and Cedar trees are indigenous to  
 > Bellevue. They are normally larger than other trees in  
 > the country and have a MUCH LARGER impact. I see no  
 > "accounting for this".

>  
 > Finally and 5) when in googling  
 > information about his subject, the most noted study in this  
 > area is: "An ecosystem service value assessment of  
 > land-use change on Chongming Island, China" various authors  
 > dated 2002. Their conclusion is "... eco system

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I137-B -1 The source of Table 3.10-3 is ESA's worksheets from the iTree Eco software, as cited in the Phase 2 Draft EIS. A tree inventory was completed, and a conservatively high estimate of the trees to be removed, including size and species, was provided by PSE and its contractors and used in the EIS. The Final EIS includes a new appendix (Appendix E-2) describing the methodology used for collecting, analyzing, and verifying the data. PSE has not committed to a specific program or ratio of replacement, so the EIS simply notes the level of impacts and states that replacement could be required as mitigation through the permitting process in each jurisdiction. For purposes of this analysis, the use of the iTree software was considered adequate to understand the scale of the loss of ecosystem services that could occur. No adjustments were made for local conditions in the determination of the value of ecological services. However, elsewhere in the EIS, impacts related to visual resources and habitat are discussed in detail, and do reflect local conditions.

I137-B-1

I137-B

COMMENT

RESPONSE

7/11/2017

Weebly Email Service Mail - Fw: Economic Chapter - Eco-System Value Assessment

I137-B-1

> values that we used in our analysis have been challenged on  
> a theoretical and empirical grounds ... in order for the  
> kind of ecosystem-service analysis that we conducted to  
> become more meaningful for policy formulation affecting land  
> use, it is imperative to obtain value coefficients for  
> ecosystems services that more accurately REFLECT LOCAL  
> CONDITIONS  
> (caps added)".  
>  
> I REQUEST your providing references in  
> this area and the author of this portion of the study.  
> I, too, REQUEST your local study.  
>  
>  
> Warren E. Halverson  
>

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15d1a022e7691184&siml=15d1a022e769...> 2/2

6/14/2017

Weebly Email Service Mail - Question and please add as a party of record



Energize Eastside EIS <info@energizeeastsideeis.org>

**Question and please add as a party of record**

1 message

**Carolyn Stanley** <carolynstanley@gmail.com>  
 To: info@energizeeastsideeis.org

Wed, May 24, 2017 at 8:16 PM

[info@EnergizeEastsideEIS.org](mailto:info@EnergizeEastsideEIS.org)

I would like to be a party of record:

Carolyn Stanley  
 1915 177th Ave NE  
 Bellevue WA 98008

I138-A-1

Can you frame this in the context of the water lines being replaced in Redmond/Bellevue and the timing of how these improvements would impact traffic? I am aware significant impacts will occur within the next two years along 24th, West Lake Sammamish Parkway and other heavily traveled arterials.

I138-A-2

Do you have the maps with the comprehensive plans for Bellevue and Redmond projects that may impact yours? Or could you please direct me to the appropriate resources?

Thank you so much!

Sincerely,

Carolyn Stanley  
 424-502-9151

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4ds2&view=pt&search=inbox&th=15c3d9bb98b7739d&siml=15c3d9bb98b7739d>

1/1

- I138-A -1 The only potential for significant transportation impact that was described in the Phase 1 Draft EIS was the possibility of building the transmission line underground in a street right-of-way. Since this alternative is not being brought forward, there was no need to further analyze transportation impacts from the project in the Phase 2 Draft EIS. Transportation impacts resulting from construction of Alternative 1 would be below the level of significance and addressed through regulatory requirements as part of the right-of-way use permit.
- I138-A -2 Maps of Comprehensive Plans are available from each of the Partner Cities through their websites. The ways in which this project would affect or be affected by comprehensive plans is discussed in the Land Use section of the Phase 1 Draft EIS and Phase 2 Draft EIS.

May 22, 2017

City of Bellevue, Development Services Dept. Attn: Heidi Bedwell  
P O Box 90012  
Bellevue, WA 98009-9012



SUBJECT: Puget Sound Energy

Dear Ms. Bedwell:

I own a home in the Olympus Development, Newcastle – a home bought with my late husband who died of a cancerous brain tumor. We had been married for many happy years and this home is my memories of a wonderful husband and where we gathered with family and friends. You can only imagine how disgusted I was to receive a telephone call asking when your employees could come to the home. I can only presume to attempt to persuade me of the merits of Puget Sound Energy's plans to wreck the Eastside. This home is my sanctuary and people I distrust with every part of my being do not enter!

For going on four years Puget Sound Energy has attempted to push their money grabbing, unnecessary blight of the Eastside down our throats. It has made living here a nightmare and something I think about last thing at night and first thing in the morning.

I139-A-1 | Puget Sound Energy's gives no definite answers to where the route will be, where  
I139-A-2 | the poles will be located and their design. PSE cannot prove the project is truly  
I139-A-3 | needed – we are NOT stupid, regardless of what you may think of us, we know it is a  
money making project and will line the pockets of Puget Sound Energy. Do you  
honestly think the hedge fund in Melbourne, Australia even knows where  
Newcastle, WA is and what's more they could care less about the impact on our lives  
and also reduced home prices.

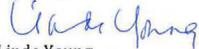
I139-A-4 | We are all petrified of the thought of a gas explosion due to high voltage running  
over sixty year plus old gas lines. It is presumed that when you work out costs you  
have factored in millions that will have to be paid out to burnt to death Eastside  
residents or even PSE employees. Remember Bellingham and the three young boys  
who died at your hands.

I139-A-5 | Have Puget Sound Energy thought about earthquakes and where the faults lie?

I139-A-6 | Puget Sound Energy has everything to gain as we, the unfortunate customers, foot  
the bill.

I sometimes wonder how it feels to be involved in this project and to know you are hated by the community and rest assured we will not quit fighting your money making scheme.

Sincerely,

  
Linda Young

12813 SE 80<sup>th</sup> Way, Newcastle, WA 98056

I139-A -1 See response to comment I114-B-3.  
I139-A -2 Comment noted.  
I139-A -3 Comment noted.  
I139-A -4 See response to comment I17-A-1.  
I139-A -5 See response to comment I120-A-1.  
I139-A -6 See response to comment I16-A-2.

6/14/2017

Weebly Email Service Mail - FW: Council FW: Include CENSE Plan 2Bin EIS for the Energize Eastside project



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**FW: Council FW: Include CENSE Plan 2Bin EIS for the Energize Eastside project**

1 message

HBedwell@bellevuewa.gov <HBedwell@bellevuewa.gov>  
 To: knkcoston@gmail.com

Tue, May 30, 2017 at 2:31 PM

Ms. Coston,

Your comments were forwarded to me as they related to the Energize Eastside project under environmental review by the City of Bellevue at this time. The City appreciates your interest in the project and the comments will be included in the record for comments received during this public comment period on the Draft EIS. Thank you for your interest and involvement in this process.

Sincerely,

**Heidi M. Bedwell**

Energize Eastside Project Manager

Environmental Planning Manager, Land Use Division

Development Services Department

425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)**From:** Nola Coston [<mailto:knkcoston@gmail.com>]**Sent:** Monday, May 15, 2017 8:38 PM**To:** Council <[Council@bellevuewa.gov](mailto:Council@bellevuewa.gov)>**Subject:** Include CENSE Plan 2Bin EIS for the Energize Eastside project

Dear Bellevue Councilmembers,

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4ds2&view=pt&search=inbox&th=15c5b44ff90a0586&siml=15c5b44ff90a0586>

1/2

II40-A

COMMENT

RESPONSE

6/14/2017 Weekly Email Service Mail - FW: Council FW: Include CENSE Plan 2B in EIS for the Energize Eastside project

II40-A-1 I'm appalled that City of Bellevue planners threw out the only safe, smart, and green option in the environmental impact study for Puget Sound Energy's Energize Eastside proposal. I am part of the Coalition of Eastside Neighborhoods for Sensible Energy (CENSE) and its 3,000 followers.

Say "No!" to a flawed process and a bad option.

II40-A-2 An 18-mile scar through the Eastside constructed on top of jet fuel pipelines should not be our only option. And the City of Bellevue should not limit our opportunity and responsibility to transparently develop best-practice approaches that are being embraced by growing cities worldwide.

II40-A-3 CENSE hired industry experts to develop a better option known as "Alternative 2B" which:

- \*Meets our projected energy needs at lower cost, with greater reliability.
- \*Aligns with our core values of innovation, livability and environmental stewardship by employing advanced energy management technologies and robust conservation.
- \*Puts safety first, reducing the risk of devastating pipeline fires.
- \*Preserves 8,000 mature trees and the neighborhood character that attracts businesses and employees to the Eastside.

We demand the Council take steps to re-open the conversation and include the safe, smart, and green option, Alternative 2B proposed by CENSE, in the EIS.

II40-A-4 We cannot afford to rush approval of an excessively expensive, dangerous, outdated plan for our future.

Nola Coston  
 9122 122<sup>nd</sup> Place SE  
 Newcastle, WA 98056

II40-A -1 Comment noted.  
 II40-A -2 Comment noted.  
 II40-A -3 The Phase 1 and Phase 2 Draft EISs explored a range of reasonable alternatives, as required by SEPA . Also see response to comment II15-A-2.  
 II40-A -4 Comment noted.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&view=pt&search=inbox&th=15c5b44ff90a0586&siml=15c5b44ff90a0586>

2/2



**WRIGHT  
RUNSTAD  
& COMPANY**

PRINCIPALS:  
H. JON RUNSTAD  
GREGORY K. JOHNSON  
WALTER R. INGRAM

June 12, 2017

Heidi Bedwell, Environmental Planning Manager  
City of Bellevue  
Development Services Department  
P.O. Box 90012  
Bellevue, WA 98009-9012

RE: Energize Eastside Phase 2 Draft EIS comments

Dear Ms. Bedwell:

With this letter we offer our full support for PSE to finalize planning for Energize Eastside and move toward construction of the much needed new high capacity transmission lines within the existing corridor. In our view, if this project does not move forward on schedule, our ability to do business in East King County may well be compromised. We are not alone in raising this concern.

The Spring District, our 36-acre mixed use development on the BelRed Corridor of Bellevue offers an example. Users already committed to the project – residents now living at The Spring District, the Global Innovation Exchange (GIX), and REI – and future tenants are all keenly interested in power availability and reliability. It's often one of the first things they ask about when evaluating a move to The Spring District. We can ensure power distribution within a building but we must rely on PSE and local governments for regional reliability and redundancy. These are critical considerations for today's tech tenants who use more power than tenants of the past. Even while computers have become more efficient, it's common for tech employees to use multiple computers. Gaming company employees often have multiple computers and gaming systems in use at the same time at their desks. Coupled with the modern open office layouts that create higher overall density, power usage in our buildings is ramping up significantly. Older buildings are being forced to retrofit to meet this growing power need, and power supply and distribution is a critical element in the design of new buildings. But none of that matters if the transmission of power to our buildings is unreliable. Even to plan for rolling blackouts, as suggested by PSE if the project is delayed, will result in an immediate negative impact on our ability to attract the tenants to Bellevue.

Further, we reiterate our opposition to the bypass routes included for study as stated in our December 1, 2014, comment letter to the Citizen's Advisory Group (CAG).

Thank you for the opportunity to provide comment on the Phase 2 Draft EIS. We appreciate your diligent work and urge timely completion of the project.

Sincerely,



Gregory K. Johnson  
President

cc: John Stokes, Mayor, City of Bellevue and members of the Council

INVESTMENT BUILDERS AND REAL ESTATE ASSET MANAGERS  
SUITE 2700, 1201 THIRD AVENUE, SEATTLE, WASHINGTON 98101-3221  
TELEPHONE (206) 447-9000 www.wrightrunstad.com

II41-A -1 Comment noted.

II41-A-1

COMMENT

RESPONSE

II42-B-1

Comment	Timestamp	First Name	Last Name
Section 3.5.1 * What about the albedo of the lost trees? Has that been measured? It might be small but it still has an affect.	7/6/2017 22:33:55	David	Schwartz

II42-B -1 See Section 3.10.3 of the Phase 2 Draft EIS which discuss the ecosystem services of trees. The change in albedo is not expected to be significant because the project will comply with tree protection and critical areas regulations, which require impacts to be mitigated to a level of non-significance.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
II42-C-1	Section 3.5.3 * Which are 'Partner Cities'? The term is not defined	7/6/2017 22:34:17	David	Schwartz

II42-C -1 The Phase 1 Draft EIS was prepared under the direction of Environmental Coordinator for the City of Bellevue, in consultation with the co-lead agencies, the Partner Cities of Kirkland, Newcastle, Redmond, and Renton. The term "Partner Cities" is defined on page I and 1-3 of the Phase 2 Draft EIS, and added to the Glossary of the Final EIS.

COMMENT

RESPONSE

II42-D -1 See the response to comment II77-A-59.

II42-D-1

Comment	Timestamp	First Name	Last Name
Section 3.5.3	7/6/2017	David	Schwartz
* Chapter 173-441 requires reporting for facilities emitting more than 10000 metric tons of CO2e, NOT just GHG as stated. This is a potentially huge difference given the differences in GH effects of different GHGs. ( <a href="http://apps.leg.wa.gov/WAC/default.aspx?cite=173-441-030">http://apps.leg.wa.gov/WAC/default.aspx?cite=173-441-030</a> )	22:34:37		

COMMENT

RESPONSE

II42-E-1

Comment	Timestamp	First Name	Last Name
Section 3.5.3 Thanks Trump: "The Council on Environmental Quality (CEQ) has withdrawn its final guidance for Federal agencies on how to consider greenhouse gas emissions and the effects of climate change in National Environmental Policy Act (NEPA) reviews, a Notice of Availability for which was published on August 5, 2016 (81 FR 51866). As explained in the Notice of Availability, the withdrawn guidance was not a regulation. Pursuant to Executive Order 13783, "Promoting Energy Independence and Economic Growth," of March 28, 2017, the guidance has been withdrawn for further consideration." ( <a href="https://ceq.doe.gov/guidance/ceq_guidance_nepa-ghg-climate_final_guidance.html">https://ceq.doe.gov/guidance/ceq_guidance_nepa-ghg-climate_final_guidance.html</a> )	7/6/2017 22:35:07	David	Schwartz

II42-E -1 Comment noted. This project is not subject to NEPA and therefore this change does not apply.

COMMENT

RESPONSE

II42-F-1

Comment	Timestamp	First Name	Last Name
Section 3.5.3	7/6/2017	David	Schwartz
* Regarding the statement: "Although PSE operates electricity generation plants, such infrastructure is not proposed in any of the alternatives. The newly adopted Clean Air Rule does not apply to the proposed alternatives and, given its relatively large threshold, is not applied in the following impact analysis", doesn't EE involved bringing new generation on-line?	22:37:12		

II42-F -1 No new generation would be brought online as a result of this project. The project does not affect the generation of energy.

COMMENT

RESPONSE

II42-G -1 See the response to comment II77-A-61.

II42-G-1

Comment	Timestamp	First Name	Last Name
Section 3.5.5.1	7/6/2017	David	Schwartz
* What does 'considerable' mean in "cumulatively considerable contribution" in "Impacts are assessed based on the project's potential to result in a cumulatively considerable contributions to the state and overall global GHG burden"?	22:38:41		

COMMENT

RESPONSE

	<b>Comment</b>	<b>Timestamp</b>	<b>First Name</b>	<b>Last Name</b>
II42-H-1	Section 3.5.5.1	7/6/2017	David	Schwartz
	* when are potential mitigation measures warranted?	22:38:52		

II42-H -1 Mitigation measures are listed where they could minimize or eliminate project impacts. Mitigation may be required by the permitting agencies as a condition of the permits they are responsible for overseeing.

II42-1

COMMENT

RESPONSE

II42-1-1

Comment	Timestamp	First Name	Last Name
3.5.7.1 * When it is said that the emissions would be substantially below the reporting threshold of 10,000 metric tons, is that 10,000 metric tons of CO2e (same question for 3.5.7.2)? This is not clear in the document.	7/6/2017 22:39:04	David	Schwartz

II42-1 -1 See the response to comment II77-A-59.

COMMENT

RESPONSE

1142-J-1

Comment	Timestamp	First Name	Last Name
3.5.7.2 * The SF6 emission calculation is slightly off and would equate to 76.7 metric tons CO2e rather than the 75 tons as documented.	7/6/2017 22:39:18	David	Schwartz

1142-J -1 See the response to comment 1177-A-64.

COMMENT

RESPONSE

II42-K-1

Comment	Timestamp	First Name	Last Name
3.5.7.8	7/6/2017	David	Schwartz
* The numbers in the table don't reflect the body of text (39 v 40). This is also true for Table 3.5-2.	22:39:31		

II42-K -1 See the response to comment II77-A-65.

COMMENT

RESPONSE

1142-L-1

Comment	Timestamp	First Name	Last Name
3.5.8 * What is the distinction between "Mitigation measures specified by code" and those based on "state and local programs"?	7/6/2017 22:39:45	David	Schwartz

1142-L -1 Mitigation measures specified by code and listed as regulatory requirements would be required and imposed as part of the permit approval process. Potential mitigation measures based on state and local programs (such as those found in comprehensive plan policies and existing PSE programs, for example) would be at the discretion of the applicant to adopt or the local jurisdictions to impose as a condition of project approval.

COMMENT

RESPONSE

1142-M -1 See the response to comment 1177-A-67.

	Comment	Timestamp	First Name	Last Name
1142-M-1	3.5.8.1 * Why is the word 'would' used instead of 'will' in the first sentence of paragraph 2?	7/6/2017 22:40:09	David	Schwartz

1142-N

COMMENT

RESPONSE

1142-N -1 See the response to comment 1177-A-67.

1142-N-1

Comment	Timestamp	First Name	Last Name
3.5.8.1	7/6/2017	David	Schwartz
* Why would be long-term sequestration loss impacts only be POTENTIALLY offset?	22:40:21		

II42-O

COMMENT

RESPONSE

II42-O-1

Comment	Timestamp	First Name	Last Name
3.5.8.2 * The less-than-significant GHG impact obviate the need for mandatory reporting. However, does this also imply that no mitigation measures may be required as suggested? Why couldn't mitigation be nonetheless required?	7/6/2017 22:40:31	David	Schwartz

II42-O -1 See the response to comment II77-A-68.

Janis Medley  
 CENSE Board member  
 4609 Somerset DR SE  
 Bellevue, WA 98006

page 1 of 2

II43-B-1

**RE:**

**Page 3.9-19 and tables 3.9-2 and 3.9-3**

*The frequency of unintentional leaks and fatalities occurring on pipeline rights-of-way only (and not at facilities), was 0.51 incidents per 1,000 mile years; none resulted in fatalities. The average spill size of these incidents was 306 barrels (12,900 gallons). The largest reported unintentional release was 9,000 barrels (378,000 gallons).*

**Concern**

It is unrealistic and illogical attempting to predict the potential for “unintentional leaks” during the construction of Energize Eastside using data describing the frequency of “unintentional leaks” along thousands of miles of pipeline rights-of-way over a five year period where the majority of the pipeline was not exposed to intensive excavation.

**Recommendation**

To more accurately predict the potential of “unintentional leaks during the construction of EE, use data that isolates sections of other petroleum pipelines located in right of ways at a time during extensive excavation.

II43-B-2

**RE:**

**Page 2-49**

*Drilled pier foundations for new 230 kV poles are typically augered (drilled) 4 to 8 feet in diameter with steel reinforcements that could extend 25 to 50 feet deep depending on the structure type and soil conditions. Steel poles are set and anchored to the foundations. (Typically, no foundations are used for wooden poles.) Approximately 160 to 180 concrete pole foundations would need to be installed along the 18-mile distance between the Sammamish and Talbot Hill substations; however, the actual number will be determined during final design.*

**Concern**

Energize Eastside will disturb the integrity of the native soil approximately 162 times with holes 20-50’ deep and 4-8’ in diameter. That is one hole perforating the soil every 560 feet over a span of 18 miles. That is also 162 opportunities for creating an “unintended” leak.

In spite of this intense excavation in the right of way, the Draft EIS concludes “the potential risk (of building Energize Eastside) is not considered significant.”

**Recommendation**

For each pole, identify the location, slope, soil core composition, distance from pipeline and indicate whether the pole will be directly embedded or mounted on a drilled pier foundation.

II43-B -1

See response to comment II29-E-3.

II43-B -2

The pipeline safety analysis in the EIS notes that PSE would determine the exact location of the pipelines prior to installing poles. PSE has indicated that poles would be located at least 13 feet from the Olympic Pipeline System where it is co-located with the transmission lines. Therefore, excavation for the poles is unlikely to damage the pipeline. Approximately 60% of the poles would be directly embedded, therefore not requiring concrete footings. Refined location data are presented in Chapter 2 and Appendix A of the Final EIS for PSE’s Proposed Alignment, as well as on the project website ([www.energizeeastsideeis.org/](http://www.energizeeastsideeis.org/), in the Library tab). Also see response to comment II29-E-3 for information on how construction risk was estimated.

Janis Medley  
 CENSE Board member  
 4609 Somerset DR SE  
 Bellevue, WA 98006

page 2 of 2

**RE:**

**Page 3.9-16** "Leak detection systems must be capable of detecting an eight percent of maximum flow leak within fifteen minutes or less" (West, pers comm., 2016)

**Concerns**

The concern about such intensive excavation along the pipeline is that equipment will unintentionally rupture the pipeline.

The draft EIS notes that OPL has a leak detection system, but does not indicate the existence of a rupture detection system.

According to the American Petroleum Institute and the Association of Oil Pipe Lines, the best strategy for mitigating a pipeline rupture is a robust pipeline rupture detection system. This system would provide a quicker and more effective response to a rupture than relying solely on SCADA leak detection in combination with the Spill Response Plan OPL files with WA Department of Ecology.

Excerpts from the American Petroleum Institute and the Association of Oil Pipe Lines' 2014 publication, *Liquid Pipeline Rupture Recognition and Response*,

Some high-profile liquid pipeline rupture incidents have highlighted that operators have room for improvement in more consistently recognizing and responding to high flow rate pipeline releases, often referred to as ruptures. Stakeholder expectation is for prompt and consistent rupture detection and response. This requires rupture focused pipeline monitoring systems and robust operating procedures that align with a strong "Think Rupture" culture throughout the operator's organization

While leak detection and rupture detection share common techniques and methodologies, critical success factors for small volume/rate leak detection include highly accurate, repeatability, robustness, and sophistication in measurement processes. Large volume/rate rupture detection focuses on significant events on the pipeline that have unambiguous signatures, which can be readily achieved using robust CPM systems or with more fundamental analysis techniques. Small-volume leak detection focuses on detecting the smallest leak in the shortest possible amount of time with the inherent allowance for false positives. Rupture detection focuses on a highly certain indication that uniquely occurs when there has been a large volume or high rate product release. The rupture indication reliability and accuracy can typically be improved by expanding the time duration of the SCADA rupture detection algorithm to a few minutes to filter nuisance indications and false positives (versus seconds for typical leak indication alarms generated from a robust CPM system).

**Recommendation**

Include a generic description of OPL's rupture detection capability and how it interfaces with their leak detection software.

II43-B -3 To address this comment, the EIS Consultant Team consulted with Olympic. As part of its overall pipeline integrity program, Olympic maintains a leak detection system. Olympic continually monitors product flow through the pipelines, and any unexpected loss of pressure is immediately detected. Block valves will then close off each pipeline segment. The control center then analyzes any pressure differential on either side of a block valve to isolate the location of the leak. Olympic personnel will then be dispatched to the area for visual inspection. This information provided by Olympic is consistent with the description included in Section 3.9.2.2 of the Phase 2 Draft EIS and Section 1.1.3 of Appendix I-5 (Pipeline Safety Technical Report). The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system. The Energize Eastside project would have no effect on Olympic's existing pipeline integrity program.

II43-B-3

June 14, 2017

Ms. Heidi Bedwell  
 450 110<sup>th</sup> Ave NE  
 Bellevue Washington 98004

Dear Ms. Bedwell

While I gave this public testimony at Rose Hill on June 3<sup>rd</sup>, I failed to give you a copy of my verbal comments. They were as follows:

My name is Maryanne Halverson. I have lived in Bridle Trails next to Puget Sound Energy's easement and their 115kv powerline for nearly 40 years. Tonight, I would like to speak to the subject of safety because there is more of a safety risk than is portrayed in this Environmental Impact Statement. While Energize Eastside is a Puget Sound Energy project, the EIS apparently assumes all the added risk will be borne by the homeowner (**Chapter 3.9**).

As you so note, two Olympic pipelines run jet fuel through this same PSE easement. From my viewpoint, transmission line safety on top of a pipeline is far more risky than portrayed in this document.

A year and a half ago, we had a quite common, yet severe winter windstorm. It isn't simply the wind that affects this corridor, the corridor unto itself becomes a sort of "wind tunnel". During this storm a quad of cables crashed down crossing our pasture. I immediately put our horses in the barn and called Puget Sound Energy. With potentially half of this transmission line out of service, I was surprised that neither our home nor neighbors lost electricity. Then, when I called PSE, I was quite surprised -- no shocked -- that their representative did not understand that this was a transmission line which is believed to impact many, many customers. My husband made two more subsequent calls and after three days this critical piece of infrastructure was repaired. The following week the PSE representative reported to the Bellevue City Council that no transmission lines came down during this storm. Gosh, I would have thought with our deficiency in local reliability this key line would have made a significant difference in local reliability.

Now, as to safety, as this line came down it came in contact with a neighbors invisible dog fence. The electric current shot up into their home's circuit breaker box and burned out several appliances. At the next door neighbor neighbors house, the line came in contact with a television dish positioned in their garden. The exact same thing happened. Interestingly and as I understand it, when these neighbors talked to PSE about costs associated with this damage, PSE said they have no legal responsibility to provide any compensation. There you are we pay all the property taxes; suffer inconveniences and then must bare the safety risk. It is obvious to me and many or my neighbors that the safety risks of this new higher powered 230 kv line are real; and, in the real world this risk is SIGNIFICANT today and for the 40 year life of this project.

II45-B -1 See response to comment II7-A-1 regarding overall risk. Also see response to comment OO1-C-3 regarding reliability. PSE is using fast protective relays, redundant high speed tripping schemes, and fast circuit breakers. With these systems, the 230 kV lines would be designed to clear a fault in less than a tenth of a second.

II45-B-1

1145-B-1

**P2 – Maryanne Halverson testimony against Energize Eastside based upon Safety Issues**

At the same time, the risks of these lines themselves are nothing compared to the potential of an explosion of this pipeline, should they ever come in contact.

**From a Safety and risk viewpoint (Environmental Health – Pipeline safety 3.9) , a 230KV line on top of two jet fuel pipelines at this location is totally unsafe and filled with SIGNIFICANT RISK, from accident, corrosion, seismic activity (never considered) and terrorism (never considered). Think about what you are doing 40 years into the future to my children, grand children and potentially great grand children. Would you take the risk?**

Sincerely,

Maryanne Halverson  
13701 NE 32<sup>nd</sup> Pl  
Bellevue Washington 98005

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
II49-A-1	1. As a concerned resident of Bellevue and a property owner of a multi-family complex for over 35 years at the address above, it appears Willow 2 would have a direct and costly impact on this property. Referring to the EIS Phase 2 Draft, Property Values and Views, Chapter 2.1.3. page 45: Construction states: The construction period for the substation and 230KV line is estimated to be 18 months and over 2 summers. Estimates are 3-7 days within a 2 month period. There is no time frame for restoration! "Restoration will be coordinated with the property owner and relevant permitting agencies" This hangs the property owner out to PSE's desires and an unknown completion time, this is unimaginable!! In addition to the time frame, if the construction follows the existing corridor over Somerset, the entrance to the complex would be compromised. It is the only way in and out of the property, which would impact not only me, but the 9 resident families who live here also. If the project has the propensity to be on-going for 18-24 months, this would create a nightmare having to live under these circumstance for two years!! Also, the vegetation loss would be tremendous. Thirty five year old trees would be removed for the 230KV lines. Trees that have provided ecological benefits and environmental values. In 2015-2016, PSE inventoried 9,400 trees to be removed for their Energize Eastside Project. Trees are essential in keeping an ecological balance by reducing soil erosion, improving air quality, removing pollutants and providing food and habitats for birds and other wildlife. Perhaps most importantly, providing beauty and aesthetics to our environment already blemished with "Progress"	6/16/2017 16:10:55	Robin	Jacobson
II49-A-2				
II49-A-3				
	2. Pipeline Safety:			

II49-A -1 Each property owner with an easement over their property has rights regarding PSE use and maintenance of their property that are not within city authority to enforce. Local regulatory agencies could require PSE to complete restoration within a specific timeline as a permit condition, such as having all plantings restored (per agreement between the owner and PSE) within one growing season.

II49-A -2 Appropriate access to properties from the public rights-of-way would be maintained for all communities within the study area during construction. Construction of the transmission lines is anticipated to take place over 3 to 7 days within a period of approximately 2 months (see Chapter 2 of the Phase 2 Draft EIS for additional details of the construction phasing and schedule). Appendix A of the Final EIS includes maps showing specific access locations.

II49-A -3 The ecosystem services of trees are discussed in Section 3.10.4.3, Tree Cover Along Transmission Line Corridor, and Section 3.4.5 in the Phase 2 Draft EIS. In the Phase 2 Draft EIS analysis, 3,600 to 5,400 trees would be removed depending on the alternative chosen. Updated information on vegetation clearing based on refined project design for PSE's Proposed Alignment is included in the Final EIS (see Section 4.4), and approximately 3,600 trees would potentially be removed.

Soils and geology were analyzed in the Phase 1 Draft EIS, Sections 3.6 and 3.7; impacts under all alternatives would be less-than-significant with regulatory compliance, and implementation of industry standards, geotechnical recommendations, and BMPs. See also Section 4.10 in the Final EIS for additional information on geohazards. Potential impacts to the aesthetic environment is discussed in Section 3.2 of the Phase 2 Draft EIS.

II49-A -4 See response to comment II46-A-2.

Comment	Timestamp	First Name	Last Name
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II49-A-4

The Olympic Pipeline runs Parallel with 136th SE, which runs along the Eastside of Tyee Middle School. The 230KV transmission line would run above 136th, endangering the hundred of students and numerous homes with the threat of an explosion looming. It would be horrific and catastrophic if the pipeline was caused to explode by an arc of lighting, faulty components of the gas line, a leak, a rupture and more. Statistics show there have been many pipelines over the years that have exploded, causing deaths and devastation to neighborhoods. Here are some... starting with the explosion of the Olympic Pipeline Co. In Bellingham, Wa. on June 7, 2009. Two young boys were killed, the city was in turmoil, rivers were heated to 85 degrees, killing hundred of fish ,crawfish and other species! June 7, 2010 a 36-inch gas pipeline explosion and fire in Johnson County Texas was caused by workers installing poles for electrical lines. One worker killed, six injured, 2014, March 12, East Harlem gas explosion in New York City...investigators found natural gas in the soil nearby, indicating the leak had existed for some time before explosion. January 14, 2015 a gas pipeline exploded near the Ross Barnett Reservoir in Brandon, Mississippi, creating a sizable crater in the ground and burning 6 acres of vegetation. The failure was due to a "hard spot" from manufacturing, that already had a repair sleeve on it. There are many more incidents throughout the country and world. PSE maintains the Olympic Pipeline is safe and well maintained and with minimal or no risk! However, uncontrolled circumstances occur and we're left with what could be life changing for so many. Why risk it?

1149-A -5 The Phase 1 and Phase 2 Draft EISs explored a range of reasonable alternatives, as required by SEPA . Also see response to comment 1115-A-2.

1149-A-5

Comment	Timestamp	First Name	Last Name
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I sincerely hope PSE and the Energize Eastside project cans see the validity in an Alternative Solution, in lieu of the High Voltage 230KV lines they want to install. We want to keep the beauty of our five Eastside cities and still provide the necessary energy for our growing population. Please look at the alternative solutions CENCE has worked diligently on over the last 3 years. Our goal for all is to have an answer that will not destroy the beauty of the Eastside and still preserve the value of our environment and land!!.

With deep concern, Robin Jacobson

COMMENT

RESPONSE

I150-A -1 See response to comment I115-A-2.

I150-A-1

Comment	Timestamp	First Name	Last Name
The discussion of alternatives in section 2.3 delays is not consistent with industry trends. New technologies are being adopted across the country reducing the need for traditional transmission lines. Transmission projects are being cancelled all over the country including here in Washington state. Please refer to the attached link, <a href="http://www.utilitydive.com/news/bpa-turns-to-non-wire-alternatives-in-cancellation-of-transmission-project/443125/">http://www.utilitydive.com/news/bpa-turns-to-non-wire-alternatives-in-cancellation-of-transmission-project/443125/</a>	6/16/2017 12:39:00	Sean	Cox

I150-B-1

Comment	Timestamp	First Name	Last Name
The EIS does not address the impact to natural springs and runoff changes that will impact the steep slope areas that will impact residential homes along the path of the project. There exists potential for home flooding and land slides due to the impact of changing the water flow down steep slopes.	6/16/2017 12:42:20	sean	cox

I150-B -1 Section 3.3.5.1 of the Phase 2 Draft EIS states that the installation of poles could encounter shallow groundwater and require dewatering, which could cause drawdown of groundwater levels. The limited extent of the excavations would not impact groundwater flows or levels. Pump tests would be conducted prior to construction to determine the potential for drawdown and settlement, and appropriate mitigation measures would be developed to minimize impacts. As stated in Section 3.3.5.1 of the Phase 2 Draft EIS, no long-term impacts are expected to groundwater infiltration or shallow groundwater flow once the poles are installed. Additionally, construction would comply with the stormwater regulations of the Partner Cities, which are based on the standards set by Ecology's Stormwater Management Manual for Western Washington.

COMMENT

RESPONSE

I150-C-1

Comment	Timestamp	First Name	Last Name
PSE has stated that they will not underground this transmission line in the phase I EIS and in the CAG review so it should not be included as a mitigation measure.	6/16/2017 12:44:24	sean	cox

I150-C -1    Undergrounding the transmission lines for the entire 18-mile distance was not brought forward as an alternative in the Phase 2 Draft EIS. Undergrounding of transmission lines, however, was included as a mitigation measure for several elements of the environment for the Phase 2 analysis because it could be done for portions of the transmission line corridor that have high impacts. In addition, PSE has provided specific comments that identify the challenges involved with undergrounding sections of the project (see response to comment I141-A-6). Any decision to underground portions of the transmission lines would be made by PSE or the jurisdictions during the permitting process or a later phase in the project.

COMMENT

RESPONSE

I150-D-1

Comment	Timestamp	First Name	Last Name
The mitigation plan does not address the short term impact the project will have on wold life and slope erosion until the mitigation measures take effect which will take a minimum of several years for root systems to develop. Unfortunately during this time, irreversable damage will result.	6/16/2017 12:47:53	sean	cox

I150-D -1 Soils and geology were analyzed in the Phase 1 Draft EIS, Sections 3.6 and 3.7; impacts under all alternatives would be less-than-significant with regulatory compliance, and implementation of industry standards, geotechnical recommendations, and BMPs. See also Section 4.11 in the Final EIS for additional geohazards information. See also response to comment I148-A-2.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I150-E-1	The EIS conflicts with the EDM report that stated there are significant risks associated with this project and the close location of the pipeline.	6/16/2017 12:50:39	sean	cox

I150-E -1 The EDM report presented the results of the pipeline safety risk assessment for two risk measures, Individual Risk and Societal Risk. However, no determination of significance was made in the EDM report. See also Sections 9.0 and 10.0 of the Pipeline Safety Technical Report in Appendix I-5 of the Phase 2 Draft EIS for more information.

I150-F-1

Comment	Timestamp	First Name	Last Name
This project violates the Bellevue Comprehensive plan 2015, There will be significant impact for homeowners in Somerset but more impactful will be the scare that the loss of over 1600 trees will have along the path of the lines with the taller poles and thicker cables. This transmission line will become the defining feature of the view from downtown Bellevue, Mercer Island, and Seattle as you look east to see it towering over the existing structures and remaining trees.	6/16/2017 12:55:02	sean	cox

I150-F -1 Some of the segment options are not consistent with the Bellevue Comprehensive Plan. See Table 3.2-4 of the Phase 2 Draft EIS for more information. Under the various segments/options, Alternative 1 has the potential to remove between 3,600 and 5,400 trees (see Section 3.4.5.1 of the Phase 2 Draft EIS). With PSE's Proposed Alignment, approximately 3,600 trees would be removed. Loss of trees, taller poles, and thicker wires are evaluated as part of the scenic views and aesthetic environment analysis (see Section 3.2 of the Phase 2 Draft EIS). The analysis found that the transmission line would not be a defining feature from Downtown Bellevue, Mercer Island, or Seattle. The potential for significant adverse impacts is predominantly confined to a 0.25-mile study area; therefore, areas outside of the 0.25-mile study area were not evaluated for impacts. Areas within the study area that were identified as likely experiencing significant impacts to the aesthetic environment are summarized in Section 8.2 of the Final EIS, and shown in Figure 8-1.

COMMENT

RESPONSE

I150-G-1

Comment	Timestamp	First Name	Last Name
PROCESS - Section 2020 states that the CAG put forward recommendations yet this document was never signed off by the CAG as has been done with previous PSE projects due. There wasn't clear consensus within the group therefore, PSE didn't follow there own process to avoid having to address this issue.	6/16/2017 13:07:38	sean	cox

I150-G -1 The description in the EIS for the CAG process is for background only. The CAG process was not a part of the SEPA process for this project.

I150-H -1 See response to comment I120-A-3.

I150-H-1

Comment	Timestamp	First Name	Last Name
<p>SAFETY- The EIS document does nothing to address the additional risk associated with this project due to the risk of earthquakes in this region and the fault lines that it crosses. The existing transmission line does not pose a significant risk to the adjacent homes due to the pole heights as when the lines fall they will not hit homes. With this proposal the pole heights are significantly higher and increase the risk to adjacent homes as now the natural arch will have them land on homes risking injury and death to the homeowners along with increased risk of fire and damage to structures. No structures should be located within this zone.</p>	<p>6/16/2017 13:13:27</p>	<p>sean</p>	<p>cox</p>

COMMENT

RESPONSE

Comment	Timestamp	First Name	Last Name
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Dear Energize Eastside Representative:	6/17/2017 22:29:43	Amy	Faith
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I am writing to voice my concerns about the proposed transmission lines. I disagree with this project on many levels. Here are my primary reasons :

Tree removal /Environmental impacts - We need to preserve, not destroy our tree canopy. Over four thousand mature trees are slated for removal under this project. Once they are gone, they are gone. Such trees cannot be replaced. The size of the trees to be removed take hundreds of years to reach that size. Wildlife habitat would be destroyed with the removal of these trees. Animals need that habitat to survive. Trees keep soil and vegetation in place. When removed, that puts the area at increased risk for erosion, landslides, and flooding. As a member of Cense, I know that an environmentally friendly solution exists that would save these trees . My family has lived in Washington for 30 years. We are originally from a little village in Minnesota. Minnesota does not have beautiful trees like Washington does. Instead , it has little stick trees, and tall power lines lining the open prairie. There is no reason to cut our beautiful trees and replace them with stick trees and tall power lines.

Pipelines would be in close proximity to power lines- This is an accident just waiting to happen. It is not safe at all. There have already been explosions here in Washington due to this hazard. These lines with the pipeline would be going through densely populated areas including schools. Our emergency responders could not get to and assist fast enough to a disaster of that scope.

I151-A -1 Comment noted.

I151-A -2 See response to comment I17-A-1.

I151-A-1

I151-A-2

COMMENT

RESPONSE

I151-A -3 Comment noted.  
 I151-A -4 See response to comment I115-A-2.

	<u>Comment</u>	<u>Timestamp</u>	<u>First Name</u>	<u>Last Name</u>
I151-A-3	There is no documented need for this project. PSE manipulated data to create the appearance of need for this, when there is none.			
I151-A-4	PSE just wants that 9% return from this project. Instead, it should embrace the alternative proposed by Cense. Cense offers an alternative that is environmentally friendly, costs substantially less, saves the trees, and would provide our communities with reliable power.			
	Amy Faith			
	425-653-1436			

COMMENT

RESPONSE

II52-A -1 See response to comment II20-A-1.

II52-A-1

Comment	Timestamp	First Name	Last Name
I am writing about the Energize the Eastside EIS and my concern for our Olympus neighborhood safety along the proposed PSE route. To my knowledge, there still is not a seismic study and am fearful about the construction of new power poles/lines along the Olympic pipeline. I am a CENSE member and need more assurance for our safety and the de-valuation of our property values. Regards, Diane Y. Rush; 8428-128th Ave SE; Newcastle; (425) 985-5297	6/17/2017 11:28:23	Diane	Rush

	Comment	Timestamp	First Name	Last Name
I153-A-1	As a homeowner, voter and tax payer in the city of Bellevue, I do not feel this project is justified. The need has not been adequately demonstrated and alternatives have not been defined. Why have solutions employed by other areas, such as batteries in Southern California, been dismissed based on outdated data?	6/17/2017 16:04:18	Lara	Prior
I153-A-2	PSE enjoys a monopoly on the residents, we have no choices or alternatives and PSE has no competition. PSE states, without this project, they will institute rolling black outs on our communities...YET they are exporting to Canada at the same time the Eastside is experiencing a major grid failure. Additionally, PSE also plans to export to California.			
I153-A-3	In the seven years my husband and I have lived on the Eastside (in Bellevue) I do not recall a single initiative by PSE to encourage energy efficiency. We would happily put solar panels on our roof, at our own cost, or install other energy efficient upgrades...this has never been an initiative PSE has shared with their customers or made available. We currently pay for wind offset credits and would proactively work at conservation.  In summary, I feel this project does not support the good of the Eastside or the community and strongly oppose the PSE Energize Eastside.  Sincerely, Lara Prior			

I153-A -1 The purpose and need for the project are summarized in Section 1.3 of the Phase 1 and Phase 2 Draft EISs. Additionally, PSE prepared the Eastside Needs Assessment, which includes a more detailed explanation of the project need. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding the purpose and need for the project (See Topic P&N).

In regards to project alternatives, see response to comment I115-A-2.

I153-A -2 The EIS Consultant Team reviewed the planning model and found that PSE had used standard planning practices and had not modified any regional transmission planning assumptions beyond those recommended by ColumbiaGrid.

I153-A -3 Comment noted. PSE's energy conservation program is not part of the proposed action by PSE and is not specifically analyzed in this EIS. However, PSE's conservation program is described in Section 2.3.1 and Appendix A of the Phase 1 Draft EIS, and applies to both the No Action Alternative as well as action alternatives. Under state law (WAC 480-100-238), PSE "has the responsibility to meet its system demand with a least cost mix of energy supply resources and conservation." Achieving minimum conservation levels is an assumption included in all the alternatives.

I153-B-1

Comment	Timestamp	First Name	Last Name
<p>As a resident of Bellevue my only viable option for power is service with Puget Sound Energy. Because of this, there needs to be a balance of representation for the people, the planet and profit. The Energize Eastside project is only about profit, it's destructive to the environment, harmful to our community with no modern alternatives explored. PSE is a Bellevue, WA based, Australian owned FOR PROFIT company owned by the Macquarie Group. PSE claims without this project there will be rolling black outs to the community yet there has been no proof of why or where the power is going. Are we exporting to Canada and California? If so, why?</p> <p>My name is Lara Prior, I'm a homeowner, tax payer, Cense member and voter from Bellevue, WA and I oppose this project.</p>	6/18/2017 7:12:41	Lara	Prior

I153-B -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I153-C-1	This project has not adequately addressed the environmental impact on our community, the impact on the water, the salmon that spawn in Kelsey Creek, the trees and animals that share our community. PSE has not provided specifics on final location, number of trees to be removed, pole locations or a final route. How can a project be evaluated properly without this information? Why is PSE allowed to move forward without providing the data to support the need and full impact on our community.	6/18/2017	Lara	Prior
I153-C-2		7:22:26		
I153-C-3	What are the metrics to show how reliability will be improved? The Energize Eastside plan calls for removal of up to 5,400 trees, this is a significant impact to our community and should not be allowed when there are other alternatives that have not been adequately explored.			
I153-C-4	My name is Lara Prior, I support Cense. I do not support Energize Eastside, it's a bad plan for our environment and our community. We need solutions that keep the integrity of our natural resources, plants, animals and environment. Energize Eastside is not the solution.			

- I153-C -1 Potential impacts on water are analyzed in Sections 3.3 and 4.3 of the Phase 2 Draft EIS; potential impacts on plants and animals (including salmonids and other fish species) are analyzed in Sections 3.4 and 4.4 of the Phase 2 Draft EIS.
- I153-C -2 See response to comment I114-A-1.
- I153-C -3 There is no standard metric for "rolling blackouts avoided." As described in Chapters 1 and 2 of the of the Phase 1 Draft EIS, PSE's objective is to meet FERC requirements for protecting the regional grid. PSE's planning studies suggest that without additional transmission capacity, meeting FERC requirements could mean placing their Eastside customers at risk of blackouts. PSE wants to avoid rolling blackouts because its customers do not want to experience them. Attempting to specifically predict or estimate the probability of events that could lead to load shedding is nearly impossible because of the number of potential scenarios and permutations.
- I153-C -4 Comment noted. Information on potential vegetation clearing associated with PSE's Proposed Alignment is presented in Section 4.4 of the Final EIS, based on refined design data.

I154-A-1

Comment	Timestamp	First Name	Last Name
<p>As a homeowner impacted by the PSE Energize Eastside, we fear for our safety with the proximity of our home to the fuel pipeline with the Bellevue Central route option. The DNV-GL pipeline safety report says PSE's preferred route, along my property has an "unpredictable risk rang".</p> <p>This is a well traveled trail with runners, children and animals all at risk for this unnecessary project. There is a strong need for additional studies for this project.</p> <p>We strongly oppose this project, there are better solutions that are environmentally friendly, this is what the community wants.</p> <p>Sincerely, Simon Prior (Cense member &amp; supporter)</p>	<p>6/17/2017 16:12:40</p>	Simon	Prior

I154-A -1 The DNV GL analysis examined two routes through Bellevue Central: the existing transmission line corridor (Willow 1) and a route that combines parts of the existing corridor with the Newport Way area (Willow 2). For Willow 1, the analysis found that with optimized conductor geometry and with both lines operating at 230 kV, the induced AC potentials and theoretical AC current densities satisfied accepted industry levels and was not in the "unpredictable risk" range as defined in DNV GL (2016). For Willow 2, and for either route operating at 230 kV/115 kV, the analysis predicted that AC corrosion potential would be in the "unpredictable" range, and field monitoring and/or mitigation would be required to confirm that current densities remain within acceptable levels. Willow 2 was not carried forward for additional analysis in the Final EIS. Willow 1 is PSE's Proposed Alignment in the Final EIS and includes operating both lines at 230 kV at the outset.

The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering by PSE. The Phase 2 Draft EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational (Stantec 2017).

COMMENT

RESPONSE

I154-B-1

Comment	Timestamp	First Name	Last Name
I am concerned that the Bellevue Mayor's public comments during a meeting of June 13 demonstrate a lack of fairness and a bias towards implementing this project. The environmental impacts and potential effects on property prices are a real risk, and there are not clear definite benefits from this project, such as no commitment regarding reduced power outages. In order to prevent there appearing to be a further and continued bias in favor of this project, I believe the council should take action to prevent this project proceeding.	7/6/2017 17:35:37	simon	prior

I154-B -1 The comment in regard to the Bellevue Mayor is noted; however, the Mayor's remarks are not part of the EIS. With regard to the question of reliability improvement, see response to comment OO1-C-3. With regard to the Bellevue City Council, the Council will likely be the final decision-maker on the project within Bellevue's city limits, but the outcome of the permit review cannot be predetermined or concluded before the EIS process is complete.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I155-A-1	Our house is close to Olympic gas pipeline. We are losing sleep over the Energize Eastside's proposed 230kV transmission lines so close to aging pipeline. Pipeline safety during construction is a major issue for Energize Eastside. The 18 mile stretch of pipeline plus transmission line passes close to homes and a middle school in our neighborhood. If there were to be a failure of the pipeline and a major spill occurred during construction, how do you justify the loss of life?	6/17/2017 18:43:51	Sirisha	Dontireddy
I155-A-2	Appendix "I"-3 OLYMIC DATA REQUEST AND RESPONSES FOR RISK ASSESSMENT "Members of Olympics damage prevention team are located nearby at all times and are able to respond to certain types of events as quickly as traffic permits" This statement is not reassuring at all. What does "nearby" mean? What do you mean by "certain types of events"?			
I155-A-3	"Olympic has contracted with National response corporation- environmental services to respond anywhere along its pipeline system within 2 hours" what is the greatest quantity of oil that can be released in 2 hours near my house?			
I155-A-4	Page 3.9-18 2,362 incidents were reported in 5 years, over many miles of pipeline. The risk may be very low for any particular mile of pipeline that is going through unpopulated areas but what are the consequences of pipeline failure in densely populated urban areas like Renton, Redmond and Bellevue? Absolute risk may be low but the potential consequences are very high that this increased risk is not acceptable to our community.			
I155-A-5	Page 3.9-16 Pipeline leak detection system and controls. We have no information about shut off systems, how			

- I155-A -1 See response to comment I17-A-1.
- I155-A -2 The commenter is referring to a response provided by Olympic for a question posed by the EIS Consultant Team. It is inferred from Olympic's response, that by "certain types of events" they were referring to an incident involving pipeline damage, leak, or other activity requiring investigation. According to the Bellevue Fire Department Standards of Response Coverage, flow and pressure are controlled by computers in Olympic's Control Center in Renton. Check valves, hand-operated valves, and remotely operated valves are utilized throughout the system. Check valves prevent backflow, hand-operated valves are shut by Olympic personnel in the field (although "nearby," this can take over an hour depending on traffic), and remotely operated valves are controlled by Olympic's Control Center (which can take approximately 45 to 90 seconds to completely close using a computer-enhanced system) (Bellevue Fire, Undated). The maximum release volume for the Olympic Pipeline system was evaluated in greater detail in the Phase 2 Draft EIS, and it is estimated that approximately 370,000 gallons could be released. See response to comment OO4-A-6 and Section 3.9.4 of the Phase 2 Draft EIS for more information on how spill size was estimated.
- I155-A-4 See response to comment I129-E-1.

	Comment	Timestamp	First Name	Last Name
I155-A-5	<p>they work, what the actual maximum leak might be.</p> <p>This is unacceptable. What is the extent of potential risk to human life and property if a leak just smaller than the leak detection system can detect should occur?</p> <p>I am looking forward to your answers, thank you!</p> <p>Sirisha, 4254820539.</p>			

I155-A -5 There are a number of components to a pipeline operator’s leak detection system. Olympic’s Pipeline Leak Detection System (PLDS) is just one such component. Should a very slow unintentional release occur, below the threshold of this system, there are other methods of detection. Some of these include:

- Pipeline Patrols – 49 CFR 195.412 requires pipeline operators to inspect their pipeline rights-of-way at intervals not exceeding 3 weeks, but at least 26 times per calendar year. Very small leaks such as this can be identified during these inspections. For example, discolored vegetation is often indicative of such a small release.
- Over-Short Accounting – In addition to the real time leak detection, such as Olympic’s PLDS, pipeline operators maintain over-short accounting of pipeline gains and losses; these are cumulative accountings over longer periods of time (e.g., 24 hours, 7 days, monthly, etc.). A small, long-term release can be identified by continued losses in these accountings.

It should also be noted that such slow, long-term releases seldom pose a fire or explosion risk to the public; the released contents are most often dispersed into the air (evaporation) or into the soil. Also, this risk is present in the current situation and would not change with PSE’s proposal. Also see response to comment I155-A-2.

COMMENT

RESPONSE

I155-B-1

Comment	Timestamp	First Name	Last Name
Energize Eastside may remove up to 5400 valuable urban trees. And that is not a "less than significant" impact for the residents. Loss of tree canopy and the accompanying loss of 327 acres of vegetation results in reduced shading over streams and changes water temperatures as well as robbing fish of the shade cover they use to avoid predators. The loss of trees and other vegetation would have a significant impact upon the streams and fish habitat. Thank you for consideration! Sirisha	6/17/2017 19:36:10	Sirisha	Dontireddy

I155-B -1 The 327 acres was from the Phase 1 Draft EIS, which examined the worst-case scenario for new overhead transmission lines because, at the time of writing of the Phase 1 Draft EIS, the widths of clear zones were unknown because the height and form of the transmission poles had not been determined. Thus, it was assumed that the new corridor for a 230 kV line would be approximately 30 to 40 feet wider than the existing right-of-way corridor. The Phase 2 Draft EIS was based on specific more narrow clear zones. Also see response to comment I120-B-11 regarding impacts to streams and fish. The Phase 2 Draft EIS, Section 3.4.5, includes information on vegetation clearing based on design details available at that time; the Final EIS includes additional information on tree clearing based on refined project design details, focused on PSE's Proposed Alignment (see Section 4.4).

	Comment	Timestamp	First Name	Last Name
I155-C-1	We have paid premium price for our home in Somerset community for its views. We are very concerned by the potential visual impact of Energize Eastside project on our property. Our property value will be impacted significantly. I myself wouldn't buy a property so close to high powered transmission lines. Construction and installation of industrial sized poles do not belong in residential neighborhoods. When taller poles are used, the pole diameter is increased- from three feet to five feet. The ground level impact of clearing land and installation of new poles in not addressed sufficiently in the EIS. PSE traditionally makes money by building more stuff: put in a billion dollar substation and they can "rate base" it, making customers pay the cost, plus a ten-percent markup, for decades. A new wooden pole can generate that ten per-cent markup for the utility in the course of its fifty year life span. A pole makes money- hence, poles. This project is not needed by the residents of the Eastside. It's not just energy-inefficient, it's capital inefficient. PSE wants to lock us in to using outdated technology for the next 20 years or so. By what metrics will reliability be improved with EE project? PSE has stated that power outages will not be reduced. Battery storage now protects customers in Southern California from rolling blackouts. Why wouldn't that work for the Eastside? EIS contains no chart clearly demonstrating the need for the project while the recent data shows declining electricity usage. And this is earth quake prone area. What could happen if the Seattle fault slips up to 10 feet and ruptures the Olympic pipeline with increased voltage overhead?	6/17/2017 20:26:43	Sirisha	Dontireddy
	Thank you for your consideration! Sirisha.			

- I155-C -1 SEPA does not require that an economic analysis be included. It allows the Lead Agency to include economic information it believes would be helpful to decision makers. The EIS Consultant Team included a section on impacts to property values in Phase 1 because it was highlighted as a concern during the scoping process, and the Lead Agency determined it could be helpful. Information on potential impacts on property values is included in the Phase 1 Draft EIS (Section 10.7.1.4) and the Phase 2 Draft EIS (Section 3.10). PSE's Proposed Alignment is in the existing corridor.
- I155-C -2 An electrical utility facility is allowed or conditionally allowed in residential zones crossed by the project alignment. See Appendix B of the Phase 2 Draft EIS for a breakdown of the various zoning codes in each jurisdiction.
- I155-C -3 The evaluation of impacts in Section 3.4 of the Phase 2 Draft EIS included removal of vegetation for the project, taking into account the pole size. Because it was not certain what foundation type would be used, a worst-case assumption was made. See Chapter 3, in the Phase 1 Draft EIS for a general description of impacts related to ground disturbance. See Section 4.4, Plants and Animals, in the Final EIS for a description of vegetation removal impacts from PSE's Proposed Alignment.
- I155-C -4 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ"). Also, see response to comment I153-C-3.
- I155-C -5 See response to comment I1120-A-1.
- I155-C -6 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").
- I155-C -7 See response to comment I120-A-1.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I156-A-1	In terms of demand, PSE's own data indicate that electricity demand in Bellevue and other targeted communities is actually declining despite strong population growth; yet the projections PSE has published in the past (which no longer appear on their web site) forecast rapid growth in electricity demand (much higher than projected in Seattle). The current EIS provides no information to back up assumptions about demand.	6/18/2017 6:58:21	Thomas	Coffee
I156-A-2	In terms of reliability, the EIS makes no measurable claims to any improvements. Indeed, PSE has stated that the project will not reduce power outages. Other major utilities have achieved more cost-effective improvements in reliability using flow control devices and grid storage batteries. The project thus appears unnecessary from this standpoint as well.			
I156-A-3	In short, PSE has provided no data justifying any public benefits from the proposed project. The available data suggest that its only benefits will be to the bottom line of PSE's foreign owners, at massive cost to our environment and communities.			

- I156-A -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").
- I156-A -2 See response to comment 001-C-3, with regard to the measurability of improvements in reliability, and to the previous comment in this letter with regard to the need for the project.
- I156-A -3 The purpose and need for the project are summarized in Section 1.3 of the Phase 1 and Phase 2 Draft EISs. Additionally, PSE prepared the Eastside Needs Assessment, which includes a more detailed explanation of the project need. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding the purpose and need for the project (See Topic OBJ).

I157-A

COMMENT

RESPONSE

I157-A -1 Comment noted.

	<u>Comment</u>	<u>Timestamp</u>	<u>First Name</u>	<u>Last Name</u>
I157-A-1	Please build the new power lines through Bellevue.	6/19/2017 17:59:48	Robert	Billing

COMMENT

RESPONSE

I158-A -1 See response to comment I18-A-1.

I158-A-1

Comment	Timestamp	First Name	Last Name
The project should be routed to avoid residential area and the oil pipeline. Construction over pipeline definitely has risk. And something might happen usually will happen.	6/19/2017 13:50:47	Wei	Tung

I159-A-1

Comment	Timestamp	First Name	Last Name
It is my firm belief that the Willow One Route is the most logical route option available for the Energize Eastside project. I would also add that I vehemently oppose Bypass Route Two and I believe that both Bypass Route One and Bypass Route Two would be extremely detrimental to the City of Bellevue. That a special interest group like the East Bellevue Community Council could or would necessitate the creation of such ill conceived route options as Bypass Route One and the heinous Bypass Route Two is quite frankly a form of tyranny.	6/19/2017 21:49:00	Wolfgang	Loera

I159-A -1 The Bellevue Central Segment Bypass Option routes were analyzed in the Phase 2 Draft EIS. The routes, however, were not brought forward for additional analysis and are not part of PSE's Proposed Alignment, as presented in the Final EIS. PSE's Proposed Alignment analyzed in the Final EIS follows the same route as the Willow 1 Option (located entirely within the existing corridor), with refined pole type and placement.

COMMENT

RESPONSE

1160-A-1

Comment	Timestamp	First Name	Last Name
Additional electricity and pipeline is not a wise choice. Also Robert values are impacted for any property in sight lines of these large power lines, so any property owner where the looked are on their property or in sight of their property should be financially compensated for the reduction in property values. 5 percent of property value. Electricity should run on the existing corridor of similar large lines at a lower long term cost to maintain and no additional environmental or aesthetic impact	6/20/2017 8:03:20	Angela	Giboney

1160-A -1 It is not common practice to require monetary reimbursement for property devaluation associated with views of a transmission line or private view obstruction, and there is no city policy in place in any of the jurisdictions suggesting that such compensation be required. However, mitigation measures, such as requiring that the transmission line be placed underground or pole heights be minimized, could be required by the Partner Cities, and are identified as a potential mitigation measure in Section 3.2.6 of the Phase 2 Draft EIS. While Bellevue has policies regarding the general preservation of scenic views and visual character, no city regulations guarantee the protection of private views. Since the release of the Phase 2 Draft EIS, the project design has been modified to minimize impacts and, in part, to respond to neighborhood-specific concerns. PSE's Proposed Alignment, which is similar to the Willow 1 route assessed in the Phase 2 Draft EIS, would be located entirely within the existing corridor.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I161-A-1	<p>Pipeline Safety during construction (and even afterwards) is a crucial issue demonstrating the unsuitability of Energize Eastside for our community. For most of its 18 miles, the transmission line (if approved) will run along the Olympic Pipeline, which carries about 10 million gallons of jet fuel and other petroleum products each day from refineries in the north to SeaTac airport and point further south.</p>	6/20/2017 16:58:09	Jill	Sulzberg
I161-A-2	<p>Anyone who purchased a home with easements for the pipeline and transmission lines should have done so with full knowledge of the encumbrances on their property. Most likely, the homeowners weighed the benefits of their particular purchase against the downsides to buying property subject to easements for pipelines and power lines. While the homeowners may have expected some changes over time to the pipeline or the power lines, Energize Eastside is a far too outsized a plan to have reasonably been anticipated and as such presents new and unexpected safety concerns.</p>			
I161-A-3	<p>The 230kV transmission line poles require a much larger foundation than the existing 120 kV wooden poles. Placement will involve compromises, as the transmission line pass through mostly residential and business zones. Compromises will be made in pole location and construction activity to maximize distance from structures and public areas, including minimizing the distance between the pipeline and the transmission lines. Inevitably, this will entail much drilling, digging, and heavy equipment close to the pipeline.</p>			
I161-A-4	<p>An unfortunate consequence of this siting could be an</p>			

- I161-A -1 See response to comment I18-A-1.
- I161-A -2 An electrical utility facility is allowed or conditionally allowed in residential zones crossed by the project alignment. See Appendix B of the Phase 2 Draft EIS for a discussion of the various zoning codes in each jurisdiction. For a discussion of EMF and Pipeline Safety issues and potential impacts, see Sections 3.8 and 3.9 of the Phase 2 Draft EIS, respectively.
- I161-A -3 The foundations for the new transmission lines would be wider than the existing H-frame poles, ranging from 1.5 to 6 feet in width. In most cases, the number of poles would be reduced (see Chapter 2 of Final EIS) under the proposed project. Best management practices during construction to minimize impacts to adjacent structures and public areas were described in Chapter 4 of the Phase 2 Draft EIS. See Section 3.9 of the Phase 2 Draft EIS for a discussion on pipeline safety, which concluded that the likelihood of a pipeline rupture and fire would remain low if the project is built, and there would be no substantial change in risk from existing conditions.
- I161-A -4 See response to comment I19-A-6.

	Comment	Timestamp	First Name	Last Name
II61-A-4	increased risk of a pipeline release and fire during construction when compared with the No Action Alternative (see Section 4.9.1.2). While PSE states the probability of a pipeline release and fire remains low under Alternative 1, the potential environmental health and safety impacts would be significant if there were a release and fire--especially given that the pipeline is co-located with a 230 kV transmission line in a populated area.			
II61-A-6	Energize Eastside's 18 mile stretch of pipeline and transmission lines passes through or very close to schools, parks, places of worship, shopping centers and suburban neighborhoods. In some areas, the pipeline and power lines are on slopes above these communities. A pipeline failure could result in fuel pouring down the the slope, catching fire and spreading rapidly.			
II61-A-7	Equally concerning is the fact that damage may occur during construction but the effects may not be observed until later. Many disastrous pipeline accidents result months or years after the initial damage. While the EIS claims that crews will be vigilant and responsive to accidents during construction (as if there were there any other option), there is no provision for increased monitoring in the months or years following construction.			
II61-A-8	The EIS must account for all risk factors resulting from the scale and intensity of the project and for the increased potential devastation due to the location of the project through neighborhoods and public places.			

- II61-A -6 As the commenter notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks. See response to comment II30-A-4 for information on how EDM Services, the firm retained by the EIS Consultant Team to conduct the pipeline safety risk assessment, estimated the pipeline "pool fire" size, which informed the risk assessment results that are presented in Sections 3.9.5 and 4.9.1 of the Phase 2 Draft EIS.
- II61-A -7 It is correct that some amount of risk is inherent with construction near pipeline systems. The pipeline safety risk assessment considered national incident data on similar pipeline systems to estimate the probability of pipeline failures, both under existing conditions (115 kV transmission lines) and with new 230 kV transmission lines. In many cases, and in particular for pipeline damage caused by construction activities, incidents in the national database occurred as a result of failure to follow proper procedures. Even with the reasonable worst-case assumptions used in the risk assessment, and in consideration of rates of pipeline incidents from all causes of damage, the results indicate that there would be a very small increase in total risk while the project is being constructed. With implementation of the mitigation measures described in Section 5.9.4 of the Final EIS, impacts would be even lower. This does not dispute the fact that the potential public safety impacts could be significant in the unlikely event a pipeline incident were to occur as a result of construction damage. Also see response to comment II9-A-6 for additional information on construction risk and mitigation measures included in the EIS.
- II61-A -8 Impacts to neighborhoods are detailed in Section 3.1 of the Phase 2 Draft EIS. Impacts to parks are detailed in Section 3.6 of the Phase 2 Draft EIS.

COMMENT

RESPONSE

1162-A -1 Comment noted. See also comment response 1136-A-5.

1162-A-1

Comment	Timestamp	First Name	Last Name
It's incredibly disingenuous that citizens are expected to swallow the biased reporting of PSE-paid contractors. It is unconscionable that officials do so nothing to represent those who elected you. There's no semblance of accountability. Shame on you lackeys.	6/20/2017 2:49:53	Michael	Wong

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I163-A-1	The PSE Proposal is flawed because it does not utilize industry best practices and best-of-class technology in energy efficiency and distributed energy resources. PSE is asking ratepayers to pay for investments that would not be needed if PSE adopted proven best practices and technology.	6/21/2017 13:50:03	Jeff	Thiel
I163-A-2	Electricity demand is declining even as population is growing, both in our region and across the nation. We have just begun to tap the potential of Energy Efficiency in our homes and businesses. The PNW Power Planning Council has identified a lot of room for improvement if we make smart investments in more efficient systems for lighting, heating, cooling, and appliances. We can boost Energy Efficiency investment if we implement smart policies that promote education and awareness (see Portland's recent adoption of a Home Energy Score Policy), and introduce attractive financing options (see California's boom in PACE lending).			
I163-A-3	We can also do a lot more to use modern data analytics and technology to smooth demand, like Grid Integrated Hot Water Heaters and off-peak charging of EV's. Finally, if we introduce pricing policies that reward consumers for managing peak use, we could have a big impact on peak generation requirements without investing in obsolete and expensive transmission capacity.  Distributed Energy Resources can eliminate the need for expensive infrastructure. Look at the example set by Con Edison in Brooklyn. By investing in non-wires alternatives, Con Edison has been able to save			

- I163-A -1 See response to comment I115-A-2.
- I163-A -2 Comment noted.
- I163-A -3 See response to comment I115-A-2.

I163-A -4 Comment noted.

Comment	Timestamp	First Name	Last Name
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I163-A-3

ratepayers hundreds of millions of dollars versus investing in transmission lines. PSE should be pursuing a similar approach rather than saddling the Eastside with a huge bill for infrastructure that is not needed and will soon be obsolete. PSE should invest in building the Spring District as a micro-grid that uses CHP to meet it's electrical needs, and in community solar and batteries to meet the needs of neighborhoods, rather than building higher capacity substations fed by larger transmission lines that deliver electricity from far off sources. Including environmentally damaging sources like coal.

I163-A-4

Please go back to the drawing board and come up with an more credible proposal that fully employs industry best practices and best of class DER technology. The current PSE proposal amounts to a wealth transfer from Eastside citizens to the out of state owners of PSE.

I am a member of CENSE.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I164-A-1	I literally still cannot believe in today's day and age you would be putting up above-ground poles. I feel like we are taking a hundred steps backwards. It really impacts that look of our city to have hideous poles put up - particularly when they can be put underground. Why are we even discussing this? Why aren't these poles going underground, where every other new development that cares about aesthetics, puts them. I know it is more expensive, but really? What are we doing? Is this really a good idea? Who are we helping with this plan? Certainly we are not considering house values and desirability of potential homeowners who would like to live in our area. We can make up the money with higher resale values. While I am happy you are not coming closer to my neighborhood, I still vehemently disagree with putting up any additional above-ground poles. It's absurd. Thx.	6/21/2017 9:07:33	Michelle	RICHARDS ON
I164-A-2				

- I164-A -1 See response to comment I16-A-1. Additional information on issues associated with installing an underground transmission line is presented in Section 2.2.2 (Underground Transmission Line) of the Phase 2 Draft EIS. In addition, undergrounding the transmission line is included as a potential mitigation measure to address visual impacts (see Section 4.2.6.4 of the Final EIS).
- I164-A-2 See response to comment I155-C-1.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
II65-A-1	My two major concerns come from living in-between the new two route "solution". A major concern for me in living below the pipeline. I am very afraid if we are doing construction of an old pipeline the safety issues surrounding that. It seems like dangerous idea to be building on decades old infrasture.	6/21/2017 9:03:50	Stephanie	Kristen
II65-A-2	Secondly, The amount of trees removed and poles installed on Newport Way between Allen Road and Factoria is a major concern. I think the view impact to the folks that are living between Newport Way and Somerset Drive will be significantly impacted and affect home values.			
II65-A-3	As a real estate agent, I worry for all of the homes on the hill and the values to their property, not only because of the view impact but especially because of the safety concern.			

- II65-A -1 See response to comment II7-A-1.
- II65-A -2 Under the Willow 2 Option as analyzed in the Phase 2 Draft EIS, significant aesthetic impacts would occur between Newport Way and Forest Drive SE. However, the Willow 2 Option has not been brought forward for additional analysis in the Final EIS. PSE's Proposed Alignment does not follow Newport Way. See Section 4.2 of the Final EIS.
- II65-A -3 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1.

COMMENT

RESPONSE

I166-A -1 Comment noted.

	<u>Comment</u>	<u>Timestamp</u>	<u>First Name</u>	<u>Last Name</u>
I166-A-1	We do not need the upgrade to energized or add more power lines.	6/23/2017 22:07:27	Emanuel	Hertog

COMMENT

RESPONSE

II67-A -1 Comment noted.

II67-A-1

Comment	Timestamp	First Name	Last Name
I support the "no action" alternative. If consideration of PSE's proposal is delayed for at least five years, it is likely that time will put a lie to its contention that additional power will be required. The recent BPA experience in Portland and Clark County demonstrates that electricity need estimates based on outdated assumptions are unreliable. Local governments should not cower in the face of PSE's perceived power and implied threat of lawsuits. They should stand up for what's right and for their citizens. Above all, Bellevue city employees should stop acting like PSE's partners in this proposed project. It is the lead environmental agency. It needs to be independent and to keep in mind the interests of Eastside citizens. PSE is a paper tiger. It is a monopoly and a for profit entity with a poor safety record. Do the right thing and delay or reject its proposal.	6/23/2017 15:23:05	Mark	Davidson

COMMENT

RESPONSE

I168-A-1

Comment	Timestamp	First Name	Last Name
Reject the elimination of 6000 trees and the higher costs that will accompany PSE's unnecessary proposal to build new dirty infrastructure. Battery storage, wind, solar, and retrofits of homes and buildings will provide clean, reliable energy. I don't want to think this way, but the only reason I can imagine a city council member supporting PSE's plan is perhaps some type of enrichment they receive from that foreign, profit driven company. City council members will surely sleep better if they support the residents of Bellevue.	6/24/2017 10:06:31	Gwen	Hanson

I168-A -1 Comment noted.

COMMENT

RESPONSE

I169-A-1

Comment	Timestamp	First Name	Last Name
I oppose this project because I see no benefits that justify its environmental and economic costs. PSE has not shown the need for increased line capacity when electricity usage has been declining recently and new substitute technologies such as battery storage are on the horizon. PSE has also not committed to a quantified decrease in power outages, which I interpret as meaning there will be no improvement in reliability from the project.	6/24/2017 17:18:01	Jonathan	Shakes

I169-A -1 Comment noted. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Project Objectives Topic).

COMMENT

RESPONSE

I170-A-1

Comment	Timestamp	First Name	Last Name
<p>If this project is built, and I believe that there are better alternatives, it should be built 100% in the existing corridor. In this century, there is no excuse for allowing a private utility company (or public) to build infrastructure outside the existing corridors. The eastside currently has TWO electric utility corridors. The responsible (but not profitable for PSE) way to manage electrical needs is to combine the corridors. It is disheartening that our local governments have not stood up for their constituencies and forced a combination. The next lowest impact for the people who live and work in the cities this proposed project traverses is to keep it in the existing corridor. None of the project alternatives should be approved.</p>	<p>6/24/2017 12:33:20</p>	Sally	McCray

I170-A -1 PSE's Proposed Alignment as analyzed in the Final EIS would be entirely within PSE's existing corridor. See response to comment I132-B-5.

COMMENT

RESPONSE

I170-B-1

Comment	Timestamp	First Name	Last Name
The negative environmental impact of utility poles is incalculable. Who likes to look at them? The King County assessor reduces property values for proximity to utility poles, for that very reason. If this project is truly necessary, utility poles should not be allowed in any area that does not currently have them. It makes me sick to think of beautiful roadways like the Lake Hills connector being sullied for generations and centuries to come with utility poles. The lowest environmental impact for the Eastside would be to have the TWO existing electrical utility corridors combined. PSE wouldn't like that choice, but it is the right one.	6/24/2017 12:41:12	Sally	McCray

I170-B -1 PSE's Proposed Alignment as analyzed in the Final EIS would be entirely within PSE's existing corridor. See response to comment I132-B-5.

COMMENT

RESPONSE

II71-A -1 Comment noted.  
 II71-A -2 See response to comment II15-A-2.

	Comment	Timestamp	First Name	Last Name
II71-A-1	Please do not go ahead with the project "Energize Eastside". There is no need to damage our environment further and cut more trees. Energy consumption has fallen between 2011 and 2015 by over 5%, so there does not seem to be any motivation from an energy need point of view to go ahead with that project.	6/26/2017 7:00:18	Martine	Smets
II71-A-2	Regarding the need for reliability, there are alternatives much more environmentally-friendly than "Energize Eastside" (please learn from California, they use battery storage to avoid blackouts). So this project will be a needless destruction of our environment and a waste of resources. Please work to build a more sustainable future for the next generations instead of wasting resources and consumers money to pay for this project. Please invest instead in projects to develop alternative energies! Thank you for listening!			

6/28/2017

Weebly Email Service Mail - Bernie Dochnahl's support for Energize Eastside EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Bernie Dochnahl's support for Energize Eastside EIS**

1 message

**Bernie Dochnahl** <bernie@dochnahl.com>  
To: info@energizeeastsideeis.org

Thu, Jun 15, 2017 at 10:04 AM

Ms. Bedwell,

I am writing to support the upgrade of the transmission lines proposed by PSE. The current infrastructure has served us well and is now due for capacity upgrade. We must support Eastside's continued economic growth. Let's proceed with this and get in done on time and on budget.

I also support using the existing utility corridor for efficiency purposes, less disruption, and greater safety to the environment and residents.

As a community we should not ignore infrastructure improvements and recognize the ongoing growth on the Eastside.

I voice my support for Energize Eastside – approve it now and get it done! Do it for residents, hospitals, business (small and large), schools, and all people wanting to move to the Eastside of the lake to work, play and live.

Bernadene 'Bernie' Dochnahl

DENBE of Renton, LLC

Sunset Square, LLC

Lake Meridian Shopping Center, LLC

1520 Duvall, LLC

Alpine One, LLC

Valley Medical Center, Board Member

Renton Chamber of Commerce, Member

*Bernie*

**Bernadene 'Bernie' Dochnahl**

**DENBE of Renton, LLC**

**425-271-1153**

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=EZPUTRTfx.en.&view=pt&search=inbox&th=15cacb739be7a725&siml=15cacb739be7a725> 1/2

I175-A -1 Comment noted.

I175-A-1

6/28/2017

Weekly Email Service Mail - Bernie Dochnahl's support for Energize Eastside EIS

[bernie@dochnahl.com](mailto:bernie@dochnahl.com)

**" Replace judgment with curiosity. I will listen to you uninterrupted and then decide"**

**To exist is to change, to change is to mature, to mature is to go on creating oneself endlessly"**

[Henri Bergson, French philosopher](#)

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=1EZPUTRTfxL&n.&view=pt&search=inbox&th=15cacb739be7a725&siml=15cacb739be7a725>

2/2

6/29/2017

Weebly Email Service Mail - Phase 2 DEIS Comments for Energize Eastside



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

### Phase 2 DEIS Comments for Energize Eastside

1 message

Jim Long &lt;Jim@urbanrengroup.com&gt;

Fri, Jun 16, 2017 at 3:04 PM

To: "info@EnergizeEastsideEIS.org" &lt;info@energizeeastsideeis.org&gt;

Cc: "council@bellevuewa.gov" &lt;council@bellevuewa.gov&gt;

Dear Ms. Bedwell,

My name is Jim Long and I am a general manager for Urban Renaissance Group, a local commercial real estate concern that invests, operates, and builds office buildings in areas throughout the Pacific Northwest including Bellevue. We presently operate 13 buildings including hi-rise offices in downtown Bellevue and office campus' along the I-90 Corridor (Eastgate area). Over 5,500 employees come to work in our properties every day. I have been privileged to grow my career with over 15 years of experience operating office buildings in the City of Bellevue.

I176-A-1

We continue to be firmly in support of Alternative 1A: the project utilizes an existing corridor and established right-of-way; can be built in time; and provides certainty for the power supplies to our homes and office buildings.

We believe existing corridor (Willow 1) is the best choice for our area for these reasons:

1. The existing corridor is the safest option in terms of its location relative to the pipeline
2. The existing corridor doesn't require the acquisition of new right of way. We see this as a prudent means to achieve cost and project time savings.

As commercial property owners and managers, we feel very strongly that any alternatives carried forward should be reliable, proven, and no-risk options for our buildings, the companies that work in them, and for Eastside residents. Just as buildings age and require upgrading and maintenance, our existing 50+ year old distribution must be improved to meet growing demand Eastside AND ensure reliable service to the existing base of energy consumers. We have a robust economy and way of life that relies so much on the delivery of power – power that needs a proven electrical infrastructure.

East King County and the city of Bellevue have and continue to attract a healthy mix of businesses – many centered on technology. We need a reliable, predictable energy infrastructure – not untested technology - to ensure our markets remain competitive within the region and state.

We feel strongly that doing nothing is not a prudent option: If no action is taken to address the need on the Eastside, rolling blackouts could affect hundreds of thousands of people and cost the local economy millions of dollars. It is possible that the risk of outages could discourage new development and re-development of existing projects located on the Eastside. This will place Bellevue and the Partner Cities at an economic disadvantage when competing with other areas in the region.

Alternative 2 seems risky. It relies upon residents and businesses voluntarily tripling their conservation, using unproven battery technology, and attempting to place industrial generation plants in the middle of our

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I176-A -1 Comment noted.

6/29/2017

Weebly Email Service Mail - Phase 2 DEIS Comments for Energize Eastside

community. We cannot fathom the impact on the Eastside's niche as a technology center/technology leader if reliable, ample electrical power is not available.

The Eastside has seen explosive growth over the past few years, and there's more to come. We must have reliable power to support this growth. Delaying this project to continue to "study" the need compromises the Eastside's future.

We urge you to move ahead with Alternative 1A.

Sincerely,

Jim

Jim Long, CPM<sup>®</sup>

Urban Renaissance Property Company LLC

425.457.1837

[www.urbanrengroup.com](http://www.urbanrengroup.com)

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxL.en.&view=pt&search=inbox&th=15cb2efaa989b161&siml=15cb2efaa989b...> 2/2

6/29/2017

Weebly Email Service Mail - Comments on Energize Eastside Phase II EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Comments on Energize Eastside Phase II EIS**

1 message

William Herling <wahoowas@ix.netcom.com>  
To: info@energizeeastsideeis.org

Fri, Jun 16, 2017 at 12:40 PM

My name is William W. Herling. Along with my wife, Sallie G. Herling, we reside at

13825 Somerset Lane SE  
Bellevue, WA 98006

We are writing to express our concerns with the Energize Eastside Phase II Environmental Impact Statement. We are members of CENSE and feel that the issues as detailed below, excerpted from the CENSE web site, accurately represent our concerns. In summary, we feel that the EIS suffers from a lack of specificity, omission of critical information and, in some cases, outright erroneous information. Our specific concerns are elaborated below. They have been included to make sure this information becomes a matter of record regarding the Phase II EIS.

I177-A-1

**Economics**

**Summary:**

The Energize Eastside Phase 2 Draft EIS addresses economic impact to the three topics listed below. CENSE asserts this is an incomplete analysis of economic risks (there are additional risks not addressed) and the assessment to the three areas noted is flawed and incomplete. The questions and concerns are noted in the following section:

1. Potential **loss of property tax revenue**, especially to the smallest affected city (Newcastle), due to reduced property values.
2. Potential **cost to place the 230 kV transmission lines underground**. PSE is not recommending this, but is noting what cost to a "requesting party" would be (covered by a bond).
3. Monetary value of lost **ecosystem services** due to reduced tree cover. Trees improve air quality by absorbing CO2 and potentially harmful gases, such as sulfur dioxide and carbon monoxide, from the air, and releasing oxygen

**Key Questions & Concerns:**

The questions under the first 3 areas are those included in the EIS. The additional concerns are questions not covered in the EIS.

**1. Loss of property tax revenue (Section 3.10.1 & 3.10.4.1)**

- a. Property values: The Phase 2 EIS cites a single study<sup>1</sup> conducted in the Salt Lake City area statistically significant findings of ~2-5% negative impact on property tax values for homes notes within 300 meters of 138kV power lines. PSE asserts this study shows no negative impacts from 345kV lines, but fails to discuss the study also notes this is due to specific large green belt requirements for the 345kV lines in the Salt Lake City study. PSE failed to include reference to recent study *more relevant* to Energize Eastside<sup>2</sup> project reported that for *higher priced homes in the Seattle area* had a **11.2% negative impact** when abutting a high voltage transmission line.
- b. Property Tax revenue impact: The EIS references the overall property assessed values for Bellevue, Kirkland, Newcastle, and Renton, and portion of the property taxes that fund city governments (in addition to schools, King County, Library, EMS, etc.). Newcastle is examined as a "worse case/most impact city"

I177-A-2

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I177-A -1 Comment noted.

I177-A -2 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Key Theme ECON-1. In addition, see response to comment I121-A-8.

6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

scenario and notes \$3.8M of property tax revenue funds 50.2% of Newcastle city government annual budget. CENSE see the following problems with this methodology:

i. No specific data is provided on the impact of EE on property tax revenue for Newcastle (or any other city), even though the EIS notes 86 homes in Newcastle immediately adjacent to transmission lines. **This data should be provided in the EIS.**

<sup>1</sup>Tatos 2016

<sup>2</sup>Bottenmiller & Wolvertson 2013

II77-A-3

ii. The EIS focuses on impact to City government budget, but fails to note any reduction in property tax income also has a **negative impact on other public services** (schools, library, EMS, and King county)

iii. The EIS notes that reduction in property tax value through reductions in assess values, that **city governments would most likely be forced to raise property tax rates to maintain revenue.** (1<sup>st</sup> paragraph 3.10.4.1)

iv. The EIS cites a study<sup>3</sup>, created and funded by a consortium of energy companies (Electric Power Research Institute) which claims that negative impact on property values diminishes with time. This conclusion is **not supported by other studies, and is also not supported by common sense understanding** "If anyone was considering 2 identical house, one next to a transmission line and one not – would you pay equal value for each home" (2<sup>nd</sup> paragraph 3.10.4.1)

II77-A-4

**2. Place the 230 kV transmission lines underground. (Section 3.10.2 & 3.10.4.2)**

a. The EIS notes a cost of \$16-25 million per mile to place transmission lines underground (variance is due

to complexity of being to place within existing corridors vs. under streets). PSE has stated that its position is that any cities and/or property owners requesting underground alignments would be required to pay for undergrounding the lines. PSE's position is based on their utility rate tariff rule, which they have interpreted to require the parties requesting the undergrounding, or the "requesting party," to pay for the marginal or additional cost above what it would have cost for overhead lines. The actual costs for portions of transmission lines moved underground would vary considerably depending on how many payees would serve as "requesting parties". **Costs shown could be as much as \$1677 per year<sup>4</sup> per mile and per payee. (Table 3.10-5 & 3.10-6)**

II77-A-5

**3. Value of lost ecosystem services (Section 3.10.3 & 3.10.4.3)**

a. Individual trees as well as groups of trees provide ecological benefits and environmental values. Trees

improve air quality by absorbing CO2 and potentially harmful gases, such as sulfur dioxide and carbon monoxide, from the air, and releasing oxygen. Trees also store carbon, reduce soil erosion, remove pollutants, and provide food and habitat for birds and other wildlife. Each year, an acre of trees absorbs the amount of carbon produced by driving a car for 26,000 miles, and an individual urban tree contains about four times more carbon than individual trees in forests. **Approximately 9,400 trees were inventoried in the study area in 2015 and 2016.** The EIS references a model<sup>5</sup> that assigns cost/value to the carbon storage provide by tree, replacement tree costs, and "services value"<sup>6</sup> totaling in aggregate approximately \$18.7 million in one-time cost and \$37,858 in annual services value for all segments in aggregate. The actual values from this model would be less than that amount and determined by the actual route selected. **The position PSE assumes is that since the 7,779 tree in the Bellevue portions of the route constitute less than 0.2 percent of the total urban tree cover for all of Bellevue, and therefore are "not considered to be a large amount"**. CENSE has the following concerns:

II77-A-6

i. Even if PSE were to replace the existing tree at "structural value costs" of \$18.6M, it would take years/decade for new plantings to grow and mature to provide the same level of ecosystem services as the current trees.

ii. The costs of ~\$18.7M will ultimately be passed along to PSE rate payers, and with questionable energy demand for the project, and other alternatives available to meet demand, this is an avoidable cost that should not burden ratepayers.

II77-A-7

**4. Costs to PSE customers (not covered by EIS)**

a. The IES only speaks to economic direct impact to city governments and ecosystem services, and

II77-A -4 Comment noted.

II77-A -5 See response to comment II121-A-9.

II77-A -6 See response to comment II121-A-9.

II77-A -7 See response to comment II121-A-9.

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6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

I177-A-7 potential economic impact to "requesting parties" for any underground portion of the proposed routes. The EIS is silent on what the economic impact of this project will be to PSE customers. Public

<sup>3</sup> Mullins 2003  
<sup>4</sup> 20-year bond  
<sup>5</sup> The Watershed Company, 2016b  
<sup>6</sup> Gross Carbon sequestration, avoided runoff, and pollution removal

I177-A-7 information posted on an [Energize Eastside web page](#) claims "Once the project is built and added to the annual capital budget, we expect that \$1 to \$2 of the average monthly bill for residential customers will go towards paying for the project". CENSE has the following concerns:

I177-A-8

- i. PSE is a utility chartered with serving public energy needs. **PSE should be forthcoming with detailed information on overall forecasted project costs for Energize Eastside, and amounts already identified in PSE capital budgets.** The current statements amount to a "just trust us" approach.
- ii. Analysis by an independent utility financing expert hired by CENSE concluded<sup>7</sup> that assuming project costs of around \$250 million (best estimates given an absence of data from PSE) that the total cost to customers would require **\$31-32 million in incremental annual PSE revenue**, which would **accrue to an aggregate total between of \$1.45-2.03 billion dollars<sup>8</sup>** over the lifetime of the transmission line.

5. **Loss to homeowners by reduced property values (not covered by EIS)**  
 a. In "The Price Effects of HVTLs on Abutting Homes"<sup>9</sup>, it's noted that in a study of homes of similar values to the areas impacted by Energize Eastside, *higher priced homes in the Seattle area* had a **11.2% negative impact** when abutting a high voltage transmission line. Quoting the article: "Given the Seattle Study Area higher-priced home subset's \$1,035,105 average treatment group sale price, the Seattle Study Area's typical abutting, higher-priced home **would have sold for \$130,882** more if not abutting an HVTL." CENSE has the following concerns:

i. In the EIS, no reference is made of the environmental impact to economics of property owners who will be negatively impacted by reduced property resale values.

<sup>7</sup> See <http://cense.org/Lifetime%20Cost.pdf>  
<sup>8</sup> Depending on term, see link above for details <sup>9</sup> Bottenmiller & Wolverson 2013

I177-A-9 **PROPERTY - VALUE & VIEWS**

Chapter 3 Long-term Impacts and Potential Mitigation **Land Use and Housing**

p3.1.1-Potential impacts to land use, shorelines, and housing. The study area includes parcels that are included in or abutting PSE right of ways well as those adjoining parcels—within a reasonable distance. If abutting parcel is large, then adjoining parcel to the abutting parcel was not included.

The greatest potential to be impacted is the new easement acquisition (especially on option routes not currently in the existing PSE right of way corridor) and associated structure removal on PSE current or acquired easement property.

p3.1.3-Impact of property values was referred back to Phase I EIS: which said in section 10.7.1.4 (that home values are economic not an environmental issue. Reviewing 25 articles, the EIS chose to quote from Mullins in 2003 because over 50 studies were included which stated in some cases a small decrease in values with proximity to a transmission line, in other cases no change, in some cases increased property values. Quoting From Kinnard 1990- potential to decrease value is small-6.3% or lower—lots next to line often benefit, where lots next to adjacent lots often have value reductions. Higher end properties are more likely to be value affected. KC Assessor does consider

I177-A-8 See response to comment I1121-A-9.  
 I177-A-9 Please see response to comment I1121-A-10 for a response to your comments concerning "The Price Effects of HVTLs on Abutting Homes." For more information about how property resale values were considered, see Key Theme ECON-1 of the comment summary (Appendix J of the Final EIS). SEPA does not require that an economic analysis be included. It allows the Lead Agency to include economic information it believes would be helpful to decision-makers. The EIS Consultant Team included a section on impacts to property values in the Phase 1 Draft EIS because it was highlighted as a concern during the scoping process and the Lead Agency determined it could be helpful. Information on potential impacts on property values is included in the Phase 1 Draft EIS (Section 10.7.1.4) and the Phase 2 Draft EIS (Section 3.10).

6/29/2017

Weebly Email Service Mail - Comments on Energize Eastside Phase II EIS

views of power lines in assessing property values. A 2012 study concluded 3-6% of value. Any effects seems to disappear at 200-300 feet.)

Referring to EIS Phase 2 in section 3.10, Economics, p3.10-1 thru 3, Newcastle was studied for potential tax revenue loss due to property tax reduction. Of all EE cities, Newcastle would suffer most in property tax and lost ecosystem due to reduced tree cover because it is the smallest of the affected cities. Under grounding was studied as mitigation, but stated the replacement of higher voltage lines when lower voltage lines are already present would not result in a greater negative effect than the existing lines at present.

PSE estimates cost differential to underground would be between \$16-\$25 million per mile and any city or property owner requesting under grounding would be required to pay for it as interpreted by PSE in the utility rate tariff rule.

Development in proximity to utility infrastructure must comply not only with local municipalities comprehensive plans but also with PSE guidelines—which are shaped by the National Electrical Safety Code (NESC) standards. It noted Newcastle includes a new Utilities Element with policies that address collocations, limiting vegetation disturbance, and promoting conservation efforts. In the appendix B-2 it notes all four cities required a conditional use permit.

The cities of Bellevue and Renton have Shorelines of the State within their boundaries. Any project inconsistencies are described in appendix B-Section 3.1.3.

Under zoning districts, it is noted Newcastle has a required setback of 5 feet for all buildings and structures including transmission towers outside a defined typically 50 foot wide Olympic Pipeline easement which is generally centered down the PSE easement but does vary in location.

p3.1.4—PSE must consider NESC standards that factor wire swing in high wind conditions. In the 18 mile proposal land use is all follows:

-38% is residential (single and multi-family housing)

(there are 783 single family and 3,440 multi-family residences in the study area) -16% vacant  
-11% commercial

p.3.1-6 thru18—Top land uses per segment are:

-Redmond Segment: 27% multi-family residential(552 units), 24% utility, 12% single family(75 units).

-North Bellevue Segment: 59% single family (102 homes), 23% recreation. -Bellevue Central Segment—Existing corridor Option: 44% recreation (Glendale

Golf Club), 20% multi-family (1,318units), 15% single family (92 units).

-Bellevue Central Segment, Bypass Option 1:-25% commercial, 22% vacant, 16% industrial. There are 54 single family and 292 multi-family units here.

-Bellevue Central Segment, Bypass Option 2: -25% vacant, 20% commercial,

14% industrial.

-Bellevue South Segment, Oak 1 Option:-27% recreation, 17% commercial, 15%

single family homes(212 units). Newport High School and Tyee Middle School

are along this option. Also 287 multi-family units.

-Bellevue South Segment, Oak 2 Option: -25% recreation, 19% commercial, 15%

single family (229 units), 14% Institutional, and 463 multi-family units. Also Newport High School and Tyee Middle School.

-Bellevue South Segment, Willow 1 Option: 40% recreation, 19% single family (180 units), 15% vacant land and also Tyee Middle School, and 10 multi-family

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6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

units.

-Bellevue South Segment, Willow 2 Option: PSE preferred route)-33% recreation,

22% single family (257 units), 17% institutional, also 221 multi-family units. -Newcastle Segment:-59% vacant, 27% single family (89 units), and also 71

multi-family units.

-Renton Segment:-42% vacant due to the Cedar River area, 11% single family

(125 units), 295 multi-family units with Sierra Heights Elementary School and Renton Tech College.

p3.1-19 Long Term (Operational) Impacts Considered:

-Will project convert existing non-utility land use to a utility land use?

No, in all segments.

-Evaluate the project to physically separate existing neighborhoods -Will loss of housing result due to property acquisition?

Cellular phone transmitters on existing poles will be removed and PSE will allow transmitters to be replaced on new poles—no impact expected.

Potential impacts to neighborhood character and mitigation measures are defined only as “less than significant” or “significant”.

I177-A-9

p3.1-20 thru 45. See action 3.2 of Phase 2 EIS for potential impacts to scenic views and aesthetic environment replacing existing poles with taller poles.

\*\*\*\*The route options that deviate from the existing corridor where PSE will have to acquire new easements constitutes a small portion of the total land in the study area and do NOT result in significant changes to existing or future land uses or housing stock. Easement areas would not significantly impact future development but could limit the scale of the future development on those properties with new PSE easements. In these new PSE easements — limitations are to keep vegetation clear, ancillary structures—shed or garages may have to be condemned or demolished. Because the project would not result in removal of existing housing, the impacts are considered less than significant.\*\*\*\*\* ( In some cases a future home remodel/expansion would not be allowed on that new PSE easement)

The segments that would require PSE to get new easements but are all classified as “less than significant” are:

-Bellevue Central Bypass Opt. 1 and Opt. 2—but in comparing these segment areas it says “significant” impacts traversing recreational areas in these segments—(see Section 3.6 Recreation), Bellevue South Oak Opt. 1 and Opt. 2,

all these segments require new PSE easements from owners. Any new building construction would have to conform to NESC safety standards which could limit development on these parcels that would have new PSE easements.

p3.1-46 thru 47 MITIGATION FOR LAND USE AND HOUSING IMPACTS

Adherence to the zoning regulations of each jurisdiction is generally not appealable, and would require some mitigation for project related impacts to land use. In Newcastle, PSE could apply for a variance from the setback requirement which could enable use of shorter poles in that segment—See section 3.2.

Mitigation prior to construction:

—Select routes with the least number of properties where easements would restrict future development where policies encourage building taller or close to street edge.

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6/29/2017

Weebly Email Service Mail - Comments on Energize Eastside Phase II EIS

—Construct taller transmission lines so would clear tops of buildings to satisfy NESC standards for future development.

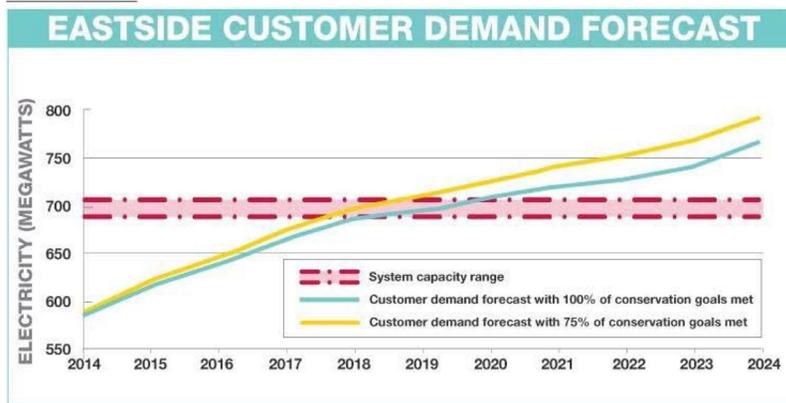
I177-A-9 —Design to extend lines as far as possible over street right of way to minimize the amount of easement and clearance needed from adjacent right of way.  
-Underground sections where it doesn't meet the comprehensive plan policies. If a city requests, PSE will work with the city to determine the cost and how the tariff may apply.

**NEED/ALTERNATIVES**

**Chapter 1.1: Energize Eastside Project/1.3 Purpose and Need**

The EIS says Energize Eastside is needed "to address a projected deficiency in transmission capacity resulting from growth in electrical demand which could affect the future reliability of electrical service for the Eastside." However, the EIS does not provide any numbers or charts to help the public understand exactly what the need is. In the past, PSE showed graphs like this one which appeared on the Energize Eastside website:

I177-A-10 This graph has now disappeared from PSE's website. Although we don't know exactly why this graph has become so shy, we wonder if the actual values for 2014-2016 are decreasing (the numbers in this graph were forecasts). Is PSE trying to avoid embarrassing questions about the need for the project?



I177-A-11 However, total electricity consumption for Bellevue, one of the Eastside's fastest growing cities, indicates declining total electricity use of 5.7% over the period of 2011 thru 2015 in contra variance to a 7.3% increase in Bellevue population. The data comes from PSE. Declining consumption doesn't support PSE's assumption that population growth is causing similar growth in the use of electricity. Energy efficiency and conservation are having a big impact.

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I177-A -10 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

The figure described is contained in Chapter 1 of the Phase 1 Draft EIS and remains as support for PSE's statement of purpose and need based on their Eastside customer demand forecast.

I177-A -11 The growth rate within the Eastside has been and is expected to continue to be greater than the growth rate in PSE's overall service area. PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers.

6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

- I177-A-12 The rate of growth shown in PSE's graph (2.4% per year, P1-5) is at least 6 times higher than demand growth expected by Seattle City Light, the electricity provider for customers who live in Seattle. Is Eastside consumption really growing 6 times faster than Seattle? These are some basic questions the EIS needs to answer.
- Chapter 1.8: Alternatives Evaluated**
- I177-A-13 A basic flaw in this EIS is the Alternatives are not fully defined. According to SEPA, WAC 197-11-440 (P2-2) "The No Action Alternative provides a benchmark against which the impacts of the project and other alternatives can be compared." Imprecise definition of the "No Action Alternative" diminishes its usefulness as a benchmark and prevents any meaningful cost effectiveness comparisons.
- Chapter 2.1: Phase 2 Project Alternatives**
- I177-A-14 The EIS accepts PSE's analysis dismissing viable Alternatives without question. PSE disqualifies these Alternatives using faulty analysis and outdated assumptions. Recent developments demonstrate how far behind the times PSE is behind.
- Batteries**
- A Southern California utility was worried about rolling blackouts after an uncontrolled release from a methane storage facility. The risk was averted by a grid storage battery installed by Tesla in only three months. Could a similar battery address the Eastside's need for less cost, less risk, and less environmental damage?
- I177-A-14 If PSE is truly concerned about rolling blackouts by the summer of 2018 (P1-1), a quickly installed battery is a better solution. PSE says its proposed substation will take up to 18 months to build (P2-46). This cannot be operational by summer 2018. For this reason, Alternative 1A, the transmission line and substation, does not meet the need in the company's required time frame. It must be disqualified as a reasonable alternative.
- Batteries are being used or considered in many other parts of the country. In a major recent development, the federal agency in charge of the Northwest regional grid, BPA, canceled plans to build a \$1.2 billion transmission line between Oregon and Washington. The line was supposed to deliver increased electricity to California. Noting declining usage and new technology, BPA said a combination of flow control devices and batteries would save customers hundreds of millions of dollars. These decisions affect the amount of regional flow that PSE has included in its models. BPA's example shows how modern alternatives could play a bigger role than PSE anticipated five years ago when Energize Eastside was conceived.
- PIPELINE SAFETY**
- Chapter 3.9 Long-term Impacts and Potential Mitigation
- I177-A-15 p 3.9-5 "Alternate plans for aboveground clearance can be developed on a case-by-case basis where access is more limited (Olympic, 2016).  
Q What is the smallest distance allowable?
- I177-A-16 p 3.9-6 "The Partner Cities generally do not directly regulate pipeline safety, but they have the authority to regulate land uses near pipelines within their jurisdictions to protect public health and safety."  
Q What are cities doing to regulate land use. Can they state transmission lines are an essential public facility without questioning need in any detail.
- I177-A-17 p 3.9-7 "In the event of a leak or other emergency, the company is required to investigate and report on the incident, and is responsible for all costs relating to the spill response effort."  
Q Who is responsible to costs related to resident's property damage?
- I177-A-18 p 3.9-9 "The last in-line inspections of the 16-inch and 20-inch pipelines were in April 2014, and the next planned in-line inspections are in early 2019 (West, pers. comm., 2016)."

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- I177-A -12 See response to comment 005-A-4.
- I177-A -13 The alternatives, including the No Action Alternative, are described in Chapter 2 of the Phase 2 Draft EIS, which provides sufficient detail to allow a reasonable evaluation of the potential impacts.
- I177-A -14 Please see responses to comments I115-A-2, OO1-A-6, and OO1-C-8.
- I177-A -15 Information on Olympic's case-by-case determinations of aboveground clearance is outside the scope of a SEPA EIS.
- I177-A -16 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. None of the jurisdictions plan to process the project as an essential public facility (EPF).
- I177-A -17 The commenter is referring to a description of the Partner Cities franchise agreements with Olympic Pipe Line Company, where it is stipulated that the company is required to investigate and report on pipeline incidents, and is responsible for all costs relating to the spill response effort. Partner Cities' franchise agreements with Olympic are currently in effect and would not be affected as a result of any of the action alternatives evaluated in the EIS.
- The comment is outside of the scope of the EIS. Under SEPA, an EIS is required to focus on the environmental impacts of a proposal and its alternatives. SEPA does not require an EIS to analyze the economic or social policy impacts of an action (WAC 197-11-448(3)).
- I177-A -18 Olympic, as pipeline operator, is responsible for operating and maintaining their pipelines in accordance with federal standards. All jurisdictions require compliance with federal regulations, including inspections, as part of their franchise agreements. None of the franchises provide authority to demand an inspection of the pipelines as part of the transmission project, unless required by federal regulations. If in-line inspections need to be completed to address the effects of the project, it is the responsibility of the pipeline operator to complete those inspections. Olympic has a responsibility and interest in working closely with PSE on the project. This includes reviewing and providing input on design, performing and evaluating field measurements and modeling data in order to determine specific measures needed to minimize electrical interference on the pipelines, and working with PSE on construction and access plans. Actions PSE can take, as project proponent, to facilitate Olympic's design review, design input, and implementation of measures that necessarily must be performed by the pipeline operator are the focus of mitigation measures included in Sections 4.9.8 and 5.9.4 of the Final EIS.

6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

- I177-A-18 Q Why not have an inspection prior to and after new poles and wires are installed to detect any differences in pipeline integrity?  
p 3.9-10-16 Unique (sensitive sites within study area)  
Q Good opportunity to speak to the wisdom of risking public safety for transmission lines with questionable ability to improve electrical reliability.
- I177-A-19 p 3.9-16 "If excavation has the potential to be within 10 feet of the pipeline, the Damage Prevention Team would be on-site to monitor excavation."  
Q What are the qualifications to be an on-site inspector. What mitigation of a "rupture" can happen immediately?  
p 3.9-17  
"Olympic's Facility Response Plan provides guidelines to prepare for and respond to a spill from the Olympic Pipeline system. The Facility Response Plan, which received final 5-year approval by Ecology in 2016, serves as Olympic's oil spill contingency plan under WAC 173-182."  
p 3.9-6 indicates "WAC 173-182 On October 12, 2016, Ecology amended the Oil Spill Contingency Plan rule to update standards to ensure that required oil spill response equipment is appropriate for the pipeline risks and operating environments (both marine and inland). The amendments enhance oil spill contingency plan requirements for hazardous liquids pipelines, and for primary response contractors that support the implementation of pipeline plans. This amendment requires pipeline operators to update their contingency plans (e.g., facility response plans) in accordance with the applicable area plan, and submit them to Ecology for approval. The Northwest Area Contingency Plan is the applicable area plan for Washington State."
- I177-A-20 Q Called Dept of Ecology and OPL's updated plan is due November 2017. How will the public find out if it has met this deadline and has adequately prepared to meet required updates
- I177-A-21 The Olympic Pipeline federally mandated Integrity Management Program (put in place after the Bellingham and Carlsbad, New Mexico explosions) require in-line inspections, but only every 5 years. The last inspection was April 2014, and the next in-line inspection is not due until April 2019. This is a year after the projected  
Page 1 of 4 Pipeline Safety
- I177-A-21 completion of the construction of the transmission line. Even with strict construction safety guidelines and rules, construction is still a human activity, subject to operator error, etc. Is this frequency enough to prevent accidents in our densely populated area?  
The regulatory system that we rely on to keep us safe is not a speedy one at the best of times. The conditions that led to the Office of Pipeline Safety issuing a notice of probable violation and Final Order for correction to Olympic Pipeline company were discovered in August of 2014. The Final Order to correct the condition was not issued until January of 2016, and the work does not have to be completed until June of 2017. According to the Office of Pipeline Safety, the case is still open. It doesn't appear that OP has worked more quickly than the required deadline to correct these potentially hazardous conditions. And the EIS now expects us to trust that OP will work diligently, quickly and completely with PSE to identify and implement new mitigations for increased electrical interference, in the absence of any ability by PSE to require cooperation.
- I177-A-22 Page 3.9-16 Pipeline Leak Detection System and Controls. "Leak detection systems must be able to detect 8% of maximum flow leak within 15 minutes." We are not provided with information about how much jet fuel in absolute terms that would be, or the extent of the potential risk to human life and property might occur if a leak

- I177-A -19 To address this comment, the EIS Consultant Team consulted with Olympic. To monitor construction activities near its pipeline, Olympic contracts with independent third parties who are OQ (Operator Qualification) qualified, as is federally mandated. Olympic has developed detailed emergency response plans that model a variety of scenarios and involve coordination with federal, state, and local agencies and first responders. While a blanket response is unlikely to apply equally to all situations, in addition to notifying appropriate authorities, Olympic's response generally can be described as involving isolation, containment, and remediation, with the uniform goals of protecting the environment and the public's health, safety, welfare, and property. The unique circumstances surrounding an event that results in pipeline damage or a leak are likely to dictate an appropriately scaled response. The on-site inspection procedures currently undertaken by Olympic would not change as a result of any alternative associated with the Energize Eastside project.
- I177-A -20 As described in Section 3.9.2.2 of the Phase 2 Draft EIS, BP/Olympic's Facility Response Plan received 5-year approval by Ecology in November 2016. It is the EIS Consultant Team's understanding that the plan will be updated for Ecology approval in 2021.
- I177-A -21 See response to comment I177-A-18 for information on Olympic in-line inspections. See response to comment I130-A-2 for information on Olympic violations. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.
- I177-A -22 See response to comment I155-A-2.

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6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

- I177-A-22 | just smaller than the leak detection system can detect should occur. And we have no information about shut off systems, how they work, what the actual maximum leak might be. This is unacceptable.
- I177-A-23 | **Page 3.9-18** Hazardous Liquid Pipeline Failures. 2,362 incidents were reported in 5 years, over many miles of pipeline. The problem with this type of statistical analysis is that unpopulated miles vs. densely populated miles are not distinguished in any way. The risk may be very low for any particular mile of pipeline, but we should not be casual about rolling the dice in considering the consequences of a failure in a densely populated area like Renton, Newcastle, Bellevue and Redmond. The absolute risk may be low but the potential consequences so high that this increased risk is not acceptable to our community.
- I177-A-24 | **Page 3.9-19**  
What would be the potential consequence of an "average" spill of 12,900 gallons igniting outside Tye Middle School for example? This is the way we need to think about risk in an urban area, not comforting abstractions like deaths per 1000 mile years.  
**Page 3.9-21**  
Can Olympic Pipeline company be relied upon to carry out all required inspections and repairs on time and in full. **Table 3.9-4** raises serious questions in that regard. Table 3.9-4 indicates that
  1. required procedures were not provided,
  2. required inspections related to corrosion, a known risk with proximity to electric transmission lines, were conducted 9 months late,
  3. Defective test sites were found, and no indication that the defects were repaired
  4. And another corrosion inspection issue, with no indication that the inspections were conducted, and are now being conducted within the required time frames.
- I177-A-25
- I177-A-26 | **Page 3.9-29** The diagram showing a small yellow circle representing the center of a pool fire tidily enclosed within the borders of the right of way seems to indicate that outside the green band, consequences would be minor. The following page, 3.9-30, says that the green band has only 1% mortality after 30 second exposure. What happens after 30 seconds? The fire does not go out. This diagram is very misleading. A more useful diagram would have a circle that shows the border of 570°F temperature, the auto-ignition point of wood, to  
Page 2 of 4 Pipeline Safety
- I177-A-26 | show people how wide the area where their 2 x 4 construction, shake roofed homes and surrounding vegetation will combust. We can assume that gasoline in automobiles parked on the street will have already caught fire at 495°F. The diagram also does not indicate the variable slopes in the landscape, which would cause the fire to pour in the downhill direction.
- I177-A-27 | **Page 3.9-45** Extreme Weather Events and Seismic Hazards. The EIS states, "If the overhead transmission lines were damaged during an extreme weather event or natural disaster, there could be risks to public safety if the poles fall and damage the buried pipelines." A vague assurance that safety measures will be included in the final design are inadequate.
- I177-A-28 | **3.9-46** Load comparisons between seismic events and extreme weather conditions may be able to ensure structural designs withstanding these conditions, but there is absolutely no analysis or even any mention of the potential consequences of a simultaneous pipeline rupture and downed transmission wires in the event of an

[https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL\\_en.&view=pt&search=inbox&th=15cb26ae964dbac9&siml=15cb26ae964...](https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL_en.&view=pt&search=inbox&th=15cb26ae964dbac9&siml=15cb26ae964...) 9/22

- I177-A -23 See response to comment I155-A-4.
- I177-A -24 EDM Services, the firm retained by the EIS Consultant Team to conduct the pipeline safety risk assessment for the Phase 2 Draft EIS, used data specific to the Olympic Pipeline system, including an estimated maximum release volume based on pipe size, pressure, and other factors, to model a release and subsequent pool fire size, as described in Section 3.9.4 and shown on Figure 3.9-7 of the Phase 2 Draft EIS.

To estimate a reasonable "worst-case" or maximum release volume, the risk assessment used U.S. Hazardous Liquid Pipeline Release data, filtered to include only refined petroleum product releases in order to be as directly applicable to the Olympic Pipeline system as possible, and normalized the data to the pipe diameter of the Olympic pipelines. The risk assessment used the average of the largest spill size range (6,000 to 12,000 barrels) to arrive at an average "maximum" spill size of 8,861 barrels (or 372,162 gallons). The risk assessment also considered the maximum population density in estimating societal risk. While a "maximum population density" segment of the corridor was used, in some instances, the actual population density could be higher, as could be the case with some schools. If the school density is higher and a fire occurs near enough to damage the school, the number of casualties could be higher if a fire occurred at that specific location. See also Section 5.2 of the Pipeline Safety Technical Report (Appendix I-5 of the Phase 2 Draft EIS) for more information on the release volume used in the risk assessment.

Under WAC 197-11-080, SEPA requires an analysis of a worst-case scenario, but not all possible scenarios. By analyzing a fire from a spill that is 30 times larger than the spill size suggested in the comment, the EIS discloses, by inference, the possibility of a smaller event.

The specific scenario raised by the commenter was not addressed in the risk assessment. However, given that it is not practicable to specify every situation along an 18-mile corridor, the EIS Consultant Team believes that the risk assessment methodology summarized in Section 3.9.5.1 of the Phase 2 Draft EIS is a reasonable approach to characterizing the possible consequences of a pipeline incident in order to identify potential impacts of the project as required under SEPA. It is understood by the Partner Cities that there are many possible variations of worst-case scenarios; predicting or describing all of them is not necessary in order to weigh the severity of possible adverse impacts and the likelihood of occurrence as required by SEPA.

I177-A -25 See the response to comment I130-A-2. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system.

I177-A -26 See response to comment I130-A-4.

I177-A -27 Additional information on seismic hazards has been included in Section 4.11 of the Final EIS. As acknowledged in this section, safety measures would be incorporated into the project design to address extreme weather and seismic conditions. The final structural design would comply with NESC 2017 as adopted by the UTC. In addition, PSE has retained a Washington-licensed geotechnical engineer to evaluate seismic hazards to ensure the design of the project facilities to withstand probable seismically induced ground shaking at each location. To further address seismic hazards, Section 4.11.8 of the Final EIS includes a mitigation measure that would require geotechnical hazard evaluations to be conducted by a Washington State licensed geotechnical engineer for all proposed elements to ensure fault rupture, liquefaction, and landslides hazards have been addressed, and recommendations incorporated into project design.

Also see response to comment I120-A-1.

I177-A -28 In general, transmission lines are flexible and can absorb movement and ground motions without failure of the structure or the conductor. The most likely cause of downed power lines is damage from an adjacent rigid structure or trees. In the event of a downed line, an arc may jump from the soil to the pipelines and cause damage to the pipelines. However, there is no identified change in risk of this happening (or consequence) if the seismic event occurred with a 115 kV line versus a 230 kV line. Additional information on seismic risks and arcing risks has been included in the Final EIS. However, given the existing seismic risks in the corridor, potential impacts from a seismic event involving a simultaneous pipeline rupture and downed transmission line would be similar to impacts that could occur under existing conditions or the No-Action Alternative. Therefore, such impacts are not specifically analyzed in the EIS.

6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

- I177-A-28 | earthquake. The project crosses the Seattle Fault. This omission is unacceptable.
- I177-A-29 | **Page 3.9-46** The vague assurances of additional engineering analysis and mitigation measures to reduce risk from arcing in areas where pipelines are within 13 feet of transmission line pole grounds are unacceptable. Even the consultants report does not provide any concrete details. More detail is required.  
P 3.9-30-51 Your time would be better spent going for a walk than reading this section. The risk study in this section and the more detailed report in Appendix "I" are a brave attempt to try to find some kind of data to
- I177-A-30 | manipulate to show the low probability of a fatal pipeline explosion. Since there is NO data regarding collocated pipes and poles, there is no data about third party accidents. If you are a data geek who might appreciate the attempt made to come up with multiple pages of text and graphs out of practically thin air.  
Only common-sense observations about the long term impacts of a spill, leak or rupture accompanied by the same mantra that all will be fine because we have such good regulations on the books
- I177-A-31 | P3-9.52 Mitigation  
Finally mentioned that some mitigation measures such as those suggested by DNV-GL to mitigate corrosion would be implemented where applicable to design of pole locations, layout and configuration. Other mitigation measures "necessarily" would need to be implemented after the project is energized or during peak winter load conditions.  
Q WHAT kind of other mitigation measures?  
P3-9-53 PSE Responsibility requirements  
Worth reading. The National Energy Safety code (NESC) contains basic provisions necessary for worker and public safety under specific conditions, including electrical grounding, protection from lightning strikes, extreme weather, and seismic hazards. PSE would use these in developing final design. The final design of the project has not been completed; therefore, the exact specifications and standards that would be incorporated into the project have not been identified.
- I177-A-32 | Q How can the EIS study the mitigations of the project when the project planning is NOT complete. Do we have to wait until PSE applies for a permit to get the specific details of this project. Is PSE using the design- build approach for this transmission line?  
P3-9-54-56 Potential Mitigation measures based on stage of project when applied  
Interesting reading. But it appears to be a grocery-list of mitigations when we were expecting exactitude.  
Chapter 4.9 Risks during construction  
p 4.9-1 Measurement of risk is Mile years = # of accidents /length of line/over a given amount of time 1 incident/1000 mile years = 1 incident on 1000 miles of line during 1 year.  
The conclusions of risk:  
The annual individual risk of fatality during construction of the 230 kV lines within the corridor is 1 in 4.6 million (Figure 4.9-3). In other words, it is estimated that there could be a 1 in 4.6 million likelihood that an individual at a specific location would be fatally injured over a 1-year construction period.  
In this case, there is an estimated 1 in 58 million chance that an individual fatality would occur during a one year construction period that would not have occurred if the project was not built. In other words, the  
Page 3 of 4 Pipeline Safety
- I177-A-33 | assessment estimates that there would be an approximately 8 percent increase in individual risk during operation of Alternative 1. Because the risk level is already very low, this 8 percent increase is not considered substantial.  
Q ????? Story problem: Calculate the risk of being on the one spot where the pipeline ruptures while being struck by lightning.  
P 4.9-5 Potential construction damage

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- I177-A -29 See response to comment I136-C-8.
- I177-A -30 Comment noted. See to response to comment I147-C-2 regarding data limitations related to co-located transmission lines and pipelines.
- I177-A -31 Olympic has informed PSE that after the system is energized, Olympic will collect field data to assess the necessity for the installation of AC grounding or similar systems to address steady state conditions. Mitigation that Olympic could provide based on the results of the analysis may include the installation of grounding mats, horizontal surface ribbons, and/or deep anode wells, as well as adjustment to cathodic protection based on observed conditions. See Section 4.9.8.2 of the Final EIS.
- I177-A -32 See response to comment I114-B-3.
- I177-A -33 The comment does not provide sufficient detail about any specific deficiencies in the EIS to allow a response.

6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

Interesting reading about digging, vibration, overloading above the pipeline + how all the mitigation activities will make pipeline damage unlikely.

I177-A-34

Q Good info in theory, but we have no idea where poles will be located, what style, how deep they will be planted, if they will have a concrete foundation, what equipment will be used and where and how the equipment will access the pipeline area etc. Again example of the EIS lacking specificity. This section has the potential for lots of specific questions.

P 4.9-7 Regulatory Requirement

How PSE and Olympic will coordinate before excavation etc. Rehash of the first doc from BP in Appendix I - see questions in Appendix "I" below.

Appendix "I"-2 BP Pipelines Construction Requirements

p I-3 "Each project in close proximity to pipeline is of great concern to BP due to potential impact to the operation and integrity of BP's pipelines. To avoid costly and lengthy delays, plans should be submitted to BP during the early planning stages of the project:

I177-A-35

Q Have plans for EE been given to OPL for review? Which route plans were sent to OPL?  
p I-4 "No excavation or backfilling within the pipeline RoW without BP rep on site giving permission"

I177-A-36

Q What criteria must be met to get permission to excavate or backfill?  
P I-4 cont. "Sometimes pipeline operating pressure has to be reduced"

I177-A-37

Q Will any construction activities require there to be pressure reduction in the pipeline?  
" contractor not permitted to transport construction material or equipment longitudinally over pipeline. Q How close to the pipeline can you operate equipment longitudinally over pipeline?  
" contractor shall submit plan indicating where equipment will cross the pipeline

I177-A-38

Q when and how will residents be notified about equipment crossing on their easement?  
Appendix "I"-3 Olympic Data Request and Responses for risk assessment

I177-A-39

Interesting reading - to see what information is considered a security risk. The responses to many of these questions were included in the main part of the EIS. You might find some questions to ask here. Ie, Q what other kinds of pipeline coating are used besides coal tar enamel?  
Members of the Olympics Damage Prevention Team are located nearby at all times and are able to respond to certain types of events as quickly as traffic permits.

I177-A-40

Q Quantify "nearby." What are examples of "certain types of events" ? Oh, the traffic, not encouraging. Olympic has contracted with National Response Corporation - Environmental Services to respond anywhere along its pipeline system within 2 hours.  
Q what is the greatest quantity of oil that can be release in 2 hours at a location near where YOU live?

**PROPERTY - VALUES & VIEWS**

**Chapter 2 – Alternatives**

I177-A-41

Chapter 2 page 12 - Creating an industrial corridor. Installing fewer poles of this nature is not a benefit i.e. reducing clutter. It is interesting that PSE also mentions a fibre optic cable that will need to be placed. Where will that go? What about other telecommunications facilities attached to these poles? What limitations are going to be put on these poles? Etc.

**Vegetation Management and Maintenance – "For vegetation clearing, it is assumed that all species (of TREES and shrubs) within the managed right of way with a mature height of more than 15' will be removed" (P2-19)**

[https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=EZPUTRTRfL\\_en.&view=pt&search=inbox&th=15cb26ae964dbac9&siml=15cb26ae96...](https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=EZPUTRTRfL_en.&view=pt&search=inbox&th=15cb26ae964dbac9&siml=15cb26ae96...) 11/22

I177-A -34

See response to comment I114-B-3. Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review.

I177-A -35

Extensive coordination with Olympic would be required during project design and construction to avoid disruption to the pipelines. As described in Section 4.9.8.1 of the Final EIS, PSE and Olympic have coordinated regarding the Energize Eastside project since 2012, and both have indicated they would continue their coordination through final design, construction, and operation. Because Olympic, as pipeline operator, is responsible for the safety of their pipelines in compliance with federal safety requirements, Olympic has a responsibility and interest in working closely with PSE on the project. This includes reviewing and providing input on design, performing and evaluating field measurements and modeling data in order to determine specific measures needed to minimize electrical interference on the pipelines, and working with PSE on construction and access plans.

I177-A -36

A grading permit must be issued in each jurisdiction. Numerous regulations apply to obtaining a grading permit, which are discussed in the Plants and Animals and Water sections of the Phase 2 Draft EIS (Sections 3.4 and 3.3, respectively).

I177-A -37

As pipeline operator, Olympic makes case-by-case determinations of the need to reduce operating pressure on their pipelines during excavation and other construction activities around their pipelines. It is not known if operating pressure would need to be reduced during construction of PSE's proposal. This would be determined by Olympic upon review of detailed engineering and construction plans.

I177-A -38

PSE is required to follow any notifications requirements in the applicable jurisdictions. PSE indicates they will also act according to terms of their easements.

I177-A -39

This comment is outside of the scope of the EIS. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system.

I177-A -40

See response to comment I155-A-2.

I177-A -41

PSE needs fiber optic along the whole system for transmission system communications purposes. A more detailed explanation of how fiber optic would be integrated into the design is provided in Chapter 2 of the Final EIS. When a 115 kV transmission line is replaced with a 230 kV transmission line, PSE would work with telecom companies to reinstall the equipment onto the 230 kV poles, per local jurisdiction regulations. For more information, see Section 2.1.2.2 of the Phase 2 Draft EIS.

6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

I177-A-42 | **Access Roads** – The EIS refers us to Appendix A but does not full divulge impacts.

**Chapter: 2.1.3 Page 45: Construction**

The construction period for the substation and 230KV line is estimated to be 18 months and over two summers. Estimates are 3-7 days within a 2 month period. There is no timeframe for restoration. "Restoration will be coordinated with the property owner and relevant permitting agencies" P2-52. All in all, this hangs the property owner out to PSE's desires.

The clearing and grading; access road requirements and pole installation sections again belie what is said in the element sections about degree of significance to each element.

Under Transmission Line (Wire) Installation, there is a wonderful statement that totally contradicts everything we know about pipeline safety and shows that PSE has not fully evaluated their co location project.

**Chapter 3.1 Land Use and Housing**

"There are 783 single-family and 3440 multifamily residences...." Redmond 75/552; Bellevue North 102/no; Bellevue Central 92/1318; Bellevue South 257/221 & New Castle 89/71; Renton 125/295. Variables reviewed are Existing Land Uses; Neighborhood Character; Zoning Districts; Future Land Uses; Housing.

**Chapter 3.1.5: Long Term Impacts (common to all components)**

"Along the existing corridor, this planned pole replacement would not change the existing future land uses, zoning designation, neighborhood character, or housing stock since it is already in use as a transmission corridor ...." Here again is PSE's EIS assumption that nothing is changing when in fact **neighborhood character** is changing with this huge advancement of an INDUSTRIAL CORRIDOR (page 20)

I177-A-43 Yet, for each segment, the EIS states: For **Existing Land Use Pattern and Neighborhood Character**: The project would **not impact** the existing land use pattern of single family and multi-family residential. The project would use an existing utility corridor and not require any new easements from adjoining properties." (Chapter 3.1-Pages 23, 25, 27, 29, 40, 43, 45) **FALSE!!**

**Chapter 3.2: Scenic Views and Aesthetic Environment**

The EIS defines the study area as the area .25 miles from the edge of the existing and new corridor (Chapter 3.2-3), with some disclaimers. One is: "While the project would be visible at greater distances, significant visual impacts are not probable given the project's scale relative to its largely mixed urban context". Variables reviewed are Visual Character, Affected Population, Visual Quality, Visual Resources. One would have to question the study area. Furthermore it should be viewed in its totality. Finally, it is impossible to rate and rank without considering the degree of significance to each variable and the population impacted.

I177-A-44 **Chapter 3.2.3.1 - Page 19: Impacts to Visual Quality of the Aesthetic Environment**

"The built environment could be negatively impacted if the project does not blend with an area that has a consistent urban form (similar building height and form) or consistent utility height, configuration and form". Table 3.2-2 (P 3.2-19) shows 18 key viewpoints. It is troublesome that in some segments only one location is the basis for the entire analysis. Looks to me like the location was selected to insure a non significance designation.

I177-A-46 **Chapter 3.2-4 - Page 26: Consistency with Relevant Plans, Policies, Regulations**  
Vegetation removal – TREES – is brought up under (Chapter 3.2-26) and Bellevue Comp Plan Chapter 3.2-32. However, within the Comp Plan there is no mention OF TREE CANOPY OBJECTIVE OF 40%, nor under Bridle Trails Sub Area plan of tree cutting restrictions.

**PROPERTY - VALUE & VIEWS:  
SCENIC VIEWS AND AESTHETIC ENVIRONMENT**

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I177-A -42 Appendix A shows where construction access was proposed by PSE. The Phase 1 Draft EIS found that construction impacts to transportation from the action alternatives to all communities in the study area were negligible because appropriate access to properties from the public rights-of-way would be maintained. Impacts to other elements described in Chapter 4 of the Phase 2 Draft EIS take into account impacts associated with access roads identified in Appendix A.

I177-A -43 Visual character of neighborhoods is not discussed in detail under land use in the EIS. The Cities of Bellevue, Redmond, Newcastle, and Renton, as well as King County consider the proposed project an electrical utility, and this would not be a change in land use from the current condition. Electrical utilities are allowed or conditionally allowed uses consistent with their zoning code (see Appendix B of the Phase 2 Draft EIS). A conditionally allowed use requires a conditional use permit which is subject to specific criteria in the applicable zoning code.

The EIS was prepared under the direction of the Environmental Coordinator for the City of Bellevue (the Lead Agency), in consultation with the co-lead agencies, the Partner Cities of Kirkland, Newcastle, Redmond, and Renton. PSE did not have any oversight on the preparation of the EIS.

I177-A -44 A new simulation has been prepared for the Final EIS that shows how visible the line would be from 0.25 mile away (Kelsey Creek Simulation). The 0.25-mile study area was selected because it is where there is the greatest potential for significant adverse impacts. Impacts were assessed based on the significance criteria described in Section 3.2.3.4 of the Phase 2 Draft EIS. For more information about how the methodology was developed and used, please see Appendix C of the Phase 2 Draft EIS.

I177-A -45 See the response to comment I195-B-2.

I177-A -46 In the Scenic Views and Aesthetic Environment section, tree removal is described as it relates to visual objectives. Because there is no goal or policy directly linking aesthetic goals with the 40% tree canopy objective, it is not described in Section 3.2 of the Phase 2 Draft EIS. Tree cutting restrictions in the Bridle Trails Subarea Plan are described in Plants and Animals (Section 3.4 of the Phase 2 Draft EIS). Consistency with the City's tree canopy goal is evaluated in the Final EIS (see Section 4.4.1).

6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

The sections mentioned in this comment sheet are: Appendix C, Chapter 3.2 - Scenic Views and the Aesthetic Environment , Chapter 1 - Introduction and Summary, Chapter 6 - Significant Unavoidable Adverse Impacts and Background Documents for Span length and Pole Height.

**Appendix C**

In this section, Scenic Views and Aesthetic Environment Methodology, Scenic Views are compared with Aesthetic Environment, defining them as follows:

**Scenic views** : This view is the "observation of a visual resource from a particular location, with visual resources generally defined as natural and constructed features of a landscape that are viewed by the public and contribute to the overall visual quality and character of an area." (This is you looking at Mr. Rainier)

**Aesthetic Environment**: "This is the portion of the environment that influences human perception of the world. It is comprised of the natural (topography, presence of trees, water bodies) and built (buildings, utility infrastructure) environments that provide a sense of place." (This is you in your home, garden or neighborhood looking at your views and natural surroundings.)

I177-A-47

**Page C-2** mentions expected pole heights in each section along the line (Table C-1) but included *limited* viewpoint locations. (Table C-4)

**Page C-22**: Summary of Planning Policies and Code requirements.

**Page C-23**: The Bellevue Comprehensive Plan 2015 which emphasizes a "City in a Park". Listed under protected views and visual resources are: views of mountains, skylines and water

(Plan Policy UD-62) , and

"**distinctive neighborhood character within Bellevue's diverse neighborhoods**". (Plan Policy N-9)

It is recommended to avoid overhead lines in greenbelts or open spaces and to minimize impact on surrounding neighborhoods" (Plan Policy UT-8 and UT 69) Plan policy UD-70 states "streetscape design should promote a safe and comfortable park-like experience" and includes reference to Bel-Red Road, Lake Hills Connector, Richards Road, Factoria Blvd SE, Coal Creek Parkway and SE Newport Way.

**Page C-27**: The Newcastle 2035 Comprehensive Plan "encourages utility providers to limit disturbance to vegetation within major utility transmission corridors".

**Chapter 1**

**Page 15**: "all significant impacts could be avoided if the line were placed **underground**."

page 1 of 3

**Chapter 3.2 SCENIC VIEWS AND THE AESTHETIC ENVIRONMENT**

In this section page numbers are listed for your quick reference. The important thing to mention is that the construction and installation of industrial sized poles do not belong in residential neighborhoods. There are 21st century solutions available *today* for any potential *future* need of expanding the electrical grid on the Eastside. PSE is ignoring these alternatives.

SEPA (State Environmental Administrative Act) ,WAC 197-11 (Washington Administrative Code) requires all major actions sponsored, funded, permitted, or approved by state and/or local agencies to undergo planning to ensure that environmental considerations, such as impacts related to scenic views and the aesthetic environment, are given due weight in decision-making.

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I177-A -47 Table C-5 provides the list of viewpoints used in the EIS, the associated segment, and the reasons supporting the selection of each viewpoint (e.g., unique natural or built environment or scoping comment). Table C-6 provides a list of viewpoints that were used to inform the analysis but were not incorporated directly into the EIS. In total, simulations from 46 key viewpoints were developed and considered for the analysis as presented in the Phase 2 Draft EIS. For the Final EIS, simulations were created for five additional viewpoints (see Section 4.2 of the Final EIS).



6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

**3.2.1:** states: " It is likely that local **covenants** exist throughout the study area that provide aesthetic standards specific to their respective communities. For the purpose of this Phase 2 Draft EIS, private covenants were not reviewed unless determined by the Partner Cities to uphold broader City policies. In general, the Partner Cities do not have SEPA policies that provide authority to recognize private covenants."

#### **3.2.3.1: Impacts** to Visual Quality of the Aesthetic Environment

**Table 3.2-4 - page 3.2-29:** outlines Potential **Inconsistencies** between City Planning Statement, Policy or regulation and Energize Eastside.

These inconsistencies are identified on the following pages for each segment separately:  
Eastside Rail Corridor: page 30

City of Redmond: page 31 City of Bellevue: pages 32-35 City of Newcastle: page 36 City of Renton: page 37

**Photo representations and details of impacts** to the Visual Quality of the Aesthetic Environment and Scenic Views and Viewer Sensitivity for each segment of the Transmission line. Starting on: **Page 28 of Section 3.2:**

Richards Creek substation - page 28-39

Redmond segment - page 40-42

Bellevue North - page 43-45

Bellevue Central, existing corridor - page 46-49

Bellevue Central, Bypass Option 1 - page 50-55

Bellevue Central, Bypass Option 2 - page 56-58

Page 59, **3.2.5.8:** shows Comparison of Bellevue Central Options

Bellevue South, Oak 1 Option - page 60-64

Bellevue South, Oak 2 Option - page 65-68

Bellevue South, Willow 1 Option - page 69-72

Bellevue South, Willow 2 Option - page 73-75

Page 76 show Comparison of Bellevue South Options

Newcastle Segment - page 77-80

Renton Segment - page 81-86

page 2 of 3

**Page 87: Chapter 3.2.6 Mitigation Measures:** For scenic views and the aesthetic environment, regulations and comprehensive plan policies were reviewed to identify mitigation measures. Mitigation measures specified by code would be required, whereas **mitigation measures based on comprehensive plan policies would be at the discretion of the applicant to adopt or the local jurisdictions to impose as a condition of project approval.** All mitigation measures would be determined during the permitting process, but may be applied prior to construction, during construction, or during operation of the project. For instance, some mitigation measures (such as co-locating utilities with existing utility corridors whenever possible) have already been incorporated into the project design. Conversely, PSE may make commitments to certain measures (such as using landscaping to screen above-ground utility facilities to diminish visual impacts) but may not actually execute them until the project has been constructed.

## **CHAPTER 6. SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS**

**Stated on Page 1 of 6.2:** "The project could have significant adverse impacts to the aesthetic environment as a result of the Bypass Options 1 and 2, the Willow 1 Option, and the Newcastle Segment. There would be no significant adverse impacts to scenic views (Figure 6-1)"

This section continues to elaborate on the **significant impacts** associated with the Energize Eastside project. The Chapter also covers land use and housing, water resources, plants and animals, greenhouse

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6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

gases, recreation, historic and cultural resources, environmental health - electric and magnetic fields, environmental health - pipeline safety and economics.

### **PSE Alternative 1 Background Documents: SPAN LENGTH & POLE HEIGHT**

**Page 2:** This section explains that when taller poles are used, the pole diameter is increased - from three feet to five feet. This also results in a larger and possibly reinforced foundation. It continues to state that taller poles are often heavier than short poles and may need to be larger in diameter and require more robust foundations.

I177-A-48

This **ground level impact** on the aesthetic environment needs to be addressed in the EIS. The ground level impact of clearing land and installation of new poles, potentially 5-6 feet in diameter at the base, is not addressed sufficiently in this EIS.

In **Chapter 1 Section 3** of the Phase 2 Draft EIS it states:

"The EIS is intended to identify reasonable alternatives that could attain or approximate PSE's objectives at a **lower environmental cost** and **disclose potential significant adverse environmental impacts** associated with the alternatives analyzed."

This should be the goal of your written comments for the EIS on PSE's proposed Energize Eastside project. Be as specific as possible and enter as many comments as you like.

### **PIPELINE & SAFETY SEISMIC & EARTHQUAKE HAZARDS**

In the Phase 2 Draft EIS it was "decided" that seismic and geotechnical hazards would NOT be analyzed further!

It states in Chapter 1.10 ELEMENTS OF THE ENVIRONMENT **NOT ANALYZED IN THE PHASE 2 EIS**

"As required by SEPA (WAC 197-11-440(6)), elements of the environment that are not significantly affected do not need to be included in an EIS. The following are elements of the environment evaluated in the Phase 1 Draft EIS that would not be significantly affected by the proposed project, and were therefore not analyzed in this Phase 2 Draft EIS.

**Earth** – Soils and geology were analyzed in the Phase 1 Draft EIS because seismic and geotechnical hazards (including ground shaking, liquefaction, landslides, coal mines and other hazards) are present throughout the area. However, impacts under all alternatives would be less-than-significant with regulatory compliance, and implementation of industry standards, geotechnical recommendations, and best management practices (BMPs)."

Chapter 3.9 .5.4 discusses Environmental Health - **pipeline safety** and the impact of: "**Extreme Weather Events and Seismic Hazards.** (page 45) If the overhead transmission lines were damaged during an extreme weather event or natural disaster, there could be risks to public safety if the poles fall and damage the buried pipelines. Safety measures would be incorporated into the project design to address the extreme weather and seismic conditions that occur in western Washington."

**BUT..... this is the text from the PHASE 1 Draft EIS Document Chapter 3 - EARTH**

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I177-A -48 See the response to comment I120-B-3.

6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

**Chapter 3.3.3 Geologic Hazards**

An important consideration for the construction and operation of the alternatives would be the potential to encounter geologic hazards, including steep slopes, erosion, landslides, seismic hazards, and other hazards such as soft soils.

**Chapter 3.3.3.4 Seismic Hazards**

The Puget Sound basin is located within a seismically active area dominated by the Cascadia *subduction zone*, which forms the boundary between two tectonic plates: the North American plate and the Juan de Fuca plate. The project vicinity has been subject to earthquakes in the historic past and will undoubtedly undergo shaking again in the future.

Earthquakes in the Puget Sound region result from one of three sources: the Cascadia subduction zone off the coast of Washington, the deep intraslab subduction zone located approximately 20 to 40 miles below the Puget Sound area, or shallow *crustal faults*.

1. The Cascadia subduction2. The closest active crustal source is the **Seattle Fault Zone which runs roughly eastwest in south Bellevue and roughly parallel to Interstate 90** (see Figure 3-2). A fault is considered active when it has shown evidence of displacement within the last 11,000 years. An earthquake on the Seattle Fault poses the greatest risk to the Seattle urban region (City of Seattle, 2015).

3. Deep quakes are the most common large earthquakes that have occurred in the Puget Sound region. Quakes larger than magnitude 6.0 occurred in 1909, 1939, 1946, 1949, 1965, and 2001 (City of Seattle, 2015). However, shallow quakes are the type expected on the Seattle Fault Zone, which can create more damage than deep quakes because of the proximity to the epicenter. Damage from earthquakes depends on many factors including distance to epicenter, soil and bedrock properties, and duration of shaking.

**Seismic hazards** include the primary effects of earthquakes, such as ground displacement from fault rupture and ground shaking, as well as secondary effects including liquefaction, *settlement*, tsunamis, and *seiche waves*. These scenarios are defined below.

**Chapter 3.3.3.4.1 Earthquake-induced ground rupture**

Defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. The magnitude, characteristics, and nature of fault rupture can vary for different faults or even along different strands of the same fault. Strong ground shaking from a major earthquake can produce a range of intensities experienced at any one location.

**Chapter 3.3.3.4.2 Liquefaction**

Of particular concern because it has often been the cause of damage to structures during past earthquakes. Liquefaction occurs where soils are primarily loose and granular in consistency and located below the water table. Saturated loose soils that are found within 50 feet of the ground surface are considered at most risk of liquefaction. The consequences of liquefaction include loss in the strength and settlement of the soil. The loss of strength can result in lateral spreading, bearing failures, or flotation of buried utility vaults and pipes. Seismic hazard areas identified in Figure 3-2 are those areas where the foundation soils are considered to be subject to liquefaction or lateral spreading during an earthquake (but could also be susceptible to seismically induced settlement). Typically, these soils are found in low-lying areas near bodies of water, such as along the larger streams and around lakes where is a high probability of loose saturated alluvial soils. In the combined study area, areas such as lowland lakeside areas of the northern and southern tips of Lake Sammamish, as well as the floodplains of the Cedar River and Evans Creek, contain areas considered susceptible to liquefaction.

**Chapter 3.4 page 11: What Geologic Risks are present for Existing Electrical Infrastructure?**

Although it is possible that the Cascadia subduction zone could move in a way that causes a series of large earthquakes (each measuring magnitude 8.0 to 8.5) over a period of years, the earthquake that many scientists and emergency planners anticipate is modeled on the zone's last major quake in 1700 that caused ruptures from end to end, causing one great earthquake measuring magnitude 9.0 (CREW, 2013). The shaking that results from this type

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6/29/2017

Weekly Email Service Mail - Comments on Energize Eastside Phase II EIS

of abrupt shifting of the earth's crust would be felt throughout the Pacific Northwest, causing shaking for 4 to 6 minutes. In general, the intensity and destructiveness of the shaking will be greater at locations closer to the plate interface, with coastal areas experiencing the highest intensities and the level of shaking diminishing farther inland. Distance, however, is not the only factor: local geologic conditions, including soil type, can increase or decrease the intensity of the shaking and produce a range of secondary effects, including landslides and liquefaction (the latter occurs when certain types of soil lose cohesion and behave like a liquid). Widespread power outages are expected throughout the Pacific Northwest, including the combined study area, from downed power lines or damage to substations as a result of an earthquake. Slope failure, soil erosion, etc. could also impact electrical infrastructure by causing downed power lines or other damage to infrastructure that would interrupt service.

**Chapter 3.6.1.3 Seismic Hazards**

An earthquake could occur during construction, resulting in embankment slope failures, liquefaction, ground settlement, or equipment destabilization. The risk of seismic hazards to construction is considered low because of the relatively *low probability* that an earthquake would coincide with the actual limited construction period. If a large earthquake were to occur, the major risk would be to the ongoing construction activities although injury to workers is also possible

I177-A-49 | The question needing an answer: why was it decided to NOT include nor analyze seismic hazards as outlined in Phase 1 Draft EIS and determined that they were less than significant and left out of the Phase 2 Draft EIS?

EIS Phase 2 - General comment areas about trees

Location	Excerpt and Comment
I177-A-50 I177-A-51	<p>P. 3.4-13</p> <p>Tree removal is discussed in the North Bellevue Segment</p> <p>The EIS does not take into account the risks for wind damage to large trees (including blow-down) when only some trees are removed and leave remaining trees vulnerable.</p> <p>The EIS does not take into account the loss in habitat due to tree removal.</p>
I177-A-52 I177-A-53 I177-A-54	<p>P. 3.4-14</p> <p><i>The lowest percentage of tree removal by segment and option (66 percent) occurs in the Bellevue North Segment. The number of trees removed could be lower than the estimates noted above because PSE could choose to trim or prune rather than completely remove trees in a manner that ensures compliance with NERC standards. Therefore, the estimate represents a worst-case assessment.</i></p> <p>The EIS is inconsistent about the trees that will be removed according to its standard set forth in section 3.4.1.3 and the fact that trees above 70 feet that are outside of the managed right-of-way would be removed (p.3.4-6). In many places along the Bellevue North Segment there are many trees over 70 feet tall along this route that would be just outside of the managed right-of-way. It also seems inconsistent with the graphic (map) shown in section 3.4.5.4, where much of the area with very tall trees just outside of the managed right-of-way area is depicted in blue (indicating "no clearing").</p> <p>What does trimming or pruning trees "in a manner that ensures compliance with NERC standards" mean? It will result in unacceptable aesthetic damage if these standards imply "topping" the trees rather than removing them.</p> <p>PSE's description of tree removal for this segment does not seem honest or realistic.</p>
I177-A-55	<p>P. 3.4-33, section 3.4.6.1</p> <p><i>During Operation</i>  <i>-- Trees removed from critical areas in Bellevue and Renton may require mitigation monitoring</i></p>

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I177-A -49 As stated in Chapter 1, Section 1.10 in the Phase 2 Draft EIS, impacts from seismic hazards were found to be less than significant in the Phase 1 Draft EIS and not brought forward for additional analysis in Phase 2. Additional detail on the Seattle fault is included in the Final EIS; see Section 4.10.

I177-A -50 Some trees may have a larger chance of wind damage because of edge effect than under existing conditions. However, the loss of trees to edge effect is not expected to be significant. The corridors being considered in the Phase 2 Draft EIS are already open to wind, either because they are on the existing transmission line corridor or because they are along a roadway. When trees are exposed to wind, they develop more extensive root systems. No new forested areas would be opened for any of the build alternatives.

I177-A -51 Section 3.4.3, Long-term (Operation) Impacts Considered, in the Phase 2 Draft EIS discusses habitat loss due to the removal of vegetation (including trees). See also Section 4.4 of the Final EIS for impacts from PSE's Proposed Alignment.

I177-A -52 All trees in the 100-foot wide legal right-of-way were inventoried (the managed right-of-way is narrower than the legal right-of-way). Also, along roads (routes that are outside of the existing legal right-of-way), the road right-of-way plus a 30-foot-wide strip outward from either side of the road was inventoried. The maps reflect the actual worst-case scenario of tree removal. Areas where there would be no clearing within the right-of-way are already cleared under existing conditions. Please refer to the Energize Eastside EIS website library for an interactive map that shows approximate pole locations and trees that are potentially proposed to be removed <http://www.energizeeastsideeis.org/library.html>. Vegetation Impact Analysis reports can be found under Phase 2 Materials, PSE Background Documents.

See also Section 4.4 of the Final EIS for details of impacts to trees from PSE's Proposed Alignment based on a more refined project design.

I177-A -53 Section 3.4.1.3, PSE Vegetation Management Program, in the Phase 2 Draft EIS describes PSE's standards, which incorporate the NERC standards. See the NERC standards for the United States under Emergency Preparedness and Operations on their website: <http://www.nerc.com/pa/Stand/Pages/AllReliabilityStandards.aspx?jurisdiction=United%20States>. PSE would trim or prune trees using arboriculture appropriate pruning methods. Topping is only performed when clearance to the conductor is not achievable through other arboriculture appropriate pruning methods. PSE prefers to remove trees rather than topping trees.

6/29/2017 Weebly Email Service Mail - Comments on Energize Eastside Phase II EIS	
I177-A-55	This statement makes no sense. How can trees that have been removed from critical areas be "monitored?" This glosses over the fact that critical areas will be permanently damaged.
I177-A-56	Regarding potential mitigation for tree removal during construction: <i>In the Bridle Trails Subarea in the City of Bellevue, plant replacement trees as required under the City's Tree Retention and Replacement Code.</i> What are the specifics around replanting – where will replanting be done?
I177-A-57	The long term impacts to visual quality of the project along the Bellevue North Segment have been total mischaracterized in this EIS as "less-than-significant." They should be characterized as "significant." There are actually many homes situated within view of the powerlines, and many more nearby with residents who frequently walk and ride along the equestrian trails in this area. The destruction of existing trees, higher poles and probable noise from crackling power lines will in fact do serious aesthetic damage to the area. The current Hframe poles are wooden, while the new poles will be twice as high, metallic, and will have an industrial appearance. This report is not honest about the visual impact to this segment.

**ENVIRONMENTAL - TREES & FISH GREENHOUSE GASES**

Chapter 3.5.1

- What about the affect of the lost trees? ( The loss of trees canopy is covered in Chapter 3.3 and 3.4.)

Chapter 3.5.3

- I177-A-58 • Which are 'Partner Cities'? The term is not defined
- I177-A-59 • Chapter 173-441 requires reporting for facilities emitting more than 10000 metric tons of CO2e, NOT just GHG as stated. This is a potentially huge difference given the differences in GH effects of different GHGs. (<http://apps.leg.wa.gov/WAC/default.aspx?cite=173-441-030>)
- I177-A-60 • "The Council on Environmental Quality (CEQ) has withdrawn its final guidance for Federal agencies on how to consider greenhouse gas emissions and the effects of climate change in National Environmental Policy Act (NEPA) reviews, a Notice of Availability for which was published on August 5, 2016 (81 FR 51866). As explained in the Notice of Availability, the withdrawn guidance was not a regulation. Pursuant to Executive Order 13783, "Promoting Energy Independence and Economic Growth," of March 28, 2017, the guidance has been withdrawn for further consideration." ([https://ceq.doe.gov/guidance/ceq\\_guidance\\_nepa-ghg-climate\\_final\\_guidance.html](https://ceq.doe.gov/guidance/ceq_guidance_nepa-ghg-climate_final_guidance.html))

thresholds will be lowered and more emissions brought into the program, through 2015 (energy, 2014). Although PSD operates electricity generating plants, such infrastructure is not proposed in any of the alternatives. The newly adopted Clean Air Rule does not apply to the proposed alternatives and, given its relatively large threshold, is not applied to the following project analysis.

Chapter 3.5.5.1

- I177-A-61 • What does 'considerable' mean in "cumulatively considerable contribution"?

Important due to cumulative effects GHG emissions have had and are having on global climate. Impacts are assessed based on the project's potential to make a cumulatively considerable contribution to the state and overall global GHG burden. Potential mitigation measures to minimize or offset these emissions are associated with the project and considered in the analysis.

- I177-A-62 • when are potential mitigation measures warranted?

Chapter 3.5.7.1

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- I177-A -54 Comment noted.
- I177-A -55 Critical areas regulations have standards for mitigation that include tree replacement and monitoring of the effectiveness of mitigation sites to ensure successful re-establishment of plants, including trees, and habitat. Monitoring usually occurs annually over a period of 5 to 10 years, and requires a qualified professional such as a professional wetland biologist to inventory plant survival, habitat, and invasive species, and to submit monitoring reports for City review. Monitoring plans are developed specific for each site and are a required part of the permitting process. A City retains funds (security devices) until the performance standards at mitigation sites are achieved per the approved mitigation plan. Specific requirements depend on the regulating agency or agencies. For example, see Bellevue LUC 20.25H.
- I177-A -56 See response to comment I1139-A-3.
- I177-A -57 The finding of less-than-significant impacts along the Bellevue North Segment was based on the transmission line being in the existing corridor, with minimal contrast with existing conditions, and low viewer sensitivity. Although the transmission line would be situated in a residential neighborhood that hosts equestrian trails, viewer sensitivity was determined to be low because only residential viewers close to the transmission line would be able to view it. The presence of dense vegetation also reduces the likelihood that the transmission line would be visible from any of the recreational resources, except where they directly cross them. In addition, none of these resources are identified as having scenic qualities. Noise was not evaluated under Scenic Views and the Aesthetic Environment. Noise was evaluated programmatically in the Phase 1 Draft EIS and it was determined that impacts would be less-than-significant (see Chapter 9 of the Phase 1 Draft EIS). Vegetation removal and change in pole height and form were evaluated as part of the analysis.
- I177-A -58 The term "Partner Cities" is used to describe the jurisdictions overseeing the EIS process for the project. This includes Bellevue, Kirkland, Newcastle, Redmond, and Renton. For more information, see Pages I and 1-3 of the Phase 2 Draft EIS, as well as the Glossary in the Final EIS.

I177-A -59 In emissions inventories, GHG emissions are typically reported in terms of metric tons of CO<sub>2</sub> equivalents (CO<sub>2</sub>e). CO<sub>2</sub>e are calculated as the product of the mass emitted of a given GHG and its specific global warming potential. While CH<sub>4</sub>, N<sub>2</sub>O, and SF<sub>6</sub> have much higher global warming potential than CO<sub>2</sub>, CO<sub>2</sub> is emitted in such vastly higher quantities that it accounts for the majority of GHG emissions in CO<sub>2</sub>e, both from residential developments and human activity in general. The assessment provided in Section 3.5 of the Phase 2 Draft EIS is consistent with WAC 173-441-030.

I177-A -60 It is correct that the Council on Environmental Quality (CEQ) withdrew its “Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews,” on April 5, 2017 for further review. The withdrawal of the guidance does not change any law, regulation, or other legally binding requirement. Consideration of GHG sources identified in the guidance was used in the Phase 2 Draft EIS impact assessment; however, that was the extent of the reliance on this guidance document. Clarifying language has been added to the Final EIS (see Section 4.5). However, the methodology used for the assessment remains valid.

Although PSE operates electricity generating plants, such infrastructure is not proposed as part of this transmission line project.

I177-A -61 A cumulatively considerable contribution of GHG emissions would be if the project would result in operational GHG emissions at or above the State of Washington reporting threshold of 10,000 metric tons of Co<sub>2</sub>e in a given year after implementing mitigation measures.

I177-A -62 Mitigation measures specified by code would be required, whereas mitigation measures based on state and local programs would be at the discretion of the applicant to adopt or the local jurisdictions to impose as a condition of project approval. For more information, see Section 3.5.8 of the Phase 2 Draft EIS.

6/29/2017

Weebly Email Service Mail - Comments on Energize Eastside Phase II EIS

I177-A-63 • When it is said that the emissions would be substantially below the reporting threshold of 10,000 metric tons, is that 10,000 metric tons of CO2e (same question for 3.5.7.2)? This is not clear in the document.

Chapter 3.5.7.2

I177-A-64 • The SF6 emission calculation is slightly off and would equate to 76.7 metric tons CO2e rather than the 75 tons as documented.

Chapter 3.5.7.8

I177-A-65 • The numbers in the table don't reflect the body of text (39 v 40). This is also true for Table 3.5-2.

Chapter 3.5.8

I177-A-66 • What is the distinction between "Mitigation measures specified by code" and those based on "state and local programs"?

3.5.8 Mitigation Measures  
For GHG, regulations and state and local GHG reduction programs were reviewed to identify mitigation measures. Mitigation measures specified by code would be required, whereas mitigation measures based on state and local programs would be at the discretion of the applicant to adopt or the local jurisdictions to impose as a condition of project approval.

Chapter 3.5.8.1

I177-A-67 • Why is the word 'would' used instead of 'will' in the first sentence of paragraph 2?  
• Why would be long-term sequestration loss impacts only be POTENTIALLY offset?

Chapter 3.5.8.2

I177-A-68 • The **less-than-significant GHG impact** obviate the need for mandatory reporting.  
However, does this also imply that no mitigation measures may be required as suggested? Why couldn't mitigation be nonetheless required?

**ENVIRONMENTAL - TREES & FISH**

**Water Resources**

There are several "long-term impacts" discussed in **Chapter 3.3.3** - Water Resources. These include:

- 1) Storm water runoff
- 2) Impact on ground water, especially in Redmond and Renton which rely on aquifers for their drinking water.
- 3) Soil Compaction from construction
- 4) Contamination of surface and/or groundwater

I177-A-69

PSE claims they can mitigate these impacts through code compliance and other mitigation and that the impact is "less-than-significant." I suspect they are right in this assumption. It is an existing corridor and much of the intrusion is, in reality, short-lived and related to construction. They should be able to successfully argue that other types of construction projects mitigate these short-term impacts through code compliance.

I think the stronger argument may be the plants and animals impacted by water changes. The most direct being **FISH**.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15cb26ae964dbac9&siml=15cb26ae96...> 19/22

I177-A -63 Please see the response to comment I177-A-59.

I177-A -64 1,416 pounds of SF6 times 23,500 global warming potential equals 166,380 pounds of CO2e. This yields 75.47 metric tons CO2e. GHG are reported to the nearest pound.

I177-A -65 The numbers in the text are correct. The numbers in the tables for the Oak 2 Option and Bypass Option 2 should be 29 and 40, respectively, and have been corrected in the Errata, Chapter 3 of the Final EIS.

I177-A -66 Mitigation measures specified by code include applicable federal, state, and local regulations (Section 3.5.8.1 of the Phase 2 Draft EIS). Mitigation measures based on state and local programs include best management practices used to reduce GHG contributions and meet goals to reduce GHG emissions related to gas-insulated switchgear (Section 3.5.8.2 of the Phase 2 Draft EIS).

I177-A -67 The word "would" is used instead of "will" because the action is conditional upon allowance of the project.

Different trees have different rates of sequestration, so the degree of sequestration loss offset would depend on the types of trees planted. Also, sequestration loss would only be offset for the first 20 years, after which point the emissions associated with maintenance of the trees would outweigh the positive benefits they provide. In addition, payment of in-lieu fees is part of the mitigation suggested for tree removal, which would not necessarily offset long-term sequestration loss impacts.

I177-A -68 According to the SEPA Handbook, decision-makers should judge whether possible mitigation measures are likely to protect or enhance environmental quality. Mitigation measures must be related to a specific adverse impact clearly identified in an environmental document [WAC 197-11-744] on the proposal, and must be reasonable and capable of being accomplished [WAC 197-11-660(1) (b) and (c)]. Section 3.3.3 of the SEPA Handbook states: "mitigation may be suggested by the applicant; mandated by local, state, and federal regulations; or required through the use of SEPA Substantive Authority." Mitigation measures may be identified in the EIS to minimize impacts, even if the impacts are less than significant, as described in Section 4.1.6 of the Final EIS. Section 3.5.8 of the Phase 2 Draft EIS does identify mitigation measures to reduce GHG contributions. A mitigation measure to report GHG has not been identified at this time but could be required as part of permit conditions. None of the Partner Cities has policies or regulations requiring that projects offset their GHG impacts.

6/29/2017

Weebly Email Service Mail - Comments on Energize Eastside Phase II EIS

I177-A-70

The new lines would involve 15 (Willows 1) to 17 (Willows 2) stream crossings.(Chapter : 3.3-21). This will result in the removal "of more than 5,400 trees." (Chapter: 3.4-16). They say that 17-26% of trees will be removed per acre of area surveyed. However, they also state that they plan retention of at least 5,000 inventoried trees. (Chapter: 3.4-14). **Another way of looking at the math is that if "inventoried" trees include those to be removed and those to be retained, than 5,400 out of 10,400 inventoried trees**

**will be removed.** That's 52% of the inventoried trees that will be removed. The DEIS chose to go with 17-26% of trees/acre which implies much less impact.

I177-A-71

Of the 5,400 trees, 1,470(27%) are stated to be in critical and stream buffer areas (Chapter : 3.4-16). However, if looking at the individual inventory for the different segments of the route, that number of trees in critical and stream buffer areas is 3,135 (Chapter : 3.4- 19-24).

This loss of tree canopy and the accompanying loss of 327 acres of vegetation results in reduced shading over streams and changes water temperatures as well as robbing fish of the shade cover they use to avoid predators. This becomes important when looking at the stream designations. I didn't research all but I have data looking at the Coal Creek Basin as an example .

I177-A-72

The preferred route for Energize Eastside retraces the existing path through this basin, even though these streams are now designated as a: "Core Summer Salmonid Habitat" for aquatic life use and "Extraordinary Contact" for recreational use according to the King County stream report updated in November 2016. The lower portion of Coal Creek has been assigned an additional "Supplemental Spawning and Incubation Protection". Any project is subject to the requirements of the Endangered Species Act.

I177-A-73

The City of Bellevue describes this area as the Coal Creek Natural Area with "second growth forests, without a house in sight - echoing the wildness that once covered this area". The City further describes the creek as supporting habitat for Chinook, Rainbow and cutthroat trout, Coho, Sockeye and Steelhead. The creek provides "valuable fish and wildlife habitat, with dense forest protecting water quality and erosion"

I177-A-74

I therefore strongly disagree with the assessments stated throughout Chapter 3.3 and Chapter 3.4 of the "less-than-significant" impact. Instead, the loss of trees and other vegetation would have a significant impact upon the streams and fish habitat.

34 attachments

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I177-A -69

Comment noted. Roughly one-third of Redmond's drinking water is from City wells on the east side of the Sammamish River. Drinking water for the balance of the City (west of the Sammamish River) where Energize Eastside is proposed is from the Tolt Pipeline, not groundwater.

I177-A -70

See response to comment II20-B-9.

I177-A -71

See response to comment II20-B-9.

I177-A -72

The statement is correct; any potential impacts to salmon species (e.g., from in-stream work) would be required to comply with the Endangered Species Act (ESA). PSE proposes to avoid all work within streams, and thus would be in compliance with the ESA, by avoiding impacts. If they are unable to avoid in-stream work, they would be required to undertake Section 7 Consultation.

I177-A -74

Impacts to water resources are considered significant where project activities cannot be reduced through mitigation. Removal of trees and other vegetation within stream and/or wetland buffers would require mitigation through city critical areas regulations. As these impacts would be reduced to a level of no-net-loss, they would not be significant.

6/29/2017

Weebly Email Service Mail - Comments on Energize Eastside Phase II EIS

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Important due to cumulative effects, CEQA mitigation measures have had and are having an impact on the project. The project is currently in the process of being approved by the Board of Supervisors. Please contact the project manager for more information.

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3.5.8 Mitigation Measures  
The CEQA mitigation measures and other CEQA mitigation measures were reviewed to identify any potential impacts. Mitigation measures identified by the project manager are listed below. Mitigation measures identified by the project manager are listed below. Mitigation measures identified by the project manager are listed below.

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To: Heidi Bedwell, Energize Eastside EIS Program Manger      June 19, 2017  
 From: Kristi and Tom Weir  
 4639 133<sup>rd</sup> Ave SE  
 Bellevue WA 98006  
 Members of CENSE

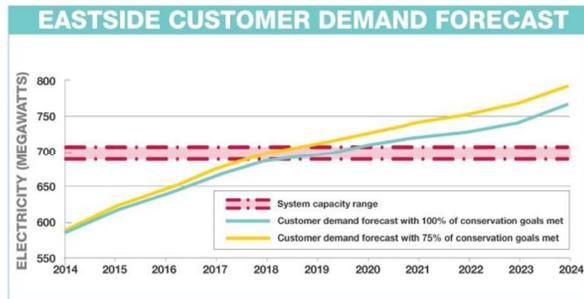
We have lived in Somerset for 46 years. Energize Eastside does not impact our property. There are many reasons PSE Energize Eastside (EE) should not go forward. We addressed some of the issues in our comments to EIS1. We do not see that our concerns were addressed in EIS2. We will review those comments and add further information.

1. **First and foremost, PSE EE is not needed.** Our first comment is based on the following statement from the FACT SHEET of EIS2

"PROJECT DESCRIPTION  
 The purpose of the project is to address a projected deficiency in transmission capacity resulting from growth in electrical demand, which could affect the future reliability of electrical service for the Eastside. "

I178-A-1

PSE has never proven that there is a projected deficiency in transmission capacity. I remember at the first Open House that PSE held on the project, PSE presented the diagram below showing how demand would outstrip supply. They asserted at that time that electricity demand would grow at 2.4% per year.



I178-A-2

As an economist, I know the assumptions behind the demand and supply curves are critical. PSE has refused to provide the data to back up the 2.4% growth in demand. However, published data show electricity consumption in Bellevue to be FALLING—not rising. PSE’s own data show since 2011 total electricity use has FALLEN 5.7% while Bellevue’s population has grown 7.3%.

I178-A -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”).

I178-A -2 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”).

I178-A-3 On May 31, 2017, KIRO news reported that "Seattle City Light CFO Paula Laschober told a council meeting recently. 'Energy use peaked in 2007 and since has been declining.'"

**Just recently KIRO news reported (Seattle City Light faces millions in lost revenue**

by: **BY MYNORTHWEST.COM** Updated: May 31, 2017 - 6:12 AM

**SEATTLE** - Seattle residents are using energy quite efficiently. That is bad news for Seattle City Light, which is facing a revenue shortfall worth millions.

"This is not a phenomenon that's unique to City Light, it's a phenomenon being experienced across the country," Seattle City Light CFO Paula Laschober told a council committee recently. "Energy use peaked in 2007 and since then has been declining."

"All of the things we are seeing on the horizon are indicating that there is likely to be even less demand at the retail level for energy," Kilduff said. "We have ongoing improvements in energy efficiency components, not just LEDs; solar panels have become more cost effective because of all the subsidies provided for them, they are also becoming more efficient. And as battery technology has been improving, this is leading to the likelihood there will be less and less retail demand."

I178-A-4 EIS2 fails to provide data to back up PSE's claim for needed transmission capacity and hence fails to address issues the public raised in comments to EIS1.

I178-A-5 If the project is not needed for capacity reasons, then the assertion of EIS2(2.1.1) that **implementation of the No Action Alternative** would not meet PSE's objectives for the proposed project is seriously called into question. The No Action Alternative clearly needs to be reevaluated. Why subject our cities to a risky, expensive project when it is not needed?

I178-A-6 2. EIS2 (3.4 Plants and Animals) A second area of concern, based on my economic background, is the **failure to completely look at all the benefits of tree canopy**. The loss of up to 5,400 trees is greater than EIS2 had indicated as the EIS has utilized a very narrow definition of the impact of trees. The EIS considers the benefit of trees in carbon sequestration but fails to consider many other benefits which will be lost with tree cutting.

I178-A-7 The University of Washington Department of Forestry has an excellent website "Green Cities; Good Health" that lists many ways trees enhance our lives. <http://depts.washington.edu/hhwb/>

The UW study lists over 10 areas where trees benefit the community. One interesting area is effect of trees on the local economy—business, government, and individuals. Below is a section of the study on Local Economics. There are nine of other effects the UW looks at.

I178-A -3 Comment noted.

I178-A -4 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

I178-A -5 The project is designed to address a transmission capacity deficiency that PSE has identified (see Chapters 1 and 2 of the Phase 1 Draft EIS). The EIS Consultant Team reviewed PSE's methods for determining this deficiency and found them to be in accord with industry practice for transmission system planning. Therefore, the EIS accepts PSE's assessment that the No Action Alternative would not meet their objectives. Even if there were some uncertainty about the need, the EIS would be required to disclose the worst-case scenario that could ensue under the No Action Alternative, in order to meet SEPA requirements.

I178-A -6 Other ecosystem benefits lost as a result of tree removal are evaluated in Section 3.10.3 of the Phase 2 Draft EIS. The number of trees removed could be lower than the estimates noted above because PSE could choose to trim or prune rather than completely remove trees in a manner that still ensures compliance with NERC standards. Therefore, the estimate represents a worst-case assessment. Section 4.4 of the Final EIS presents information on tree clearing associated with PSE's Proposed Alignment, based on refined design.

## Local Economics

Knowing the monetary value of things is important in our society. What is not counted does not count in public decision making. Trees in cities are not grown and managed for products that can be bought and sold on markets, but they do provide many intangible services and benefits! This article serves two purposes. First, it introduces valuation methods that are used to convert intangible benefits to dollar sums.<sup>1,2</sup> Economists and other social scientists have devised reliable nonmarket valuation methods to represent natural assets in cities and towns. Then, it shows how nonmarket valuations can support local decision-making.

### Fast Facts

- While development costs can be greater for lots where trees were conserved (5.5% in one study<sup>20</sup>), builders can recover extra costs of preserving homes through higher sales prices and faster sales for houses on wooded lots.<sup>21</sup>
- The presence of larger trees in yards and as street trees can add from 3% to 15% to home values throughout neighborhoods.<sup>2</sup>
- Averaging the market effect of street trees on all house values across Portland, OR (population 590,000) yields a total value of \$1.35 billion, potentially increasing annual property tax revenues \$15.3 million.<sup>9</sup>
- Homes that are adjacent to naturalistic parks and open spaces are valued at 8-20% higher than comparable properties, with the positive price effect declining to near zero about ½ mile away.<sup>26,27,28,29</sup>
- A study found 7% higher rental rates for commercial offices having high quality landscapes.<sup>14</sup>
- Shoppers claim that they will spend 9% to 12% more for goods and services in central business districts having high quality tree canopy.<sup>34</sup>
- Shoppers indicate that they will travel greater distance and a longer time to visit a district having high quality trees, and spend more time there once they arrive.<sup>34</sup>

I178-A-8

A more comprehensive study of the benefit of trees is needed. It is premature to say the effect of the loss of trees with EE is less-than-significant. Tree impacts Section 3.1-3.10—not just Section 3.4.

I178-A-9

3. (Chp 2.1 **Project Alternatives**) **EIS fails to fairly evaluate alternatives EE**. There are alternative ways to increase reliability and meet peak demand which are cheaper and more climate friendly. For example, battery storage is now being successfully used in Southern California to meet peak demand. Solar, co-generation, micro grids, and smart technology are also better strategies.

I178-A -7

The link provided in the comment identifies the following research themes being conducted by the University of Washington: livable cities, social strengths, local economics, place attachment and meaning, crime and public safety, safe streets, active living, reduced risk, wellness and physiology, healing and therapy, mental health and function, work and learning, lifecycle and gender. It is true that the trees provide a broad range of benefits that are still being studied. For the Phase 2 Draft EIS analysis, in order to assign a monetary value to ecosystem services, a statistical model called i-Tree was used to identify the current amount of carbon stored in the trees (based on tree species, diameter of trunk at breast height, and tree height), and the cost of replacing the tree with a similar tree (called the “structural value”). The model also identifies the amount of avoided runoff, pollution removal, and gross carbon sequestration on an annual basis (for more information, see Section 3.10.3 of the Phase 2 Draft EIS). This model is commonly used to determine the value of ecological services provided by trees, as was requested during scoping for the Phase 2 Draft EIS. Other values that trees provide are incorporated in many city policies and regulations, and consistency between the project and such policies and regulations is evaluated in Section 3.4 of the Phase 2 Draft EIS, Plants and Animals.

I178-A -8

See Section 3.4.3.1 in the Phase 2 Draft EIS, which defines the significance criteria; these criteria were approved by the Partner cities. The ecosystem services of trees are described in Section 3.10.3 of the Phase 2 Draft EIS.

I178-A -9

See response to comment I115-A-2.

I178-A-10

EE will increase our reliance on coal and natural gas which adds to carbon emissions.

EE will saddle the Eastside with more antiquated transmission line infrastructure while other cities and states move toward clearer solutions. For example, "Portland, Multnomah County set goal of being powered by 100% renewable energy". (Seattle Times, June 4, 2017, B7) "Seattle commits to Paris Accord, calls for end to Coal-fired power in Washington: A city council resolution calls for Puget Sound Energy to stop using coal by 2015." (Seattle Weekly, June 12, 2107.)

In summary, the EIS has not shown EE to be needed, to be the best and cheapest technology, or to be the best for our environment.

EE should not be approved.

Kristi and Tom Weir

I178-A -10 Comment noted.

6/29/2017

Weebly Email Service Mail - Energize Eastside EIS Phase 2 Comment



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

### Energize Eastside EIS Phase 2 Comment

1 message

**Pete Mansfield** <petermansfield@comcast.net>  
To: info@energizeeastsideeis.org

Mon, Jun 19, 2017 at 3:17 PM

To: EIS Hearing Examiner

Re: EIS Ph2 Comments

While I know there will be others commenting on the critically important issues of transmission line necessity and safety, I want to take a moment to comment on the section titled: Scenic Views and Aesthetic Environment (pg 1-15). On this page, under "Significant Unavoidable Adverse Impacts", the first bullet item states: "There would be no significant adverse impacts to scenic views". This is quite a bold statement considering its qualitative nature.

I179-A-1

As a counter to this, please see the attached document showing a series of before/after photo simulations developed from data available from (1) the EIS documents, (2) PSE public documents, (3) photographs and (4) geospatial data (e.g. Google Earth). This sampling of images demonstrate visual impact to a variety of public spaces which will affect all people who live in, visit or travel through the area. These are significant impacts to our scenic landscape and the EIS is deficient in not calling this out.

Original high-resolution simulations may be downloaded from [here](#).

Please let me know if there are questions regarding any of the information presented or how simulated images were constructed.

Sincerely,

Peter K. Mansfield, Ph.D.

4568 Somerset Place, SE

Bellevue, WA 98006

[petermansfield@comcast.net](mailto:petermansfield@comcast.net)

**Before-After Photo Respose.pdf**  
1783K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15cc26f25fd526dc&siml=15cc26f25fd526dc> 1/1

I179-A -1 A full explanation of the finding of less-than-significant impacts to scenic views is provided in Section 3.2 of the Phase 2 Draft EIS. Thank you for the simulations you have provided. Similar simulations have been produced by Power Engineers; an assessment of these new simulations is provided in Section 4.2 of the Final EIS.

6/29/2017

Weebly Email Service Mail - Support of Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

Support of Energize Eastside

1 message

Young, Robert(091) <RobYoung@financialguide.com> Mon, Jun 19, 2017 at 1:41 PM
To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>
Cc: "council@bellevuewa.gov." <council@bellevuewa.gov>, Kathy McCorry <kmccorry@issaquahchamber.com>

I180-A-1 | This needs to be done sooner than later to avoid a disaster. Thank you.



Rob Young
Agent with MassMutual Seattle
Million Dollar Roundtable Lifetime Member (MDRT)
701- 5th Ave, Suite 1100
Seattle, WA 98104
Office 206-346-3258/ Fax 206-624-1766
Cell 206.234-6797 , mail to robyoung@financialguide.com
Rob's Website Click Here www.robyoungfinancial.com



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Registered Representative of MML Investors Services, LLC, Member SIPC and a MassMutual subsidiary.

I180-A -1 Comment noted.

6/29/2017

Weebly Email Service Mail - Phase 2



Energize Eastside EIS <info@energizeeastsideeis.org>

**Phase 2**

1 message

Michael Blodgett <m\_j\_blodgett@yahoo.com>

Tue, Jun 20, 2017 at 1:09 PM

Reply-To: "m\_j\_blodgett@yahoo.com" <m\_j\_blodgett@yahoo.com>

To: "info@energizeeastsideeis.org" <info@energizeeastsideeis.org>

II81-A-1

I do not believe that PSE is sincere about utilizing input given by the public. I usually got responses that it was too expensive, we need this, or no response to why they (PSE) is not accessing the power grid closer to the stated need.

[Sent from Yahoo Mail on Android](#)

II81-A -1 Comment noted.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15cc71fdcf27ebde&siml=15cc71fdcf27ebde> 1/1

6/29/2017

Weebly Email Service Mail - Comments on the Phase 2 Draft EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Comments on the Phase 2 Draft EIS**

1 message

James Adcock <jimad@msn.com>

Sat, Jun 24, 2017 at 7:32 AM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

Comments on the Phase 2 Draft EIS

James Adcock  
5005 155th PL SE  
Bellevue WA 98006  
jimad@msn.com

James Adcock Electrical Engineer, is a resident of Eastgate, and long-time participant in PSE's Integrated Resource Planning.

I182-A-1

I would like to reiterate my concerns about City of Bellevue adding their consultant's review results "after" the close of the previous comment period, dropping them into the record as-if "The Voice of God" without allowing any public review or commenting on those consultant's results. I suggest instead, that all documents introduced by City of Bellevue or PSE should have been, and should be, subject to public comment and review. The current "Voice of God" approach that City of Bellevue is taking to the consultant's results is inappropriate and grossly unfair.

I182-A-2

I will also point out again, as an electrical engineer, that a project of this scope, cost, size, and environmental destruction, particularly to trees and to the environmental quality of views -- especially in Somerset -- is simply not necessary. A simple, small, inexpensive, non-destructive counterapproach, as I have stated in my prior comments, is simply to double-wire the existing system, putting two wires on each hanger in where there are currently one. This might require new crossbars, and perhaps in some areas new uprights. Staying at 120kv rather than going to 230kv. This would also require doubling up on transformers on each end, or putting new twice as powerful transformers at each end. There is room "outside the fence" to do this even if PSE claims that there isn't room "inside the fence." It might require a little bit of cooperation, leasing or taking, from the Cities at each end of the line to do this -- but surely they would cooperate compared to the magnitude of needless environmental destruction and expense being caused by PSE's current proposal! While PSE claims to have invented PSE-specific "internal design rules" to prevent this simpler "double-wire" approach, note that in fact PSE themselves have in fact implemented a similar approach with their double-wired transmission lines along the Iron Horse Trail near Rattlesnake Lake. Again, prudent design and actions on the part of PSE requires SOME kind of thoughtful consideration and trade-off between their current "Go Big or Go Home" design approach, verses taking a more measured, conservative approach, more in scale with the impacted neighborhoods, and with magnitudes lower environmental destruction.

I182-A-3

James Adcock

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15cda845870e3eff&siml=15cda845870e3eff 1/1

I182-A -1

It is not clear what results this refers to that were posted, or after what comment period. Assuming the subject of this comment is the data that were posted to the project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) during the comment period for the Phase 2 Draft EIS, this was additional geographic information system data that the EIS team had relied on. It did not change the results of the EIS content.

I182-A -2

Comment noted.

I182-A -3

PSE found that the capacity deficiency is on transformers at the Sammamish and Talbot Hill substations that convert 230 kV to 115 kV; therefore, in order to address the problem using only 115 kV lines, power must be supplied either from other existing 230-115 kV transformers or by new ones. The Phase 1 Draft EIS examined a method of addressing the project objective using only 115 kV lines (Alternative 3). That alternative required approximately 60 miles of new 115 kV lines and three new transformers in order to meet the applicant's objectives. The SEPA process cannot be used to alter design standards that are set by the applicant. PSE examined various means of re-conductoring existing lines with higher capacity lines, and found that none would solve the capacity deficiency in the Eastside. PSE did not identify any solutions that would use only double-conductoring on existing 115 kV lines.

6/29/2017

Weebly Email Service Mail - Comments for PSE



Energize Eastside EIS <info@energizeeastsideeis.org>

Comments for PSE

1 message

Garry Kampen <kampen@comcast.net> Wed, Jun 28, 2017 at 10:26 AM

To: info@energizeeastsideeis.org
Cc: Julie Cassata <JulieC@newcastlewa.gov>, Gordon Bisset <gordonb@ci.newcastle.wa.us>, Rich Crispo <richc@ci.newcastle.wa.us>, Carol Simpson <carols@ci.newcastle.wa.us>, Linda Newing <lnewing@comcast.net>, John Drescher <johndr@ci.newcastle.wa.us>, John Dulcich <johnd@ci.newcastle.wa.us>, Allen Dauterman <allend@ci.newcastle.wa.us>, Garry Kampen <kampen@comcast.net>, Peggy Price <PPrice@appraisalgroupnw.com>, Grace Stiller <gracestiller@comcast.net>, Jim Price <jprice@appraisalgroupnw.com>, Giles Velte <arctandar@msn.com>, Bruce Christopherson <bchristo@bellevuecollege.edu>, Bill Burris <BillB499@msn.com>, Wes Maldonado <wes@newcastetrails.org>, Eva Lundahl <eva.lundahl@hotmail.com>

Heidi-
I've attached my suggestions for trail mitigation by PSE as part of the Energize Eastside project within Newcastle.

The details (with maps) are in the attachment. But here's the gist:

- 1183-A-1 A. The area where the China Creek Trail crosses the PSE corridor could be developed as community open space or a mini-park. A trailside bench would offer a partial view of Lake Boren and a panoramic view of Cougar Mountain.
1183-A-2 B. The Olympus Trail within the PSE corridor could be completed with a crushed-rock or grass surface on its middle segment. Better yet, the corridor could be developed as a kind of linear park, with landscaping around the trail.

With regards,
Garry Kampen
12601 SE 75th Place, Newcastle
425-271-6181

PSE Mitigation for Newcastle.pdf
7513K

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRtfxl.en.&view=pt&search=inbox&th=15cefbddefdd23e1&siml=15cefbddefdd23e1 1/1

- 1183-A -1 Comment noted.
1183-A -2 Comment noted. This will be evaluated as part of the permitting process for the facility.

**PSE Mitigation for Newcastle**  
**Garry Kampen, 6/28/17**

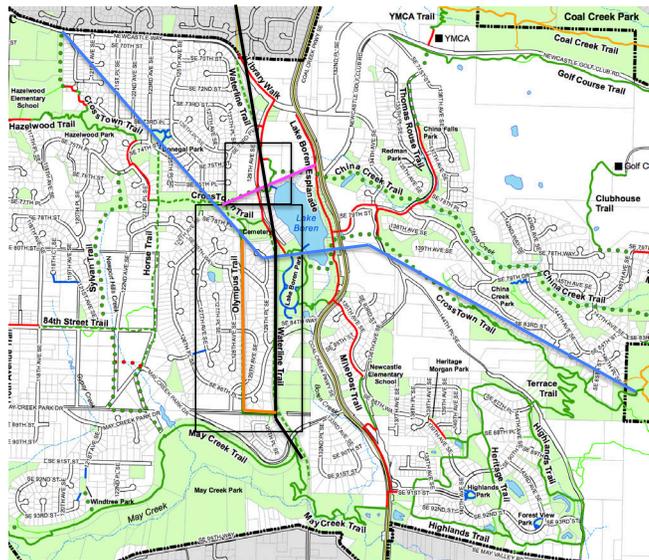
The map below highlights two of Newcastle's longest and most heavily used trails: the CrossTown Trail (blue), extending from the new Middle School to Cougar Mountain Park, and the Waterline Trail (black) from Bellevue to May Creek Park. There are two areas where mitigation by PSE could benefit Newcastle's system of parks and trails:

**A.** The area where the China Creek Trail (magenta) crosses the PSE corridor could be developed as community open space or a mini-park. A trailside bench would offer a partial view of Lake Boren and a panoramic view of Cougar Mountain.

**B.** The Olympus Trail (orange) within the PSE corridor could be completed with a crushed-rock or grass surface on its middle segment. Better yet, the corridor could be developed as a kind of linear park, with landscaping around the trail.

The highlighted trails appear in Newcastle's Comprehensive Plan; all but the Olympus Trail will be complete by the end of 2017. For details, see **Figures 2 & 3** below.

**Figure 1. Newcastle Trail Map**



**Figure 2. China Creek Trail** (magenta line in old aerial view below)

A bench at **X** would offer rest to stair-climbers, and views of Lake Boren and Cougar Mountain from above the Lake House development (formerly Residences at Lake Boren). The PSE corridor within the red oval could become a neighborhood mini-park with views, grass & shrubs, accessed from the north via the City-owned tract outlined in blue, and from west & east by the China Creek Trail. Grading and improved drainage alone would make this area usable, and prepare it for improvements by the eventual Lake House HOA.

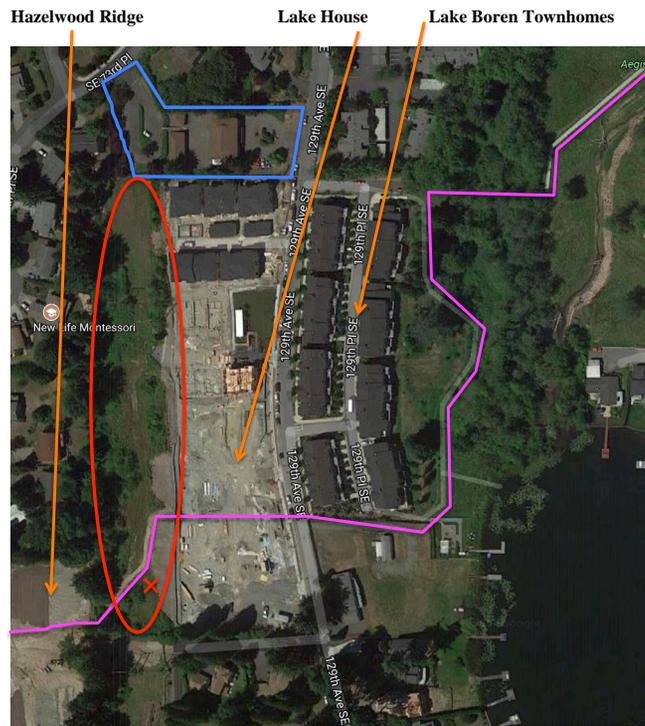


Figure 3. Olympus Trail



The Olympus Trail provides a scenic link (with views) between 2 major trails (CrossTown and Waterline), and it connects the large Olympus neighborhood with both trails. The north and south sections (solid green line) are on public open space, and have been developed as an official Newcastle trail, with trail signs. The middle section (dashed green line) is on a utility corridor owned by the Olympus Homeowners Association (OHA) and is still incomplete. Over the years the OHA has expressed an interest in working with Newcastle Trails, a local volunteer group, to complete the Olympus Trail here. PSE could jump-start this long-overdue project by offering its help to the OHA.

This area could become a kind of linear park, with landscaping around the trail designed in conformance with the needs of a utility corridor.

The trail here could be surfaced with crushed rock, built to City standards, curved and graded for good drainage.

Or, part or all of this middle trail section could be nothing more than a stretch of grass, mowed by the utilities, OHA, or adjoining residents. This is the case at the south end of the trail (circled area): the adjoining residents began mowing the corridor as an extension of their lawn; the City simply added trail signs to mark the trail across the grass.

The Olympic Pipeline company also has an easement in the corridor, and needs to be consulted. Newcastle Trails and the City of Newcastle cooperated with them in building the north section of trail, which crosses and re-crosses the pipeline as it climbs uphill. My own experience with Olympic (as a member of Newcastle Trails) has been extremely positive: the pipeline folks have been remarkably helpful and cooperative.

6/29/2017

Weebly Email Service Mail - Council FW: Energize Eastside EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Council FW: Energize Eastside EIS**

1 message

**MLuce@bellevuewa.gov** <MLuce@bellevuewa.gov>  
To: info@energizeeastsideeis.org

Wed, Jun 28, 2017 at 8:28 AM

For your tracking.

-----Original Message-----

From: [itsweet@gmail.com](mailto:itsweet@gmail.com) [mailto:[itsweet@gmail.com](mailto:itsweet@gmail.com)]  
Sent: Wednesday, June 28, 2017 7:57 AM  
To: Council <[Council@bellevuewa.gov](mailto:Council@bellevuewa.gov)>  
Subject: Energize Eastside EIS

Council Members,

I184-A-1

I would like you to consider alternative methods to increase reliability or to meet any future needs for electricity. We should be working to minimize costs to us— looking at the best alternatives for us and not for what is best for PSE and its Australian and Canadian owners.

I184-A-2

PSE claims we need this costly project to increase reliability of energy at peak demands. Yet, there are cheaper and more environmentally friendly ways to increase reliability. For example, battery storage is now being used in Southern California to avoid rolling blackouts.

Energy consumption has fallen in Bellevue by 5.7 percent from 2011-2015 due to gains in energy efficiency and new smart technology. The trend is to reduce our reliance on the grid, using solar panels and co-generation of power.

Joan Sweet

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTf1.en.&view=pt&search=inbox&th=15cef5197a8fa7c0&siml=15cef5197a8fa7c0> 1/1

I184-A -1 The Phase 1 and Phase 2 Draft EISs explored a range of reasonable alternatives, as required by the SEPA process.

I184-A -2 Comment noted.

COMMENT

RESPONSE

II85-A -1 See response to comment II15-A-2.

II85-A-1

Comment	Timestamp	First Name	Last Name
The city, county and state should be doing everything possible to preserve mature trees and move quickly to increase energy efficiency and adopt alternative sources of energy. This is precisely the opposite of what Energize Eastside plans assume and project. Solar, battery, hydro, thermo are all sources that PSE should be promoting not this outdated plan.	6/29/2017 7:17:23	Marilyn	Mayers

6/30/2017

Weebly Email Service Mail - Olympic Pipe Line Company Comments on Phase 2 Draft EIS (comments attached)



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Olympic Pipe Line Company Comments on Phase 2 Draft EIS (comments attached)**

1 message

Stone, Joseph &lt;Joseph.Stone@bp.com&gt;

Fri, Jun 16, 2017 at 8:20 AM

To: "info@EnergizeEastsideEIS.org" &lt;info@energizeeastsideeis.org&gt;

City of Bellevue,

Please find comments from Olympic Pipe Line Company on the Phase 2 Draft EIS for the PSE Energize the Eastside Project.

Should you have questions regarding our comments please feel free to contact me via email or phone at 42-981-2506.

Olympic Pipe Line Company

600 SW 39<sup>th</sup> Street, Suite 275

Renton, WA 98057

[\(425\) 981-2506](tel:4259812506)

Also would you be so kind as to acknowledge receipt of our comments.

Thank you.

Joseph Stone, SR/WA

Right of Way Agent

BP Pipelines (North America) Inc.

Operating Agent for

Olympic Pipe Line Company

[joseph.stone@bp.com](mailto:joseph.stone@bp.com)[\(425\) 981-2506](tel:4259812506) office[\(206\) 245-8550](tel:2062458550) cell
**Olympic Pipe Line Company Comments Section 3.9.7 DEIS 06.15.2017.docx**  
19K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15cb17fd766a184c&siml=15cb17fd766a1...> 1/1

**Olympic Pipe Line Company's Proposed Comments**  
**Section 3.9.7 (Mitigation Measures) of Individual Phase 2 Draft EIS**

- I186-A-1 **Pages 3.9-54/55: Change last sentence beginning on page 54 and first sentence on page 55 to read as follows:**  
 "Recommended measures to incorporate into the project design may include installing arc shielding protection, consisting of zinc ribbon, copper wire, or other acceptable means extending a minimum of 25 feet past the transmission line pole grounding rods in both directions. The arc shielding protection should be designed so that it is connected to the pipeline through a single direct-current decoupler."
- I186-A-2 **Pages 3.9-55: Change 1st sentence of first bullet to read as follows:**  
 "Install AC monitoring systems where AC current densities have been predicted by the *AC Interference Study* (DNV GL, 2016) to exceed 20 amps per square meter prior to energization of the 230 kV powerline."
- I186-A-3 **Page 3.9-55: Replace 2<sup>nd</sup> sentence of fourth bullet point under heading "At Project Start-up" with the following:**  
 "Olympic has informed PSE that, after the system is energized, it plans to collect field data in order to assess the necessity for the installation of AC grounding or similar systems. Olympic has informed PSE that it plans to implement appropriate mitigation measures to the extent needed based on its analysis of field data collected following system energization."
- I186-A-4 **Page 3.9-55: Change 1<sup>st</sup> sentence of fifth bullet point under heading "At Project Start-up" to read as follows:**  
 "Install additional grounding as appropriate based on the results of the analysis conducted by Olympic."
- I186-A-5 **Page 3.9-55: Change 1<sup>st</sup> sentence of second bullet point under heading "During Operation" to read as follows:**  
 "Inform Olympic when the electrical system is expected to operate at, or near, winter peak loading so as to provide Olympic a reasonable opportunity to take appropriate steps to measure actual AC current densities in any areas where AC current densities have been predicted by the *AC Interference Study* (DNV GL, 2016) to exceed 20 amps per square meter."
- I186-A-6 **Page 3.9-55: Change 1<sup>st</sup> sentence of third bullet point under heading "During Operation" to read as follows:**  
 "Inform Olympic when loading scenarios are expected to be at their greatest so as to provide Olympic a reasonable opportunity to conduct field monitoring to test for AC potential greater than 15 volts or AC current density greater than 20 amps per square meter in any areas of concern identified by the *AC Interference Study* (DNV GL, 2016)."
- I186-A-7 **Page 3.9-56: Change last sentence on page 56 to read as follows:**

- I186-A -1 Comment noted; this change has been made in the Final EIS.  
 I186-A -2 Comment noted; this change has been made in the Final EIS.  
 I186-A -3 This commitment by Olympic is acknowledged. Please see Section 4.9.8 of the Final EIS for revised mitigation measures.  
 I186-A -4 Comment noted; this change has been made in the Final EIS.  
 I186-A -5 Comment noted; this change has been made in the Final EIS.  
 I186-A -6 Comment noted; this change has been made in the Final EIS.  
 I186-A -7 Comment noted; this change has been made in the Final EIS.

I186-A-7

"Provide Olympic with as much advance notice as practical in advance of the time when there are planned outages on the individual circuits, as the AC induction effects on the pipelines may be magnified when only one circuit (of the double-circuit transmission lines) is energized."

RECEIVED  
JUN 19 2017  
Development Services

**ARAMBURU & EUSTIS, LLP**  
Attorneys at Law

J. Richard Aramburu  
rick@aramburu-eustis.com  
Jeffrey M. Eustis  
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720 Third Avenue, Suite 2000  
Seattle, WA 98104  
Tel 206.625.9515  
Fax 206.682.1376  
www.aramburu-eustis.com

June 14, 2017

Heidi Bedwell  
Energize Eastside EIS Program Manager  
450 110th Ave. NE  
P.O. Box 90012  
Bellevue, WA 98009

Via Email:  
HBedwell@bellevuewa.gov  
info@EnergizeEastsideEIS.org

Re: Extension of Comment Period on "Energize Eastside" Phase 2 DEIS to July 5, 2017

Dear Ms. Bedwell:

I write today on behalf of the Coalition of Eastside Neighborhoods for Sensible Energy, whose members have been frequent participants in the continuing review of the PSE proposal to construct an 18 mile electric transmission line through Bellevue and other Eastside communities. Recently the Phase 2 DEIS for the project has been released and the City has set the comment deadline as June 21, 2017.

I187-A-1

As you know, the Phase 2 DEIS is a substantial document, with the DEIS and accompanying appendices being more than three inches thick. The cost of a paper copy of the document is \$300, which is more than many potential DEIS commenters can afford. Accordingly, many commenters rely on the City's website to review the DEIS, and supporting documents, to prepare comments. (Many interested citizens cannot escape the fact that while PSE has sent out several different, full color paper brochures to substantially all of their rate payers promoting its project, including newspaper inserts, but when criticism of their project might be generated, rate payers are charged exorbitant sums to get paper copies.)

I187-A-2

However, many CENSE members and others have had serious problems accessing information on the website recently. This is due to problems with the new City of Bellevue website "BellevueWA.gov," which debuted on June 4, 2017. The "Hot Topics and Initiative" page does not mention "Energize Eastside" at all. There is only a reference to "Electrical Reliability."

- I187-A -1 The City of Bellevue acknowledges that the migration of the City of Bellevue website did create inaccessibility to EIS materials via some links for a few days during the Energize Eastside Phase 2 Draft EIS Comment period. The broken links were repaired quickly, but it is hard to assess how this impacted people's ability to review and comment on the Phase 2 Draft EIS. In addition, although a printed copy of the document would be costly, as noted; the link provides free unlimited access to the EIS contents and supporting documents. The comment period was extended by 14 days to mitigate this concern.
- I187-A -2 The City acknowledges that the Energize Eastside project Phase 2 Draft EIS was not listed as a "Hot Topics and Initiative," which is a notification service outside of the required SEPA process. See response to comment I187-A-1.

COMMENT

RESPONSE

June 14, 2017  
Page 2

Other links, including the following, do not work:

([http://www.bellevuewa.gov/pdf/PCD/Bellevue\\_Reliability\\_Report\\_for\\_2014\\_update\\_150609.pdf](http://www.bellevuewa.gov/pdf/PCD/Bellevue_Reliability_Report_for_2014_update_150609.pdf), and

[http://www.bellevuewa.gov/pdf/PCD/Bellevue\\_Reliability\\_Report\\_for\\_2015\\_final\\_160729.pdf](http://www.bellevuewa.gov/pdf/PCD/Bellevue_Reliability_Report_for_2015_final_160729.pdf)). The City has recognized these broken links by renouncing numerous decision as found it's June 8, 2017 Weekly Permit Bulletin.

I187-A-2

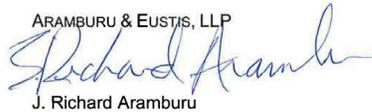
Based on the foregoing, CENSE requests that the City extend the deadline for comments by two weeks to July 5, 2017. Given the length of time that this matter has been considered, a short extension is certainly in the public interest when most interested parties have only electronic access to the pertinent documents and that access has been disrupted.

I187-A-3

If you have any questions, please let me know.

Sincerely,

ARAMBURU & EUSTIS, LLP



J. Richard Aramburu

JRA:cc  
cc: CENSE

I187-A -3 See response to comment I187-A-1. The comment period was extended until July 6, 2017.

**ARAMBURU & EUSTIS, LLP**

Attorneys at Law

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July 6, 2017

City of Bellevue  
Development Services Department  
Attn: Heidi Bedwell  
450 110<sup>th</sup> Avenue NE  
Bellevue WA 98004

VIA EMAIL:  
hbedwell@ci.bellevue.wa.us  
info@EnergizeEastsideEIS.org

Re: CENSE Comments on Phase 2 DEIS for the Construction of 18 Miles of new 230 kV Electrical Transmission lines

Dear Ms. Bedwell:

I write again on behalf of CENSE, the local citizens organization concerned with the proposal by Puget Sound Energy (PSE) to construct approximately eighteen miles of 230 kV transmission lines through Bellevue and other Eastside communities. Because the term "Energize Eastside" is an inaccurate brand devised by PSE, we refer to the proposal herein as the "PSE Transmission Proposal" or "PSETP."

Since this project originated in 2013-14, CENSE has written numerous comment letters on the PSETP, including letters written June 15, 2015, August 15, 2015, November 10, 2015, December 23, 2015, May 24, 2016, April 18, 2017 and numerous emails and other letters. All of our prior correspondence is incorporated by reference.

The SEPA review process to date has been subject to numerous and significant errors. The following are the two most significant:

*First*, PSE has not filed an application for the PSETP, which is required by the Bellevue Land Use Code (LUC) Section 20.20.255. As we have previously described, LUC 20.20.255 is not merely a reference to a requirement for a conditional use permit, but sets forth the specific and unique criteria that must be considered. Among these are an "alternate siting analysis" found in subsection 20.20.255.D.2. Obviously the consideration of the "alternative siting analysis" will have environmental consequences

I187-B -1 Filing of a conditional use permit under LUC 20.20.255 is not a necessary component prior to preparation of an EIS under SEPA. Discussions between partner Cities and PSE determined that the proposal is likely to have significant adverse environmental impacts. Pursuant to SEPA, a Threshold Determination of Significance was issued as required in the Washington Administrative Code (WAC) 197-11-360 on April 30, 2015. The specifics of the design and exact placement of poles would be determined closer to the time that the project is constructed. The Phase 2 Draft EIS covers details of the project as known at the time of publishing. The City of Bellevue has been attentive to ensuring that required environmental information is included. The Final EIS contains more refined design information about the project.

I187-B-1

July 6, 2017  
Page 2

I187-B-1

which must be considered in environmental documents. WAC 197-11-055(2) makes clear that environmental review must be "at the earliest possible point in the planning and decision-making process." Give the three years that this proposal has been "branded" by PSE, there is no reason why application materials required by Section 20.20.255 have not been submitted. It appears that the withholding of the application by PSE is intended as a strategic move so that the public will be kept in the dark about how PSE intends to comply with LUC 20.20.255.D.

Second, the Phase 2 DEIS was promoted by PSE as the time when site specific details of the PSETP would be revealed for public review and comment. However, the Phase 2 DEIS does not provide site specific details. Rather, the DEIS continues to be vague about the location of poles and lines for the PSETP that PSE touts as important to meet loads. The Phase 2 DEIS says:

Information about the project is approximate and subject to change and refinement as the design is developed.

Page 1-3. The comments above apply here as well. If indeed this project is to address load issues "as early as the summer of 2018" (page 1-1) then the design of the PSETP should be known now and an application prepared with site details.

I187-B-2

Based on the foregoing, the City should require the preparation of a supplemental EIS (SEIS) when a) an application for a conditional use permit under LUC 20.20.255 is made to the City and b) when the design for the PSETP showing lines and pole locations is available.

WAC 197-11-405(4)(b) requires a supplemental EIS when:

(b) There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. Preparation of a SEIS shall be carried out as stated in WAC 197-11-620.

We regret the need to ask for a SEIS given the length of time that has passed since this concept was initiated, but the strategic refusal of PSE to provide either an application or project details makes this request necessary.

Additional comments are as follows.

I187-B-3

Economics. Given the circumstances, the FEIS should contain a cost-benefit analysis as described in WAC 197-11-450 and 197-11-726. The Phase 2 DEIS states that "Economics" are a key element of the environment to be considered at page 1-31 and section 3-10 of the Phase 2 DEIS. With regard to under-grounding the transmission lines, the DEIS says that PSE has stated it will require individual propertyowners to pay for this feature. However, mitigation measures under SEPA and LUC 20.20.255.G

I187-B -2 See response to comment I114-B-3. Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review.

I187-B -3 Economic analysis is not a required element for a SEPA EIS; however, SEPA provides discretion to agencies to include economic information in an EIS that could be beneficial to decision makers, such as information related to environmental concerns that may not be readily available elsewhere. The analyses of property tax effects on the City of Newcastle and the value of lost ecosystem services due to reduced tree cover were conducted in response to comments received during the public comment periods for the Phase 1 Draft EIS and the scoping period for the Phase 2 Draft EIS.

The analysis of the costs of undergrounding a portion of the transmission line was developed because it was recognized in Phase 1 that the cost of undergrounding the entire line would be prohibitively high, but that undergrounding might be viable as mitigation in site-specific areas. The analysis is intended to assist decision makers considering whether to require undergrounding as a mitigation measure to offset environmental impacts. Per state-approved tariff rules, the requesting party (such as the local jurisdiction, or an affected party or group) is responsible for paying the difference between overhead and underground costs, including design, construction, and maintenance.

See the response to comment I16-A-2 regarding how the project cost would affect ratepayers.

July 6, 2017  
Page 3

I187-B-3 provide that: "The City may impose conditions relating to the location, development, design, use, or operation of an electrical utility facility to mitigate environmental, public safety, or other identifiable impacts." Undergrounding, as a measure to address and mitigate environmental impacts, cannot be required to be paid for by local residents, especially when they derive little if any benefit from the new transmission.

Along the same lines, the Economics section of the DEIS, and the cost benefits analysis, should address the total cost of the PSETP and whether PSE rate payers or owners of PSE will be paying for the cost of the proposed transmission lines. There should be discussion of requiring the new developments that generate the supposed need for the line to pay for the cost, as opposed to spreading the cost over the entire PSE client base.

I187-B-4 Impact Area. We believe there are errors in the stated number of properties impacted by the development. Page 3.1-1 says that the "study area" encompasses areas in or abutting the right-of-way and "parcels in close proximity" to the right-of-way. However, visual and aesthetic impacts from the lines may extend well beyond such properties. The PSE study area for visual impacts is .25 miles from the edge of the new corridor. See page 3.2-3. However, visual impacts will extend beyond that distance. The FEIS must include information concerning the total number of residential, public and commercial properties that are impacted.

Canada Transmission. In a startling turnaround, the Phase 2 DEIS states, at page 2-55, that flows to and from Canada are not relevant to the consideration of the need for the PSE proposal. The DEIS states:

Many of these comments focused on the idea that the deficiency had to do with providing capacity for energy flowing to Canada. This is a misconception. Due to the interconnected nature of the transmission grid, and the flow of electricity through the grid, minor energy flows through the Eastside to Canada are inevitable, but they are not the source of the problem PSE has identified.

I187-B-5 (Emphasis supplied.) This new information also indicates that the "Eastside Needs Assessment Report: Transmission System King County" dated October 2013 is in error. It relied heavily on the need for transfers to interconnected neighbors and winter and summer peak Northern Intertie transfers. See page 8. See also pages 15 and 25. The new information indicates that the Needs Assessment requires reevaluation in light of the statements in the Phase 2 DEIS. Given the importance ascribed to the Canadian flows in prior materials, and the indication that the concern is Eastside loads, a wide variety of additional alternatives to new 230-kV lines is now available. These include energy conservation, demand-response, grid batteries, gas peaking plants located near the downtown Bellevue loads, and other alternatives. These alternatives should be given complete consideration in the FEIS and in the alternative siting analysis required

I187-B -4 The study area focuses on areas where the proposed transmission line would be within the foreground view, where viewers are most likely to experience the scale of the project and observe details and materials. While the project may be visible at greater distances, significant scenic or aesthetic impacts are not probable given the project's scale relative to its largely mixed urban context. The EIS Consultant Team determined this by conducting a GIS analysis of where the project would be potentially visible from, as well as where views of scenic resources could be affected. For both scenic views and the aesthetic environment, field checks were made to determine whether there were areas beyond the stated study area where the project could significantly affect visual resources. For more information about the methodology, see Appendix C of the Phase 2 Draft EIS, as well as revisions to the appendix in the Final EIS, which were made to reflect PSE's Proposed Alignment.

I187-B -5 See response to comment I12-B-5.

The integrated resource approach was evaluated in the Phase 1 Draft EIS as Alternative 2. See Section 2.3.3 of the Phase 1 Draft EIS for a full description of the integrated resource approach.

July 6, 2017  
Page 4

in LUC 20.20.255.

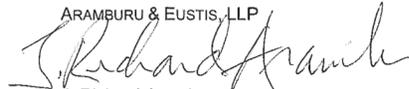
1187-B-5 CENSE incorporates by reference other comments made by it and its members, as well as other comments made on the DEIS.

1187-B-6 As noted above, the Phase 2 DEIS is inadequate because of the lack of a project application and an identification of the actual poles and lines that may be constructed. A supplemental DEIS is required to incorporate analysis of this information when available before proceeding to prepare a final environmental impact statement for this proposal.

Thank you for your attention to these issues.

Sincerely,

ARAMBURU & EUSTIS, LLP



J. Richard Aramburu

JRA:cc  
cc: CENSE

1187-B -6 See response to comment 1114-B-3.

**How you can make your comments most effective**



Check out the Department of Ecology Citizen's Guide to SEPA Review and Commenting at [EnergizeEastsideEIS.org/sepa-review](http://EnergizeEastsideEIS.org/sepa-review).

**Be clear, concise, and organized.** Decide what you need to say before you begin. If you have a number of points, group your comments in a logical order.

**Be specific.** Give support to your comments by including factual information. For instance, compare how things *were*, to how they *are*, to how you believe they *will be* in the future—and why.

Refer to Comprehensive Plans, development regulations, information on similar projects or situations, and other environmental laws or documents. Be as accurate as possible.

**Identify possible solutions.** Suggestions on reasonable mitigation—conditions to avoid, minimize, or reduce adverse impacts—can help influence how a project is ultimately built. After identifying your concern, suggest possible solutions.

*fold here*

**Comments on the Phase 2 Draft EIS of PSE's Energize Eastside Project**

Name Cynthia Rozabek Address\* 12144 SE 14<sup>th</sup>

\* You must provide your physical mailing address to be considered a "party of record," eligible to appeal the adequacy of the EIS.

I188-A-1

I do not favor the line going any where near the Wilburton trestle, the most historic structure in Bellevue and site of the planned walking path.

I188-A-2

I favor the original central route on the east side of Halsey Creek Park and the industrial area of Richards Valley IF a line is built.

I188-A-3

Please provide the public with maps that we can easily read (where is the trestle, SE 8<sup>th</sup>, 116<sup>th</sup> etc.?) Can't tell the plan for areas I know well.

- I188-A -1 Comment noted. The historical significance of the Wilburton Trestle is discussed in the Phase 2 Draft EIS (Section 3.7.2). The Wilburton Trestle is adjacent to the Bypass Option 1 and Bypass Option 2 routes. Neither of these options is being brought forward for additional analysis in the Final EIS. PSE's Proposed Alignment as analyzed in the Final EIS would not be adjacent to the Wilburton Trestle.
- I188-A -2 Comment noted. PSE's Proposed Alignment as analyzed in the Final EIS would be entirely within the existing corridor.
- I188-A -3 A number of maps were included in the Phase 2 Draft EIS to support the analysis, including Figure 4.7-1 in the Phase 2 Draft, EIS which shows the location of the Wilburton Trestle, as well as other resources described in the historic analysis. Most of the maps include street names for arterials, including SE 8th, 116th, and others, as the scale allowed.

How you can make your comments most effective



Check out the Department of Ecology Citizen's Guide to SEPA Review and Commenting at EnergizeEastsideEIS.org/sepa-review.

Be clear, concise, and organized. Decide what you need to say before you begin. If you have a number of points, group your comments in a logical order.

Be specific. Give support to your comments by including factual information. For instance, compare how things were, to how they are, to how you believe they will be in the future—and why.

Refer to Comprehensive Plans, development regulations, information on similar projects or situations, and other environmental laws or documents. Be as accurate as possible.

Identify possible solutions. Suggestions on reasonable mitigation—conditions to avoid, minimize, or reduce adverse impacts—can help influence how a project is ultimately built. After identifying your concern, suggest possible solutions.

---fold here---

Comments on the Phase 2 Draft EIS of PSE's Energize Eastside Project

Name DANIEL RENN Address\* 603 129TH PL NE BELLINGHAM WA 98205

\* You must provide your physical mailing address to be considered a "party of record," eligible to appeal the adequacy of the EIS.

I189-A-1

THE BYPASS ROUTE TO AVOID EBCC AREA WILL RUN UP 120TH AVE. THIS WILBURTON COMMERCIAL AREA IS IN THE PROCESS OF HAVING A CAL STUDY FOR REDEVELOPMENT. THIS BYPASS IS NOT COMPATIBLE WITH THESE FUTURE PLANS FOR THIS AREA.

I189-A-2

THE BYPASS ROUTE WOULD ALSO REQUIRE THE 230KV PSE LINE TO CROSS THE SEATTLE CITY LIGHT 230KV LINE IN 2 PLACES. THIS WILL INVOLVE 460KV BETWEEN THE 2 LINES. NOT GOOD!

I189-A -1 The Bypass Option routes as evaluated in the Phase 2 Draft EIS have not been brought forward for additional analysis; PSE's Proposed Alignment, as evaluated in the Final EIS, is entirely within the existing corridor. Additionally, it was determined that the project would not impact future land uses, including those being considered in the Wilburton Commercial Area Land Use & Transportation Project, which are mostly mixed uses (commercial and multi-family residential). The project would use an existing utility corridor and would not interfere with planned development. It is recognized that the project creates uncertainty about the visual environment that could affect plans for the Wilburton area.

I189-A -2 See response to comment I147-A-5.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Where Are The Details?



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: Where Are The Details?**

1 message

Russell Borgmann <rborghmann@hotmail.com> Mon, Jul 3, 2017 at 11:20 PM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborghmann@hotmail.com>

I190-A-1 | The EIS process has taken the public through 4 public comment periods and 2 phases. Phase 1, a Programmatic EIS, was supposed to address need and purpose. It failed on both counts. Phase 2, a Project EIS, is supposed to address project specifics so that appropriate mitigations can be applied. The EIS fails on this count as well.

I190-A-2 | There are insufficient details presented in this EIS to provide meaningful comments that can lead to adequate mitigations.

I190-A-3 | The interactive map was released late into the EIS open comment period. It is confusing, cumbersome, difficult to use, outdated, and contains inaccurate information. The City of Bellevue's website even states that this map contains "approximate locations" and its "accuracy and completeness are not guaranteed". Given that this project has been in the works for several years now, this is alarming and surprising.

I190-A-4 | More time should be allocated to the Open Comment Period so that citizens can try to make some sense of the confusing material presented. Better yet, the City should wait to hold Open Comment Periods until accurate, up-to-date information can be coherently presented. At this juncture, with the incomplete, inaccurate information presented, reviewing this version of the EIS is a waste of citizens' time and a waste of taxpayer dollars.

**Questions for the City of Bellevue to Address in the EIS**

- I190-A-5 | 1. Where are the project specifics?
- 2. What specific poles will be used in which specific locations?
- I190-A-6 | 3. What is the span between each pole?
- 4. What is the height of each specific pole?
- I190-A-7 | 5. What is the final route?
- 6. Which specific trees will be cut down?
- 7. Which specific trees will be trimmed?
- I190-A-8 | 8. How will the City of Bellevue respond to this criticism of insufficient and confusing detail in the project-specific EIS?
- 9. Will the City of Bellevue **require a Supplemental EIS** to provide critical detailed information?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxI.en.&view=pt&search=inbox&th=15d0c421c73c63d7&siml=15d0c421c73c... 1/1

- I190-A -1 | Comment noted.
- I190-A -2 | See response to comment I114-B-3.
- I190-A -3 | Comment noted. The interactive maps presented the most current data and information reasonably available. The Partner Cities believe that the maps provide relevant information in a reasonable manner. The datasets were not developed for publication but were posted for public use in response to public request. Refined pole location data are presented in Chapter 2 and Appendix A of the Final EIS for PSE's Proposed Alignment, as well as on the project website ([www.energizeeastsideeis.org/](http://www.energizeeastsideeis.org/)), in the Library tab.
- I190-A -4 | See response to comment I130-A-1. None of the information provided was inaccurate or incomplete, except as noted in the Errata in the Final EIS.
- I190-A -5 | See response to comment I114-B-3.
- I190-A -6 | See response to comment I1139-A-3.
- I190-A -7 | The City of Bellevue and other Partner Cities found the EIS analysis to be unbiased, accurate, and thorough for the level appropriate for this stage of review. Additionally, the Partner Cities believe that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA.
- I190-A -8 | At this time in the EIS process a supplemental EIS is not being considered.



7/5/2017

Weebly Email Service Mail - Re: Energize Eastside EIS Public Comments: EIS Element - Aesthetics



Energize Eastside EIS <info@energizeeastsideeis.org>

**Re: Energize Eastside EIS Public Comments: EIS Element - Aesthetics**

1 message

Russell Borgmann <rborghmann@hotmail.com> Mon, Jul 3, 2017 at 11:24 PM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborghmann@hotmail.com>

City Planners know there are numerous studies citing a self-fulfilling destiny: Large overhead transmission lines beget an unspoken, but noticeable "industrial" feel. This leads to less desirable neighborhood/community character, which begets declining property pride-in-ownership, which begets declining property values, begetting declining tax revenues, begetting more industrialization to compensate for declining tax revenues. Where does this spiral end?

I190-B-1

Bellevue's tagline is a "City In a Park". Energize Eastside will result in the destruction of over 5,400 mature trees and other vegetation crucial for maintaining a clean air supply – totaling more than 327 acres. The eastside's tree canopy is essential for health as well as aesthetics. Bellevue already has the lowest remaining tree canopy in the Puget Sound eastside (declined to approximately 36%). Energize Eastside will contribute to this rapidly dwindling tree canopy. [http://www.ci.bellevue.wa.us/pdf/Manager/Urban\\_Ecosystem\\_Analysis.pdf](http://www.ci.bellevue.wa.us/pdf/Manager/Urban_Ecosystem_Analysis.pdf)

EIS Appendix C (pg C-1): "A number of methodologies were reviewed to inform the methodology used for this project. For this project, the assessment of impacts was generally based on methods described in the Federal Highway Administration (FHWA) Guidelines for Visual Impact Assessment (FHWA, 2015). FHWA guidelines do not specify thresholds for determining significant impacts, nor do state or local regulations. Therefore, significance was assigned based on criteria similar to those described in The State Clean Energy Program Guide: A Visual Impact Assessment Process for Wind Energy Projects (Vissering et al., 2011)

**Questions for the City of Bellevue to Address in the EIS**

I190-B-2

1. How has the City of Bellevue mitigated the adverse economic impact caused by the detrimental aesthetics of high voltage transmission lines?

I190-B-3

2. How will the City of Bellevue address the violation of Low Impact Development LID ordinances that apply to Land Use Development projects like the proposed Energize Eastside project?

I190-B-4

3. Why were FHWA guideline chosen? What is the rationale for the selection of this methodology?  
 4. What elements of FHWA methodology make it the best choice for evaluating the citing of a 230kV transmission line through residential neighborhoods?

I190-B-5

5. What is the rationale for the selection of a methodology that appears to have been applied to wind energy projects? Energize Eastside is a completely different type of project in a completely different context – residential urban environments vs. wind projects in rural, sparsely populated environments.

I190-B-6

6. Page 4 states that "many excellent methodologies have been developed over the past half century for evaluating scenic quality and visual impacts of development projects." The authors of the cited study above (Vissering, et. Al. 2011) suggest several additional methods. Why did this EIS eliminate Numerical Assessment Systems? Professional Peer Review and Panel Review? Objective Multifactor Approaches (rather than subjective one-day workshops with staff from partner cities)?  
 7. Why did the City of Bellevue eliminate the 2010 Sumper study, "Methodology for the Assessment of the Impact of Existing High Voltage Lines in Urban Areas"?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d0c45288987c06&siml=15d0c4528898...> 1/2

I190-B -1

See response to comment I120-B-9.

I190-B-2

See response to comment I155-C-1.

I190-B -3

The project would be required to comply with local stormwater standards, including LID requirements. New permanent roads would be limited to short segments connecting to existing roads and would include stormwater treatment systems that meet state and local requirements. Additionally, once installed, the poles would not affect stormwater runoff, groundwater infiltration, or shallow groundwater flow.

I190-B -4

Little SEPA guidance exists supporting a standard methodology for assessing visual impacts associated with transmission line projects. A number of methodologies were reviewed to inform the methodology used for this project. The FHWA methodology was used to assess changes in visual quality and viewer sensitivity because it is used for linear projects in urban environments. The State Clean Energy Program Guide was used for determining significance due to its emphasis on consistency with local policy, which is consistent with SEPA guidance. Appendix C of the Phase 2 Draft EIS describes the methodology used in further detail.

I190-B -5

The visual analysis methodology was developed by the EIS Consultant Team in collaboration with the City of Bellevue and other Partner Cities based on a review of methods specifically developed for linear projects, adapted to this project and context, and took into account adopted local policies in determining the visual impacts of the project.

I190-B -6

The "Methodology for the Assessment of the Impact of Existing High Voltage Lines in Urban Areas" presents a method for determining what should be mitigated (including several types of impacts) using public outreach to help determine weighting. It was used in a mid-sized town in Catalonia, Spain.

The Energize Eastside EIS has followed the SEPA guidelines for public outreach, impact assessment, and mitigation. Development of significance criteria was based on input from the Partner Cities. Per SEPA requirements, this analysis was based on adopted SEPA policies for each jurisdiction.

7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Build Environment (EIS Element in SEPA not covered in EIS)



Energize Eastside EIS <info@energizeeastsideis.org>

**Energize Eastside EIS Public Comments: Build Environment (EIS Element in SEPA not covered in EIS)**

1 message

Russell Borgmann <rborgmann@hotmail.com> Mon, Jul 3, 2017 at 11:26 PM  
 To: Energize Eastside EIS <info@energizeeastsideis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborgmann@hotmail.com>

I190-C-1 | Currently there are no WA state regulations for siting 230kV transmission lines in urban areas. This is the result of tacit oversight, NOT explicit approval.

I190-C-2 | Many houses are closer than 130 feet to the monopole sites. If a monopole were to fall (e.g. in an earthquake, sustained high winds, etc.), it could hit houses. Houses within the fall zone of transmission poles are not eligible for financing from certain lenders (FHA, etc.) and may have difficulty in obtaining/retaining homeowners' insurance policies.

I190-C-3 | Bypass Routes 1 & 2 skirt the Kelsey Creek Park and sensitive wetlands areas along Wilburton Hill Park. The confluence of Mercer Slough with Richards Creek and Kelsey Creek is a sensitive wetlands area. This is a sensitive estuary and confluence of multiple watersheds feeding into Lake Washington. This area is home to delicate native vegetation, abundant terrestrial wildlife, mating bald eagle pairs, blue herons, and other abundant waterfowl.

**Questions for the City of Bellevue to Address in the EIS**

I190-C-4 | 1. When WA state legislature addresses 230kV transmission line regulations, will Energize Eastside be retroactively subject to those regulations?

I190-C-5 | 2. How is the "fall-zone" of 130-ft tall monopoles accounted for in the Right of Way?

I190-C-6 | 3. How will the City of Bellevue mitigate residents' concerns about qualifying for home loans and obtaining/retaining homeowners' insurance?

I190-C-7 | 4. How will the City protect the sensitive wetlands and estuary at the confluence of Richards Creek, Kelsey Creek, and Mercer Slough?

I190-C-8 | 5. How will Energize Eastside specifically impact sensitive wetlands and the estuary at the confluence of Richards Creek, Kelsey Creek, and Mercer Slough?

I190-C-9 | 6. Citizens have noticed aggressive vegetation clearing in the easement granted to PSE for their existing transmission line. PSE's contractor, Asplundh, has removed significant vegetation and cut-in some road grading on steep slopes. Additionally, there has been significant work done in the Lakeside Substation (site where PSE's proposed Richards Creek substation would expand if Energize Eastside is approved). At this substation there has been significant vegetation cleared, foundations poured, and large vertical structures being assembled. Where are the permits for the work that PSE is doing in advance of permits being issued for Energize Eastside? Where are the mitigations discussed for this work already in-progress?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d0c47a319b46d6&siml=15d0c47a319b...> 1/2

I190-C -1 | Comment noted.

I190-C -2 | The proposed poles are designed to sustain high winds and to stand in earthquakes, in accordance with NESC regulations.

I190-C -3 | Impacts to critical areas, including wetlands, are discussed in Section 3.3.5 in the Phase 2 Draft EIS. Bypass Option 1 and Bypass Option 2 are not being brought forward for additional analysis in the Final EIS. See Section 4.4, Plants and Animals, of the Final EIS for impacts from PSE's Proposed Alignment.

I190-C -4 | This is outside the scope of SEPA review for this project.

I190-C -5 | The proposed poles are designed to sustain high winds and to stand in earthquakes, in accordance with NESC regulations. It is highly unlikely that a pole would fall.

I190-C -6 | There are numerous homes within a short distance of existing transmission line poles, so it is not clear that insurance or home loans are unavailable for homes in such locations. For FHA-insured financing, HUD 4000.1 states that the transmission lines cannot pass directly over structures or related improvements (such as pools) on the property. However, PSE's Proposed Alignment will not require the procurement of additional easements, and the transmission lines will be placed entirely within the existing corridor, which has included the presence of transmission lines for several decades. The availability of housing throughout the City of Bellevue that is not adjacent to the PSE corridor as well as different financing methods available to borrowers means that this concern is unlikely to result in significant harm to current and potential homeowners.

I190-C -7 | Mercer Slough and the Mercer Slough wetlands, Richards Creek, and Kelsey Creek are critical areas within the City of Bellevue and protected under the critical areas and shoreline (Kelsey and Mercer Slough) regulations. PSE's Proposed Alignment, as analyzed in the Final EIS, is not near Mercer Slough or the Mercer Slough wetland complex, and it is east of the confluence of Richards and Kelsey Creeks. There are no estuaries in the study area. Additionally, these resources are protected under state and federal regulations. Construction would comply with the stormwater regulations of the City of Bellevue, which are based on the standards set by Ecology's *Stormwater Management Manual* for Western Washington. Project compliance with these regulations would result in less-than-significant impacts on surface and groundwater.

I190-C -8 | See response to comment I190-C-7.

I190-C -9 These actions are outside of the SEPA process and not related to the Energize Eastside project. PSE has a permit from the City of Bellevue for programmatic vegetation management within its existing corridor. Additionally, PSE has received approval to replace aging equipment and provide more reliability along the existing transmission lines connecting to the Lakeside substation. These improvements are approved under separate permit from the vegetation management activities.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Low Impact Development (LID) Principles



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

## Energize Eastside EIS Public Comments: Low Impact Development (LID) Principles

1 message

Russell Borgmann &lt;rborgmann@hotmail.com&gt;

Mon, Jul 3, 2017 at 11:30 PM

To: Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborgmann@hotmail.com>, "jstokes@bellevuewa.gov" <jstokes@bellevuewa.gov>, "rrobinson@bellevuewa.gov" <rrobinson@bellevuewa.gov>, "j.robertson@bellevuewa.gov" <j.robertson@bellevuewa.gov>, "clee@bellevuewa.gov" <clee@bellevuewa.gov>, "krwallace@bellevuewa.gov" <krwallace@bellevuewa.gov>, "jchelmiak@bellevuewa.gov" <jchelmiak@bellevuewa.gov>, "council@bellevuewa.gov" <council@bellevuewa.gov>

Low Impact Development (LID) Best Management Practices (BMPs) are required for new development and redevelopment of a certain size in the City of Bellevue as of December 31, 2016. The City of Bellevue has adopted Ordinance No. 6323 which includes amendments to the Bellevue Land Use Code that address LID principles, including measuring and minimizing loss of native vegetation.

<https://development.bellevuewa.gov/zoning-and-land-use/environment-and-critical-areas/low-impact-development/>

### Low-Impact Development - Development Services

[development.bellevuewa.gov](http://development.bellevuewa.gov)

What is Low Impact Development? Low Impact Development (LID) is a stormwater and land use management strategy that strives to mimic pre-disturbance hydrologic ...

**Low Impact Development (LID) Principles** are a state-mandated approach to site development, specifically to minimize native vegetation loss to meet newly adopted tree canopy targets. LID also supports the City Council's vision of a high-quality built and natural environment for Bellevue. LID Principles apply to Land Use Code and Transportation Code. It's only logical that LID principles also extend to infrastructure projects, like electric utilities. One of the key Land Use Code goals is to preserve and **enhance** the tree canopy, because it is recognized how important the tree canopy is to storm run-off, air pollution reduction, and noise/light/glare reduction. The EIS preferred alternative does not meet the state-mandated LID principles.

Energize Eastside is slated to destroy at least 327 ACRES of native vegetation. How big of an area is that? BIG. That is an area equivalent in size to the ENTIRE DOWNTOWN BELLEVUE corridor – from Main St. to NE 12<sup>th</sup> St., from Bellevue Way to I-405. LID Principles are state-mandated governance to minimize native vegetation loss, and to **preserve and enhance the tree canopy**. This is not a question of aesthetics. Trees and native vegetation are essential to address storm run-off, steep slope retention, minimize noise/light/glare pollution, and scrub our air of pollutants while converting CO2 to oxygen. LID Principles protect vegetation essential for surface water management and pollution control. LID Principles are designed to protect the safety, health, and livability of our communities by promoting **sustainable** growth. On April 22, 2016, the "EPA gave King County a D for high-ozone days and a C for short-term particle pollution... The report ranked the Seattle-Tacoma area the 26<sup>th</sup> worst metropolitan area in the country for short-term particle pollution..." Transmission line induced corona create charged particles which readily attach to pollution, exacerbating our region's existing pollution problems. These particles can lodge deep in

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL.en.&view=pt&search=inbox&th=15d0c4aaa55dbd9c&siml=15d0c4aaa55d...> 1/2

7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Low Impact Development (LID) Principles  
 the lungs, aggravating asthma, increasing respiratory symptoms, decreasing lung function, and complicating cardiovascular issues.  
[http://www.seattletimes.com/seattle-news/seattle-areas-air-quality-gets-poor-grades/?utm\\_source=email&utm\\_medium=email&utm\\_campaign=article\\_left\\_1.1](http://www.seattletimes.com/seattle-news/seattle-areas-air-quality-gets-poor-grades/?utm_source=email&utm_medium=email&utm_campaign=article_left_1.1)



**Seattle area's air quality gets poor grades | The Seattle ...**

[www.seattletimes.com](http://www.seattletimes.com)

Even as air quality improves nationwide, some Washington cities and counties received poor grades in a pollution assessment by the American Lung Association.

**Questions for the City of Bellevue to Address in the EIS**

I190-D-1

1. How will the City justify building Energize Eastside, which violates Low Impact Development (LID) Principles enacted by City Ordinances?

Sincerely,

Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

I190-D -1 See response to comment I190-B-3.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxI.en.&view=pt&search=inbox&th=15d0c4aaa55dbd9c&siml=15d0c4aaa55d...> 2/2

7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Design Elements (EIS Element in SEPA not covered by EIS)



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: Design Elements (EIS Element in SEPA not covered by EIS)**

1 message

Russell Borgmann <rborghmann@hotmail.com> Mon, Jul 3, 2017 at 11:32 PM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborghmann@hotmail.com>

Overhead power lines do not go around curves. The Bypass Routes show the line snaking along Lake Hills Connector. The maps and descriptions of the Bypass Routes are inadequate to provide meaningful EIS comments.

**Questions for the City of Bellevue to Address in the EIS**

II90-E-1

1. How many times will the line cross Lake Hills Connector?
2. Where will the poles go?
3. How tall will the poles be?

II90-E-2

4. What types of poles will they be?
5. What is the spacing between poles?

II90-E-3

6. Where are the Bypass Route specific design details?
7. How many additional trees will be removed? The CAG information showed 7,989 trees will be removed or mutilated. The EIS now states that at least 5,400 trees will be adversely affected. How many additional trees are affected by Willow2, Oak2, Bypass Route 1, and Bypass Route 2?

II90-E-4

8. How many additional Sensitive Community Land Uses are affected by PSE's route alterations? Schools affected? Parks affected? Recreation areas affected? Trails affected? Historic Sites affected? Stream crossings affected? Steep Slope Instability affected? Earthquake fault lines?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d0c4d30acbd4c8&siml=15d0c4d30acbd4c8> 1/1

II90-E -1 For the Bellevue Central segment options, Option 1 would cross the Lake Hills Connector approximately 8 times and Option 2 would cross approximately 3 times. PSE's Proposed Alignment for the Final EIS would be contained entirely within the existing corridor. Information on pole types and height was provided in the Phase 2 Draft EIS. In regards to further project specifics, see response to comment II14-B-3.

II90-E -2 The alternatives are described in detail in Chapter 2 of the Phase 2 Draft EIS. The Bellevue Central Segment Bypass Option routes were analyzed in the Phase 2 Draft EIS. The routes, however, were not brought forward for additional analysis and are not part of PSE's Proposed Alignment, as presented in the Final EIS.

II90-E -3 Page 3.4-14 in the Phase 2 Draft EIS states that the greatest number of trees that would potentially be removed would be 5,400. Willow 2 Option, Oak 2 Option, Bypass Option 1, and Bypass Option 2 are not being brought forward for additional analysis in the Final EIS. See Section 4.4, Plants and Animals, of the Final EIS for impacts from PSE's Proposed Alignment, which would remove up to 3,600 trees.

II90-E -4 Schools and Parks/Recreation areas/Trails in the vicinity of the Energize Eastside alternatives are listed in Section 3.1 (Land Use and Housing) and Section 3.6 (Recreation) of the Phase 2 Draft EIS. Historic sites are included in Section 3.7 (Historic and Cultural Resources) of the Phase 2 Draft EIS. Stream crossings are included in Section 3.3 (Water Resources) of the Phase 2 Draft EIS. In regards to geological impacts, see response to comment II20-A-3. For the Final EIS, PSE's proposed alignment uses the existing alignment, therefore there would be no "route alterations" that might affect locations that are not already adjacent to the transmission line.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: EIS Element - Safety



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Energize Eastside EIS Public Comments: EIS Element - Safety**

1 message

**Russell Borgmann** <rborgmann@hotmail.com> Mon, Jul 3, 2017 at 11:35 PM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, "jstokes@bellevuewa.gov" <jstokes@bellevuewa.gov>, "Irobinson@bellevuewa.gov" <Irobinson@bellevuewa.gov>, "j.robertson@bellevuewa.gov" <j.robertson@bellevuewa.gov>, "clee@bellevuewa.gov" <clee@bellevuewa.gov>, "krwallace@bellevuewa.gov" <krwallace@bellevuewa.gov>, "jchelmiak@bellevuewa.gov" <jchelmiak@bellevuewa.gov>, "council@bellevuewa.gov" <council@bellevuewa.gov>, Russell Borgmann <rborgmann@hotmail.com>

I190-F-1

There are substantial safety issues with digging 15ft to 30ft deep holes for monopoles right next to 2 aging gas pipelines. Vertical boring of these holes cause significant vibration which can cause settlement damage to nearby house foundations. Additionally, the vibration can damage aging fuel pipelines located within the selected transmission line corridor. Vibration stress fractures and damage can ultimately lead to pipeline rupture days/weeks/months after transmission line construction is complete.

I190-F-2

PSE commissioned a safety report by DNV-GL. Portions of this report are noticeably absent from the EIS. The DNV-GL report shows that co-locating 230kV transmission lines, in parallel, with 2 aging pipelines fails several important safety criteria. The DNV-GL report finds that PSE's preferred route violates safety stands and is in an "unpredictable risk range".

I190-F-3

Corona Discharge is positively linked to an increase in air pollution. Air quality is degraded near High Voltage Transmission Lines and is especially problematic for those prone to respiratory illnesses and diseases (asthma, etc.). Henshaw/Fews Study, 2001.

I190-F-4

Putting a SECOND 230kV transmission line running parallel within 0.8 miles of an existing line (the Seattle City Light transmission lines) poses exponentially higher health risks, especially to children (numerous scientific studies have already been submitted to the EIS public record). Depending on the routing, these two transmission lines could run within 1,000 feet of one another, on either side of Newport High School posing elevated health risks to school age children and public employees (teachers, staff, coaches) that spend extended periods of time outdoors near these transmission lines.

- 1979, Wertheimer & Leeper Study (1950-1973) 2.11 times increased risk for all childhood cancers, 3.09 times increased risk for children living entire life in a high current environment
- 1979 Cohort Mortality Study (Mortality in Aluminum Reduction Plant Workers)
- Leukemia Mortality in Washington State Electrical Workers
- 1988 Savitz, et. al. (1976 – 1983) 1.53 times increased risk for all childhood cancers, 1.78 times increased risk if child spent 90% of life in a high current environment, 5.22 times increased risk if child lived in a very high current environment
- 1992 Feychting and Ahlbom Study (1960-1985) 2.7 times increased risk if 2 milligauss or more, 3.8 times increased risk if 3 milligauss or more, 5.6 times increased risk if one-family homes over 2 milligauss
- 1997 Theriault and Li Meta Data Analysis: Increased leukemia for both children & adults living between <25 and <50 meters from powerlines >49kV
- 1998 Li and Lin Taiwan Study: 2.5 times increased leukemia risk for children living <100 meters from HVTL vs. leukemia risk of children living >100 meters from HVTL
- 2005 Draper, et. al. UK Study (1962-1995) Leukemia RR of 1.69 for children living <200 meters from HVTL; Leukemia RR of 1.23 for children living 200-600 meters from HVTL
- 2007 Lowenthal et al. Tasmania Study (1972 – 1980) 3 times increased risk of adult cancer living <300 meters from HVTL, during first 15 years of life; Children age 0-5 had a 5 fold increase risk in lymphatic and hematopoietic cancers. Residence near HVTL, especially early in life increases subsequent development of lymphatic and hematopoietic cancers

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d0c4f34e1ea14d&siml=15d0c4f34e1ea... 1/2

I190-F -1 Vibration from construction equipment is addressed in Section 4.9.3 of the Phase 2 Draft EIS. PSE would work with Olympic to confirm that potential vibration associated with excavation methods for pole installation that include the use of vacuum trucks and auger drills would avoid damaging the pipelines. For additional information on mitigation measures related to preventing construction incidents, see Section 4.9.4 of the Phase 2 Draft EIS.

I190-F -2 See response to comment 001-A-4.

I190-F -3 Based on reviewed and available publications, there is no scientific consensus that corona ionization poses a health risk; therefore, the Phase 1 Draft EIS concluded that there were no probable significant impacts (see Section 8.6.1.4 of the Phase 1 Draft EIS). Available studies and research, including those referenced in Section 8.3.6 of the Phase 1 Draft EIS, are considered inconclusive and do not suggest a probable health impact associated with corona ionization, either during the construction or the operation of PSE's proposed project. The EIS Consultant Team's review of scientific literature during the preparation of the Phase 1 Draft EIS included the reference cited in the comment (Henshaw/Fews, 2001) as part of their scope of review. The findings of the study does not change the conclusions in the Phase 1 and Phase 2 Draft EISs regarding adverse health effects (Sheppard, 2017).

I190-F -4 The maximum calculated magnetic field levels would typically occur within the transmission line corridor and drop in value at the edge of the transmission right-of-way. At a distance of 1,000 feet, there would be no measurable magnetic fields associated with the proposed transmission line; therefore, no cumulative effect is anticipated. Extensive health studies have not found a causal link between adverse health effects and EMF from electrical transmission lines (see Section 8.6.1.4 of the Phase 1 Draft EIS). The EIS Consultant Team's review of scientific literature during the preparation of the Phase 1 Draft EIS included the references cited in the comment as part of their scope of review. The findings of those studies do not change the conclusions in the Phase 1 and Phase 2 Draft EISs regarding adverse health effects (Sheppard, 2017).

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: EIS Element - Safety

**Questions for the City of Bellevue to Address in the EIS**

- I190-F-5 | 1. How will the City of Bellevue address safety concerns associated with **construction risk, seismic risk, and corrosion/arcng risk**?
- I190-F-6 | 2. How will the City of Bellevue address ignoring crucial portions of the DNV-GL safety report?
- I190-F-7 | 3. How will the City of Bellevue respond to criticism that local fire departments are not adequately equipped to handle an explosive fire from a ruptured Olympic pipeline in a dense urban corridor?
- I190-F-8 | 4. How will the City of Bellevue mitigate increased pollution concerns associated with High Voltage Transmission Lines?
- I190-F-9 | 5. How will the City of Bellevue mitigate residents' safety and health concerns for the children and teachers that spend unusually long periods of time in close proximity to multiple high voltage transmission lines?

Sincerely,

Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

- I190-F -5 See response to comment I17-A-1 for information on how construction risk and corrosion/arcng risk were addressed in the Phase 2 Draft EIS. See response to comment I120-A-1 for additional information on seismic risk.
- I190-F -6 See response to comment 001-A-4.
- I190-F -7 See response to comment I148-A-3.
- I190-F -8 The comment is not specific to what type of pollution the transmission lines could potentially cause, but assuming the commenter is speaking to the potential for corona discharge from the electrical lines to attach to air molecules, the effect of corona ions on human health were evaluated in the Phase 1 Draft EIS. Based on reviewed and available publications, there is no scientific consensus that corona ionization poses a health risk; therefore, the Phase 1 Draft EIS concluded that there were no probable significant impacts (see Section 8.6.1.4 of the Phase 1 Draft EIS). Available studies and research, including those referenced in Section 8.3.6 of the Phase 1 Draft EIS, are considered inconclusive and do not suggest a probable health impact associated with corona ionization, either during the construction or the operation of PSE's proposed project.
- I190-F -9 Exposure to magnetic fields in homes, schools, parks, and daycare facilities is acknowledged in the Phase 2 Draft EIS (see Section 3.8.2), and such unique uses were identified within the study area. As noted in the Phase 1 Draft EIS, there are no known health effects from EMF expected as a result of the project. The calculated magnetic fields levels would be well below the lowest reference guideline, even assuming 24-hour exposure, which is unlikely because the modeled electrical loads would only occur during peak load periods, not all day. See Section 3.8.5.1 of the Phase 2 Draft EIS for more detail.

[https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL\\_en.&view=pt&search=inbox&th=15d0c4f34e1ea14d&siml=15d0c4f34e1ea...](https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL_en.&view=pt&search=inbox&th=15d0c4f34e1ea14d&siml=15d0c4f34e1ea...) 2/2

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Economic Impact



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: Economic Impact**

1 message

Russell Borgmann <rborgmann@hotmail.com>

Mon, Jul 3, 2017 at 11:37 PM

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Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborgmann@hotmail.com>

I190-G-1

Energize Eastside will increase costs in at least two ways:

1. Electricity rates will increase for ALL PSE ratepayers; and
2. Residents can expect an increase in local taxes to offset the decrease in the local property tax base from declining property values

I190-G-2

**SEPA Handbook** (Publication # 980114, Paragraph 3.3.5, pg 57, states, "Other (non-environmental) impacts, such as a cost/benefit analysis, may be included in the EIS if the lead agency determines this information would be helpful in evaluating the proposal" (WAC 197-11-440). For a MEGA-project like Energize Eastside, a Cost/Benefit Analysis absolutely would be helpful in evaluating the proposal. This isn't some small, ordinary project. The proposed Energize Eastside project warrants the very best and most detailed of analyses.

I190-G-3

**Questions for the City of Bellevue to Address in the EIS**

1. How does the City of Bellevue justify not including a Cost/Benefit Analysis in the SEPA EIS?

Sincerely,  
Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL.en.&view=pt&search=inbox&th=15d0c5156bac1146&siml=15d0c5156bac1...> 1/1

I190-G -1

The EIS does not evaluate the effect on utility rates, but PSE has stated what they project the costs would be, and do not project an increase in rates. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding total project cost and the impacts to ratepayers. For more information, see Topic Econ - Key Theme 4.

Section 3.10 of the Phase 2 Draft EIS evaluated potential impacts that a change in assessed value as a result of the project could have on property taxes. No analysis of the changes to individual property values was conducted. It was determined that, based on a hypothetical \$10 million decrease in assessed values, the project could result in a mil rate increase and corresponding tax expenditure increase for the average (median) Newcastle homeowner of approximately \$5.27 annually. If the City Council did not want the mil rate to increase, the City would need to reduce its budget (for items covered by property tax) by approximately \$20,000.

I190-G -2

A cost/benefit analysis is not a required element of the SEPA process.

I190-G -3

See response to comment I190-G-2.

7/5/2017

Weebly Email Service Mail - Re: Energize Eastside EIS Public Comments: EIS Element - Environmental Health



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Re: Energize Eastside EIS Public Comments: EIS Element - Environmental Health**

1 message

Russell Borgmann &lt;rborgmann@hotmail.com&gt;

Mon, Jul 3, 2017 at 11:38 PM

To: Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

Cc: "eis@cense.org" &lt;eis@cense.org&gt;, Russell Borgmann &lt;rborgmann@hotmail.com&gt;

High Voltage Transmission Lines are 50% thicker than typical distribution lines and operate at much higher temperatures, causing endangerment to native and migratory bird species, flying insects (like bees) necessary for pollination, and other plant and animal species sensitive to heat and nighttime light emissions. HVTL produce ultra-violet (UV) flashes that are invisible to humans. HVTL produce nighttime UV flashes that affect the vision of all mammals (except humans). <http://www.bbc.com/news/26548483>



Lead researcher on the study, Prof Glen Jeffery from University College London, explains why these flashes of light occur

[www.bbc.com](http://www.bbc.com)

Bursts of UV light from high-voltage cables may be causing animals to avoid large areas around power lines, research reveals.

The EIS is silent on the topic of environmental health due to nighttime UV emissions.

**Questions for the City of Bellevue to Address in the EIS**

I190-H-1

1. How will the City of Bellevue mitigate nighttime UV emission concerns in the EIS?

Sincerely,

Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

I190-H -1 Most of the project alignment occurs in areas that produce a variety of human-induced disturbances to animal species. As discussed in the EIS, vegetation removal and maintenance activities along transmission corridors result in modified habitat and the potential displacement of some species. Similar effects are expected for the operation of the facilities. As discussed in the EIS, the larger wire sizes for the 230 kV lines would also be more visible to flying species, resulting in increased avoidance behavior, which is expected to reduce direct impacts from collision and electrocution. The 230 kV lines would also be higher above the ground, which would minimize potential impacts to low-flying insects and other ground oriented species from increased light flashes or heat from the wires. EMF/corona impacts to wildlife species are generally unknown or inconclusive; see the response to Key Theme P&A-3 in Appendix J of the Final EIS.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d0c52c41e478ba&siml=15d0c52c41e4...> 1/1

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: EIS Element - Housing



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: EIS Element - Housing**

1 message

**Russell Borgmann** <rborghmann@hotmail.com>

Mon, Jul 3, 2017 at 11:40 PM

To: Energize Eastside EIS <info@energizeeastsideeis.org>

Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborghmann@hotmail.com>

I190-I-1 Numerous studies and national data from Realtors indicate a 10% to 30% decrease in property values near High Voltage Transmission Lines (HVTL).

**Questions for the City of Bellevue to Address in the EIS**

I190-I-2 1. How will the City of Bellevue, via the EIS, mitigate the broad economic consequences (residents, businesses, and city government) of Energize Eastside (e.g. declining property taxes from declining valuation, loss of business development opportunities due to increasing electricity costs, etc.)?

Sincerely,  
Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

I190-I -1 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1.  
I190-I -2 Mitigation for economic impacts from a project is not required under SEPA; however, potential impacts to city revenues due to decreased assessed value for property could be mitigated by an adjustment to the mil rate for all taxpayers or a reduction in expenditures to match the reduced revenues (See Section 3.10.6 of the Phase 2 Draft EIS and Section 4.10.6 of the Final EIS). The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding project cost and fairness of financial burden. For more information, see Key Theme ECON-4 in Appendix J.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d0c53f3a73052a&siml=15d0c53f3a730...> 1/1

7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Light and Glare (EIS Element in SEPA not covered by EIS)



Energize Eastside EIS <info@energizeeastsideeis.org>

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**Energize Eastside EIS Public Comments: Light and Glare (EIS Element in SEPA not covered by EIS)**  
1 message

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**Russell Borgmann** <rborghmann@hotmail.com> Mon, Jul 3, 2017 at 11:42 PM  
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I190-J-1 | Energize Eastside will result in the destruction of over 5,400 mature trees and other crucial vegetation. The Eastside's tree canopy is essential for health as well as the reduction of light and glare, especially nighttime light pollution. Bellevue's tree canopy has already decreased to 36%, the lowest along the Puget Sound eastside. Energize Eastside will contribute to this rapidly dwindling tree canopy. [http://www.ci.bellevue.wa.us/pdf/Manager/Urban\\_Ecosystem\\_Analysis.pdf](http://www.ci.bellevue.wa.us/pdf/Manager/Urban_Ecosystem_Analysis.pdf)

I190-J-2 | **Questions for the City of Bellevue to Address in the EIS**  
1. The EIS only addresses short-term light and glare concerns during the construction phase. How will the City of Bellevue mitigate long-term light and glare concerns in the EIS?

I190-J-3 | 2. Will 130ft poles require flashing beacons to alert low flying private aircraft of tall aerial obstructions, especially in areas that cross I-90 or over Somerset?

Sincerely,  
Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

- I190-J -1 | See the response to comment I190-J-2 regarding light and glare impacts. Section 3.4.6 of the Phase 2 Draft EIS and Section 4.4.6 and Appendix M of the Final EIS identify mitigation measures for tree canopy reduction.
- I190-J -2 | Operational impacts resulting from increased light and glare were evaluated programmatically in Section 11.6 of the Phase 1 Draft EIS. Because impacts were determined to be less-than-significant, they were not evaluated further in the Phase 2 Draft EIS.
- I190-J -3 | The Federal Aviation Administration (FAA) has standards and guidelines that determine when structures need to be marked and lighted for aircraft safety. Aviation warning lights would not be required for this project because the proposed electrical infrastructure, including transmission poles, would be less than 200 feet in height and would not exceed the obstruction standards contained in 14 CFR Part 77 (FAA, 2007). This is documented in Section 11.6.2.4 of the Phase 1 Draft EIS.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d0c5619d9631c0&siml=15d0c5619d96...> 1/1

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: EIS Element - Noise



Energize Eastside EIS <info@energizeeastsideis.org>

**Energize Eastside EIS Public Comments: EIS Element - Noise**

1 message

**Russell Borgmann** <rborghmann@hotmail.com> Mon, Jul 3, 2017 at 11:44 PM  
 To: Energize Eastside EIS <info@energizeeastsideis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborghmann@hotmail.com>

I190-K-1

Corona emissions produce audible noise - snaps, crackles, and pops. This audible noise is disruptive to humans and animals, and this noise intensifies when it rains (which occurs frequently in the rainy Northwest). When water droplets hit high temperature transmission lines which are rated to 400°F (during full load), raindrops sizzle. Birds steer a wide berth.  
<http://www.bbc.com/news/26548483>



Lead researcher on the study, Prof Glen Jeffery from University College London, explains why these flashes of light occur

[www.bbc.com](http://www.bbc.com)

Bursts of UV light from high-voltage cables may be causing animals to avoid large areas around power lines, research reveals.

I190-K-2

Corona can extend 2,000 feet (600m) and will cause Electromagnetic Interference (EMI) noise, interfering with emergency 911 back-up communication, e.g. HAM radio communication - crucial radio broadcasting capabilities during times of natural disasters, like earthquakes.

(2005 Draper, et. al. UK Study (1962-1995) Leukemia RR of 1.69 for children living <200 meters from HVTL; Leukemia RR of 1.23 for children living 200-600 meters from HVTL)

**Questions for the City of Bellevue to Address in the EIS**

I190-K-3

1. The EIS appears to only address short-term noise concerns during the construction phase. How will the City of Bellevue mitigate long-term audible noise concerns in the EIS? How will audible noise be mitigated in urban areas?

I190-K-4

2. What are the minimum and maximum noise estimates (decibels) under different loading conditions and weather conditions (e.g. cold winter weekday morning between 5am to 8am and heavy moisture/mist/fog conditions)? When transferring 1,500MW of power to Canada, as stated in one of the key assumptions of the *Eastside Needs Assessment Report*?

I190-K-5

3. How will the City of Bellevue mitigate the impact of EMI noise (Electromagnetic Interference) on emergency 911 communications?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

I190-K -1

Corona noise was analyzed as a part of the Phase 1 Draft EIS, Section 9.3 and Section 9.6. The potential impacts of corona noise for the proposed 230 kV transmission lines were found to be relatively low for nearby residential environments. The maximum corona noise of a 230-kV line outside at ground level is approximately 29 dBA, which is approximately 10 dBA below the federal housing interior noise goal. While corona noise from the project may be audible in very quiet areas, it is expected to be virtually the same as existing corona noise levels produced by the existing 115 kV transmission line. As stated in the Phase 1 Draft EIS, corona noise is generally a concern for transmission lines operating at 345 kV or above. Corona noise from the transmission lines is expected to remain well below the limits required by local noise regulations, and below levels that would warrant mitigation.

EMF/corona impacts to wildlife species are generally unknown or inconclusive; see the response to Key Theme P&A-3 in Appendix J of the Final EIS.

The estimates of corona noise in the Phase 1 Draft EIS were based on a combination of empirical measurement and modeling (Oregon DOE, 2013). These measurements indicate maximum corona noise levels from a 230 kV transmission line to be 33 dBA, L5 directly below the line, about 80 feet below the sag point midway between supporting poles. (The L5 noise descriptor represents the noise level exceeded 5% of a given measurement and therefore reflects the period with the predominantly greatest noise levels.) The clear zone for an overhead 230 kV line could be approximately 120 to 150 feet wide. Consequently, the distance from any multi-story residence would be greater than that assumed in the prediction of worst-case corona noise of 33 dBA and therefore would be lower than this worst-case noise level.

I190-K -2 Section 15.6.2 of the Phase 1 Draft EIS states that overhead transmission lines do not generally interfere with radio or television reception. Whenever corona is a problem, it is usually for amplitude modulation (AM) radio and not the higher frequencies associated with frequency modulation (FM) radio or TV/satellite signals. Therefore, it is possible that some residents near the transmission lines would notice interference with AM stations. Section 15.6.4.1.3 of the Phase 1 Draft EIS states that corona interference is not considered a problem for transmission lines rated at 230 kV and below, and is not anticipated to interfere with police and emergency personnel communication/emergency devices.

PSE evaluates radio frequency interference caused by the transmission lines per FCC Title 47 Part 15. PSE anticipates that the upgraded 230 kV lines will have a similar or reduced interaction with radio frequency as new construction and steel poles tend to reduce interference as compared to older, wooden transmission line poles. Where potential issues are found, impacts can be mitigated by de-tuning structures through the installation of hardware (such as arresters). PSE states they have successfully limited interference between transmission lines and radio frequencies using arresters.

With regard to health effects, the EIS Consultant Team's review of scientific literature during the preparation of the Phase 1 Draft EIS included the references cited in the comment as part of their scope of review. The findings of those studies do not change the conclusion in Section 8.6.1.4 of the Phase 1 Draft EIS that extensive health studies have not found a causal link between adverse health effects and EMF from electrical transmission lines (Sheppard, 2017).

I190-K -3 The project is not expected to have significant long-term noise impacts. See Chapter 9 of the Phase 1 Draft EIS.

I190-K -4 See Section 9.3.1 of the Phase 1 Draft EIS.

I190-K -5 The project is not expected to cause interference with emergency 911 communications. See Section 15.6.2 of the Phase 1 Draft EIS.

7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Public Outreach (EIS Element in SEPA not covered in EIS)



Energize Eastside EIS <info@energizeeastsideeis.org>

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**Energize Eastside EIS Public Comments: Public Outreach (EIS Element in SEPA not covered in EIS)**  
1 message

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**Russell Borgmann** <rborghmann@hotmail.com> Mon, Jul 3, 2017 at 11:45 PM  
To: Energize Eastside EIS <info@energizeeastsideeis.org>  
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The Draper Study (2005) found that corona can drift in the wind much farther than anticipated, in excess of 600m (2,000 ft). Based on the Draper study, EIS notices should have been sent out to all affected residents a **minimum of a 2,000 feet radius** along the selected route.

I190-L-1 While the City of Bellevue Guidelines for public notice are 500 feet, that is an arbitrary range that can vary depending on circumstances. Additionally Since all PSE customers are affected by an anticipated rate increase, the City of Bellevue should require that PSE send out EIS notification to ALL customers – if by no other means than via printed notifications in all customers’ electricity bills.

I190-L-2 **Questions for the City of Bellevue to Address in the EIS**  
1. How will the City of Bellevue address inadequate public notice and outreach in the EIS?

Sincerely,  
Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

I190-L -1 See response to comment I130-A-1. Also see analysis in the Phase 1 Draft EIS regarding corona discharge, in Section 8.5 and 8.6.

I190-L -2 See response to comment I130-A-1. Additionally, the Energize Eastside EIS followed the SEPA guidelines for public outreach and mitigation, and developed significance criteria based on Partner Cities input.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d0c593670b5392&siml=15d0c593670b...> 1/1

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: EIS Element - Risk of Explosion



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: EIS Element - Risk of Explosion**

1 message

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Remember the Olympic Pipeline explosion in Bellingham in 1999? <https://www.youtube.com/watch?v=AJRwePrctGw>



**C-SPAN Cities Tour- Bellingham: The Olympic Pipeline Explosion**

[www.youtube.com](http://www.youtube.com)

On June 10, 1999, a gasoline pipeline operated by Olympic Pipeline Company exploded in Bellingham's Whatcom Falls Park. Three boys died in the explosion. Thi...

Remember the San Bruno, CA gas pipeline explosion in 2010? [http://www.mercurynews.com/business/ci\\_27880159/san-bruno-pg-e-faces-record-penalty-punishment](http://www.mercurynews.com/business/ci_27880159/san-bruno-pg-e-faces-record-penalty-punishment)



**PG&E slapped with record \$1.6 billion penalty for fatal San Bruno explosion**

[www.mercurynews.com](http://www.mercurynews.com)

PG&E slapped with record \$1.6 billion penalty for fatal San Bruno explosion

Remember the Texas gas pipeline explosion caused by installing HVTL in 2010? <https://www.youtube.com/watch?v=RSCz-35M9hA>

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfkl.en.&view=pt&search=inbox&th=15d0c5bb4d8ab9d2&siml=15d0c5bb4d8a...> 1/3

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: EIS Element - Risk of Explosion



### Gas Pipeline Explosion - North Texas 06-07-2010

[www.youtube.com](http://www.youtube.com)

I shot this video from the news chopper, and put together some of the best shots and audio I was hearing up there. Some of the audio is from me talking, the news ...

[Puget Sound Energy has experience with filing fraudulent gas pipeline inspection records:](http://www.seattletimes.com/seattle-news/puget-sound-energy-to-pay-125-million-fine-for-falsifying-inspection-records/)  
<http://www.seattletimes.com/seattle-news/puget-sound-energy-to-pay-125-million-fine-for-falsifying-inspection-records/>

### Puget Sound Energy to pay \$1.25 million fine for ...

[www.seattletimes.com](http://www.seattletimes.com)

Puget Sound Energy, the major source of natural gas to homes around Puget Sound, will pay a \$1.25 million fine over fraudulent gas-pipeline inspection records, state ...

I190-M-1

**Olympic Pipeline was installed AFTER the power lines** were installed. **Not the opposite.** The sequence of power lines first and pipeline second is important. Now PSE is proposing installing significantly higher power/voltage/amperage transmission lines on top of existing, old jet fuel pipelines. This **presents considerably more safety risk** - increasing the probability of explosion risk above and beyond the risks that were incurred when the original pipeline was installed AFTER the power poles and lines were already installed.

I190-M-2

The discussion of mortality rates included in the EIS Appendix I is sobering. The loss of a single human life due to an accident associated with an unjustified project like Energize Eastside is unacceptable. The pipeline report commissioned by the City of Bellevue establishes an "acceptable mortality threshold". The EIS should not be taking a statistical analysis and an "aggregate risk assessment" to the potential loss of human life. PSE and the City of Bellevue are accepting the loss of human life by couching death in technical non-emotive terminology. Terminology like that is meaningless to the families of the 3 young people killed in the Bellingham pipeline explosion. Every life is sacred.

I190-M-3

#### Questions for the City of Bellevue to Address in the EIS

1. While the EIS pays lip-service to explosion risk, how will the City of Bellevue specifically protect residents and businesses against the risk of explosion before, during and after construction of Energize Eastside?
2. It is disconcerting to see the EIS split hairs between a "pool fire" and "explosion", especially when loss of life was involved (EIS pg 3.9-30). The radiant heat flux from a pool fire (EIS, Appendix I, pg71) is nothing short of terrifying. While the risks are mathematically calculated, where are pool fire and explosion mitigations addressed in the EIS?

I190-M-4

Sincerely,

Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

I190-M -1

See response to comment OO4-A-5.

I190-M -2

The risk analysis was included because there is a possibility, however remote, that there could be a release from the pipeline that was caused by or ignited by the transmission line, which could have significant adverse impacts. Calculating the probabilistic risk of mortalities is the accepted method for such risk assessment in the pipeline industry. The analysis explains both the existing risk and how the project could affect that risk. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.

I190-M -3

The EIS discusses measures that can be taken to reduce risk. Many of these measures are mandatory, some are measures PSE has proposed, and others could be required through the permit process. The role of the EIS is to identify mitigation measures for decision makers to use in the permitting process.

I190-M -4

As acknowledged in the EIS, if a pool fire were to occur as a result of interaction with PSE's transmission lines, such an event would be extremely hazardous. To establish potential consequences in the pipeline safety risk assessment, it is necessary to distinguish between pool fires, flash fires, and explosions. Gasoline, jet fuel, and diesel fuel generally do not explode, unless the vapor cloud is confined in some manner. For the most recent PHMSA incident database (2010 – 2015), there were no reported explosions for refined petroleum product pipelines. As described in Section 3.9.4 of the Phase 2 Draft EIS and Section 7.2 of the Pipeline Safety Technical Report (Appendix I-5), the modeled peak overpressure level was not high enough to pose potentially fatal risks to the public. However, fatal impacts could occur with a pool fire. With the mitigation measures included in Section 3.9.7 of the Phase 2 Draft EIS, operation of the Energize Eastside project would not likely increase the risk, and could decrease the probability of some aspects of the risk of an accidental release on the pipelines. Even with reasonable worst-case assumptions related to increased risk during construction, the likelihood of a pipeline release and fire would remain low, and no substantial change in risk compared to the existing condition (No Action Alternative) has been identified. These incremental changes to risks to public safety and the environment as a result of the Energize Eastside project are discussed in Sections 3.9 and 4.9 of the Phase 2 Draft EIS.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Alternatives



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: Alternatives**

1 message

**Russell Borgmann** <rborgmann@hotmail.com> Mon, Jul 3, 2017 at 11:52 PM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, "jstokes@bellevuewa.gov" <jstokes@bellevuewa.gov>, "Irobinson@bellevuewa.gov" <Irobinson@bellevuewa.gov>, "j.robertson@bellevuewa.gov" <j.robertson@bellevuewa.gov>, "clee@bellevuewa.gov" <clee@bellevuewa.gov>, "krwallace@bellevuewa.gov" <krwallace@bellevuewa.gov>, "jchelmiak@bellevuewa.gov" <jchelmiak@bellevuewa.gov>, "council@bellevuewa.gov" <council@bellevuewa.gov>, Russell Borgmann <rborgmann@hotmail.com>

- I190-N-1 Several viable alternatives have been previously submitted into the EIS public record for Energize Eastside. Several Case Studies have been submitted during this EIS to provide evidence that other viable alternatives exist and are currently in-use throughout the U.S. The EIS fails to adequately discuss or address the alternatives and case studies that have been submitted. As such the only viable alternative presented in this version of the EIS is the "NO ACTION" alternative.
- I190-N-2 This EIS does not adequately evaluate many viable alternatives that been submitted throughout the entire EIS process. This EIS must compare the environmental impact of each viable alternative.
- I190-N-3 PSE has publically stated that "Energize Eastside is the only way." Ms. Leann Kostek, (original PSE Energize Eastside Project Manager) acknowledged that PSE had not considered any other solution than poles and wires. PSE clearly defined the box for the solution: poles and wires – and as such they are allowing only *their* solution to be studied. Other Non-Wire Alternatives (NWA) have been quickly dismissed or side-stepped.
- I190-N-4 Against PSE's "you-can-only-discuss-our-project" mantra, the Phase 2 Draft EIS (Section 1.3) states, *"The lead agency is responsible for ensuring that a proposal that is the subject of environmental review is properly defined. The process of defining the proposal includes an understanding of the need for the project, to enable a thorough understanding of the project's objectives."*  
 Given that language, the EIS is incomplete and flawed when it fails to objectively compare and evaluate viable alternatives that are in-use elsewhere in the U.S. to solve the precise problem that PSE has described – a transmission deficiency during peak electrical demand. There are less expensive, more safe, more environmentally sound alternatives available to the City of Bellevue.  
**Navigant Research** just published a report (June 2017) on how the industry is adopting "non-wires alternatives" instead of more transmission lines. Below are just some of the interesting quotes contained in this report:  
*"Traditionally, when a transmission or distribution system operator needed to upgrade or replace infrastructure due to aging equipment or increased load demand, it would simply conduct poles and wires projects. However, grid management and distributed energy resources (DER) technologies have improved, utilities are looking to engage customers more, and policy concerns related to cost and the environment have grown. In reaction, more creative solutions are being explored to address infrastructure needs at a lower cost with greater customer and environmental benefits. These types of projects are known as non-wires alternatives (NWAs)....it appears that NWAs are ready to become a bigger piece of the transmission and distribution (T&D) investment picture based on advancements in DER technology and utility willingness to try new means of infrastructure replacement."*
- I190-N-5 According to Navigant Research, global NWA spending is expected to grow from \$63 million in 2017 to \$580 million in 2026. NWAs were quickly dismissed by PSE in this EIS. Mr. Jens Nedrud (former PSE Energize Eastside Project Engineer) stated in 2014: *"When this new line needs to be replaced, and it should last through at least the 2030s, I*

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRtXl.en.&view=pt&search=inbox&th=15d0c5eea7c41b8e&siml=15d0c5eea7c4...> 1/3

- I190-N -1 See response to comment I115-A-2.
- I190-N -2 The Phase 1 and Phase 2 Draft EISs explored a range of reasonable alternatives, as required by SEPA. For the Phase 1 Draft EIS, this includes the No Action Alternative, Alternative 1 (New Substation and 230 kV Lines) with four sub-options, Alternative 2 (Integrated Resource Approach), and Alternative 3 (New 115 kV Lines and Transformers). For the Phase 2 Draft EIS, Alternative 1 was further developed to the project level, with a variety of alternative alignments. Each alternative has been thoroughly evaluated and compared. Section 2.2 of the Phase 2 Draft EIS includes information on other alternatives identified during scoping that were not included for analysis in the Phase 2 Draft EIS, generally because they did not meet PSE's project objectives. SEPA does not require the analysis of every possible alternative.
- I190-N -3 See response to comment I115-A-2.
- I190-N -4 The Phase 1 and Phase 2 Draft EISs explored a range of reasonable alternatives, as required by SEPA . Also see response to comment I115-A-2.
- I190-N -5 Comment noted.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Alternatives

1190-N-5 *hope battery technology has advanced to the point that we can use that instead. But so far, no other utility has used it for application to an area this large.*  
<http://www.seattletimes.com/seattle-news/pse-faces-opposition-over-options-for-eastside-power-line-route/>



### PSE faces opposition over options for Eastside power-line ...

[www.seattletimes.com](http://www.seattletimes.com)

Hundreds of angry Eastside property owners are determined to block or at least delay Puget Sound Energy's plan to install 18 miles of newer, taller transmission ...

1190-N-6 This assertion can now be refuted. Southern California Edison (SCE) provides 14 million people with electricity across a service territory of approximately 50,000 square miles (PSE serves 1.1 million customers across 6,000 square miles). SCE is rough 10 TIMES bigger than PSE. SCE had an immediate need for a peak demand solution: SCE had lost methane gas reserves that were needed to meet peak electricity demand that winter. Tesla installed a large battery installation in mere months, satisfying SCE's need, immediately.

1190-N-7 PSE's need will develop gradually over time, based on PSE's (exaggerated) demand forecast. If the need exists at all (which is unlikely), PSE could solve their peak demand problems the same way that SCE solved them – with battery storage. Additionally, this storage would provide the added benefits of increased reliability and reduced carbon emissions.

Here is an opportunity for PSE to compromise: Although PSE has not proven or technically justified the need for Energize Eastside, they could provide a scalable battery storage project to satisfy any concerns about “rolling blackouts”.

If, in the distant future, the need does materialize for Wired Alternatives, these alternatives are appropriate for evaluation:

- **Monroe-Echo Lake #2:** Re-evaluate BPA's best technical solution (lowest risk, TCRM, and highest transfer capacity, TTC) by building a second Monroe-Echo Lake transmission line.
- **Lake Tradition Option:** Re-evaluate PSE's plan-of-record until approximately 2011 to route power from Lake Tradition along I-90 to the Lakeside Substation.
- **Reconductor 115kV lines** to improve transmission efficiencies.
- **SCL Loopback:** Add a new 230/115kV transformer at Lakeside Substation. Loop the existing Seattle City Light double circuit 230kV line through the Lakeside Substation. Route the line east along I-90 then turn north to the Lakeside Substation. Continue along the existing PSE right-of-way north of the Lakeside Substation. Turn west near the Lake Hills Connector until the SCL lines are once again intercepted. This has significantly less environmental impact than 18 miles of new transmission lines. This could have the added benefit of removing 230kV SCL lines that currently run over the top of the Woodridge neighborhood – over the top of a public elementary school and two community swimming pools.
- **Underground** installation of portions of the line through dense urban areas
- **Submerging** the line if a route under Lake Washington can be found viable

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRfXl.en.&view=pt&search=inbox&th=15d0c5eea7c41b8e&siml=15d0c5eea7c4...> 2/3

1190-N -6 Comment noted. The energy storage solution referred to in the comment was much smaller than would be required to address the Energize Eastside project objectives. As discussed in the Phase 1 Draft EIS, batteries could be used in combination with other technologies. However, PSE selected Alternative 1 as its solution, therefore the Phase 2 Draft EIS and Final EIS focus on the project PSE has proposed.

1190-N -7 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic P&N”).

Battery storage was a component evaluated in the Phase 1 Draft EIS. Section 2.3.3.4 of the Phase 1 Draft EIS describes battery storage, including the results of a study prepared for PSE by Strategen (2015). Limitations of battery storage technology identified in that study led PSE to conclude that battery storage alone could not address the project objectives.

7/5/2017

Weekly Email Service Mail - Energize Eastside EIS Public Comments: Alternatives

**Questions for the City of Bellevue to Address in the EIS**

- I190-N-9 | 1. How will the City of Bellevue explain why batteries can, or cannot, meet the Eastside's peak demand needs?
- I190-N-10 | 2. How will the City of Bellevue ensure it is working on behalf of its citizens to provide reliable, fairly-priced electricity by examining viable alternatives?
- I190-N-11 | 3. How will the City of Bellevue justify excessive infrastructure environmental damage (and economic consequences) in the face of lower cost, more reliable, safer alternatives?

Sincerely,

Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

I190-N -8 The Phase 1 and Phase 2 Draft EISs explored a range of reasonable alternatives, as required by SEPA. The Energize Eastside project is designed to address a transmission shortfall, not a generation shortfall, within the Eastside. The Monroe-Echo Lake and Lake Tradition options listed do not address the transmission deficiency that PSE has identified for the Eastside.

The reconductoring of the current 115 kV lines was explored as an alternative in Phase 1. Please see Section 2.2.4 of the Phase 2 Draft EIS for an explanation of why this option was not carried forward for analysis in Phase 2 of the EIS.

Utilizing the SCL corridor was explored as an option in Phase 1 but was not brought forward for additional analysis in Phase 2. See Section 2.2.1 of the Phase 2 Draft EIS for an explanation on why this alternative was not carried forward. Additionally, PSE does not have the authority to compel SCL to combine corridors and cannot make decisions for SCL about which, if any, lines they would remove or co-locate in the future.

Undergrounding was explored as an option in Phase 1 but was not brought forward for additional analysis in the Phase 2 EIS. See Section 2.2.2 for an explanation of why this was not carried forward for analysis in Phase 2 of the EIS. While not a part of the project-level alternatives in Phase 2, undergrounding was included as a potential mitigation measure for visual impacts. See Section 3.2.6 of the Phase 2 Draft EIS.

Submerging the 230 kV transmission lines was explored as an alternative in Phase 1. Please see Section 2.2.3 of the Phase 2 Draft EIS for an explanation of why this option was not carried forward for analysis in Phase 2 of the EIS.

I190-N -9 See response to comment I1120-A-1.

I190-N -10 See response to comment I115-A-2.

I190-N -11 See response to comment I1120-A-2.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxL.en.&view=pt&search=inbox&th=15d0c5eea7c41b8e&siml=15d0c5eea7c4...> 3/3

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Essential Public Facility



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: Essential Public Facility**

1 message

Russell Borgmann <rborgmann@hotmail.com> Mon, Jul 3, 2017 at 11:55 PM  
To: Energize Eastside EIS <info@energizeeastsideeis.org>  
Cc: "eis@cense.org" <eis@cense.org>, "jstokes@bellevuewa.gov" <jstokes@bellevuewa.gov>, "robinson@bellevuewa.gov" <robinson@bellevuewa.gov>, "j.robertson@bellevuewa.gov" <j.robertson@bellevuewa.gov>, "clee@bellevuewa.gov" <clee@bellevuewa.gov>, "krwallace@bellevuewa.gov" <krwallace@bellevuewa.gov>, "jchelmiak@bellevuewa.gov" <jchelmiak@bellevuewa.gov>, "council@bellevuewa.gov" <council@bellevuewa.gov>, Russell Borgmann <rborgmann@hotmail.com>

I190-O-1

The statute on Essential Public Facilities (EPFs) is RCW 36.70A.200. Facility designation to transmission lines are expressly excluded from the EPF definition in Washington Administrative Code. Exclusion of transmission lines was not an oversight – they were expressly omitted from the definition of facilities that qualify as an Essential Public Facility.

Energize Eastside does NOT meet the definition of an EPF. Per the City of Bellevue's Comprehensive Plan, "the Growth Management Act defines essential public facilities as those "that are typically difficult to site, such as airports, state education facilities and state or regional transportation facilities as defined in RCW 47.06.140, state and local correctional facilities, solid waste handling facilities, and in-patient facilities including substance abuse facilities mental health facilities, group homes, and secure community transition facilities as defined in RCW 71.090.020."

Several documents and comments have been previously submitted throughout the EIS process during public comment periods to provide evidence that Energize Eastside does not meet the standard for an EPF.

**Questions for the City of Bellevue to Address in the EIS**

I190-O-2  
I190-O-3  
I190-O-4  
I190-O-5  
I190-O-6  
I190-O-7  
I190-O-8  
I190-O-9  
I190-O-10

1. How can Energize Eastside be deemed an EPF when it has been independently shown NOT to be essential to other directly affected jurisdictions (Renton, Newcastle, Redmond, and Kirkland)?
2. How will the City justify the erroneous application of the Essential Public Facility designation on Energize Eastside, when transmission lines are specifically and intentionally omitted from the legal definition for an "Essential Public Facility"?
3. Why hasn't PSE petitioned EFSEC to address the Energize Eastside project?
4. Why aren't City Staff and City politicians pressing PSE on this question to get a full, accurate, and well-reasoned answer as to why PSE is not presenting the Energize Eastside project to EFSEC?
5. Why aren't PSE's answers to the EFSEC question being publically disclosed to inform the general public?
6. Why is PSE afraid of EFSEC, if Energize Eastside is so obviously needed?
7. Will the lingering questions and questionable data justifying the Energize Eastside project withstand analysis and scrutiny by EFSEC?
8. What is PSE hiding from EFSEC?
9. **What does the City of Bellevue (acting as SEPA Lead Agency) have to lose by denying the Energize Eastside permits, thereby forcing PSE's hand to submit Energize Eastside before EFSEC?**

Sincerely,

Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=EZPUTRTRfxl.en.&view=pt&search=inbox&th=15d0c62273aabc0c&siml=15d0c62273aa... 1/2

- I190-O -1 See response to comment I190-O-2.
- I190-O -2 The Energize Eastside project is not being treated as an Essential Public Facility in the City of Bellevue. The City of Bellevue has permitting procedures that apply specifically to electrical utility facilities regardless of whether or not the project is defined as an EPF. Other jurisdictions also have regulations that will allow the Energize Eastside project to follow standard permitting procedures for required City permits.
- I190-O -3 See response to comment I190-O-2.
- I190-O -4 The project is not required to be under EFSEC jurisdiction. The facilities subject to review by the EFSEC are found here: <http://www.efsec.wa.gov/cert.shtml#Certification2>. EFSEC review and certification would pre-empt all local SEPA and permit review. It is up to PSE to determine whether they would pursue EFSEC certification for the Energize Eastside project. In this case, PSE has not requested EFSEC certification.
- I190-O -5 See response to comment I190-O-4.
- I190-O -6 See response to comment I190-O-4.
- I190-O -7 See response to comment I190-O-4.
- I190-O -8 See response to comment I190-O-4.
- I190-O -9 See response to comment I190-O-4.
- I190-O -10 See response to comment I190-O-4.



7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Growth Rate



Energize Eastside EIS <info@energizeeastsideis.org>

**Energize Eastside EIS Public Comments: Growth Rate**

1 message

**Russell Borgmann** <rborgmann@hotmail.com> Mon, Jul 3, 2017 at 11:58 PM  
 To: Energize Eastside EIS <info@energizeeastsideis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, "jstokes@bellevuewa.gov" <jstokes@bellevuewa.gov>, "Irobinson@bellevuewa.gov" <Irobinson@bellevuewa.gov>, "j.robertson@bellevuewa.gov" <j.robertson@bellevuewa.gov>, "clee@bellevuewa.gov" <clee@bellevuewa.gov>, "krwallace@bellevuewa.gov" <krwallace@bellevuewa.gov>, "jhelminiak@bellevuewa.gov" <jhelminiak@bellevuewa.gov>, "council@bellevuewa.gov" <council@bellevuewa.gov>, Russell Borgmann <rborgmann@hotmail.com>

Compare growth rates from Northwest Power and Conservation Council, Seattle City Light, Energy Information Administration, Puget Sound Regional Council, and Sound Transit East Link Expansion. Please reference my previous DEIS comments submitted February 23, 2016.

**Comparison of Annual Growth Projections**

Northwest Power and Conservation Council	0.4%
Seattle City Light	<b>0.5%</b>
Energy Information Administration	0.6% - 0.9%
Puget Sound Regional Council	1.2%
Sound Transit East Link Expansion	33% by 2040 = 1.3% per year
Puget Sound Energy	<b>2.4%</b>

[http://www.seattle.gov/light/news/issues/irp/docs/SeattleCityLight2014\\_IRPUdateandProgressReport.pdf](http://www.seattle.gov/light/news/issues/irp/docs/SeattleCityLight2014_IRPUdateandProgressReport.pdf) (pg 12)

[https://www.nwcouncil.org/news/press-releases/2016-02-10\\_7th\\_plan\\_adopted/](https://www.nwcouncil.org/news/press-releases/2016-02-10_7th_plan_adopted/)

<http://www.eia.gov/todayinenergy/detail.cfm?id=10491>

<http://www.seattletimes.com/business/energy-of-downtown-seattle-grows-ever-stronger/>

I190-P -1 WECC base cases are based on each utility's latest load forecast for the specific years being modeled. The WECC base case in 2012 did not have a specific growth rate from PSE for the Eastside because PSE only performed a system-wide forecast for 2012. The 0.5 percent growth rate cited by the Lauckhart/Schiffman report for the Eastside reflected average growth for PSE's entire system. PSE subsequently determined that the load for the Eastside area studied in the EIS is expected to grow at a faster rate than the rest of the PSE system. As described in the Phase 1 Draft EIS, PSE's analysis of growth expected for the Eastside was 2.4 percent. PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers.

I190-P -2 Comment noted.

I190-P-1

Data that PSE supplied to the Western Electricity Coordinating Council (WECC) cites a load growth forecast of 0.5% annually. A 0.5% growth rate closely correlated with other independent data shown above. Yet PSE's submitted a growth rate of 2.4% to the City of Bellevue and the WUTC.

I190-P-2

Seattle City Light recently revised its growth rate DOWN to **0.3%**. A recent article (June 18, 2017) in *The Seattle Times* cites that BPA and Seattle City Light power sales are down, reflecting lower demand for BPA to provide power to utilities and major industrial customers, which all have been working to boost conservation. Sadly, utilities have not appropriately managed their operating costs in the face of this declining energy usage. While demand is down in the face of robust growth, revenue is up because PSE continues to raise electricity rates.

<http://www.seattletimes.com/seattle-news/northwest/lower-demand-higher-operating-costs-help-push-electricity-rates-for-seattle-area-customers/>

The Eastside is NOT growing 8 TIMES faster than Seattle.

**Questions for the City of Bellevue to Address in the EIS**

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=EZPUTRTfxl.en.&view=pt&search=inbox&th=15d0c64f2a074252&siml=15d0c64f2a074...> 1/2



7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Growth Rate

- II90-P-3 | 1. How will the City of Bellevue independently justify the inflated growth rate (2.4%) contrived by PSE, when there are several other independent sources that contradict this growth forecast?
- II90-P-4 | 2. How will the City of Bellevue justify such a large rate of growth for electricity demand, when Seattle (which is booming) is forecasting flat-to-declining demand, in the face of robust growth? What explains such extreme differences?
- II90-P-5 | 3. How will the City of Bellevue address the lack of at least 10 years of actual historical data showing peak demand for the Eastside? How will the City of Bellevue guarantee that PSE is properly correlating historic trends to future forecasts?
- II90-P-6 | 4. Why is there a discrepancy between the growth rate that PSE submitted to WECC vs what they submitted locally?
- II90-P-7 | 5. How will the City of Bellevue ensure they are making the best long-term decisions for residents to provide reliable, fairly-priced electricity?

Sincerely,

Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

- II90-P -3 | See response to comment 005-A-4.
- II90-P -4 | See response to comment 005-A-4.
- II90-P -5 | As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").
- II90-P -6 | See response to comment II90-P-1.
- II90-P -7 | The City of Bellevue, as the lead agency for the SEPA review, is tasked with ensuring that the EIS presents a thorough analysis of potential environmental impacts from the proposed project. In the permit process, the City of Bellevue will consider the project under the criteria established for conditional use approval.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxL.en.&view=pt&search=inbox&th=15d0c64f2a074252&siml=15d0c64f2a074...> 2/2

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Reliability



Energize Eastside EIS <info@energizeeastsideis.org>

**Energize Eastside EIS Public Comments: Reliability**

1 message

**Russell Borgmann** <rborghmann@hotmail.com> Tue, Jul 4, 2017 at 12:01 AM  
 To: Energize Eastside EIS <info@energizeeastsideis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborghmann@hotmail.com>

I190-Q-1

PSE has not been forthcoming about the specific mathematical probability of "rolling blackouts". PSE has not quantified the SAIDI (duration) and SAIFI (frequency) reliability metrics for Energize Eastside. Without these metrics, the EIS fails to compare the cost effectiveness of the project against other viable alternatives. Cost effectiveness is an environmental impact, because it determines the amount of financial resources that are available for environmental mitigations.

I190-Q-2

On Page 1 of the EIS: "...This would need to be fed by new 230 kV transmission lines from the north and south. By having lines from two different directions, a substation can continue to be supplied even if one line goes down."

The EIS provides no assessment of reduced resilience of tree stands after clearing selected large trees. Trees that have matured in thick stands have developed resiliency to high winds over the course of their growth. Removal of mature trees from the edges of those stands leave remaining trees more vulnerable to storm damage.

I190-Q-3

**Questions for the City of Bellevue to Address in the EIS**

1. How will the City of Bellevue objectively state how likely such blackouts would be, how long they would last, and how many customers would be affected?
2. How much will Energize Eastside effectively improve electrical reliability on the Eastside? What are the specific SAIDI and SAIFI criteria for Energize Eastside?
3. Describe the specifics of the "line going down". This phrase infers de-energizing the line. How often is this likely to occur? What are the impacts of the line going down? For how long will those impacts be felt? By whom? What are the details of how often PSE experiences a 230kV transmission line failure? Quantify the risk of failure and the potential effects of a failure.
4. How will the City of Bellevue assess the longer term impact to the remaining trees, when mature tree removal occurs on the edges more dense tree stands?

I190-Q-4

I190-Q-5

I190-Q-6

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d0c678da021f4d&siml=15d0c678da021...> 1/1

- I190-Q -1 See response to comment 001-C-3 regarding the probability of rolling blackouts. SAIDI and SAIFI performance metrics apply to distribution systems and are not applicable to transmission systems, including the Energize Eastside project.
- I190-Q -2 See response to comment I177-A-50.
- I190-Q -3 See response to comment 001-C-3. The Phase 1 Draft EIS Chapter 1 describes the potential extent of rolling blackouts. PSE estimates that the number of days per year when rolling blackouts could be necessary would gradually increase up to about 9 days by the end of the 10-year study period.
- I190-Q -4 See response to comment 001-C-3, regarding the probability of rolling blackouts. SAIDI and SAIFI criteria are not applicable to transmission system reliability.
- I190-Q -5 Regarding the potential for downed power lines, given the anticipated upgrades to PSE's infrastructure under the project, including the use of steel versus wood poles and newer standards not applicable during the original installation in the 1960s, it is anticipated that the risk of downed power lines will be lower than with the existing poles. Given the stricter NERC vegetation management standards the project would be subject to, these risks would be further reduced. Also see response to comment I190-Q-4.
- I190-Q -6 See response to comment I177-A-50.

7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: No Firm Transmission Commitment to Canada ("Canadian Entitlement")



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: No Firm Transmission Commitment to Canada ("Canadian Entitlement")**

1 message

Russell Borgmann <rborgmann@hotmail.com> Tue, Jul 4, 2017 at 12:05 AM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborgmann@hotmail.com>

A key assumption in the *Eastside Needs Assessment*, the original study that justifies the project, states: "*Winter peak Northern Intertie transfers [of] 1,500 MW exported to Canada*"

I190-R-1

There is no Firm Requirement to deliver Canada's share of the Columbia River Treaty (CRT) power to the Canadian Border. Public Records Requests with BPA show that no Firm Commitment Contract exists. In the absence of a contract, if at any time there is available transmission capacity to deliver electricity to Canada, then under Open Access, BPA must make deliveries of that power to the Canadian border IF CANADA REQUESTS IT BE DELIVERED THERE. BC Hydro's IRP states that CRT electricity delivery from the U.S. is unreliable, and hence it does NOT rely on U.S. delivery of CRT "Canadian Entitlement" electricity in its capacity planning.

When (or if) Canada asks for electricity to be delivered to the Canadian Border and there is NOT sufficient transmission capacity at the time of the request (e.g. because of high loads in the Puget Sound Area, causing "congestion" and the Cross-Cascade lines are fully used to serve the Puget Sound), then Canada is told its "Entitlement" cannot be delivered to the Canadian Border. Canada has it delivered somewhere else in the U.S. HOWEVER, this is not a problem. Canada prefers to have the electricity delivered somewhere in the U.S. most of the time. Canada sells that power, resulting in a financial exchange between Canada and the U.S. – NOT a transfer of electricity. Canada much prefers (some might even argue that Canada has become dependent upon) the cash payments (in excess of USD\$200MM annually) rather than the delivery of power.

I190-R-2

Representatives of PSE (Ms. Keri Pravitz and Mr. Mark Williamson) have stated on the record that inclusion of the 1,500MW of electricity export to Canada was a mistake. They stated, "It has no bearing" on the need for Energize Eastside. Mr. Williamson has also stated on the video record (on another occasion) that if the 1,500 MW Firm Commitment to Canada did not exist, then the power flow studies would need to be re-done.

**Questions for the City of Bellevue to Address in the EIS**

I190-R-3

1. If the 1,500MW transfer has no bearing on the need for Energize Eastside, why is 1,500MW of electricity a key assumption justifying the need for Energize Eastside?

I190-R-4

2. Since there is no 1,500 Firm Requirement to deliver electricity to Canada (especially under extreme peak load conditions), why hasn't PSE re-done the load flow studies with that assumption removed, as PSE representatives stated would be required? And why won't PSE release those re-done load flow studies to qualified CEII experts for examination?

I190-R-5

3. How will the City of Bellevue clarify the precise NERC Reliability Standards that apply for this specific Energize Eastside project? Please provide specific NERC citations.

I190-R-6

4. Specifically, do NERC standards explicitly state that the BES must enable exports of 1,500MW of electricity transfer to Canada, simultaneously when Puget Sound temperatures have fallen below 23°F, an N-1-1 outage has occurred, AND 6 local generation plants are offline?

I190-R-7

5. How will the City of Bellevue clarify if Corrective Action Plans (CAPs) are allowed by NERC to address the scenario that PSE has assumed above?

Sincerely,

Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

- I190-R -1 See response to comment I12-B-5.
- I190-R -2 See response to comment I12-B-5.
- I190-R -3 See response to comment I12-B-5.
- I190-R -4 The USE study did examine condition under which the energy delivery to Canada was eliminated and Puget Sound area generation was on. See response to comments I12-B-5 and I131-A-6.
- I190-R -5 The City of Bellevue, as the Lead Agency for the SEPA review, is not required to evaluate project need, but rather is tasked with ensuring that the EIS presents a thorough analysis of potential environmental impacts from the proposed project. See Section 2.2 of the Phase 1 Draft EIS for citations to transmission planning standards and guidelines.
- I190-R -6 No. The NERC standards state that a utility must protect other utilizes on the grid from damage in any N-1-1 or N-2 condition. NERC does not have specific local criteria like the other criteria cited.
- I190-R -7 Corrective Action Plans are allowed by NERC, including load shedding and rolling blackouts, if needed.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: ColumbiaGrid Hypothetical Study



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: ColumbiaGrid Hypothetical Study**

1 message

Russell Borgmann <rborgmann@hotmail.com> Tue, Jul 4, 2017 at 12:07 AM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborgmann@hotmail.com>

Energize Eastside is an inferior technical solution and an expensive compromise. The proposed Energize Eastside project contradicts the **ColumbiaGrid 2013 System Assessment** Report which says, "...The Northwest to British Columbia transfer was increased to 1500MW and the West of Cascades North transfer was increased to near its limit (10,200 MW) by reducing local west side gas generation. This case is being studied for information purposes and mitigation is not required as it goes beyond what is required in the NERC Reliability Standards." [https://www.columbiagrid.org/client/pdfs/2013SAforweb\(7.1.13\)FINAL.pdf](https://www.columbiagrid.org/client/pdfs/2013SAforweb(7.1.13)FINAL.pdf) (2017-18HW2, pg 12, PDF pg 17 of 92)

ColumbiaGrid conducted an **informational study** which exported 1,500MW to Canada and turned off local generation plants. **These are precisely the same assumptions PSE is using to justify the need for Energize Eastside in PSE's Eastside Needs Assessment Report.** [http://energizeeastside.com/Media/Default/Library/Reports/Eastside\\_Needs\\_Assessment\\_Final\\_Draft\\_10-31-2013v2REDACTEDR1.pdf](http://energizeeastside.com/Media/Default/Library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf) (see key assumptions)

This was a **hypothetical situation** – **"for information purposes". "Mitigation is not required." "It goes beyond what is required in the NERC Reliability Standards."**

**Questions for the City of Bellevue to Address in the EIS**

- I190-S-1 | 1. How will the City of Bellevue justify using a hypothetical study, that far exceeds NERC Reliability Standards, to provide the basis for the need for Energize Eastside?
- I190-S-2 | 2. PSE and ColumbiaGrid studies did not reflect the Remedial Action Schemes (RAS) and Schedule Adjustment Schemes that have been put in place for Northern Intertie schedules. Please explain why?
- I190-S-3 | 3. In PSE's 2013 IRP, PSE indicates a 1,500MW **generation** shortfall forecast (unmet capacity, Figure G-12 on page G-25). PSE plans buy electricity on the open spot market (when demand is high and prices are higher) to address not having enough electrons to flow through the Energize Eastside transmission lines. Building an electricity transmission pipeline the size of Energize Eastside will do no good, if PSE and others cannot produce enough electricity to flow through that transmission line (e.g. a bridge to nowhere). Energize Eastside transmission lines would depend upon PSE's ability to sufficiently generate electricity or buy electricity generation. Where will PSE obtain a new electricity supply to cover peak load with the pending shutdown of Colstrip? This planning must be part of the EIS process.

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=EZPUTRTfxl.en.&view=pt&search=inbox&th=15d0c6cb51a874b2&siml=15d0c6cb51a8...> 1/2

- I190-S-1 | The City of Bellevue, as the Lead Agency for SEPA review, is not required to evaluate project need, but rather is tasked with ensuring that the EIS presents a thorough analysis of potential environmental impacts from the proposed project.
- I190-S-2 | Electrical generation could help address the transmission capacity deficiency if the generation facilities were constructed within the Eastside. This was analyzed in Alternative 2 of the Phase 1 Draft EIS and was not brought forward for additional analysis in the Phase 2 Draft EIS as an alternative that would meet the project objectives.
- I190-S-3 | The project is not being constructed to increase power production, and there is no indication in its IRP that PSE plans to increase reliance on or transmission from the Colstrip plant. Therefore, impacts associated with increased power production, such as increased operations at the Colstrip plant, were not evaluated as part of this EIS process.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: BPA Cancels I-5 Corridor Reinforcement Project



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

## Energize Eastside EIS Public Comments: BPA Cancels I-5 Corridor Reinforcement Project

1 message

Russell Borgmann &lt;rborgmann@hotmail.com&gt;

Tue, Jul 4, 2017 at 12:09 AM

To: Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

Cc: "eis@cense.org" &lt;eis@cense.org&gt;, Russell Borgmann &lt;rborgmann@hotmail.com&gt;

*As a result of a comprehensive review of the project and the inherent difficulties associated with building the line, BPA is taking a new approach to managing grid congestion, Mainzer said.*

*"My decision reflects a shift for BPA--from the traditional approach of primarily relying on new construction to meet changing transmission needs, to embracing a more flexible, scalable, and economically and operationally efficient approach to managing our transmission system," he said in a three-page letter to parties interested in the project.*

*"Instead of concentrating all of our energy on one very expensive, concentrated, controversial transmission path, we have a much more robust toolbox and efficient ways to address the challenges in southwest Washington..."*

*BPA is also looking at flow-control devices and battery storage...*

*Cost was another issue, he acknowledged. The current projected all-in cost of the project is \$1.2 billion, Mainzer told Clearing Up. When first proposed in 2009, it was expected to cost \$332 million. BPA's revised approach will save hundreds of millions of dollars over time, Mainzer said*

<https://www.bpa.gov/news/newsroom/Pages/BPA-will-not-build-I-5-Corridor-Reinforcement-Project.aspx>

### BPA will not build I-5 Corridor Reinforcement Project

[www.bpa.gov](http://www.bpa.gov)

The Bonneville Power Administration will not build the I-5 Corridor Reinforcement Project, a proposed 80-mile, 500-kilovolt transmission line that would have ...

<http://www.opb.org/news/article/pge-bpa-cancel-plans-for-major-transmission-line/>

### PGE, BPA Cancel Plans For Major Transmission Line - OPB

[www.opb.org](http://www.opb.org)

Two Northwest utilities have announced they're abandoning plans to build a major new transmission line across northern Oregon.

The recent article above shows that BPA considered recent developments in the rapidly changing energy landscape to solve grid congestion and peak load issues. The name "PSE" can be substituted for "BPA" in the above article and the same would hold true for PSE's proposed Energize Eastside project.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRfkl.en.&view=pt&search=inbox&th=15d0c6eea28b30c7&siml=15d0c6eea28b...> 1/2

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: BPA Cancels I-5 Corridor Reinforcement Project

In its decision to cancel the I-5 Project, BPA stated: *"The scope, impact and increasing budget for this project became the catalyst for pushing us to reconsider our existing analytical processes, our commercial business practices and our implementation of federal reliability standards."*

PSE should also reconsider the ongoing validity of their proposed Energize Eastside project, as well as re-examine their analytical processes, practices, and implementation of NERC reliability standards. The increasing budget for Energize Eastside (which started as \$70 Million in the **ColumbiaGrid 2013 System Assessment**) has now ballooned to over \$200 Million. In addition, PSE has growing knowledge of the risks of co-locating this high voltage transmission line in parallel with existing jet fuel pipelines.

BPA continued, *"For example, in reviewing its project assumptions with regional utilities, BPA identified that it used a conservative approach to risk that went beyond industry standards."* PSE continues to use as its justification for Energize Eastside a set of scenarios that vastly exceeds NERC reliability criteria.

**Questions for the City of Bellevue to Address in the EIS**

- I190-T-1 | 1. How will the City of Bellevue answer questions about examining new approaches to manage grid congestion?
- I190-T-2 | 2. Is the City of Bellevue embracing more flexible, scalable, economic, and operationally efficient approaches to provide the most reliable, fairly priced electricity to its citizens?
- I190-T-3 | 3. How will the City of Bellevue justify the ballooning costs of Energize Eastside (and associated rise in electricity rates) to its citizens, especially when there is no measurable increase in reliability?
- I190-T-4 | 4. How will the City of Bellevue respond to the criticism that PSE is using a set of scenarios that vastly exceeds NERC reliability criteria while providing no measurable increase in reliability?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

- I190-T -1 | See response to comment I190-S-3.
- I190-T -2 | See response to comment I115-A-2.
- I190-T -3 | This is outside the scope of SEPA.
- I190-T -4 | See response to comment I12-B-1.

[https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL\\_en.&view=pt&search=inbox&th=15d0c6eea28b30c7&siml=15d0c6eea28b...](https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL_en.&view=pt&search=inbox&th=15d0c6eea28b30c7&siml=15d0c6eea28b...) 2/2

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Critique of "5 Independent Studies"



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

### Energize Eastside EIS Public Comments: Critique of "5 Independent Studies"

1 message

Russell Borgmann &lt;rborgmann@hotmail.com&gt;

Tue, Jul 4, 2017 at 12:13 AM

To: Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

Cc: "eis@cense.org" &lt;eis@cense.org&gt;, Russell Borgmann &lt;rborgmann@hotmail.com&gt;

Several documents and comments have been previously submitted throughout the EIS process during public comment periods to call into question the "5 independent studies that justify the need for Energize Eastside". Those 5 studies include:

1. The **EXPONENT** Reliability Report
2. PSE's **Eastside Needs Assessment Report**
3. **Quanta** Services Report
4. Utility Systems Efficiencies, Inc. (**The U.S.E. Report**)
5. The **Stantec** Report

I190-U-1 | The **EXPONENT** Report concluded that Bellevue's electrical reliability exceeds WUTC goals for SAIDI and SAIFI. EXPONENT urged the City of Bellevue to retain on-staff electrical reliability expertise to independently analyze and assess future needs.

I190-U-2 | PSE's **Eastside Needs Assessment Report** cannot qualify as an independent study since it was conducted by PSE. It contains assumptions that far exceed NERC reliability standards.

I190-U-3 | The **Quanta** Study appears to be the first time PSE has used outside consultants to perform load flow studies. Even though PSE has internal capability and sophisticated software to perform their own load flow studies, why did PSE hire Quanta to conduct the Energize Eastside load flow study? Quanta is known to perform significant consulting for PSE's parent owner, Macquarie – not exactly an independent voice.

I190-U-4 | The Quanta study started with the "2018 Base Case" and then added other critical assumptions that far exceed NERC reliability standards (sending 1,500MW to Canada, temperatures below 23F, 2 of 4 transformers offline, 6 west-of-Cascade emergency generators offline – all simultaneously) that stressed the Bulk Electrical System well beyond hypothetical NERC reliability limits. By imposing these assumptions, Quanta's load flow study created cross-Cascade (east-west) transmission problems – there wasn't enough electricity available to flow over the Cascades to meet these extreme conditions.

I190-U-5 | The **USE Report** only validated that PSE's processes were used. This report did not independently run load flow studies. The USE Report also found that when 1,500MW of transfer from Canada was eliminated from the study that only one small overload occurred at the Talbot Hill substation (Renton) that could be rectified by other more simple, much less costly solutions (redundant transformer).

I190-U-6 | The **Stantec** Report appears to have rubber-stamped PSE's study without providing independent analysis.

#### Questions for the City of Bellevue to Address in the EIS

- I190-U-7 | 1. Why has the City of Bellevue not hired electrical reliability expertise as recommended in 2012 by EXPONENT?
- I190-U-8 | 2. How does the City of Bellevue respond to criticism that the **Eastside Needs Assessment Report** contains assumptions that far exceed NERC Reliability Standards, while providing no measurable increase in reliability for PSE customers?
- I190-U-9 | 3. How does the City of Bellevue respond to criticism that there are less expensive ways to address overloads at the Talbot Hill substation in lieu of building Energize Eastside?

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=EZPUTRTfxl.en.&view=pt&search=inbox&th=15d0c7267b512e1e&siml=15d0c7267b51...> 1/2

I190-U -1 Comment noted.

I190-U -2 Comment noted.

I190-U -3 This topic is beyond the scope of the EIS. The study performed by Quanta was reviewed by the EIS Consultant Team and found to be in accord with industry standards. The Lead Agency has limited authority to question an applicant's motives and cannot use SEPA authority to alter the objectives of an applicant for purposes of review under SEPA. While PSE may be owned or controlled by a foreign company, it is regulated by the Washington UTC and is a member of regional utility planning organizations, such as ColumbiaGrid.

I190-U -4 Comment noted.

I190-U -5 The EIS Consultant Team reviewed the planning model and found that PSE had used standard planning practices and had not modified any regional transmission planning assumptions beyond those recommended by ColumbiaGrid. As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included.

I190-U -6 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included.

I190-U -7 This is outside the scope of SEPA.

I190-U -8 As discussed in the Phase 1 and Phase 2 DEISs, the EIS Consultant Team did review the planning model and found that PSE had used standard planning practices. In determining the capacity deficiency for 2024, PSE used best available data and industry-standard utility planning modeling.

I190-U -9 See response to comment I115-A-6.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Critique of "5 Independent Studies"

I190-U-10

4. Quanta, U.S.E and Stantec (all consultants) will NOT take a stance against PSE for fear of retaliation in the form of losing future lucrative consulting contracts from PSE and other utilities. How does the City of Bellevue plan to respond to clear conflicts of interest on the part of Quanta (known to do substantial work for PSE's owner, Macquarie), U.S.E., and Stantec?

I190-U-11

5. U.S.E. did not independently analyze PSE's load forecast. U.S.E. accepted PSE's inputs as fact and verified that PSE had followed an industry-standard process. Why didn't U.S.E. obtain independent data from unbiased third-parties, rather than rely strictly on data provided by PSE?

I190-U-12

6. How will the City of Bellevue ensure they are making the best long-term decisions for residents to provide reliable, fairly-priced electricity?

Sincerely,  
Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

I190-U -10 See response to comment I136-A-5.

I190-U -11 See response to comment I12-B-1.

I190-U -12 After completion of the Final EIS, the City of Bellevue (as well as the other Partner Cities) is required to make a permitting decision for the Energize Eastside project according to the criteria for conditional use approval. Consistency with the Comprehensive Plan is part of the decision criteria listed for Conditional Use Permit approval in the City of Bellevue.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxL.en.&view=pt&search=inbox&th=15d0c7267b512e1e&siml=15d0c7267b51...> 2/2



7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Macquarie Announces Pending Sale of PSE



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: Macquarie Announces Pending Sale of PSE**

1 message

Russell Borgmann <rborgmann@hotmail.com> Tue, Jul 4, 2017 at 12:16 AM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborgmann@hotmail.com>

Macquarie Infrastructure Partners is a joint owner of PSE, along with the Canadian Pension Plan Investment Board (CPPIB) and other Canadian provincial pension plans. As I have mentioned in previous EIS public comments, Macquarie's purchase was via a 10-year closed investment fund. That fund term is now coming due, and Macquarie is seeking to return capital to its investors. As I had mentioned previously, I anticipated that Macquarie would seek to exit PSE ownership in the 2017-2018 timeframe.

II90-V-1 NOW, June 2017, Macquarie has announced exactly that:  
<https://www.bloomberg.com/news/articles/2017-06-15/macquarie-said-to-explore-sale-of-stake-in-utility-puget-energy>  
  
<http://www.pionline.com/article/20170616/ONLINE/170619905/canadian-funds-part-of-consortium-ready-to-sell-stake-in-puget-energy>

II90-V-2 Macquarie is the current defacto decision maker for PSE. If Macquarie sells its stake in PSE, then new owners will be the decision makers. It makes sense to delay decisions on Energize Eastside, until new owners are in-place, so that they can make a reasonable assessment of the need (or lack thereof) for the proposed Energize Eastside project.

Another real possibility with the change in ownership of PSE is that a King County PUD will be formed to purchase PSE. A PUD would have elected officials, chosen by eastside customers of that PUD, and would be responsive to customers' concerns. A PUD would not be focused on maximizing profits for foreign investment funds (Macquarie and CPPIB). Instead, its sole concern would be to serve the public interest as a public utility.

II90-V-3 Until the need for Energize Eastside is proven beyond a shadow of a doubt, the "NO ACTION" alternative is the only prudent choice. If, or when, such a need may arise in the distant future, then smarter alternatives including demand response, electrical efficiency, and battery storage can provide reliable electricity to our region – at a fraction of the cost, with better reliability, and substantially less environmental impact. Example: Batteries are becoming a substantial part of the solution for Southern California, as well as for BPA. See my EIS comments on "ALTERNATIVES".

II90-V-4 Until PSE's new ownership is finalized, questions surrounding the need and justification for the proposed Energize Eastside project will likely remain unanswered. **The FEIS and subsequent permitting processes for Energize Eastside should not be based on guesswork.** The "NO ACTION" alternative is the only prudent, acceptable option for this project, until PSE and its new owners provide historic data and accurate forecasts for scrutiny by CEII-cleared independent experts.

**Questions for the City of Bellevue to Address in the EIS**

- II90-V-5 1. Will the new ownership of PSE finally lead PSE to disclose relevant load flow data and historic substation loading data that citizens have been requesting for the past 3 years?
- II90-V-6 2. Why saddle the Eastside with a transmission line – a relic of the past – especially just before a pending change in PSE ownership?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

- II90-V -1 See response to comment II32-A-1.
- II90-V -2 See response to comment II32-A-1.
- II90-V -3 See response to comment II15-A-2.
- II90-V -4 Financing of the project is not a SEPA issue. See response to comment II32-A-1.
- II90-V -5 This is outside the scope of SEPA.
- II90-V -6 The ownership of PSE is not relevant to the SEPA process.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Conflict of Interest #1 - DNV-GL



Energize Eastside EIS <info@energizeeastsideis.org>

**Energize Eastside EIS Public Comments: Conflict of Interest #1 - DNV-GL**

1 message

**Russell Borgmann** <rborgmann@hotmail.com> Tue, Jul 4, 2017 at 12:19 AM  
 To: Energize Eastside EIS <info@energizeeastsideis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, Russell Borgmann <rborgmann@hotmail.com>, "council@bellevuewa.gov" <council@bellevuewa.gov>

DNV-GL was commissioned to conduct a pipeline safety study by PSE for their proposed Energize Eastside project. Ironically, DNV-GL was fired for conflict of interest over a pipeline safety study in Michigan. DNV-GL was fired because of a conflict of interest with Enbridge Energy. The State of Michigan stated, *"Our trust was violated and we now find ourselves without a key piece needed to fully evaluate the financial risk associated with the pipeline that runs through our Great Lakes."*



LANSING, Mich. (AP) — A company hired to analyze the worst-case scenario of an oil pipeline failure in the Straits of Mackinac has been fired because of a conflict of interest with Enbridge Energy, the state of Michigan announced Wednesday.

An employee on the project subsequently worked on another project for Enbridge, which owns Line 5 in northern Michigan. Det Norske Veritas, also known as DNV-GL, is the contractor.

"Our trust was violated and we now find ourselves without a key piece needed to fully evaluate the financial risks associated with the pipeline that runs through our Great Lakes. This is unacceptable," Attorney General Bill Schuette said.



It is important to note that Enbridge Energy is now the owner of Olympic Pipeline – the VERY pipeline running through the Eastside, and through substantial portions of Bellevue. PSE contracted DNV-GL to write a safety report on the risks of co-locating Energize Eastside on top of the Olympic Pipeline, owned by Enbridge Energy. DNV-GL has a known conflict of interest with Enbridge Energy, as clearly stated above.

I190-W-1 | Added to this irony is the fact that a PSE banner advertisement appears in conjunction with this article. Does anybody see something seriously wrong with this whole picture?

**Questions for the City of Bellevue to Address in the EIS**

- I190-W-2 | 1. How will the City of Bellevue address the serious, proven, conflict of interest issues associated with PSE contractors conducting "independent" work for the purposes of this EIS?
- I190-W-3 | 2. How will the City of Bellevue instill trust with its citizens that true, accurate, and objective facts are being used to create this EIS vs. biased information presented by PSE and its special interests in support of PSE?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

- I190-W -1 | Comment noted.
- I190-W -2 | See response to comment I136-A-5.
- I190-W -3 | The City is following the procedures of SEPA. See Response to Comment I136-A-5.



7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Conflict of Interest #2 - City of Bellevue Development Services Funding



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: Conflict of Interest #2 - City of Bellevue Development Services Funding**

1 message

Russell Borgmann <rborgmann@hotmail.com> Tue, Jul 4, 2017 at 12:23 AM  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: "eis@cense.org" <eis@cense.org>, "council@bellevuewa.gov" <council@bellevuewa.gov>, Russell Borgmann <rborgmann@hotmail.com>

Previous EIS comments submitted during the EIS Scoping Public Comment Period have alerted Ms. Carol Helland (City of Bellevue Land Use Director, Development Service Department) to potential financial and political impropriety, and how PSE and its consultant's undue influence and half-truths may affect the SEPA vs. NEPA review of the Energize Eastside project.

I190-X-1 | Bellevue's Development Services Department is **funded from permit fees, not from tax revenues**. The Development Services Department stands to generate significant revenue from the issuance of permit fees for Energize Eastside, crucial funding for Ms. Helland's department. This could create a potential conflict of interest for Ms. Helland, as she may feel pressured to avoid a NEPA review and "shortcut" the path to issuing permits for Energize Eastside.

I190-X-2 | For a project of the size and scope of Energize Eastside, the determination for SEPA vs. NEPA review should be determined by an independent panel/commission that includes detailed local, state, and federal legal and agency review.

**Questions for the City of Bellevue to Address in the EIS**

- I190-X-3 | 1. How can the City of Bellevue ensure it is considering the best interests of its citizens in providing reliable, fairly priced electricity?
- I190-X-4 | 2. How does the City of Bellevue avoid the conflict of interest associating with deriving significant City revenue from a project vs. over-burdening the community with an expensive, unnecessary project?
- I190-X-5 | 3. Has the City of Bellevue definitively ascertained that a NEPA review is not required? Why or why not?
- I190-X-5 | 4. Did the City of Bellevue make the NEPA determination with input from the WA Department of Ecology? Why or why not? If not, with whom?
- I190-X-5 | 5. Where is the documentation about the NEPA determination from the WA Department of Ecology? Why is it not included in the EIS?
- I190-X-5 | 6. Why hasn't the WA Department of Ecology weighed in on the need for NEPA review?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d0c7bd331f624d&siml=15d0c7bd331f6...> 1/1

- I190-X -1 | Potential revenues from permits are not considered a conflict of interest. Also, the City of Bellevue has no say in whether a project is subject to NEPA or what NEPA process would apply.
- I190-X -2 | This is incorrect. NEPA review is only conducted on projects requiring federal approvals or funding. Each federal agency makes its own decisions regarding the timing and procedures for NEPA review. An independent panel could not assign a project to undergo NEPA review.
- I190-X -3 | See response to comment I190-U-12.
- I190-X -4 | See response to comment I190-U-12.
- I190-X -5 | No federal agency has elected to begin NEPA review at this time. If and when NEPA review is required, it will be led by a federal agency and not the City of Bellevue. The WA Department of Ecology is not a federal agency.

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: NEPA Review



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: NEPA Review**

1 message

Russell Borgmann <rborgmann@hotmail.com> Tue, Jul 4, 2017 at 12:28 AM  
To: Energize Eastside EIS <info@energizeeastsideeis.org>  
Cc: "eis@cense.org" <eis@cense.org>, "council@bellevuewa.gov" <council@bellevuewa.gov>, Russell Borgmann <rborgmann@hotmail.com>

**Bonneville Power Administration documentation (in addition to Memoranda of Agreement) states that all Lakeside Transformer (Bellevue) 230kV activities fall under NEPA.**

Mr. Pyle (former City of Bellevue Sr. Environmental/Land Use Planner charged with the Energize Eastside EIS, now replaced by Ms. Heidi Bedwell) said that BPA has provided a letter stating that BPA is not involved with the Energize Eastside project (aka: Sammamish-Lakeside-Talbot project).

On the City of Bellevue EIS Scoping website , a MOA (amended April 2015, link included below) states, "Concerning the Puget Preferred Plan Projects identified in Section 3(b) of the MOA, the parties agree that the **BPA funding originally intended for these projects** will instead be directed under separate agreement to PSE's Whatcom County Transformer project. Accordingly, the parties acknowledge that BPA is not involved in any manner or capacity in PSE's Sammamish to Lakeside to Talbot Rebuild Project or its Lakeside 230 kV Transformer Addition Project."

I190-Y-1 This MOA goes out of its way for BPA to disavow any association with Energize Eastside, yet, it also clearly states that BPA funding was, in fact, originally intended for this project.

BPA is merely diverting payment for Energize Eastside to another project in Whatcom County. This is a maneuver to avoid FERC Order 1000 cost allocation requirements. This maneuver is also an attempt to avoid triggering a NEPA review. BPA is obviously playing a financial shell game.

In that same MOA, paragraph 3(a), "Upon completion of the Puget projects, PSE shall submit an invoice or payment to SCL for the SCL cost obligations associated with construction of the Puget Preferred Plan Projects." Seattle City Light is complicit in the shell game and is being forced to pay PSE, so that BPA can no longer appear to have any financial obligation.

BPA is going out of its way to misdirect and divert funds from a broader REGIONAL project to address west coast grid reinforcement (Energize Eastside) to avoid a NEPA review and circumvent compliance with FERC Order 1000.

The Mid-West Electric Consumers Association states on their **Funding the Federal Power Program** fact sheet, "...due to ongoing federal budget crisis, appropriations from the U.S. Treasury will not be available to fund capital programs such as new construction and replacement or rehabilitation of existing facilities...For two decades, administrations' Budget Requests for funding of the federal power program have steadily decreased...Customer funding has become an important funding source..."

I190-Y-2 Translation: Local ratepayers (like PSE customers) are being forced to finance new construction, replacement, and rehabilitation of electrical infrastructure that provides benefits to a substantially larger base of beneficiaries throughout the west coast region. Electricity grid reinforcement is paramount to national security and economic wellbeing. However, implementation is being abused.

Some U.S. utilities (like PSE) are "gold-plating" their infrastructure projects to qualify for higher rates of Return On Equity. The Federal Power Program is leveraging individual utilities to address grid reinforcement. FERC has

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d0c806c1f4b778&siml=15d0c806c1f4b... 1/2

I190-Y -1 Comment noted.  
I190-Y -2 Comment noted.



7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: NEPA Review

programs that provide EXTRA incentive (a higher rate of Return On Equity, ROE) to reward utilities for infrastructure investment that reinforces the electrical grid. In turn, those individual utilities get to charge their local customers for projects that have more far-reaching goals beyond just benefitting local ratepayers. Current WA state legislation actually REWARDS PSE for over-building infrastructure.

<http://meconsumers.com/wp-content/uploads/2013/02/Funding-Federal-Power-2013.pdf>

<http://www.wsj.com/articles/utilities-profit-recipe-spend-more-1429567463>

**Questions for the City of Bellevue to Address in the EIS**

- I190-Y-3 | 1. Why has the City of Bellevue overlooked crucial binding documentation requiring Energize Eastside to submit for NEPA review?
- I190-Y-4 | 2. If BPA is not involved in Energize Eastside, why are there BPA Memoranda of Agreement (MOA) included on the City of Bellevue EIS scoping website? [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/2015-06-01\\_moa\\_with\\_bpa-seattlecitylight-pse.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/2015-06-01_moa_with_bpa-seattlecitylight-pse.pdf)
- I190-Y-5 | 3. Why would Seattle City Light pay PSE, if Energize Eastside is solely to address Puget Sound eastside (local) load growth?
- I190-Y-6 | 4. Where is the WA Department of Ecology determination of the need for a NEPA review?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

- I190-Y -3 This EIS is being prepared under SEPA. If federal permits or funding are required for the Energize Eastside project, PSE will pursue those at the time necessary.
- I190-Y -4 Citizens requested information regarding whether the project was subject to NEPA because of federal funding or approval required from BPA. The memo clarified that question so it was made available for citizens who were interested in understanding BPA's position regarding its funding or approval of the project.
- I190-Y -5 Whether or not Seattle City Light would pay PSE is outside of the scope of SEPA review. See WAC 197-11-448 (3).
- I190-Y -6 The Department of Ecology is not a federal agency.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxL.en.&view=pt&search=inbox&th=15d0c806c1f4b778&siml=15d0c806c1f4b...> 2/2

7/5/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: WA Department of Ecology Review and Public Comments



Energize Eastside EIS <info@energizeeastsideeis.org>

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**Energize Eastside EIS Public Comments: WA Department of Ecology Review and Public Comments**  
1 message

**Russell Borgmann** <rborgmann@hotmail.com> Tue, Jul 4, 2017 at 12:31 AM  
To: Energize Eastside EIS <info@energizeeastsideeis.org>  
Cc: "eis@cense.org" <eis@cense.org>, "council@bellevuewa.gov" <council@bellevuewa.gov>, Russell Borgmann <rborgmann@hotmail.com>

- II90-Z-1 In reviewing the previous EIS Open Comment Record, I do not find any comments submitted by the WA Department of Ecology. The Process employed by the City of Bellevue for this particular Energize Eastside EIS deviates from previous EIS process. The Energize Eastside process is not consistent with WA Department of Ecology SEPA guidelines.
  - II90-Z-2 Bypass Routes 1 & 2 skirt the Kelsey Creek Park and sensitive wetlands areas along Wilburton Hill Park. The confluence of Mercer Slough with Richards Creek and Kelsey Creek is a sensitive wetlands area. This is a sensitive estuary and confluence of multiple watersheds feeding into Lake Washington. This area is home to delicate native vegetation, abundant terrestrial wildlife, mating bald eagle pairs, blue herons, and other abundant waterfowl.
  - II90-Z-3 **Questions for the City of Bellevue to Address in the EIS**  
1. Please provide an explanation, legal justification, and examples of other DEIS and EIS that have been recently prepared following the same approach that the City of Bellevue has employed on the Energize Eastside EIS.
  - II90-Z-4 2. Where are the WA Department of Ecology submitted public comments about wetlands impact along the confluence of the Richards Creek and Mercer Slough? Where are the WA Department of Ecology Public Comments about any portion of the Energize Eastside EIS? It seems highly unusual that the Department of Ecology would not render Public Comments on this project, yet I find no record of submitted comments in reviewing the Public Comment Record.
  - II90-Z-5 3. PSE's technical consultants claimed to have asked the WA Department of Ecology for permission to install a peaking generator but was turned down. Where is that report? Why is PSE's request, Department of Ecology's response, and the report not included in this EIS? Please detail why the cost and environmental impact to install a peaking generator is more than the environmental impact of the proposed Energize Eastside project. Where is the comparison analysis of those two alternatives?
  - II90-Z-6 4. Per Bellevue statute, PSE should not be privy to comments from Public Open Comment Periods until after the Comment Periods close. At that point all questions and comments are to be aggregated and submitted to PSE and the EIS consultants for analysis and response. PSE is not allowed early access to information that is not already disclosed to the public. Why is the City of Bellevue providing comments and questions to PSE BEFORE the Open Comment Periods officially closes?
- Sincerely,  
Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

- II90-Z -1 The Department of Ecology is not required to comment on every EIS. This EIS has been prepared in accordance with WAC 197-11 SEPA Rules. See Chapter 9 of the Phase 2 Draft EIS for the distribution list (which includes Ecology).
- II90-Z -2 See response to comment II90-C-3.
- II90-Z -3 SEPA guidelines do not require that EISs contain legal justification or examples of other EISs prepared in a similar way. As described in Chapter 1 of the Phase 1 Draft EIS and Phase 2 Draft EIS, the project is being prepared under the rules for phased review, WAC 197-11-060(5).
- II90-Z -4 No comments have been received from the Department of Ecology.
- II90-Z -5 This appears to refer to communication outside of the EIS process. Neither the Lead Agency nor the EIS consultant team know what Department of Ecology communication this refers to. The Phase 1 Draft EIS did examine the potential environmental concerns that could accompany a peak generation plant.
- II90-Z -6 The City of Bellevue has not provided any public comments or questions to PSE prior to releasing them to the general public via the EIS project website. PSE did have representatives attending public meetings on the Phase 2 Draft EIS, and would have heard some comments there prior to print versions being available.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTf1.en.&view=pt&search=inbox&th=15d0c8336688ceef&siml=15d0c8336688c...> 1/2

7/5/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: False Threat of Rolling Blackouts



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Public Comments: False Threat of Rolling Blackouts**

1 message

Russell Borgmann <rborgmann@hotmail.com> Tue, Jul 4, 2017 at 9:29 AM  
To: Energize Eastside EIS <info@energizeeastsideeis.org>  
Cc: "eis@cense.org" <eis@cense.org>, "council@bellevuewa.gov" <council@bellevuewa.gov>, Russell Borgmann <rborgmann@hotmail.com>

EIS Team,

Attached is a document refuting PSE's claims that the region faces rolling blackouts. Please include this attachment in the Public Comments for the Energize Eastside EIS.

I have submitted comments on 28 separate topics of the Energize Eastside EIS. Numerous questions remain unanswered. I look forward to comprehensive answers to the questions posed for each of these topics.

As a result of the significant outstanding issues associated with this EIS, the prudent choice is either:

I190-AA-1

- 1. Select the "NO ACTION" alternative
- 2. Create a Supplemental EIS that adequately addresses all questions and concerns posed by residents and businesses, BEFORE considering the issuance of permits for this project. The EIS should provide a list of changes made in response to the questions posed. Please provide a cross-reference between the EIS changes and the questions posed.

I190-AA-2

Sincerely,  
Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

False Threat of Rolling Blackouts.pdf  
796K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTf1.en.&view=pt&search=inbox&th=15d0e6f527a8d219&siml=15d0e6f527a8d...> 1/1

I190-AA -1 Comment noted.

I190-AA -2 Questions and concerns are addressed directly in several places in the Final EIS. Chapter 6 of the Final EIS includes a summary of comments and responses received on both the Phase 1 and Phase 2 Draft EIS documents. Chapter 3 of the Final EIS, Errata, notes any errors in the Phase 1 and Phase 2 Draft EIS documents. Appendix J includes a detailed narrative summary of comments and responses on the Phase 1 Draft EIS. Appendix K includes all comments received on the Phase 2 Draft EIS, paired with responses. The Partner Cities believe that the Phase 2 Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA.

**False Threat of Rolling Blackouts**

CURE, Communities United for Reliable Energy, calls itself a grassroots organization dedicated to reliable energy. Looking at their website (if you can find it), CURE is comprised of current and former PSE employees, corporate interests, and developers. It is interesting to note that as a grassroots organization, there is no apparent way to join the organization, at least via their website. In fact, a simple Google search demonstrates that it is difficult to find and navigate to CURE's website. CURE appears to hold meetings privately and allows membership by PSE invitation only.

Some CURE representatives have spoken publically before Bellevue City Council, Renton City Council and other public decision makers. CURE's theme is that this region cannot grow without reliable power and the threat of rolling blackouts will be devastating to the Puget Sound region. Without fail, every time they speak, CURE mentions "rolling blackouts". How accurate are those claims about rolling blackouts?

PSE has a carefully crafted, succinct advertising and messaging campaign, designed to strike fear in the hearts of residents, businesses and city governments:

1. Explosive growth on the Eastside is straining our electricity grid
2. The "Backbone" of the Eastside's electric grid has not been upgraded in over 50 years
3. If we don't act now, the Eastside faces planned rolling blackouts

**Growth on the Eastside is Straining our Electricity Grid**

Bellevue has grown eight-fold since the 1960s. That much is true. However, in the face of robust recovery and expansion since the 2008 Great Recession, electricity consumption has DECLINED approximately 6%.

Why?

More efficient building construction, energy-efficient remodeling, conservation, energy-saving appliances, on-site micro-generation and decreased industrial demand all contribute to lower demand. Boeing no longer buys their power from PSE. Microsoft is in the process of disconnecting from PSE as they seek to reduce their carbon footprint and find more sustainable, renewable sources of energy for their business.

In fact, the growth on the Eastside is NOT straining our electricity grid. The same is true across Lake Washington in Seattle. Seattle City Light is experiencing a DECREASE in demand despite the explosive growth they are experiencing, especially in the South Lake Union area. Seattle City Light revised its growth rate DOWN to 0.3%. A recent article (June 18, 2017) in *The Seattle Times* cites that BPA and Seattle City Light power sales are down, reflecting lower demand for BPA to provide power to utilities and major industrial customers, which all have been working to boost conservation.

<http://www.seattletimes.com/seattle-news/northwest/lower-demand-higher-operating-costs-help-push-electricity-rates-for-seattle-area-customers/>



This map shows major PSE **transmission** line upgrades (not small residential distribution lines) throughout the Eastside during the 1990s and 2000s.

Critical transmission infrastructure is a mesh – a network – with redundancy for reliability. It is unwise to rely on a singular, centralized “backbone” prone to single points of failure, without a back-up path. If PSE has not been upgrading our critical infrastructure – as PSE advertisements claim – they what has PSE been doing the past 50 years, while collecting revenue from hard-working Eastside residential and business customers?

FACT: PSE is required to review and upgrade infrastructure at least every 2 years via the WUTC mandated Integrated Resource Planning (IRP) process. If PSE did not do this, PSE would be negligent in their regulated duty to provide reliable electricity.

Sadly, PSE’s advertising campaign is false.

#### If We Don’t Act Now, the Eastside Faces Planned Rolling Blackouts

Again PSE makes this claim in their advertising campaigns. Here’s an example:



You can watch Mr. Andy Wappler, PSE Vice President of Communications, make this same pitch in his video advertisement seen here: <https://www.youtube.com/watch?v=ryNAEqSUV8>

The facts tell a different story. Bonneville Power Administration (BPA) says:

*“Will the lights go out when schedules are curtailed?  
It is unlikely anyone’s lights will go out when the automated curtailment system is used. This is for a couple of reasons. For one, **BPA will alert utilities** in the affected area when the system looks as though*

*a curtailment will be needed. All affected utilities need to know in order to shift some generation and transmission patterns to avoid the need for the curtailment. For another, once a curtailment is announced, the utilities have the same options of shifting generation or transmission to assure that they have sufficient energy.”*

<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKEwiozbbfrVNAHUN6GMKHUEuDa4QFgcMAA&url=https%3A%2F%2Fwww.bpa.gov%2Fnews%2Fpubs%2FfactSheets%2Ffs200709-BPA%2520to%2520automate%2520transmission%2520curtailment%2520procedure%2520for%2520the%2520puppet%2520sound%2520area.pdf&usq=AFQjCNFSFFVL66n0GuUxGsqYfVohDLw&bvm=by.123325700.d.cGc>

A look at PSE’s recent IRP submission shows that PSE is facing an electricity GENERATION SHORTFALL, not a transmission deficiency.

**APPENDIX G – OPERATIONAL FLEXIBILITY**

Figure G-12  
Summary Hour-Ahead Balancing Results, 50 Simulations

Portfolio	Avg. Unmet Spin Capacity (Hrs)	Avg. Unmet INC Capacity (Hrs)	Avg. Unmet DEC Capacity (Hrs)	Avg. Unmet Spin Capacity (aMW)	Avg. Unmet INC Capacity (aMW)	Avg. Unmet DEC Capacity (aMW)
2018 Base	0.1	0.3	1.9	0.5	9.1	17.3
2018 Base + CCCT	0.1	0.3	1.7	0.5	9.1	15.7
2018 Base + Frame CT	0.0	0.0	0.2	0.0	0.0	0.0
2018 Base + Recip CT	0.2	0.3	1.2	0.1	8.5	10.5

PSE’s IRP Figure G-12 (page G-25) 2018 base case indicates PSE has “Unmet Capacity”. What good does it do to build a transmission line, like Energize Eastside, if there is no electricity to flow over that line?

PSE must acquire additional sources of electricity generation in the coming decade, because PSE faces a **generation** shortfall (unmet capacity). PSE’s plan is to buy power on the open spot market – during times of Peak Demand when demand is high and prices are higher. This is a risky strategy, exposing Eastside residents and businesses to massive rate hikes.

Why would PSE pursue a transmission line, instead of build additional generation capacity? Transmission lines are not required by the WUTC to be competitively bid. Transmission lines are more costly, and the rate of return on a transmission project is very lucrative for PSE. This generates more revenue for PSE. Generation facilities cost less to build and must be subject to competitive bid.

Is it any wonder why Jefferson County left PSE and formed its own PUD?  
And why Boeing no longer buys its electricity from PSE?  
And why Microsoft is disconnecting from PSE in favor of more sustainable, affordable electricity?

PSE’s three advertising claims prey on the fears of residents, businesses, and city governments. They claim we will experience rolling blackouts, businesses will not be able to grow, and city governments will

not be able to promote business development. These claims are false. They serve one purpose: to maximize revenue for PSE's Canadian and Australian owners.

**Questions for the City of Bellevue to Address in the EIS**

1. How can the City of Bellevue ensure it is considering the best interests of its citizens in providing reliable, fairly priced electricity?
2. How can the City of Bellevue justify PSE's Energize Eastside advertising campaign in the face of facts that completely refute PSE's claims about the need and justification for Energize Eastside?
3. Will PSE's advertising costs be added to the cost of Energize Eastside with the expectation that PSE customers will pay for it via increased electricity rates?
4. Will the City of Bellevue protect its citizens and petition the WUTC and the WA Attorney General's office to intervene and disallow PSE reimbursement for false advertising claims?

I190-AA-3

I190-AA -3 These comments are outside the scope of SEPA.

7/6/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Ulterior Financial Motivations and Tainted EIS Process



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

## Energize Eastside EIS Public Comments: Ulterior Financial Motivations and Tainted EIS Process

1 message

Russell Borgmann <rborghmann@hotmail.com>  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: Russell Borgmann <rborghmann@hotmail.com>

Thu, Jul 6, 2017 at 7:49 AM

The information below provides further detail and context regarding Energize Eastside financial motivations, and subsequent EIS Process concerns:

1. According to PSE, their consultant, Mr. Mark Williamson, speaks on behalf of PSE. *"As an industry expert hired by PSE to work on technical aspects of the energizeEASTSIDE project, Mr. Williamson's answers have been reviewed by PSE and represent the company's position."* (email from Jens Nedrud, PE, Puget Sound Energy Energize Eastside Sr. Project Manager, dated 3/11/2015)
2. According to Mr. Williamson's website, *"Williamson has developed a strategic communications technique patterned on "election campaigning" – polling, message development and communication – tools that he employs, and has for years, to get utility projects approved, sited, built and on-line..... Williamson has been associated with American Transmission Company (ATC) since its inception in 2001. He initially served on ATC's board of directors representing Madison Gas & Electric Company.... He was instrumental in negotiations leading to legislation that permitted guaranteed rate of return long-term leases for power plant construction, aiding construction of new coal fired power plants in Wisconsin... " "PRW <Mr. Mark Williamson's firm> has a winning strategy – getting your projects "elected" to office...." [http://prwcomm.com/now/?page\\_id=71](http://prwcomm.com/now/?page_id=71) [http://prwcomm.com/now/?page\\_id=657](http://prwcomm.com/now/?page_id=657)*

### Mark Williamson – PRW Communications – Strategic ...

[prwcomm.com](http://prwcomm.com)

Mark Williamson Mark Williamson is partner/Chairman of PRW Communications (PRW), a public relations firm based in downtown Madison, Wisconsin.

3. Citizens (including myself) have voiced their concerns about Mr. Williamson's financial and political influence on the Energize Eastside Project. Those concerns are warranted due to prior activities by Mr. Williamson on other projects:
  - a. *"Last year <2002>, a Waunakee <WI> resident sent an email to a neighborhood listserv formed to discuss the power line. The email questioned Williamson's role in a scandal surrounding former state Sen. Chuck Chvala, who was convicted and jailed for misconduct in public office and circumventing election laws. In 2002, Williamson had testified that Chvala asked him to send campaign donations from Madison Gas & Electric to the Kansas Democratic Party. Kansas allows direct campaign contributions from corporations; Wisconsin does not. From 1998 to 2001, MGE and its subsidiaries sent at least \$170,000. Money from Kansas was then sent back to Wisconsin, to a group run by Chvala. The resident wrote of Williamson, "It seems he may be the guy who paid some of the bribes to which state Sen. Chuck Chvala has pleaded guilty of accepting." Shortly afterward, the activist received a "cease-and-desist letter" from Williamson's attorney, hand-delivered to him at work. The activist, who has obligingly ceased all his work on the ATC issue, is now so fearful of the company that he doesn't want his name used. Williamson would do it again. "Some guy was*

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d18611fd9e98a&siml=15d18611fd9e98a> 1/4

7/6/2017

Weebly Email Service Mail - Energize Eastside EIS Public Comments: Ulterior Financial Motivations and Tainted EIS Process

slandering me!" he exclaims. " <http://www.isthmus.com/news/cover-story/atc-has-the-power/#sthash.G7daBqOi.dpuf>

### ATC has the power - Isthmus | Madison, Wisconsin

[www.isthmus.com](http://www.isthmus.com)

ATC has the power. Despite making lots of enemies, American Transmission Company controls the agenda for infrastructure projects in Wisconsin

b. *"The Journal Sentinel reported Wednesday that the utility gave \$20,000 more to the Kansas Democratic Party than the \$25,000 that was disclosed in the complaint against Chvala. The MG&E statement said its former vice president, Mark Williamson, told prosecutors that the payments to the Kansas Democrats totaled \$45,000....The complaint says MG&E knew the political contributions were made after Chvala told the utility's lobbyists that the donation would be "helpful" to the majority leader. Benkley declined to comment on whether the prosecution is considering charges against MG&E....Wisconsin law prohibits corporate contributions to candidates and political parties. Kansas law does not. Chvala is accused of creating phony independent groups to get around those Wisconsin laws."* <https://news.google.com/newspapers?nid=1683&dat=20021024&id=HzlqAAAAIBAJ&sjid=EEEEAAAIBAJ&pg=6713,2484136&hl=en>

c. *"Before Enron fell, Reliability 2000 allowed for the formation of the American Transmission Company (ATC). "The transmission company" authorized by "Reliability 2000" is merely a sham or artifice which is perpetrated to smuggle through a public utility in the sheep's clothing of a budget bill. The true purpose of the bill is private enterprise in the guise of a public utility. Its purpose is to vest control over the transmission facilities of the "public utility affiliates" in a single company to be owned by themselves thereby retaining the advantages of such controls in pricing wholesale and retail electricity. "Reliability 2000" is so called deregulation legislation under a unique scheme within Wisconsin; the first of its kind in the United States. Under no other deregulation scheme does utility deregulation vest control over the transmission facilities in a single utility-owned private company..... Madison Gas and Electric (MGE), along with Wisconsin Public Service (WPS) became founding members in the ATC, MGE employed Mark Williamson at the time of his "donations". A Milwaukee Journal Sentinel article Oct. 24, 2002 states MGE "made two payments totaling \$125,000 to a political group set up by Sen. Chuck Chvala shortly before lawmakers took up key pieces of legislation sought by the utility, prosecutors allege in the criminal complaint against Chvala.". One of those pieces of legislation is Reliability 2000. The criminal complaint clearly states "Mr. Williamson knows corporate offer contributions to political candidates are forbidden by law within the State of Wisconsin."... Reliability 2000 included the legalized "bribes" Mark Williamson is now dangling in front of local government officials (mostly in private non-open meetings). As part of that legislation the money was authorized as "impact fees" to county and local governments but included no "impact fees" for landowners who can simply be condemned. These legalized bribes were also made recoverable through rate increases to Wisconsin's electrical customers..... One begins to question the honesty of this former MG&E lobbyist now hired as a lobbyist by the American Transmission Company to put a happy face on the disastrous ArrowheadWeston transmission line and sell it to officials in Northern Wisconsin." <http://www.wsn.org/energy/ArrowheadWestonsandal.pdf>*

### Capitol Scandal Extends To Transmission Line Deal

[www.wsn.org](http://www.wsn.org)

[https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL\\_en.&view=pt&search=inbox&th=15d18611ffdae98a&siml=15d18611ffdae98a](https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL_en.&view=pt&search=inbox&th=15d18611ffdae98a&siml=15d18611ffdae98a) 2/4

7/6/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Ulterior Financial Motivations and Tainted EIS Process  
 SOUL PO Box 11 Mosinee, WI 54455 [www.wakeupwisconsin.com](http://www.wakeupwisconsin.com) Soul is a grassroots organization whose mission is to promote efficient and orderly management of power ...

d. *“Ben Fischer’s fine [March 19th business story](#) featured ATC’s Mark Williamson as chief apologist for his company’s operations as a state-created, unregulated, for-profit monopoly that is guaranteed above-industry profits from electric rate-payers on all its unchecked transmission-line construction. The article enumerated a small fraction of the connections between the company and the political process that created it. Williamson’s theme is that this is all ok because his actions must be transparent.... Public court documents in the Chuck Chvala case state that Williamson testified that he offered to “route money to the Kansas Democratic Party, and that such contributions would be ‘helpful’ to [Chvala].” The court documents say that Williamson produced the checks to show that he had acted on this plan, knowing that direct “corporate coffer contributions to political candidates and political committees are forbidden by law within the State of Wisconsin.” On reading this, I wrote to a private mailing list for those concerned with a power line that ATC is attempting to run through our neighborhood. I cited the sources and asked if anyone knew more about this. Williamson’s lawyers then threatened legal action for my question, without any explanation other than that “Mr. Williamson never engaged in any such activity.” I’d love to know whether the lawyers feel that the court reporter was lying, or whether Williamson’s testimony against Chvala was a lie.... the Wisconsin Attorney General’s office is now investigating complaints from other states regarding the role that ATC and its corruption have had in increasing rates for other state’s citizens. I would like an explanation of the process by which our own rates have, on Williamson’s watch, gone from being the cheapest in the Midwest to being the most expensive. Or of how ATC’s profit margin is more than three times higher than the oil companies’ returns.” <http://www.wetmachine.com/inventing-the-future/nimby-indeed/>*

- I190-BB -1 The lead agency has limited authority to question an applicant’s motives and cannot use SEPA authority to alter the objectives of an applicant for purposes of review under SEPA. The EIS is not required to evaluate who would profit from a project.
- I190-BB -2 The City of Bellevue and the Partner Cities are held to the standards of the permitting processes enumerated in their municipal codes.
- I190-BB -3 The EIS process is governed by the requirements of SEPA, which include mandated public commenting periods following the scoping process and the release of the draft and final EISs. It is during these commenting periods that the public is invited to review the EIS documents and submit comments on them. Additionally, the project website includes the documents produced for the EIS process, plus numerous background documents that would help inform the public about the project.
- I190-BB -4 This is outside the scope of SEPA.

I190-BB-1

4. PSE’s Sr. Vice President and Chief Financial Officer, Dan Doyle, and Mr. Williamson have known each other a long time and have long history together at American Transmission Company. Does Energize Eastside have potential financial ulterior motives that have not been disclosed to the public? With all of the PR capability and talent available in Seattle and the greater Puget Sound area, why would PSE need to hire a PR consultant and lobbyist from Wisconsin? Are Mr. Doyle and Mr. Williamson exploiting techniques they developed and honed in Wisconsin, and are they the architects of a financial scheme that seeks to fleece customers via an excessive Return-On-Equity (ROE) of approximately 10% per year, over approximately 40 years, from a “gold-plated” utility infrastructure project re-branded “Energize Eastside” (nee: Sammamish-Lakeside-Talbot Hill)? See fifth page (photo): [http://www.atcllc.com/wp-content/uploads/2011/05/2003\\_ATC-Annual\\_Report.pdf](http://www.atcllc.com/wp-content/uploads/2011/05/2003_ATC-Annual_Report.pdf) [http://www.oatioasis.com/PSEI/PSEIdocs/Formula\\_Rate\\_Settlement\\_Package.pdf](http://www.oatioasis.com/PSEI/PSEIdocs/Formula_Rate_Settlement_Package.pdf) (top of pg 5)

I190-BB-2

5. Are Puget Sound politicians and Bellevue City Staff engaging with Mr. Williamson to the point of PSE and Mr. Williamson having undue influence on, and interfering with, the EIS public process for Energize Eastside? Do PSE and their consultants hold political or financial sway over Energize Eastside public decision-makers?

I190-BB-3

6. Why have PSE and their consultants subverted the EIS process by threatening, intimidating, criticizing, and bullying citizens to keep quiet about their concerns over Energize Eastside? Have PSE and their consultant’s condescending responses to the public clouded the EIS process, when the public is seeking the WHOLE truth (not half-truths) about Energize Eastside?

I190-BB-4

7. Are Bellevue City Staff, WUTC regulatory officials, and WA State politicians aware of Mr. Williamson’s pattern of behavior? Why did Mr. Williamson, a known political lobbyist, willingly testify against Sen. Chvala? Was Mr. Williamson offered a deal to avoid prosecution, or otherwise induced, in exchange for testifying against Sen. Chvala? Has Mr. Williamson become *persona non grata* in Wisconsin, so he is now engaging in the fine State of Washington?

Based on the information provided above, there are legitimate questions and concerns about Energize Eastside worthy of serious consideration during the EIS process.

[https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL\\_en.&view=pt&search=inbox&th=15d18611fdae98a&siml=15d18611fdae98a](https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfL_en.&view=pt&search=inbox&th=15d18611fdae98a&siml=15d18611fdae98a) 3/4



7/6/2017 Weebly Email Service Mail - Energize Eastside EIS Public Comments: Ulterior Financial Motivations and Tainted EIS Process  
 According to the City of Bellevue, PSE does not have early access to documents developed with the EIS process beyond what is available to the public. PSE should not have access to public comments until the EIS has been publically issued. PSE is to receive the EIS (and public comments) at the same time as the general public, according to an email dated 7/2/2015 from Mr. David Pyle, Energize Eastside EIS Program Manager, Sr. Land Use Planner, City of Bellevue.

The Energize Eastside Draft EIS should be invalidated because the City of Bellevue has violated the rules and regulations governing the public process by providing EIS information to PSE earlier than is allowed by the process. The City of Bellevue has provided PSE early access to public comments, BEFORE being available to the general public. This practice has allowed PSE a "sneak peek" into concerns, and it permits PSE the opportunity to craft arguments, change their public and political messaging, and adopt strategies in PSE's favor, subverting the public process and the public's trust.

Based on the information provided above, an investigation into Energize Eastside's potential financial ulterior motives is strongly warranted.

**Questions for the City of Bellevue to Address in the EIS**

I190-BB-5

1. Does Energize Eastside have potential financial ulterior motives that have not been disclosed to the public?

I190-BB-6

2. Please explain why PSE and its consultant hold significant political and financial sway with decision makers tasked with issuing permits for PSE's proposed Energize Eastside project.

I190-BB-7

3. Citizens no longer feel safe in submitting public comments on Energize Eastside without fear of retaliation. Why has the City of Bellevue allowed this undue influence by PSE to cloud the public EIS process via threatening, intimidating, criticizing, and bullying letters to citizens to keep quiet about their concerns regarding Energize Eastside?

Sincerely,  
 Russell Borgmann  
 2100 120th Place SE  
 Bellevue, WA 98005

I190-BB -5 The lead agency has limited authority to question an applicant's motives and cannot use SEPA authority to alter the objectives of an applicant for purposes of review under SEPA.

I190-BB -6 See response to comment I190-BB-2.

I190-BB -7 The City of Bellevue has not seen any threatening or intimidating letters and is not aware any have been sent by any party.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxL.en.&view=pt&search=inbox&th=15d18611ffdae98a&siml=15d18611ffdae98a> 4/4

COMMENT

RESPONSE

II91-A -1 Chapter 2 of the Phase 1 and Phase 2 Draft EISs explain the alternatives evaluated at each phase of the EIS.

II91-A-1

Comment	Timestamp	First Name	Last Name
The city of Bellevue should consider alternatives to this plan. This plan should be rejected because of all the reasons that have be talked about.	6/30/2017 13:42:15	Richard	PRESLEY

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
I192-A-1	I remain concerned about ambient noise created by coronial discharge from high voltage lines. Being able to sit outside on our deck that is adjacent to the power line easement on our property with zero power transmission line noise is a very high priority. Anything less will be significant reduction in quality of life and property value. Outdoor living is a significant reason for high value properties in Bridle trails and this would be impacted by noise generating high voltage transmission lines.	7/2/2017 9:30:10	Calado	Brian
I192-A-2	I don't see any comments in the latest EIS statement by PSE on this topic and this is very concerning. The best solution to this problem is to come up with a design that produces zero noise based on latest engineering practices. Please make specific allowances in the process and design to make sure this happens.			

- I192-A -1 The Phase 1 Draft EIS examined corona-based noise and found that existing and proposed levels of noise from corona discharge are expected to be similar and well below noise control standards for residential areas. Therefore, significant impacts are not expected. Also see response to comment I190-K-1.
- I192-A -2 The Phase 1 Draft EIS Chapter 9 (Noise) describes noise from corona discharge. Noise from the proposed line would be similar to noise from the existing line, which is low, but audible. Because significant noise impacts are not expected, additional analysis was not included in the Phase 2 Draft EIS.

7/6/2017

Weebly Email Service Mail - Phase 2 DEIS comments



Energize Eastside EIS <info@energizeeastsideeis.org>

**Phase 2 DEIS comments**

1 message

**The Sinclair Family** <twsinclair@comcast.net>  
To: info@energizeeastsideeis.org

Sun, Jul 2, 2017 at 4:39 PM

Attached as pdf and pasted below.

Thank you for watching out for Bellevue citizens.

2 July 2017

City of Bellevue  
Development Services Department  
Attn: Heidi Bedwell  
450 110th Ave NE  
Bellevue, WA 98004

RE: Energize Eastside DEIS

We remain unconvinced that the Energize East Side project truly addresses a need. It appears to be an unnecessary project designed only to generate expense for the rate payers, and profits (9.8%) for the private, for-profit PSE.

To do this project, PSE will

- Risk safety of residents by building new towers astride an active and aging petroleum product pipeline, in designated high-risk earthquake country
- Destroy natural habitat and remove thousands of trees
- Take private property and devalue dozens of others
- And all without a realistic or thorough justification analysis while ignoring the questions raised by the affected and threatened citizens.

PSE has been dishonest in their claims of need (power consumption has gone down in spite of population growth; claims of no new powerlines yet three new have been built; no safety risk to planned right-of-way adjacent to a pressurized pipeline, etc.)

The only urgency to this project is to serve the PSA shareholders at expense of property owners and rate payers.

I ask the City of Bellevue and Bellevue City Council to side with Bellevue citizens in opposition to this unnecessary project.

Please include us as a party of record.

Thank You!

Terry & Joan Sinclair

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfkl.en.&view=pt&search=inbox&th=15d05abf9c649044&siml=15d05abf9c649...> 1/2

I193-A -1 Comment noted.

I193-A-1



7/6/2017

Weebly Email Service Mail - Phase 2 DEIS comments

4510 144<sup>th</sup> Ave SE  
Bellevue WA 98006-2325  
[twsinclair@comcast.net](mailto:twsinclair@comcast.net)

 **Ltr to Bellevue planner re powerlines -- #3.pdf**  
206K

COMMENTS LOCATION



<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d05abf9c649044&siml=15d05abf9c649...> 2/2

Comment	Timestamp	First Name	Last Name
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Background; We have lived in Somerset since 1978 and in our present home since 1987. Our house is located about a block above the PSE power lines and the Olympic pipeline. We are members of SENCE.	7/3/2017 11:19:00	Robert	Moloney
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Pipeline Safety:

Re; Section 3.9 Environmental Health-Pipeline Safety Studies

This section studies many of the events which could lead to a tragic result and seems to conclude the risk is historically low when measured on the basis of how many chances in a million there are that an event will occur or what percent of the population will be effected. These statistics mean little to the folks like us, who, because of our close proximity to the pipeline will most probably be the ones who are injured or killed by a fire of burning fuel. It is foolish to assume that the process of installing the new gigantic poles and the presence of much higher voltage in the lines does not put us more at risk than we are at this time. Why do we have to bear the these risks to our families when PSE has other alternatives available?

I194-A-1

We are especially concerned about the much greater risk of fire presented by a pipeline break with fuel ignited by the high voltage in the new power lines following an earthquake in the Seattle Fault. The City of Bellevue recognizes the real risk presented by the Seattle Fault-so should PSE.

I194-A-2

Property Value and Views-Scenic Views and Aesthetic Environment.

We chose Someset because of the terrific UNOBSTRUCTED views facilitated by the underground utilities. The new huge poles and heavy power lines

I194-A-3

I194-A -1 See response to comment I19-A-3.

I194-A -2 See response to comment I120-A-1.

I194-A -3 Existing electrical lines that are undergrounded in Somerset are limited to distribution lines. Raising the poles and wires above the existing transmission corridor has the potential to raise the lines out of the viewshed of some residential views and into the viewshed of other residential viewers. However, the impacts overall would be less-than-significant because the low degree of additional new obstruction. Although the impacts to scenic views would be less-than-significant, it was determined that impacts to the aesthetic environment would be significant under the Willow 1 Option as evaluated in the Phase 2 Draft EIS, which would raise the poles by 30 feet and would substantially change the pole configuration (see Section 3.2.5.11 of the Phase 2 Draft EIS). The EIS Consultant Team does not consider placement of the transmission line within the existing transmission corridor to be inconsistent with the City of Bellevue's policy to avoid placing overhead lines in greenbelts or open spaces. Mitigation would be required to minimize the impact to surrounding neighborhoods. Undergrounding the transmission line is a potential mitigation measure proposed to avoid significant adverse aesthetic impacts (see Section 3.2.6 of the Phase 2 Draft EIS).

I194-A-3

Comment	Timestamp	First Name	Last Name
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will now stretch from north to south across our view. This obviously will have a catastrophic effect on our aesthetic environment and is in violation of the Bellevue Comprehensive Plan's recommendation that overhead lines be avoided in greenbelts or open spaces and that they minimize the impact on surrounding neighborhoods. Putting the power lines underground would save our views and maintain Somersets park like setting.

I195-A-1

Comment	Timestamp	First Name	Last Name
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The two large diameter Olympic Pipelines (Jet fuel) run through my back yard along with the current 115 kV lines. My concern is that doubling the 115 kV lines to 230 kV will also increase the electrical induced corrosion to the two aging pipes. Damage that may not show. The Bellingham disaster was caused by "minor" damage by construction machinery, resulting leakage and a spark was all it took. This part of the pipeline here goes through a beautiful mature treescape within a heavily populated area. The same or similar disaster as Bellingham would result in a much worse disaster here, as bad as that one was. Alternate options exist that are 20th century technology. Possibly batteries to store power, for heavy use times. I would like to see those alternative avenues pursued rather than 230 kV lines. Thank you for your consideration.	7/4/2017 15:26:43	Pat	McGiffert
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COMMENTS LOCATION



I195-A -1 See response to comment I17-A-1. It is true that despite regulations in place, pipeline incidents can and do occur. It is important to note that as a result of the Bellingham and other pipeline incidents, the National Transportation Safety Board (NTSB) made a number of recommendations that resulted in new gas pipeline regulations requiring improvements in gas pipeline integrity management. As a result of this new federal legislation, the State of Washington passed the Underground Utilities Damage Prevention Act in 2011 that increased requirements for pipeline operators operating in the State of Washington. See Section 3.9.1.2 of the Phase 2 Draft EIS for additional information.

7/6/2017

Weebly Email Service Mail - Phase 2 Draft EIS Comment



Energize Eastside EIS <info@energizeeastsideeis.org>

**Phase 2 Draft EIS Comment**

1 message

Pat McGiffert <pmcgiffert@aol.com>  
To: info@energizeeastsideeis.org

Wed, Jul 5, 2017 at 6:56 AM

Pat McGiffert  
pmcgiffert@aol.com  
13621 NE. 42nd St, Bellevue 98005-1101  
CENSE Member and owner of property under the proposed C line.

**Category:** Scenic Views & the Aesthetic Environment

II95-B-1 Please note, the hazard of having increased kV next to two large diameter jet fuel pipelines, could drastically change the aesthetic environment and scenic view with a failure as seen in the 1999 Bellingham explosion.

II95-B-2 The PSE Conceptuals, photo simulations, provided in the EIS for the Bellevue North Segment are inadequately illustrating the view impact – here are some additional simulations that provide a more realistic and comprehensive illustration of the expected impacts.

These are simulations done from photos of the proposed 'C line' in the Bridle Trail's area at the West end of NE 42nd St, West of 140th Ave. between NE 40th St. and NE 44th Pl., using the current 65 ft poles as guides for sizing. The new poles would be seen above the tree canopy, where they now blend in.

**See attached:**

- 1) PSE proposed simulations showing before and "after".
- 2) 115kV\_to\_230\_Simulation (photos I took of the area near my house and a proposed pole as the overlay.)
- 3) Jills\_Simulated\_230kV\_Views. (from a neighbor's photos, superimposed with the proposed poles.)

These photos (2 & 3) give a much more realistic idea of how the proposed 119 to 130 ft tall poles will change the tree-scape. Neighbors on the hill above will be even more impacted as the poles and lines cross their view of the Cascade Mountains. These photos don't take into consideration the cleared view due to tree removal in the construction process.

II95-B-4 I request that alternative, 20th century technology, such as storage batteries, be considered to save the trees, the esthetics of the Bridle Trails neighborhood and the safety of the two jet fuel pipelines in our back yards.

Thank you for your consideration,  
-Pat McGiffert

**3 attachments**



PSE\_Simulations\_for\_Seg\_C.jpg  
1341K

Jills\_Simulated\_230kV\_Views\_1and2\_Poles.jpg  
1523K

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d130a1d5e80327&siml=15d130a1d5e8... 1/2

II95-B -1 Section 3.9.6 of the Phase 2 Draft EIS describes the potential impacts of a spill or a fire on the natural and built environment in the unlikely event that a pipeline release were to occur. It describes the types of impacts on each element of the environment addressed in the Phase 2 Draft EIS, including scenic views and the aesthetic environment.

II95-B -2 Only one simulation was created for the Bellevue North Segment for the Phase 2 Draft EIS because, based on the project design and the topographic and vegetation conditions of the segment location, it was determined that one simulation was representative of the entire segment. However, an additional simulation has been prepared for analysis in the Final EIS to confirm this is the case, which is similar to the simulations you have provided (see Section 4.2 of the Final EIS). It was taken from NE 29th Place because that was thought to provide the best example of more contrast along the segment as a result of vegetation removal and curves in the alignment that require slightly larger poles.

II95-B -3 Thank you for your submission. Simulations from approximately 50 key viewpoints have been developed for this project, which the EIS Consultant Team feels adequately summarizes the potential visual impacts. For more information regarding how the visual simulations were developed, please see Appendix C of the Phase 2 Draft EIS.

II95-B -4 See response to comment II15-A-2. The Phase 2 Draft EIS and the Final EIS contain a detailed analysis of the risk to public safety associated with the Olympic Pipeline system (see Sections 3.9 and 4.9, respectively).

7/6/2017

Weebly Email Service Mail - Phase 2 Draft EIS Comment



 115kV\_to\_230\_Simulation\_PSE\_Easment.pdf  
6377K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTfxl.en.&view=pt&search=inbox&th=15d130a1d5e80327&siml=15d130a1d5e8...> 2/2

COMMENT

RESPONSE

II96-A -1 See response to comment II15-A-2.

II96-A-1

Comment	Timestamp	First Name	Last Name
Please consider alternative methods to increase reliability or to meet future needs for electricity other than the current proposal ENERGIZER EASIDE EIS. Increasing our rates are just driving more people out of their homes. The cost of living here has skyrocketed.	7/4/2017 21:26:50	Wendy	Romanchuk -Czarney

Comment	Timestamp	First Name	Last Name
<p>Thank you for providing the opportunity to comment on Phase 2 of the Environmental Impact Statement for the project called "Energize Eastside." My name is Jennifer Keller. My address is 115 - 146th Ave SE, Bellevue, WA 98007. I am part of the Coalition of Eastside Neighborhoods for Sensible Energy (CENSE). First, I would like to comment on chapter 1 and other places in the EIS where the need for the Energize Project is outlined. In describing the reason for the proposed Energize Eastside project, the EIS speaks of addressing a projected "deficiency in electrical transmission capacity during peak periods" that PSE claims to have identified. This claim has no backing in the EIS--no numbers, no charts. This hole in the EIS must be addressed, first and foremost. I am aware that PSE has made forecasts in the past to try to back up that claim, but these supposed forecasts have so far not come true, and information about them has quietly disappeared from PSE's website. The entire EIS has a shaky foundation, given that the supposed "deficiency" does not appear to exist. This shaky foundation should be looked at very closely. Even the source of the supposed "deficiency" is not supported. The EIS claims that the deficiency would result from "anticipated population and employment growth on the Eastside." Actual data from PSE over the 2011-2015 time period shows Bellevue population increasing by 7.3% while total electricity use DECREASED by 5.7%. This is actually a good thing--conservation and energy efficiency are helping us decrease our footprint. But it further shows how unsubstantiated (and misleading) it is to claim that</p>	7/5/2017 0:22:28	Jennifer	Keller

II97-A -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. In regards to the population and employment growth, see response to comment 005-A-4.

II97-A-1

I197-A -2 The No Action Alternative is described in detail in Section 2.1.1 of the Phase 2 Draft EIS.

See response to comment I115-A-2 in regards to comments about the use of alternative technologies to accomplish the project objectives.

See response to comment OO1-C-8 in regards to the BPA project.

**Comment** **Timestamp** **First Name** **Last Name**

I197-A-1

we're somehow going to need more electricity year over year. There is absolutely no reason to ignore existing data and the existing trends when trying to evaluate the claims in the EIS. The EIS should be held to a higher standard than that.

I also see that PSE claims a rate of demand growth (2.4% per year) that is at least 6 times higher than demand growth expected by Seattle City Light, the electricity provider for customers who live in Seattle. The PSE claim seems way out of line, and the EIS provides nothing to back it up. Again, the supposed "deficiency" in capacity provides, in theory, the entire foundation of the EIS--and that foundation is extremely weak, which weakens every claim this EIS tries to make that it's acceptable to let this project go ahead and damage our environment. (After all, that's the whole point of an EIS, to look at how much a project might damage our environment, so we can weigh whether the need for the project justifies the damage.)

I197-A-2

Continuing on, I've looked at the basic way that the EIS evaluates different Alternatives--one of the key parts of an EIS. According to SEPA, WAC 197-11-440 (P2-2) "The No Action Alternative provides a benchmark against which the impacts of the project and other alternatives can be compared." But in this EIS, the "No Action Alternative" is not defined precisely. This decreases its usefulness as a benchmark and undermines cost effectiveness comparisons. This EIS is lacking in this key element, and this should be addressed.

Further, the EIS accepts, without explanation, PSE's dismissal of a number of viable Alternatives--but PSE disqualified these Alternatives by using outdated assumptions and faulty analysis. With every passing

Comment	Timestamp	First Name	Last Name
<p>month and year, it becomes clearer how far behind the times PSE has become. This lack in the Alternatives in the EIS needs to be given serious review.</p> <p>Here is a clear example of the outdated assumptions and faulty analysis that PSE is using. A Southern California utility examined ways to protect itself from rolling blackouts, in case there was an uncontrolled release from a methane storage facility. They found they could protect themselves from risk by having Tesla install a grid storage battery, in only three months. A similar battery could potentially address the Eastside's need--possibly for less cost, less risk, and less environmental damage. If PSE is truly concerned about rolling blackouts, this appears to be a far better solution. But where is the analysis of this type of option? It appears to be completely missing from the EIS.</p> <p>Here's another example--in a major recent development, the Bonneville Power Administration (BPA), the federal agency in charge of the Northwest regional grid, canceled plans to build a \$1.2 billion transmission line between Oregon and Washington. The line was supposed to deliver increased electricity to California. BPA noted declining usage and new technology, and said a combination of flow control devices and batteries would save customers hundreds of millions of dollars. These decisions affect the amount of regional flow that PSE has included in its models. BPA's example shows how modern alternatives could play a bigger role than PSE anticipated five years ago when Energize Eastside was conceived. Where in the EIS is this accounted for?</p>			
I197-A-2			
<p>Other foundations in the project and in the EIS are weak. It appears that PSE assumes that 1,500 MW</p>			
I197-A-3			

	Comment	Timestamp	First Name	Last Name
II97-A-3	<p>must be exported to Canada even if the Eastside is, at that moment, experiencing a major grid failure. This export is not required, not realistic, and would cause problems for the regional grid. It appears that PSE also assumes 2,850 MW must be exported to California during a major grid failure. But BPA just canceled a big transmission line that would increase service to California because better alternatives are feasible. Again, the need for the Energize Eastside project is undermined when PSE's claims are carefully examined, and this weakens all other parts of the EIS.</p>			
II97-A-4	<p>Starting from the serious weaknesses in the EIS, described above, it's clear that this project should be held strictly to standards that are used for projects with better foundations (that is, clearly substantiated reasons for a project, plus full examination of current viable Alternatives). For example, there is no reason that the project should be allowed to sidestep requirements in the Bellevue Comprehensive Plan 2015, which emphasizes a "City in a Park." However, what I see is that the EIS project Alternatives basically ignore recommendations to "avoid overhead lines in greenbelts or open spaces" and do not make a serious attempt (for example, using battery technology) to "minimize impact on surrounding neighborhoods" (Plan Policy UT-8 and UT 69). The EIS project Alternatives also ignore recommendations that "streetscape design should promote a safe and comfortable park-like experience"--for example, on Bel-Red Road, Lake Hills Connector, Richards Road, Factoria Blvd SE, Coal Creek Parkway and SE Newport Way (Plan policy UD-70). Couldn't the use of battery and other improved technologies do just that? The EIS Alternatives include nothing about that.</p>			

II97-A -3 As described in the Phase 1 Draft EIS, transmission of electrical power outside of PSE's service territory is not an objective of the project. However, as with all of PSE's transmission equipment, the project would be part of the regional electric power grid. As such, it is virtually impossible to prevent flows of electricity from or to other regions over PSE's transmission lines, and PSE has a regulatory responsibility to keep power moving through the grid in accordance with Columbia Grid commitments and federal guidelines. As such, PSE has included expected peak regional power flows in its planning model as required, and has not increased them beyond those recommended by Columbia Grid to justify the project. Also see response to comment II2-B-5.

II97-A -4 In selecting alternatives to be evaluated in an EIS, the City is not obligated to consider every conceivable scenario. The SEPA Rules note that use of the word "reasonable" is intended to *limit* (emphasis added) the number and range of alternatives, as well as the amount of detailed analysis for each alternative. For the Phase 1 Draft EIS, an objective of the Partner Cities was to identify a set of alternatives (including the No Action Alternative) that would define the range of possible alternatives to meet PSE's objectives.

For all alternatives, the transmission lines would be placed predominantly within a right-of-way (not greenbelts or open spaces) that already includes 115 kV transmission lines, and a hazardous liquids pipeline in some portions of the corridor. The same land uses that now occur would be present once the project was built. For PSE's Proposed Alignment in the Final EIS, the entire project would be within the existing corridor.

I197-A-5 See response to comment I177-A-50.

The Phase 2 Draft EIS is accurate based on the information available at the time; see the Final EIS for impacts to trees from PSE's Proposed Alignment. Critical areas regulations have standards for mitigation and monitoring of the effectiveness of mitigation sites.

Monitoring usually occurs annually over a period of 5 to 10 years, and requires a qualified professional such as a professional wetland biologist to inventory plant survival, habitat, and invasive species. Monitoring plans are developed specific for each site and are a required part of the permitting process. Specific requirements depend on the regulating agency or agencies. For example, see Bellevue LUC 20.25H. The exact location of mitigation (tree replacement) will be determined in the permitting phase.

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One of the things I love about Bellevue is the number of beautiful trees we have, and the fact that we have worked hard to keep our tree cover. The "City in a Park" concept reflects one facet of this, and regulations requiring tree retention reflect the fact that, project by project, we try to keep our beautiful trees standing and alive. Although our city does allow cutting or trimming of trees in relation to utilities, this EIS has an extremely weak foundation, including omission of a number of valuable Alternatives, including Alternatives that would require few or no trees to be cut. So we should not allow this EIS to slip by because of that word "utilities." Put another way, although PSE is a "utility," it appears to me to be offering unsubstantiated reasons for Energize Eastside, and is also deliberately avoiding the mention of valuable Alternatives--so it should not be given free rein to cut magnificent trees that are a wonderful part of our city.

There are also specific weaknesses in the EIS in the way it discusses trees and tree removal.

The EIS does not take into account the risks for wind damage to large trees (including blowdown) when only some trees are removed and leave remaining trees vulnerable.

The EIS does not take into account the loss in habitat due to tree removal.

The EIS is inconsistent about the trees that will be removed according to its standard set forth in section 3.4.1.3 and the fact that trees above 70 feet that are outside of the managed right-of-way would be removed (p.3.4-6). In many places along the Bellevue North Segment there are many trees over 70 feet tall along this route that would be just outside of the managed right-of-way. This appears to be inconsistent with the

I197-A-5

II97-A -6 See response to comment II77-A-57.

Comment	Timestamp	First Name	Last Name
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II97-A-5

graphic (map) shown in section 3.4.5.4, where much of the area with very tall trees just outside of the managed right-of-way area is depicted in blue (indicating "no clearing"). In addition, I would like a better explanation of what is meant by trimming or pruning trees "in a manner that ensures compliance with NERC standards." If these standards imply "topping" the trees rather than removing them, it will result in unacceptable aesthetic damage. In summary, PSE's description of tree removal for the Bellevue North segment does not seem honest or realistic.

In section 3.4.6.1, it says that trees removed from critical areas in Bellevue and Renton may require mitigation monitoring. This statement makes no sense. Trees that have been removed from critical areas could not be "monitored." Critical areas will be permanently damaged—"monitoring" does not change this. In section 3.4.6.2, it says "In the Bridle Trails Subarea in the City of Bellevue, plant replacement trees as required under the City's Tree Retention and Replacement Code." There is no explanation of where this replanting would be done.

II97-A-6

In section 3.2.5.4, it says "Impacts to the aesthetic environment on the Bellevue North Segment would be less-than-significant." This seems callous to me--an avoidance of the actual reality. These impacts should be characterized as "significant." Many homes are situated within view of the powerlines, and many more nearby with residents who frequently walk and ride along the equestrian trails in this area. The destruction of existing trees, higher poles, and probable noise from crackling power lines will in fact do serious aesthetic damage to the area. The current H-frame poles are wooden, while the new poles will be twice as high,

	Comment	Timestamp	First Name	Last Name
1197-A-6	<p>metallic, and will have an industrial appearance. This lack of honesty in the report should not be allowed to stand.</p> <p>Finally, in my comments, I feel compelled to discuss climate impacts, given that the EIS has the weak foundations as described above, and some of that foundation has to do with ignoring steps (such as turning to good battery technology) that can be, and need to be, taken immediately to move into a sustainable energy future. It's abundantly clear that in our current situation, when building energy infrastructure, we must consider climate impacts. We owe it to ourselves, to the young people of today, and to future generations. Climate impacts are real--we've already experienced a serious summer drought here in western Washington, very different from what we used to see in past years. Climate impacts also extend to the Sound and the ocean, and determine whether we will have living oyster beds, and healthy food webs that support our much-loved salmon and orcas. With too much carbon dioxide, all of this (and more) is at risk. So, when considering building energy infrastructure, we must take climate impacts seriously.</p> <p>That means that we should look at whether this project is aimed at the things we need right now. We need energy efficiency, a smart grid, rooftop solar, small-scale wind turbines, and the types of batteries that even now are becoming more useful and affordable. A well-designed and well-documented EIS for this project should contain Alternatives with a large amount of information about the potential for all these types of technologies in helping the Eastside move into the future. This is lacking in this EIS.</p>			
1197-A-7				
1197-A-8				

1197-A -7 Greenhouse gas emissions resulting from the proposed alternatives are evaluated programmatically (see Chapter 4 of the Phase 1 Draft EIS) and for the proposed project (see Section 3.5 of the Phase 2 Draft EIS).

1197-A -8 The Phase 1 Draft EIS explored a range of reasonable alternatives, including an integrated resource approach that focused on energy conservation and use of technologies other than transmission lines to address the project objectives. See Chapter 2 of the Phase 1 Draft EIS for a full description of the alternatives considered for the programmatic-level review of the project, and Section 2.3.3 for a description of the integrated resource approach explored as Alternative 2. Section 2.2 of the Phase 2 Draft EIS includes information on other alternatives identified during scoping that were not included for analysis in the Phase 2 Draft EIS, generally because they did not meet PSE's project objectives.

Impacts to plants are covered in Section 3.4 of the Phase 2 Draft EIS. Additionally, Section 3.5 of the Phase 2 Draft EIS covers Greenhouse Gases, which includes an analysis on the loss of sequestered carbon due to tree and vegetation removal.

I197-A-8

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In addition, at this moment in time, we need a huge number of living trees. James Hansen, the climate scientist, has emphasized that what's necessary right now is NOT just a transformation of our energy infrastructure--we also need to take care of forests (and wetlands and farmland, which can also absorb CO2). We need to preserve the trees we have, and in fact we need to expand our forest cover quickly, planting trees by the billions. This EIS ignores this reality, or treats it as inconsequential. In the EIS, it seems that the loss of trees is considered a matter of simply meeting the regulations of one city or another in a minimalist manner. But this project would involve cutting a huge number of established trees. Cutting these trees means going the wrong direction completely. In the past, we might have said that if we cut a tree and at the same time plant a tree, it's all the same. When it comes to climate, that logic is completely false, especially at this extremely critical time. A large healthy tree makes a layer of wood all over its big trunk and big branches, every year, capturing substantial amounts of CO2. Smaller trees take years or decades to catch up with large trees in this respect. So cutting large numbers of large trees is a backwards idea, completely out of line with the times we're in.

In other word, in evaluating this EIS, I urge that we take seriously the reality of the situation we're in today in relation to greenhouse gases and climate.

In summary, my view is that this EIS has an extremely poor foundation in terms of the basic justification for the project, ignores extremely important Alternatives, discounts the value of our magnificent trees, and seems to be written as if climate change did not exist. In my

1197-A-8

Comment	Timestamp	First Name	Last Name
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<p>view, these flaws in the EIS are not acceptable and should not be ignored. I hope my comments will help in the evaluation of this EIS and the evaluation of the proposed Energize Eastside project itself. Thank you.</p>			
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As a resident of Newcastle living within close proximity to the proposed path running adjacent to the pipeline (in the segment just behind Newcastle City Hall and now next to the new Tria Apartment complex), I remain concerned about PSE's proposed power line on a number of key points. First, I do not believe that PSE has adequately addressed the dangers of co-locating this 230KV line with the gas line. In this particular section of the proposed line, a new 76 unit apartment building has been built within feet of the pipeline. On the other side of the line and within feet is our neighborhood of Newport Woods of approximately 98 homes. Should an explosion occur during construction or after construction, hundreds of lives could be risked in this small section alone.



I198-A-1

The Pipeline and Hazardous Materials Safety Administration data for the past 20 years regarding pipeline incidents does not demonstrate increased safety. The trend line appears to be worsening. Add the increased risk of a high voltage line and the risks are magnified. Worsening this still is the fact that we live in an area with seismic activity.

[https://hip.phmsa.dot.gov/analyticsSOAP/saw.dll?Portalpages&NQUser=PDM\\_WEB\\_USER&NQPassword=Public\\_Web\\_User1&PortalPath=%2Fshared%2FPDM%20Public%20Website%2F\\_portal%2FSC%20Incident%20Trend&Page=All%20Reported&Action=Navigate&col1=%22PHP%20-%20Geo%20Location%22.%22State%20Name%22&v11=%22%22](https://hip.phmsa.dot.gov/analyticsSOAP/saw.dll?Portalpages&NQUser=PDM_WEB_USER&NQPassword=Public_Web_User1&PortalPath=%2Fshared%2FPDM%20Public%20Website%2F_portal%2FSC%20Incident%20Trend&Page=All%20Reported&Action=Navigate&col1=%22PHP%20-%20Geo%20Location%22.%22State%20Name%22&v11=%22%22)

I198-A-2

Despite Bellevue's growth, declining consumption

I198-A -1 Section 3.9 of the Phase 2 Draft EIS includes a pipeline safety risk assessment that estimates the potential impacts of a pipeline release using information on fuel type, pipe parameters, safety features, and reasonable assumptions, and identified the maximum population density along the corridor to use in estimating the potential public safety consequences (in terms of potential fatalities). The raw data from the PHMSA database are somewhat misleading. There was a major change in the reporting threshold for hazardous liquid pipelines in January 2002. At that time, the reporting threshold was reduced from 50 barrels (2,100 gallons) to 5 gallons. As a result, beginning in 2002, there was a significant increase in the number of reported spills, since operators were then required to report much smaller releases. Also, the nation's mileage of hazardous liquid pipelines has increased somewhat over time. See response to comment I120-A-1 for information on seismic risks.

	Comment	Timestamp	First Name	Last Name
I198-A-2	<p>doesn't support PSE's assumption that population growth is causing similar growth in the use of electricity. Energy efficiency and conservation are having a big impact. With questions still being debated about the need for this line, putting so many lives in potential jeopardy is too high of a price to pay. What are the current projections for energy consumption?</p>			
I198-A-3	<p>Second, the health considerations of EMF exposure remain a concern. While studies continue to be debated, it is the thousands of residents living within close proximity to these lines that may pay the ultimate price. PSE will be held accountable.</p>			
I198-A-4	<p>Third, the aesthetic destruction of the eastside will have a significant impact on property values for the thousands of residents who have built these communities. Some have cited that property values could be negatively impacted by the adjacent location of these lines by 20-30%. Additionally, Eastside cities were designed to be woven into the natural beauty of the area. The destruction of thousands of trees without clear details and timing for mitigating this loss will have additional impact on property values. Declining property values will result in lower tax revenues for our cities resulting in loss of services to all communities - especially impactful for small cities such as Newcastle.</p>			
I198-A-5	<p>Given that the Eastside will be forever impacted by the installation of these lines, PSE should be required to address the need by evaluating current up to date data. Given that thousands of lives may be at risk, the necessity of the project as proposed must be re-assessed.</p>			

- I198-A -2 PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers.
- I198-A -3 Extensive health studies have not found a causal link between adverse health effects and EMF from electrical transmission lines (see Section 8.6.1.4 of the Phase 1 Draft EIS).
- I198-A -4 Property values, as they relate to scenic views and the aesthetic environment, were evaluated programmatically in the Phase 1 Draft EIS (see Chapter 11). Impacts to tax revenue as a result of decreased property values were evaluated in the Phase 2 Draft EIS (see Section 3.10). It was determined that impacts to tax revenue would be less-than-significant.
- I198-A -5 The purpose and need for the project are summarized in Section 1.3 of the Phase 1 and Phase 2 Draft EISs. Additionally, PSE prepared the Eastside Needs Assessment, which includes a more detailed explanation of the project need. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding the purpose and need for the project (See Topic OBJ).

COMMENT

RESPONSE

Comment	Timestamp	First Name	Last Name
July 5, 2017 Response to Second EIS By Julian von Will, PHD.	7/5/2017 1:23:00	Julian	von Will

I199-A-1

The second EIS distorts facts, dismisses others and is either incomplete or neglects adequate details for the following:

- 1) Pipeline safety
- 2) Location of towers to pipeline.
- 3) What trees will be cut and their location to pipeline and towers (Your ledger map pole does not work!)
- 4) What is the impact of these big canopy trees on many factors more than just air quality?
- 5) Construction Roads and Public Roads and Traffic
- 6) Skyline
- 7) Eastside Reputation

I199-A-2

Moreover, this study, ironically, seems to advance PSE's claim. It does not get to the impacts and define the destruction this project will have on our fragile ecosystem. A spectral sellout document and testament to Corporatocracy. I feel this analysis negated its own responsibility and purpose. It's not science and it does not serve the public. It has failed to represent technological and environmental concerns in details of life and death. Pipelines and towers are technical and the location of towers and trees and the 'vibration' of the work do not add up. This study says all will be just fine. The pictorial depictions of the towers were out of scale, they looked like cave drawings. The professionalism in this work was lacking, this study was defeatist and questions are not out of line as to its honesty, effort and content. Old school capitalism,

I199-A -1 The City of Bellevue and other Partner Cities found the analysis to be unbiased, accurate, and thorough for the level appropriate for this stage of review. Where there were errors noted in comments or discovered after the Phase 1 Draft EIS was published, these have been noted in the Errata in both the Phase 2 Draft EIS and the Final EIS. Additionally, the Partner Cities believe that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA. As discussed, environmental information was compiled based primarily on literature reviews and discussions with knowledgeable resource agencies. Assumptions made in the analysis were explained so that the reader could understand what was assumed and why.

For analysis of pipeline safety, see Sections 3.9 and 4.9 of the Phase 2 Draft EIS. For analysis of the impacts of vegetation clearing, see Section 3.4. For analysis of the construction-related impacts, see Chapter 4 of the Phase 2 Draft EIS.

I199-A -2 See response to comment I136-B-1.

	Comment	Timestamp	First Name	Last Name
I199-A-2	Soviet engineering and baroque corporate blitzkrieg encircle it. This project is putting lives at risk.			
I199-A-3	PSE's arguments are contradictory, misleading, obscure and hidden in areas of serious safety concern. This will not work. It's bewildering but now well documented. But big business has everything to lose here with this regressive project and the Eastside turned into a scorched earth. The process has been completely one sided. A form of violence is being committed and improper and self-destructive sympathies have been conducted. Arguments made by CENSE reveal flaws, dangers and lies sufficient for major changes or cancellation of Energize Eastside. It's so ugly it leads most people to indifference and isolation. It's a bluescreen mindwarp. The individual and reason are not heard. Reason is on autopilot and the system is going nowhere fast. The "quickenning" is taking shape. Better save those trees. But what is worse, is to see foreign own corporations dominate local governments. There is a hand full of foreign owned power companies in the United States, too bad one of them is here in Seattle threatening our beautiful big canopy trees. The manner in which they have conducted this has been thug like. They say the power has not been upgraded since 1960s, and it has, and yet they propose 1960 style upgrades threatening a massive jet fuel pipeline in the process.			
I199-A-4	Progressive engineering and social commitments, as seen in Germany (Energiewende), reveal PSE's backward thinking. PSE is a Luddite with bad manners and gangster tactics. Anyone associated with it will be marked for life. Its overkill and remarkably rigid and			

I199-A -3 Comment noted.  
 I199-A -4 See response to comment 005-A-4 in regard to questions about the growth rate for the Eastside. See response to comment I132-A-1 in regard to the purpose and need for the project. Section 4.4.5 of the Final EIS includes additional information on vegetation clearing based on refined project design details, focused on PSE's Proposed Alignment.

I199-A-4

Comment	Timestamp	First Name	Last Name
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demeaning. The project compounds centralism, hierarchy and slavery. PSE has put profit and shareholders before systematic projections. Energize Eastside will be an embarrassment for PSE and will destroy their future not ours. PSE plays on the growth factor while energy consumption dwindles, the argument's askew. They are trying to boost revenue and then sell the company in 2018. 7000 thousand trees, many of them mature territorial life supporting trees are under threat from Woodinville to Renton. That's a lot of trees! These trees belong to the general public. PSE will turn the Eastside into a Godzilla film set. It's a Potemkin village.

Again, anyone directly or indirectly supporting PSE and its backwards engineering will have to answer for it. Only the next few years will prove to friends and family what a disgraceful project this is. This is a foreign colonial attempt to make shareholders money by inventing projects and exploring how far regressive capitalism sells out our children. Better to be poor by candle light than in league with a greedy system. The Bourgeoisie down under want their money though a faulty project and forced process. PSE has pushed over the local people's rights. Overtime this will unravel and retirement for those involved will be guilt and shame giving into a scam. Refusing more advanced engineering solutions, ignoring details and the realities of eco-systems leads to dystopia.

Promoting Energize Eastside has no family. Its slavery to a foreign power.

A few of these big trees down the people will rise up.

Thank you.

Julian von Will, PHD.



COMMENT

RESPONSE

II100-A-1

Comment	Timestamp	First Name	Last Name
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I am writing to oppose PSE's Energize Eastside project.	7/5/2017 10:25:48	LI JIAN	YU
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The proposed project is over-done using outdated technologies. It is completely driven by profit instead of needs. Rolling blackout is just an excellent excuse to achieve the profits badly sought by PSE in the expenses of its customers over decades. Today, there are advanced modern technologies to transmit electricity reliably and sufficiently. By employing these advanced technologies, there will be much less negative impacts to the environment and the communities. However, PSE is not willing to use these modern technologies because the latest technologies are cost-effective, which means PSE will not be able to rip the maximum profits when outdated and costly transmission methods are employed.

I urge PSE to consider CENSE's suggestions and to provide a better solution to meet future energy needs.

Thanks  
Li Yu  
Member of CENSE

II100-A -1 See response to comment II15-A-2.

	Comment	Timestamp	First Name	Last Name
II101-A-1	I and my neighbors, including my immediate street, and friends on NE 40th Street, have asked me to comment that this study does not include enough specifics on what you will do to protect our neighborhoods, it is unclear on the map about who will specifically be effected, and what it will cost to our properties in future sales due to possible risks, vegetation removal, and eye sore.	7/5/2017 18:38:35	Marlene	Meyer
II101-A-2	Also, in regards to section 3.4.10, there are no specifics as to how you are going to protect our beloved soaring eagles, owls, and bats. There is some reference that they are pileated and redneck sapsuckers and Northern flickers who enjoy pecking at poles. Will the poles be wood?, And, there was a statement that "the quality of the habitat and the species uses could potentially change." What specifically does that mean? These things make up the enjoyable life of our neighborhoods and it seems this plan will effect our Bridle Trails area in a very disruptive way for humans and wildlife. Please consider the lack of details of this report to be a real problem in the future. Bellevue is a wonderful combination of nice homes and nature, please keep it that way.Thank you.			

II101-A -1 Section 3.1.2. of the Phase 2 Draft EIS includes an analysis of the neighborhoods that the proposed project could go through. Vegetation removal and mitigation measures to minimize impacts are discussed in Section 3.4 of the Phase 2 Draft EIS. Visual resources and mitigation measures to minimize impacts are analyzed in Section 3.2 of the Phase 2 Draft EIS. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme ECON-1 in Appendix J.

II101-A -2 Section 3.4.1 in the Phase 2 Draft EIS lists the regulations that will be applied to this project, and Section 3.4.6 identifies potential mitigation measures to minimize impacts on plants and animals. The new poles would be steel. See Section 4.4 in the Final EIS for a description of impacts from PSE's Proposed Alignment.

The statement cited was very general, but intended to acknowledge that minor changes could occur. Species that occupy the existing and proposed corridors are tolerant of human activity and anthropogenic structures, and commonly occur throughout the area. While some localized habitat changes would likely occur, based on the number and location of removed trees and vegetation, the overall character of the habitat would be maintained. Thus, the makeup and distribution of wildlife species are not expected to change over the entire alignment. The potential impacts of the new transmission lines on eagles, owls, and bats would likely be reduced because the transmission lines would be larger (more visible or detectable to these species), and the poles would be equipped with features to reduce electrocution risks. The use of steel poles would also reduce the amount of future maintenance and pole replacement activities along the alignment. Under existing conditions, PSE would replace any deteriorating poles, particularly those infested with bugs, that would attract woodpecker species (including sapsuckers and flickers).

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name	II101-B -1	See response to comment II101-A-1.
II101-B-1	<p>My neighbors and I, including my immediate street, and friends on NE 40th Street, have asked me to comment that this study does not include enough specifics on what you will do to protect our neighborhoods; it is unclear on the map about who will specifically be effected, and what it will cost to our properties in future sales due to possible risks, vegetation removal, and eye sore.</p>	<p>7/5/2017 18:47:59</p>	<p>Marlene</p>	<p>Meyer</p>	II101-B -2	See response to comment II101-A-2.
II101-B-2	<p>Also, in regards to section 3.4.10, there are no specifics as to how you are going to protect our beloved soaring eagles, owls, and bats. There is some reference that they are pileated and redneck sapsuckers and Northern flickers who enjoy pecking at poles. Will the poles be wood? And, there was a statement that "the quality of the habitat and the species uses could potentially change." What specifically does that mean? These things make up the enjoyable life of our neighborhoods and it seems this plan will affect our Bridle Trails area in a very disruptive way for humans and wildlife. Please consider the lack of details of this report to be a real problem in the future. Bellevue is a wonderful combination of nice homes and nature, please keep it that way. Thank you.</p>					

II102-A-1

Comment	Timestamp	First Name	Last Name
<p>As we work to upgrade our Eastside electrical grid, it is worth noting the drive towards low-carbon emission demands and generation from solar in our community both in terms of the challenges to the natural environment, climate change, and to customer needs.</p> <p>Natural environment stresses on the grid structure: As temperatures warm, the Northwest is projected to see potentially more severe storms which could include increased wind shear (falling limbs), increased microburst and rainfalls totals (localized flooding), and heat waves (high heat demands and impacts on energy use and infrastructure) to a degree.</p> <p><a href="https://earthobservatory.nasa.gov/Features/RisingCost/rising_cost5.php">https://earthobservatory.nasa.gov/Features/RisingCost/rising_cost5.php</a></p> <p><a href="https://earthobservatory.nasa.gov/Features/ClimateStorms/page2.php">https://earthobservatory.nasa.gov/Features/ClimateStorms/page2.php</a></p> <p><a href="https://climate.nasa.gov/news/897/severe-thunderstorms-and-climate-change/">https://climate.nasa.gov/news/897/severe-thunderstorms-and-climate-change/</a></p> <p>Climate Change and low-carbon Generation: With the scientific realities necessitating a move to low-carbon generation, how can the grid prepare in advance for distributed solar generation, micro-grids, community solar projects, home solar shingles and storage batteries, net-metering expansion, grid-tied inline storage, etc? How can our upgrades today help support air pollution reduction efforts on the state level?</p> <p><a href="https://energy.gov/oe/services/technology-development/smart-grid/role-microgrids-helping-advance-nation-s-energy-system">https://energy.gov/oe/services/technology-development/smart-grid/role-microgrids-helping-advance-nation-s-energy-system</a></p> <p><a href="https://fortress.wa.gov/ecy/publications/documents/1601010.pdf">https://fortress.wa.gov/ecy/publications/documents/1601010.pdf</a></p>	<p>7/5/2017 13:16:54</p>	<p>Rachel</p>	<p>Molloy</p>

II102-A -1 As described in Chapter 2 of the Phase 1 Draft EIS, energy efficiency is the largest contributor to total energy savings in PSE’s conservation program, accounting for approximately 90 percent of total energy savings system wide by 2024. Fuel conversion (from electric to natural gas) and distributed generation (smaller sources of power such as solar, wind, and other generation types) represent a small but growing component of PSE’s conservation program, jointly comprising less than 10 percent of existing energy savings but projected to increase to approximately 14 percent of energy savings by 2024. Figure A-1 in Appendix A provides additional detail.

Impacts of climate change on this project were not part of the scope of this particular GHG analysis. SEPA does not require evaluation of whether the project would be resilient in the face of climate change. SEPA suggests evaluation of impacts a project would create on its surrounding environment.

The purpose of this project is to address a deficiency in electrical transmission capacity and would allow for improved redundancy (N-1-1 or N-2) (see Chapter 2 of the Phase 1 Draft EIS).

I1102-A

COMMENT

RESPONSE

I1102-A-1

<u>Comment</u>	<u>Timestamp</u>	<u>First Name</u>	<u>Last Name</u>
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As we upgrade, it is important to ensure every infrastructure project takes into account resiliency and it's ability to contribute to adaptation and mitigation, in addition to supplying a dependable power source for homes. Thank you, Rachel Molloy - Education Hill Resident			
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Comment	Timestamp	First Name	Last Name
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Thank you for providing this EIS. I've learned a lot by reading through much of it. I'll try to limit my comments to three main areas of concern:	7/6/2017 22:59:48	Diana	Wadley
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1) Greenhouse gases. Yeegads, that sulfur hexafluoride is potent stuff!! And transporting electricity long distances always results in a loss of electricity (exasperated by adding distance). Thus, this project that ships massive amounts of electricity long distances, and at the moment will utilize fossil fuels for much of its power source, is keeping us locked into the treadmill of conventional large power stations and loss-inherent delivery. With technologies that are both proven and advancing rapidly every day, this seems like a foolish path to take. Thus, I see this as a GHG issue, as distributed energy systems could help break us out of this mindset, and give us gains in broader, often less GHG impactful fuel sources, and less system loss (meaning more efficient fuel use in the end). How much sulfur hexafluoride would be needed in a more distributed energy system? How many trees would need to be reduced (since it says in this EIS that there would be negative GHG impacts (as in less sequestering) due to tree loss)? I sense less environmental impact via smaller, distributed energy sources.

II103-A-1

2) The safety issue. Looks like Olympic Pipeline doesn't exactly have a stellar track record with the UTC. And the EIS notes that construction will likely place wear and tear on the pipelines, which seem to only get internal monitoring around every 5 years (which seems like a long time, to me). It's good that they have ongoing pressure monitoring, but I still have concerns. Furthermore, this project won't do anything to help with the relatively frequent (compared to when I lived in KS)

II103-A-2

II103-A -1 Impacts to greenhouse gases as a result of distributed energy sources are evaluated programmatically (as Alternative 2) in Chapter 4 of the Phase 1 Draft EIS. Please see Section 2.2.7 of the Phase 2 Draft EIS for an explanation of why Alternative 2 was not carried forward for further analysis in the Phase 2 Draft EIS.

II103-A -2 See response to comment II30-A-2 regarding Olympic's record. Regarding the frequency of power outages, the outages that occur in PSE's system are primarily related to distribution. The project will not affect distribution system outage rates. Outages on the transmission system are relatively rare; therefore, the project is not likely to substantially reduce the total number of outages. PSE has indicated that potential for the need for load shedding is expected to increase unless the project is built.

	Comment	Timestamp	First Name	Last Name
II103-A-2	power outages. Again, I'd prefer to see PSE invest its capital in structures and systems that diversify our portfolio of energy options, not hang them on some bigger, uglier wires.			
II103-A-3	3) The aesthetics. I can see the current lines from my house. I'm not thrilled about the artistic renditions of what may be coming. (Though at least now I understand why a shield wire is important.) I am a member of CENSE. Thank you again for the EIS, and for the opportunity to comment. Respectfully, ~Diana Wadley			

II103-A -3 Comment noted.

II104-A-1

Comment	Timestamp	First Name	Last Name
<p>Section 3.8.2 states that Power Engineers, Inc. identified magnetic field strengths at 35 locations along the project segments. I understood that to mean the magnetic fields were measured. Section 3.8.3 states that Power Engineers, Inc. "calculated potential magnetic fields at 35 representative locations along the corridor..." Which was it?</p> <p>If the field strengths were measured, what instrument was used?</p> <p>If analysis was used, has the method been shown to accurately predict near field magnetic field strength?</p> <p>I am a retired Boeing electromagnetic effects engineer.</p>	<p>7/6/2017 11:57:30</p>	Harlan	Kammin

II104-A -1 Power Engineers both identified the magnetic field strengths to establish the existing conditions, and also calculated magnetic field levels at 35 locations along the corridor to characterize changes. Information on the associated magnetic fields during operation is included in Section 3.8.3 of the Phase 2 Draft EIS. This analysis includes calculated magnetic field levels, which represent the estimated magnetic fields for the highest peak period. The method that Power Engineers used was evaluated by Eneritech, a consultant on the EIS team, and is consistent with industry practices. All calculated magnetic field levels are anticipated to be well below reference guidelines.

COMMENT

RESPONSE

II105-A-1

Comment	Timestamp	First Name	Last Name
In the 900 pages of documentation, Puget Sound Energy's Energize Eastside Phase 2 Draft EIS does not identify a preferred route (preferred alternative) the transmission lines will follow.	7/6/2017 7:30:15	James	Loring
This is a fundamentally flawed proposal and ill-formed environmental study. PSE should be required to re-submit its environmental documentation in standard form.			

II105-A -1 The EIS is intended to be a disclosure document providing decision-makers with information about potential impacts and options that could reduce or eliminate some or all of the impacts of the project. SEPA does not require that an EIS identify a preferred alternative. Chapter 2 of the Phase 2 Draft EIS did identify a route that PSE preferred, although their preference has now changed. The Final EIS describes PSE's Proposed Alignment. The Partner Cities have chosen not to identify a preferred alternative. Each City has separate decision criteria for permitting, and will determine through that process what alternatives, if any, should be approved within its respective jurisdiction. The Partner Cities did not see the identification of a preferred alternative in the EIS as necessary to providing a complete analysis of the impacts, so long as a reasonable range of alternatives was evaluated.

II106-A-1

Comment	Timestamp	First Name	Last Name
<p>PSE has failed to adequately show a real need for this boondoggle to its rate payers. A number of Cense studies have shown that the PSE studies are fatally flawed. The system has been rigged to give PSE this avenue to pursue free money at the expense of the rate payers and the neighbors of this new system. This project will amount to a tax on the rate payers and neighbors. Surely there must be a higher bar required to allow such money grab project to proceed.</p> <p>Beyond economics and lack of need this project will tear through our backyards where we walk our dogs and go to enjoy the outdoors. We would like to continue to do so and not be subject to the unnecessary interruption from construction and further without the continuous bombardment of unhealthy levels of radiation.</p> <p>In short we don't need it - we don't want it- please go away!</p>	<p>7/6/2017 21:20:52</p>	<p>Joel</p>	<p>Glass</p>

II106-A -1 The purpose and need for the project are summarized in Section 1.3 of the Phase 1 and Phase 2 Draft EISs. Additionally, PSE prepared the Eastside Needs Assessment, which includes a more detailed explanation of the project need. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding the purpose and need for the project (See Topic OBJ).

Most back yards would not be affected by construction, although those required to access pole locations will be. The Phase 1 Draft EIS, Phase 2 Draft EIS, and Final EIS provide information on potential health effects from electrical and magnetic fields (EMF), both from the existing and proposed lines. Please see these sections for a discussion of health effects. Potential impacts on trail and park use in the study area are described in Section 3.6.3 of the Phase 2 Draft EIS.

COMMENT

RESPONSE

	Comment	Timestamp	First Name	Last Name
II107-A-1	<p>1.The document is full of statements with no data or method of calculation to back up the statements. An example home values will not be decreases due to EE. How was that conclusion arrived at? This is one example of many instances.</p> <p>2. There is no building permit to evaluate which makes this process moot.</p>	7/6/2017 20:32:24	Kathleen	Sherman
II107-A-2	<p>The risk analysis is not specific to this project. It looks like an encyclopedia entry. There are no numbers, values, actuarial computations. There are. O names of insurers or reinsurers. There is no acceptance of responsibility for construction risk or long term co location risks.</p>			

- II107-A -1 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1.
- II107-A -2 An EIS is typically prepared in advance of building permit applications. Regarding specific project details see response to comment II14-B-3. Insurance is not an issue addressed by the EIS. In the Phase 2 Draft EIS Sections 3.9 and 4.9 (Pipeline Safety), there is a discussion of the probability of risks associated with the Olympic Pipeline. PSE would be responsible for construction risks and risks associated with operating the transmission line. As described in the EIS, protection of the pipeline is the responsibility of Olympic Pipeline Company.

II107-B-1

Comment	Timestamp	First Name	Last Name
Where are only the studies in favor of energize eastside on the website? Why aren't opposing studies and opinions listed. Why isn't the Lockhart load flow study and others on the website? Why doesn't the city of Bellevue promote only one Puget Sound Energy and its foreign owners point of view? Is thd. It's objective? I want to see Puget sound energy revenue forecasts that include the guaranteed return on infrastructure investment and the return on energy sales outside of the Puget Sound service area.	7/6/2017 20:43:07	Kathleen	Sherman

II107-B -1 The project website includes documents that have been produced by the EIS Consultant Team for the project and documents that provide background information that the EIS Consultant Team relied upon. The Lauckhart/Schiffman report was not produced by the EIS Consultant Team, but was submitted with comments and was considered by the EIS Consultant Team. It is available on the [www.energizeeastsideeis.org](http://www.energizeeastsideeis.org) website.

The Energize Eastside EIS does not advocate for or against the project, but rather presents an analysis of potential environmental impacts from the proposed project and a range of reasonable alternatives.

Presenting data or analysis on the revenue from the project is outside the scope of the SEPA process.

II107-C-1

Comment	Timestamp	First Name	Last Name
The question needing an answer: why was it decided to NOT include nor analyze seismic hazards as outlined in Phase 1 Draft EIS and determined that they were less than significant and left out of the Phase 2 Draft EIS?	7/6/2017 21:05:58	Kathleen	Sherman

II107-C -1 See response to comment II20-A-3.

II108-A

COMMENT

RESPONSE

II108-A-1

<u>Comment</u>	<u>Timestamp</u>	<u>First Name</u>	<u>Last Name</u>
I believe that putting new transmission poles next to the aging pipeline is foolhardy, unnecessary and reckless.	7/6/2017 12:56:57	Linda	Taylor

II108-A -1 Comment noted.

COMMENT

RESPONSE

II109-A-1

Comment	Timestamp	First Name	Last Name
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I would like to comment of the EIS section of Plants and Animals. My comment also relates to the Historic and Cultural Resources. Let me start by expressing my amazement by how keen to go ahead with this project the city of Bellevue is; a project that will destroy thousands of trees, when the city has set a 40% tree canopy target. Beyond the obvious lack of need for this project, the EIS describes the tree removal process with graphs, charts, and numbers. There is a major component of this that is completely missed by the EIS. The trees of the city are our history and part of our culture. PSE is going to remove all these trees with no real consideration of how the trees are the cultural heritage of the people and residence of our city. They are not just vegetation and wildlife habitat. The trees define our well-being, and promote our quality of life. It you want to include numbers and charts, why not include numbers and charts from multiple studies that have proven causality between high canopy levels and increased health and well-being metrics? PSE seems to have no regard for anything else than the infrastructure of a project that defies technological advances in renewable energy resources and new statistics of energy demand. PSE should have no right to destroy our cultural heritage that these trees provide and that make our city and our region a special place to live.	7/6/2017 11:11:47	Maria	Vlachopoul ou
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Thank you,

Maria Vlachopoulou (CENSE member)

II109-A -1 Comment noted. See response to comment II109-B-1.

7/11/2017

Weebly Email Service Mail - Comment on Phase 2 Draft EIS



Energize Eastside EIS &lt;info@energizeeastsideeis.org&gt;

**Comment on Phase 2 Draft EIS**

1 message

maria v. &lt;mariaserios@hotmail.com&gt;

Thu, Jul 6, 2017 at 11:16 AM

To: "info@EnergizeEastsideEIS.org" &lt;info@energizeeastsideeis.org&gt;

Name: Maria Vlachopoulou (CENSE member)

Address: 14708 SE 15th Pl, Bellevue, WA 98007

Comment:

I would like to comment of the EIS section of Plants and Animals. My comment also relates to the Historic and Cultural Resources. Let me start by expressing my amazement by how keen to go ahead with this project the city of Bellevue is; a project that will destroy thousands of trees, when the city has set a 40% tree canopy target. Beyond the obvious lack of need for this project, the EIS describes the tree removal process with graphs, charts, and numbers. There is a major component of this that is completely missed by the EIS. The trees of the city are our history and part of our culture. PSE is going to remove all these trees with no real consideration of how the trees are the cultural heritage of the people and residence of our city. They are not just vegetation and wildlife habitat. The trees define our well-being, and promote our quality of life. If you want to include numbers and charts, why not include numbers and charts from multiple studies that have proven causality between high canopy levels and increased health and well-being metrics? PSE seems to have no regard for anything else than the infrastructure of a project that defies technological advances in renewable energy resources and new statistics of energy demand. PSE should have no right to destroy our cultural heritage that these trees provide and that make our city and our region a special place to live. I make this comment as a involved citizen who cares about our community and a CENSE member.

I1109-B-1

I1109-B -1 For purposes of the EIS, tree removal has been identified and evaluated as an impact on visual resources and as habitat. The visual resources analysis addresses policies that relate to neighborhood character. Trees do not fall within the definition of Historic and Cultural Resources as defined in this EIS (see the glossary in Chapter 11 of the Final EIS). As described in Section 3.4.6 of the Phase 2 Draft EIS, potential mitigation measures identify approaches to reduce the number of trees that would be removed and replace the trees where avoidance is not possible. Tree removal information presented in the Phase 2 Draft EIS represents a worst-case assessment because PSE could choose to trim or prune rather than completely remove trees in a manner that ensures compliance with NERC standards.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15d191e8a43815bb&siml=15d191e8a438...> 1/1

Comment	Timestamp	First Name	Last Name
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3.4.1.4 PSE Avian Protection Program	7/6/2017	Martha	Cross
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"PSE implements measures to minimize the effects of its transmission system on avian species through its Avian Protection Program, with particular emphasis on species protected under the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and the Endangered Species Act. The three primary mechanisms for harming birds are electrocutions, collisions, and problem nests (PSE, 2016b). In addition to the potential for harming birds, these incidences can cause power outages, fires, and other damage to the electrical system. Between 2009 and 2012, an average of about 1,500 bird or animal-caused outages occurred over PSE's entire distribution system. To improve system reliability and reduce wildlife impacts, PSE completes over 400 avian-safe system modifications each year system-wide and builds new facilities using avian safe standards. System modifications include adding safe perching structures, line markers, bird guards, perch discouragers, wire and equipment covers, and nesting platforms."

This is great! I additionally would like to know if in case of finding a nest of protected raptors (including Great Horned Owls, and Red-Tail Hawks) near existing or new corridors, it would be relocated with a nesting platform or nesting box for the owls.

3.4.3.2 Sensitive or Protected Fish and Wildlife  
 "As described in the Phase 1 Draft EIS (Section 6.4), the study area provides potential habitat for several bird, mammal, reptile, amphibian, and fish species protected by federal, state, or local environmental laws and regulations (e.g., federal or state listed endangered

II110-A-1

II110-A-2

II110-A -1 As part of PSE's Avian Protection Program (PSE 2016b), PSE would relocate bird nests that are protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. A brochure describing PSE's Avian Protection Program is available from PSE's website at [https://pse.com/aboutpse/PseNewsroom/MediaKit/4483\\_Avian\\_program\\_brochure.pdf](https://pse.com/aboutpse/PseNewsroom/MediaKit/4483_Avian_program_brochure.pdf). There is also a mitigation measure listed in the Phase 2 Draft EIS and Final EIS that describes the provision of nesting platforms in isolated areas away from power lines when nests need to be removed from power structures.

II110-A -2 Through the PSE Avian Protection Program, PSE implements measures to minimize the effects of its transmission system on avian species with particular emphasis on species protected under the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and the Endangered Species Act. See Section 3.4.1.4 in the Phase 2 Draft EIS for a description of PSE's Avian Protection Program.



Comment	Timestamp	First Name	Last Name
<p>terrestrial habitat would vary depending on the extent of the impact (how much area is affected), the recovery time for replanted areas, and if listed species, species of concern, or priority habitats are affected. However, typical maintenance activities associated with the No Action Alternative are expected to be infrequent (typically every 3 years) and of limited scale (typically trimming and isolated tree removal), which is expected to result in less-than-significant losses of habitat or species displacement.</p>			
<p>PSE's existing policy is to restore vegetation other than trees within transmission corridors using plant communities composed of low-growing native ferns and shrubs and small-scale native trees, particularly those that resist disease and insect infestations (PSE, 2014)."</p>			
<p>I also suggest planting a pollinator garden with wildflowers.</p>			
<p>3.4.5.1 Impacts Common to all Components                      Potential Impacts to Animals and Critical Habitat                      "Of the more than 5,400 trees that could potentially be removed, depending on the segment or option combination, about 340 of these trees (6 percent) occur in critical areas (primarily wetland habitat), and about 1,070 trees (20 percent) occur in wetland and stream buffer areas (Figure 3.4-8) (The Watershed Company, 2016c). This would increase the potential disturbance of these sensitive habitats and reduce the shading provided by the trees. These numbers are based on the strict application of PSE's vegetation management standards (see Section 3.4.1.2), and represent a conservatively high rate of tree removal. PSE has the</p>			

II110-A -4 PSE will be required to follow applicable regulations that protect critical areas. The removal of trees in critical areas would result in impacts to critical area functions. However, with mitigation, impacts would be less-than-significant. See Section 3.4.3.1 of the Phase 2 Draft EIS for the definition of less-than-significant and significant impacts. Appendix D in the Phase 2 Draft EIS lists the applicable critical areas regulations that will be followed. Mitigation measures are proposed in Section 3.4.6 of the Phase 2 Draft EIS and Section 4.4.6 of the Final EIS. The removal of trees would be limited to outside of the nesting season for birds protected under the MBTA. Also, see response to comment II110-A-2 regarding the MBTA.

II110-A-3

II110-A-4

II110-A-4

Comment	Timestamp	First Name	Last Name
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management flexibility of pruning rather removing trees where adequate clearance can be maintained. To the extent practicable, the number of trees removed from sensitive habitats would be minimized, and any removal would be mitigated as required by local critical area ordinances. With mitigation, the effects of impacts to critical areas would be less-than-significant."

This is not quite accurate. Nothing can mitigate the effects of impacts to critical areas; any loss of habitat would be significant to wildlife. The removal of several trees and old-growth trees in both critical and forested areas greatly affects ecosystems that thrive in this environment, and just like these trees, they won't be coming back.

If a project of this magnitude gets approved to be done in critical and forested areas during nesting season, one does not need to be a wildlife biologist to know that such project will have a quite significant impact in nesting birds. Since migratory and native birds are protected under the MBTA, would the removal of trees with active nests of protected birds under the MBTA during breeding season violate this treaty? This should be addressed.

Here is a link to an article I found on L.A. Times about the MBTA. "Tiny hummingbird egg stalls project to upgrade a Bay Area bridge"  
<http://www.latimes.com/local/lanow/la-me-hummingbird-bridge-20170131-story.html>

Finally, the North American bird population is greatly declining in part due to habitat loss. According to

II110-A-4

<b>Comment</b>	<b>Timestamp</b>	<b>First Name</b>	<b>Last Name</b>
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CENSE there is no need for this project; leave critical and forested areas for wildlife. I am a CENSE member, and I think that wildlife needs their habitat for survival more than we need to "Energize Eastside". If PSE really cares about the impact this project has on critical areas and their wildlife, please do not destroy them. There are other solutions. Thank you so much for your time.

Sincerely,  
Martha Cross

II111-A-1

Comment	Timestamp	First Name	Last Name
In section 3.10 of the Phase 2 EIS Draft, you review the economic impact of lost property tax revenue, cost of placement of underground transmission lines, and lost ecosystem services. You refer to the impact to the city but you do not refer to the economic impact to the PSE customers living in the affected areas. Your estimates of lost assessed value first uses an estimate of \$116,000 reduced value in each of the 86 adjacent homes in Newcastle. This would amount to a total impact of \$9.976 million. According to a study by Bottenmiller and Wolverton in 2013, homes in the Seattle area that abutted a high voltage transmission line had a 11.2% negative impact. This would be a total of \$57,000 reduced value per home based on the median Newcastle home value in 2014 shown in table 3.10-4. This would still amount to a total impact of \$4.9 million to Newcastle PSE customers. This impact does not include the devaluation of the homes that are close but not adjacent to the transmission lines. Those homes would also see an economic home devaluation as the towers are twice as tall as the existing poles. These impacts are certainly significant and are not detailed in the document.	7/6/2017 0:25:07	Tamra	Kammin

II111-A -1 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic ECON - Key Theme ECON-1. Also see response to comment II121-A-10.

The \$10 million shift in assessed value is an example round number that allows an understanding of how a shift of this magnitude might affect taxes in a jurisdiction. Using this example would translate to an average decline of approximately \$116,000 per residence for the 86 homes abutting the transmission corridor as a point of reference, not to infer that only the property values of homes immediately adjacent to the transmission line would be impacted.

7/6/2017

Weebly Email Service Mail - Energize Eastside Phase 2 Draft EIS - Public Safety Issues Unaddressed



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside Phase 2 Draft EIS - Public Safety Issues Unaddressed**

1 message

Suzanne Burnell <suzanneburnell@yahoo.com>  
 To: info@energizeeastsideeis.org

Wed, Jul 5, 2017 at 11:24 AM

Dear Ms. Bedwell,

As a Licensed Geologist and Hydrogeologist in State of WA with over 20 years of Environmental Consulting experience I am deeply concerned about the current inadequate attention to public safety in the PSE Energize Eastside Phase 2 Draft EIS.

The Energize Eastside project proposes to co-locate a PSE 230,000-volt power line with two existing high-pressure gas pipelines that run through the City of Bellevue and other Eastside cities.

The risk of a large earthquake in the Eastside and Puget Sound Region is well documented (see attached memo for detailed comments). In fact, the Energize Eastside Phase 1 Draft EIS specifically referred to this risk.

**Why is the PSE Energize Eastside project not required to address the most obvious public safety hazard: that of an earthquake causing downed power lines to arc into the shallow, co-located high pressure gas pipelines? Any resulting explosion from this scenario could potentially cause major damage and loss of life.**

Geologic seismic hazards clearly identified in the Phase 1 Draft EIS were conveniently dismissed in the Phase 2 Draft EIS without any substantive technical analysis.

**How is the absence of an evaluation of this high-risk Public Safety scenario acceptable to PSE, the City of Bellevue and other Eastside cities?**

Please enter this email and the attached memo (which contain additional comments) into the public record on the Phase 2 Draft EIS.

Thank you,  
 Suzanne Burnell, MSc  
 Licensed WA Geologist & Hydrogeologist

20130 106th Ave NE  
 Bothell, WA 98011

Burnell\_Public Comment\_Energize Eastside Phase 2 EIS\_July 5\_2017.pdf  
 387K

II113-A-1

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**DATE:** July 5, 2017  
**TO:** Heidi Bedwell, Energize Eastside EIS Program Manager, City of Bellevue  
**FROM:** Suzanne Burnell, MSc  
 WA Licensed Geologist and Hydrogeologist (L.G, L.HG)  
**RE:** Public Comment: Energize Eastside Phase 2 Draft EIS

Dear Ms. Bedwell,

I am writing to provide public comment on the Energize Eastside Phase 2 Draft EIS. As a Licensed Geologist and Hydrogeologist in Washington, with over 20 years of professional geologic and environmental experience, I provide the following comments:

**1.0. Earthquake / Seismic Risk to Public Safety Cannot Be Ignored or Dismissed**

In the first Chapter of the Phase 2 Draft EIS, Chapter 1.10 “**Elements of the Environment Not Analyzed in the Phase 2 EIS**”, 2<sup>nd</sup> paragraph entitled ‘Earth’ the statement is made: “...*Soils and geology were analyzed in the Phase 1 Draft EIS because seismic and geotechnical hazards (including ground shaking, liquefaction, landslides, coal mines and other hazards) are present throughout the area. However, impacts under all alternatives would be less than significant with regulatory compliance and implementation of industry standards, geotechnical recommendations and best management practices...*”

This Phase 2 Draft EIS conclusion that seismic and ground shaking “**impacts under all alternatives would be less than significant**” completely ignores the most obvious public safety hazard: an earthquake causing downed 230,000-volt power lines which would then arc into the Olympic Pipeline high pressure gas pipelines and ignite the gas. This scenario could potentially cause a massive explosion in a densely populated region.

The above referenced statement in Chapter 1.10 also is completely contradictory to statements made in the Phase 1 Draft EIS:

The Energize Eastside Phase 1 Draft EIS (Chapter 3.3.3.4) states: “...*The project vicinity has been subject in the historic past and will undoubtedly undergo shaking again in the future.*”

The Phase 1 Draft EIS also confirmed: (Chapter 3.4, 1<sup>st</sup> para. “...*Widespread power outages are expected throughout the Pacific Northwest, including the combined study area, from downed power lines or damage to substations as a result of an earthquake. Slope failure, soil erosion, etc. could also impact electrical infrastructure by causing downed power lines or other damage to infrastructure...*”

These Phase 1 Draft EIS statements are validated by numerous technical experts and agencies across the Puget Sound Region. Some of these experts and agencies include:

I1113-A -1 See response to comment I120-A-1.

I1113-A-1

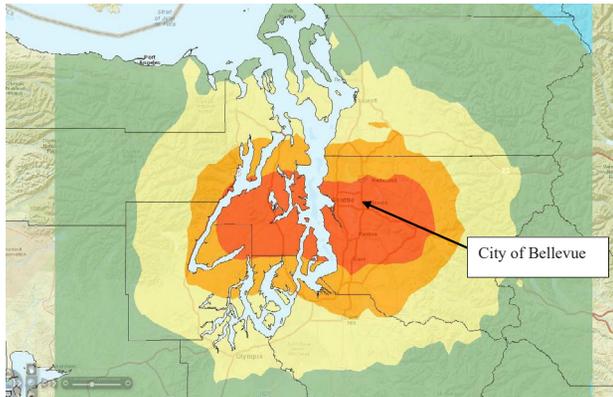
**DATE:** July 5, 2017  
**TO:** Heidi Bedwell, Energize Eastside EIS Program Manager  
**FROM:** Suzanne Burnell, L.G., L.HG  
**RE:** Public Comment: Energize Eastside Phase 2 Draft EIS

- Czajkowski, J. L.; Bowman, J. D., 2014, "Faults and earthquakes in Washington State: Washington." Division of Geology and Earth Resources, Open File Report 2014-05, 1 sheet, scale 1:750,000
- HAZUS-MH: *Earthquake Event Report*, 2011.
- City of Seattle. 2015. Emergency Management, *Earthquake Risks*. Available at <http://www.seattle.gov/emergency-management/what-if/hazards/earthquake>.
- CREW (Cascadia Region Earthquake Workgroup). 2013. *Cascadia Subduction Zone Earthquakes: A Magnitude 9.0 Earthquake Scenario*, update 2013.

**2.0. A Seismic (Earthquake) Hazard and Public Safety Evaluation Has Not Been Completed**

The risk of a large earthquake in the Eastside and Puget Sound Region is well documented (see Phase 1 Draft EIS, Chapter 3 and the above reference list). Figure 1 shows the estimated hazard zone from a magnitude 7.2 Earthquake.

**Figure 1:** Washington State Seismic Hazard Map, Seattle Fault, M7.2 (Magnitude 7.2) Scenario.



(Washington Department of Natural Resources, online map accessed June 6, 2017)

I1113-A-1

I1113-A-2

I1113-A -2 See response to comment I120-A-1 for information on seismic risks.

Additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS. Section 3.9 of the Phase 2 Draft EIS considered electrical interference risks related to corrosion, fault conditions, and arcing. As described in Section 3.9.1.4, PSE retained DNV GL (the author of the report "Criteria for Pipelines Co-Existing with Electric Power Lines") to develop a detailed analysis of risks and recommendations for the Energize Eastside project. This study ("A Detailed Approach to Assess AC Interference Levels Between the Energize Eastside Transmission Line Project and the Existing Olympic Pipelines, OLP16 & OPL20"), referred to in the EIS as the AC Interference Study, was used in preparing the analysis for the Phase 2 Draft EIS. The study included recommendations related to the design of pole locations, layout, and configuration to mitigate potential electrical interference-related impacts on the pipelines. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering design by PSE, as described in Section 4.9.8 of the Final EIS. The EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational. Those recommendations have been incorporated into the mitigation section of the EIS, with regard to arc distance.

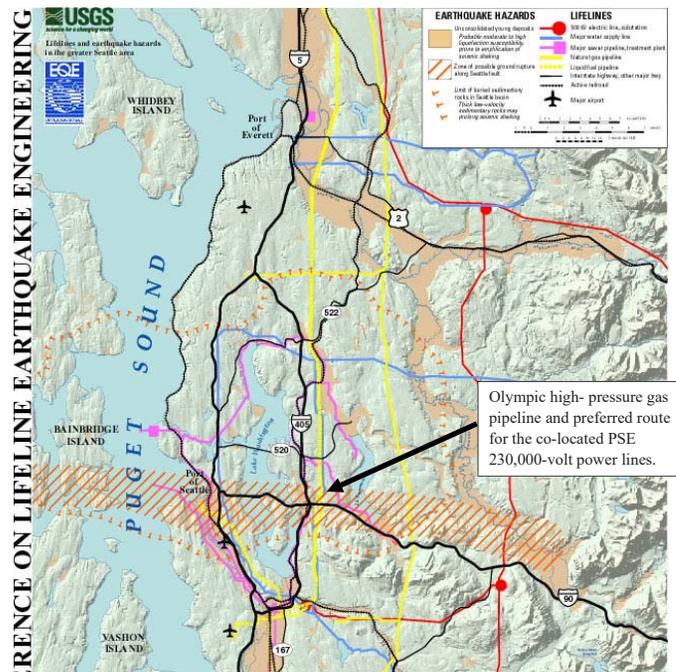
Even with the reasonable worst-case assumptions used in the risk assessment completed for the Phase 2 Draft EIS, the results of the assessment indicated there would be a small increase in total risk during operation. With the implementation of measures to mitigate potential risks described in Section 4.9.8 of the Final EIS, these estimated risks would be even lower. Both the DNV GL report and an independent, technical analysis completed by Stantec Consulting Services Inc. concluded that the pipelines and proposed transmission lines could coexist safely with proper engineering and safety precautions by PSE and Olympic. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipelines; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission lines and providing information to Olympic, the responsibility for protecting the pipelines from corrosion lies with Olympic.

Regarding the commenter's question about potential locations of pipeline damage, as is common pipeline safety risk assessment practice, the risk assessment summarized in the Phase 2 Draft EIS was

**DATE:** July 5, 2017  
**TO:** Heidi Bedwell, Energize Eastside EIS Program Manager  
**FROM:** Suzanne Burnell, L.G., L.HG  
**RE:** Public Comment: Energize Eastside Phase 2 Draft EIS

The 2006 United States Geological Survey (USGS) map (Figure 2) shows the Olympic high-pressure pipeline route (shown using the yellow dashed line immediately east of 405) which, under the preferred alternative, would be co-located with the PSE 230,000-volt powerlines. This pipeline and 230,000-volt transmission line cross the zone of potential ground rupture (shown in orange hash tags).

Figure 2: USGS Earthquake Hazards, 2006



completed for the alignment, and not for specific sites along the alignment. Given that it is not practicable to specify every situation along an 18-mile corridor, the EIS Consultant Team believes this is a reasonable approach to characterizing possible consequences of a pipeline incident in order to identify potential impacts of the project. However, specific sites and their characteristics will be the focus of the detailed engineering analysis and construction plans developed as part of the project design and the permitting process. See Sections 4.9.8 and 5.9.4 of the Final EIS for additional information on measures to mitigate operational and construction risks. As described in Section 4.9.8, PSE has committed to placing the ground wires to be at least 13 feet from the pipelines, and to conduct an analysis of each pole location in the final design to determine if additional grounding is necessary to avoid arcing risk.

**DATE:** July 5, 2017  
**TO:** Heidi Bedwell, Energize Eastside EIS Program Manager  
**FROM:** Suzanne Burnell, L.G., L.HG  
**RE:** Public Comment: Energize Eastside Phase 2 Draft EIS

In Chapter 1: “Introduction and Summary, Environmental Health / Pipeline Safety”, Page 1-29, there is no mention of public safety if downed electrical power lines arc causing shallow pipelines buried between 3-4 feet below ground surface to rupture, igniting the gas. The only pipeline safety issue addressed is the probability of damage to the pipeline and gas leakage into the environment.

However, Chapter 3, Section 3.9.5.4, “Arcing Damage” states: “...With a shield wire, the distance an arc can travel from a line fault (arc distance) is estimated to range from 4 to 13 feet under Alternative 1. This would pose a potential risk for pipeline damage at transmission pole locations where the electrical grounding rod might be less than 13 feet from the pipeline.”

My questions:

1. Where are these potential locations of pipeline damage based upon current design drawings?
2. Are any of these potential locations near any schools, colleges or residences?
3. Where is the risk evaluation and public safety assessment that has evaluated the risk of above-referenced arcing damaging a pipeline and causing a subsequent explosion?

Also, in the second paragraph in Chapter 3, Section 3.9.5.4, “Extreme Weather Events and Seismic Hazards”, the statement is made: “...If the overhead transmission lines were damaged during an extreme weather event or natural disaster, there could be risks to public safety if the poles fall and damage buried pipelines. Safety measures would be incorporated into the project design to address extreme weather and seismic conditions that occur in western Washington.”

My question:

1. What are these safety measures specifically? This section and many other sections quote general regulations, but provide no specific design statements. How are the referencing of general regulations that can't be verified providing concerned citizens with any concrete design information?

**3.0 Water Resources**

Table 3.3-1 (pages 3.3-4 through 3.3-7) summarizes all the streams that the transmission lines will cross. The Willows 2 route crosses 30 creeks, streams and rivers. Of these water courses, 60% are fish-bearing. No indication is given as to which streams contain salmon.

My questions:

1. Why have salmon-bearing streams and rivers not been identified?
2. Will salmon-bearing stream crossings be handled differently than other streams? What particular precautions will be put in place to ensure habitat and water quality are not negatively impacted.
3. How will sensitive streams and rivers be protected from soil erosion and other construction impacts?

II113-A -3 See response to comment II77-A-27. In addition, Section 4.9.8 of the Final EIS describes potential mitigation measures during the design stage of the project.

II113-A -4 The Willow 2 Option was not brought forward for additional analysis in the Final EIS as part of PSE’s Proposed Alignment. Type F streams are streams and waterbodies that are known to be used by fish (salmon, steelhead, and/or trout), or meet the physical criteria to be potentially used by fish. Many Type F streams have the potential to be salmon-bearing or have the physical characteristics to potentially be used by fish and are thus typed as if they do contain fish. Streams (both fish bearing and non-fish bearing) are protected under city critical areas regulations. Additionally, PSE would follow required best management practices to prevent erosion and other potential impacts to streams during construction (see Section 4.3.3 of the Phase 2 Draft EIS for potential mitigation measures that could be implemented during construction). Note: the City of Redmond uses a class system for streams; Class II streams are salmon bearing, or have the potential to be used by salmon.

All projects affecting surface waters in the state must comply with the provisions of the state’s Water Pollution Control Act. Additionally, if a federal Section 404 permit is required under the Clean Water Act, Ecology would also issue a Section 401 Water Quality Certification. See Section 5.2 in the Phase 1 Draft EIS for details.

II113-A-2

II113-A-3

II113-A-4

7/6/2017

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Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside Phase 2 EIS comments**

1 message

shmadonna@aol.com <shmadonna@aol.com>  
 To: info@energizeeastsideeis.org, eis@cense.org

Wed, Jul 5, 2017 at 4:40 PM

My name is Shannon Madonna, I live at 13711 NE 81st Street in Redmond, 98052. I am a member of CENSE.

II114-A-1

In evaluating the Energize Eastside Project, it is imperative to keep in mind the public interest. PSE and all cities from which permits will be requested have a mandate to place the best interests of all PSE ratepayers first when considering the following

- Is there a demonstrated need to increase electrical production in the affected areas?
- Does a 230kV transmission line best serve any demonstrated need, rather than non-wires alternatives (NWA), in terms of reliability, cost and environmental impact?
- Impact on public safety

Failure to place the public good ahead of any other considerations in approving or rejecting this project is a betrayal of trust and an abdication of duty.

BPA recently cancelled a project similar to Energize Eastside due to the cost of the project and lack of a demonstrable need. Per a recently published report by Navigant Research, non-wires alternatives, "address infrastructure needs at a lower cost with greater customer and environmental benefits".

II114-A-2

PSE has failed to demonstrate an actual need for such a massive increase in electrical production capabilities. In Section 1.3, page 1-4 of the Phase 2 EIS, the August 2003 blackout in the Midwest and Northeast is referenced as justification for such an increase. **This blackout was caused by a chain reaction initiated by a software bug, rather than lack of supply.** The leading cause of electrical outages in the PSE service area is trees falling on power lines during a storm. PSE admits that construction of a new transmission line will not decrease power outages. There is no data provided by PSE detailing increased electrical usage that would justify this project.

II114-A-3

PSE has yet to provide a cost estimate for this project. This is hardly surprising, since no route has been chosen, nor is there a final design. The one thing that can be determined with certainty is that the entire cost of this project will be borne by ratepayers.

Although I have concerns about this project regarding need and cost, my biggest concern with Energize Eastside is public safety. Chapter 3.9, pertaining to pipeline safety and potential ruptures of the Olympic Pipeline that runs through the PSE easement, does not deal adequately or realistically with the potentially catastrophic effects of a pipeline rupture during or after construction of the transmission line.

Chapter 4.9 of the EIS outlines a number of statistical probabilities that are not related to the specific circumstances of this project. Page 3.9-18 provides information about Hazardous Liquid Pipeline Failures and concludes that the risk for this project is low.

II114-A-4

Because the pipeline runs primarily through densely populated areas, the potential consequences of a pipeline rupture must be considered realistically. It is misleading and irresponsible to treat every mile of pipeline in the country as presenting an equal risk of rupture when evaluating these potential consequences. The risk presented by a stretch of pipeline in a rural, seismically stable area can in no way be considered as equivalent to the risk of the same length of pipeline running through a densely populated area with schools and residences, located in an area with slopes and unevaluated soil instability caused by heavy rains and seismic activity.

**The risk evaluation for this project should be focused on the consequences of a pipeline rupture, rather than the statistical probability of such a rupture. The consequences of a rupture near one of the schools located along the transmission line route, or in any heavily populated neighborhood, would be catastrophic. Because of the degree of human activity along much of the 18 mile transmission line route, the risk of a pipeline rupture is very real.**

II114-A-5

The diagram on page 3.9-29 shows a circle with a radius of 113' as an example of the extent of potentially fatal impacts due to a pool fire caused by a fuel leak. The EIS states that this figure is based on a number of reasonable assumptions and data inputs, but does not state what these assumptions and data inputs are.

II114-A -1

As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ"). SEPA does not require that an EIS determine what it is in the interests of ratepayers or in the public interest. Each City has different permit approval criteria in its adopted land use code and take into account the public interest. Because the project does not involve increased electrical production, the need for increased production would not be a consideration for this project.

II114-A -2

As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

II114-A -3

See response to comment II6-A-2 for information about project cost and how the cost will be applied to ratepayers. The specifics of the design would be determined during the local permitting process. The Phase 2 Draft EIS covers details of the project as it was known at the time of publication and reflects information based on the early stages of design. Project design has been refined and is included as part of this Final EIS. PSE's Proposed Alignment (which is similar to the route of the Willow 1 Option as analyzed in the Phase 2 Draft EIS) is described in Chapter 2 of the Final EIS, and includes more site-specific information on the route, pole types, pole locations, and vegetation clearing requirements. The Partner Cities and the EIS Consultant Team believe the information provided is adequate for evaluating potential impacts under SEPA.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d1520a726bc9f2&siml=15d1520a726bc...> 1/2

I1114-A -4 The purpose of a risk assessment is to identify, describe, and estimate risk, in recognition of the potential hazards and with a focus on describing risk in terms of consequences (severity of a pipeline incident) and the likelihood of occurrence. The risk assessment used available information and reasonable worst-case assumptions to provide a reasonable examination of this risk to help the public and decision-makers understand potential impacts.

As described in Section 3.9.5.1 of the Phase 2 Draft EIS, the baseline data (frequency of incidents) used in the pipeline safety risk assessment was developed using available national data. These data do not differentiate between incidents that occurred in densely populated areas vs. sparsely populated areas. However, population density was considered in the consequence analysis in determining societal risk. While the EIS presented the consequences for a "maximum" population density area (based on the most dense Census tract along the alignment), the risk assessment included in Appendix I-5 of the Phase 2 Draft EIS considered three different population densities. The results varied significantly, from zero fatalities for a minimum population density of 568 persons per square mile to 17 fatalities for the maximum population density of 23,169 persons per square mile. Population density is not a factor in the calculation of individual risk. As defined in the EIS, individual risk was determined for the maximally exposed individual; in other words, it assumed that a person was present within the potential impact area of the pipeline continuously - 24 hours per day, 365 days per year. See the Pipeline Safety Technical Report (Appendix I of the Phase 2 Draft EIS) for more information.

Based on comments received on the Phase 2 Draft EIS, additional qualitative discussion of possible pool fire scenarios resulting from a pipeline rupture has been included in Final EIS; see Section 4.9.5 of the Final EIS.

I1114-A -5 See response to comment I130-A-4 for information on how the pool fire was estimated for the Phase 2 Draft EIS pipeline safety risk assessment.

Potential effects on public services, including emergency response, are described in Section 15.5 of the Phase 1 Draft EIS. The Phase 1 Draft EIS found there would be no unavoidable significant adverse impacts to public services due to construction or operation of the Energize Eastside project. Mitigation measures can limit but cannot eliminate the risk of a catastrophic release and fire on the pipelines, which is possible under both the No Action Alternative and any of the action alternatives. Some of the risk of pipeline release is attributable to proximity to transmission lines, both existing and proposed, as described in Section 3.9 of the Phase 2 Draft EIS. This low probability/high consequence risk is considered a potential significant impact because it could exceed the capacity of available resources should such an event occur in any of the affected communities.

Mitigation measures for impacts to public services are included in Section 15.7.2 of the Phase 1 Draft EIS to minimize impacts on response times, including requiring the contractor to prepare “maintenance of traffic” plans for any work within the public right-of-way. Emergency response personnel are trained in proper response protocol and procedures to ensure their safety and the public’s safety when responding to incidents. The Phase 2 Draft EIS provides additional information on protections in place to prepare for and respond to an incident along the Olympic Pipeline (see Section 3.9.2.2). Measures to minimize the potential for pipeline incidents that could occur as a result of construction or operation of the project are included in Sections 4.9.8 and 5.9.4 of the Final EIS.

In the event of a pipeline release, Olympic would follow its normal protocol, which would include reporting to appropriate state and federal authorities for coordination with emergency responders. While on-site personnel may clear the immediate area, any broader evacuation order would be issued by local emergency responders in accordance with adopted emergency response plans. A review of evacuation plans included in emergency response plans is outside of the scope of the EIS process.

7/6/2017

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II114-A-5

The EIS does, however, go on to say that the figure does not take into account factors such as hilly terrain, waterbodies or catch basins, which may cause the fuel to spread further away from the release site. The figure also does not take into consideration vegetation or structures which might catch fire and cause the fire to spread further. Even if a spill does not result in a fire, the spilled fuel in and of itself can result in adverse health effects to humans and wildlife.

According to the 2012 Emergency Response Guidebook, Guide 128, the evacuation radius for a petroleum pipeline spill is based on 100 feet per inch diameter of the pipeline. For the Olympic pipeline, this would yield an evacuation radius of 1600 to 2000 feet from the spill. No comparable evacuation radius information is provided in the EIS.

II114-A-6

Page 3.9-30 states that pipeline carrying gasoline, jet fuel and diesel fuel generally do not explode, and that as a result, explosions are not described any further in that chapter. **On October 31, 2016, however, the Colonial Pipeline was struck by a track-hoe, causing a significant explosion and a fire that burned 31 acres.**

Causes of pipeline ruptures include:

- Corrosion - Two studies by DNV-GL indicate that proximity to high voltage lines carries increased risk of pipeline corrosion. This issue does not appear to be addressed in the EIS.
- Weld failures – weld failures can occur years after a repair is done, as in the 1999 Bellingham pipeline explosion
- Hitting pipes during construction

II114-A-7

The chances of a rupture of the Olympic pipeline during or after construction of a new transmission line may be small. The potential consequences of a fuel spill, fire or explosion resulting from such a rupture are terrifying. The extent of existing weakness or damage to the pipeline caused by corrosion, previous construction accidents or shifting from seismic activity, such as the 2001 Nisqually earthquake, or heavy winter rains is unknown.

Given the unknown costs of Energize Eastside, uncertain need for such an increase in production and public safety concerns, this project should be rejected in favor of safer and more cost effective non-wires alternatives.

Respectfully,

Shannon Madonna  
425-802-1873

II114-A -6

In the context of the pipeline safety risk assessment, the potential risk to human life is evaluated. Outdoors, an explosion overpressure level of 2.4 pounds per square inch (psi) is necessary to cause mortality for 1% of the exposed population. The explosion impacts from the pipelines were modeled using refined petroleum products, medium fuel reactivity, and low obstacle density. The resulting peak overpressure was 0.38 psi. Although this is sufficient to result in window breakage, it is not high enough to pose potentially fatal risks to the public. As described in Section 3.9.4 of the Phase 2 Draft EIS, pool fires are the biggest concern for the Olympic Pipeline system and are evaluated in the risk assessment to estimate mortality risks for the Energize Eastside project.

The Colonial pipeline incident resulted in one fatality (a pipeline construction worker); however, the incident occurred in sparsely populated rural Alabama. The peak overpressure level from the Colonial pipeline incident was likely similar to that modeled for the Energize Eastside corridor. Although the National Transportation Safety Board (NTSB) report has not yet been published, it is likely that the pipeline operator died as a result of burns, not the explosion. It is also possible that the explosion occurred on the inside of the pipeline, resulting in much higher overpressure levels, which could have proved fatal. (The pipeline was being cleaned at the time of the incident.) The potential for an explosion under similar circumstances along the transmission line corridor would be the same under both the No Action Alternative and Alternative 1.

II114-A -7

The three causes of pipeline ruptures cited by the commenter were considered in the pipeline safety risk assessment conducted for the project-level EIS. See Section 3.9 of the Phase 2 Draft EIS. See also the Pipeline Safety Technical Report in Appendix I-5 of the Phase 2 Draft EIS for more information on how all causes of pipeline incidents were considered in the risk assessment. It was determined in the risk assessment that the probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.

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Energize Eastside EIS <info@energizeeastsideeis.org>

**Energizer Eastside EIS**

1 message

Keith K <keithgk@outlook.com>  
 To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

Wed, Jul 5, 2017 at 11:03 PM

Heidi Bedwell  
 Environmental Planning Manager  
 City of Bellevue  
 Development Services Department  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

II115-A-1

I want to present my opposition to the two bypass routes being considered for the Engergizer Eastside transmission project that were added a year ago at the end of the public review process in May 2016 by Puget Sound Energy (PSE). These late route additions were added at the end of a previously two and half year public review process for the Energize Eastside Project with only a 60 day comment period during the summer months last year.

II115-A-2

With the additional supporting documents in the EIS, it better illustrates the major long-term damage that these bypass routes would cause the multiple city neighborhoods that are bisecting this new transmission "corridor" in an urban environment as well as significant impact to the key natural areas left within the City of Bellevue but is still missing some key considerations.

II115-A-3

- This route would affect several current and future neighborhoods as the routes "winding through" the Spring District (framing the 130th Eastside Link station), Bel-Red, Wilburton as well as the Bellevue's natural areas including Wilburton Hill Park, Kelsey Creek Park Lake Hills Connector and Bel-Red Mini-Park.

II115-A-4

- Bypass Option 1 would have the highest number of trees removed per acre out of all the segments and options (About 1,790 trees) which the EIS does not quantify this cost.
- Elimination of tree line streets, which helps makes Bellevue a livable city, along the entire bypass route to maintain the required clearance of 20 feet.

II115-A-5

- Elimination of several natural vistas including tree lined westbound Bel-Red Road, City views from East Bellevue and Downtown views looking east.

II115-A-6

- The safety considers of placement of high voltage lines within 25 feet of existing housing along Bel-Red Rd and Lake Hills Connector that can swing 12 feet vertically in the wind is not addressed in the EIS

II115-A-7

- Increase cost of construction of a non-tangent route along and over urban streets that be result in an ongoing rate burden for PSE customers was not addressed in the EIS which will require up to 66% more transmission line length compares to the other alternatives.

II115-A-8

- The by-pass routes would locate 50-61 transmission poles that would cross Bellevue streets 13-14 times including one block that will have transmission lines on both sides of the street with the current SCL transmission line on one side and the new route on the other is not covered in the EIS.

II115-A-9

- The ground level impact of new poles, potentially 5-6 feet in diameter at the base, is not addressed sufficiently in this EIS which include termination poles and poles where the transmission

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II115-A -1

The Bellevue Central Segment Bypass Option routes were analyzed in the Phase 2 Draft EIS. The routes, however, were not brought forward for additional analysis and are not part of PSE's Proposed Alignment, as presented in the Final EIS. It is correct that the Bypass Option routes were added at the end of the Phase 2 Draft EIS public scoping comment period, which is why the lead agency reopened the scoping comment period to provide the public with an extended opportunity to comment. Please see the Scoping Comment Summary Report, Part 2 on the EIS project website at [www.EnergizeEastsideEIS.org](http://www.EnergizeEastsideEIS.org) for more information.

II115-A -2

Comment noted. Please note that the Bypass Options as evaluated in the Phase 2 Draft EIS have not been brought forward for additional analysis in the Final EIS.

II115-A -3

It is correct that Bypass Option 1 would result in the removal of approximately 1,790 trees. Section 3.10.4.3 of the Phase 2 Draft EIS states that Bypass Option 1 would result in the largest losses in ecosystem services. The quantified costs are described by option combination in Table 3.10.7 of the Phase 2 Draft EIS. Please note that the Bypass Options have not been brought forward for additional analysis in the Final EIS; PSE's Proposed Alignment, as evaluated in the Final EIS, is entirely within the existing corridor.

II115-A -4

Options that follow streets, in particular where there were no existing transmission lines, would result in the removal of trees along these streets. These options include Bypass Option 1 and Bypass Option 2, as well as Oak 1, Oak 2, and Willow 2. Refer to Sections 3.4.5.6 and 3.4.5.7 of the Phase 2 Draft EIS for a discussion of trees removed associated with the Bypass Options. However, the Bypass Options as presented in the Phase 2 Draft EIS were not brought forward for additional analysis in the Final EIS. PSE's Proposed Alignment, as analyzed in the Final EIS, is entirely within the existing corridor and thus would not follow tree-lined streets. See Section 4.4. of the Final EIS.

- II115-A -5 Under the Bypass Options, tree removal would occur along Bel-Red Road, which is inconsistent with the Bel-Red Subarea Plan. Both Bypass Options as analyzed in the Phase 2 Draft EIS would result in significant adverse aesthetic impacts (see Section 3.2.5.8 of the Phase 2 Draft EIS). Views from Downtown Bellevue looking east would not experience significant scenic view or aesthetic impacts due to the topography, distance, and visual separation created by I-405. There are locations east of the Bypass Options where wires would cross views of Downtown Bellevue under those options (see Figure 3.2-13 of the Phase 2 Draft EIS). However, the degree of obstruction would be minimal. Please note that the Bypass Options have not been brought forward for additional analysis in the Final EIS; PSE's Proposed Alignment, as evaluated in the Final EIS, is entirely within the existing corridor.
- II115-A -6 For structures in the vicinity of high capacity transmission line, PSE will design the transmission system to be in compliance with NESC guidelines, which are summarized in Section 3.1.1.1 of the Phase 2 Draft EIS. Please note that the Bypass Options as evaluated in the Phase 2 Draft EIS have not been brought forward for additional analysis in the Final EIS.
- II115-A -7 See response to comment II6-A-2.
- II115-A -8 The Bellevue Central Segment Bypass Option routes were analyzed in the Phase 2 Draft EIS. The routes, however, were not brought forward for additional analysis and are not part of PSE's Proposed Alignment, as presented in the Final EIS. The transmission lines would cross under the existing SCL lines in one location in the Bellevue Central Segment Bypass Option routes. The Oak 2 Option does include a portion where both the project transmission lines and the SCL lines would be present for a span of 124th Ave SE. For this section, the presence of the SCL line already contributes to the more dominant utility presence in the aesthetic environment, and therefore the visual impacts were considered less than significant.
- II115-A -9 See response to comment II20-B-3.

7/6/2017

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I1115-A-9

line changes direction need to be larger than tangent poles to handle the asymmetrical weight and tension from the lines they are holding is not fully detailed.

- Double crossing of existing City of Seattle high transmission lines at two points along 124<sup>th</sup> Ave NE that will require even taller transmission poles to safely clear these existing lines (13 story tall transmission poles being recommended to the existing lines.) is not adequacy addressed in the EIS.

I1115-A-10

Please carefully consider each of the significant deficiencies in the EIS outlined above that even alone would have a major impact and collectively override the selection of this route for this project.

Keith Krist  
12117 Bel-Red Rd  
Bellevue, WA 98005

 Engergize\_Eastside\_Bellevue\_BypassRoutes.pdf  
527K

I1115-A -10 The crossings of the SCL line along 124th Ave NE were described in the Phase 2 Draft EIS (see Section 2.1.2.2 and page 2-29), and the potential impacts of increased pole heights up 130 feet were evaluated in the scenic views and aesthetic environment section (see Section 3.2.5.6 and 3.2.5.7). Please note that the route followed by PSE's Proposed Alignment as evaluated in the Final EIS does not include these crossings.

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7/6/2017

Weebly Email Service Mail - Energize Eastside EIS Comments for Phase 2 Draft EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS Comments for Phase 2 Draft EIS**

1 message

**Kathy Judkins** <kathy.judkins@gmail.com>  
To: info@energizeeastsideeis.org

Wed, Jul 5, 2017 at 11:40 PM

From: Kathy Judkins  
4324 136th PI SE  
Bellevue, WA 98006  
CENSE member

II116-A-1

My home is located on a PSE and Olympic Pipeline easement off SE 44th in Somerset. I have lived here for 33 years. Two wood poles are on my property line in close proximity to the Olympic Pipeline. These poles and lines were replaced about 8 years ago so stating that nothing has been done in 50 years is wrong. The only access to my home by car is using this easement which dead ends at the house next door to me. I am greatly concerned regarding how I will access my home during construction and also what damage large trucks and equipment will do to the paved road on the easement which has the Olympic Pipeline underneath. My safety from the Pipeline being damaged is also a great concern to me and my neighbors.

II116-A-2

My view will not be affected but my property value will be affected along with my safety. All homes above mine will have their view ruined in my opinion. The house next door at 4316 sold six months ago with only one offer. This beautiful home was remodeled and has a gorgeous view. The real estate agent told me that everyone who looked at it stated their fear of the Energize Eastside project so no multiple offers. It sold to the one offer they received at the asking price. Every other home in Somerset is selling with multiple offers and most for more than the asking price.

II116-A-3

My driveway could be destroyed to install 5 to 6 foot diameter bases for the steel poles. The EIS shows one set of poles but due to the Olympic Pipeline there must be two more poles across the easement on Stan and Cheryl Huang's property. My fence and my neighbor Kelly Xu at 4332 will have her fence removed. A very old and tall Arborvitae is tagged for removal. I lost another one when PSE replaced the wood poles. It fell across my driveway the week after PSE replaced the poles.

II116-A-4

I have solar panels and all LED light bulbs as do many others in Somerset. Energy use is down and this project should be done with batteries and not 75 foot plus steel towers that even downtown Bellevue and Mercer Island residents will see.

II116-A-5

Finally, two weeks ago Energize Eastside left a two page door hanger on my and my neighbors doors on my street. Keri Pravitz office called twice. A field study was to be done last week at my home and others on this easement. They were to knock and state their presence plus paint on the areas in question. I was not to remove the paint. I have artificial grass which was very expensive. I left a notice on my door stating that they were not to mar my grass with paint. No one showed up at my home or my other neighbors the entire week. No one came so far this week either. The money PSE is spending on printing, mailing, delivering door hangers, paying for surveys etc. is astounding. Plus all of our PSE bills will be much higher for years to pay for this unnecessary project. These communications from Energize the Eastside are very upsetting and then they don't arrive.

Please listen to CENSE and find a better way. We have proved to you and Energize Eastside that there are better ways to do this project. I do not feel that we are being heard or listened to.

Regards,

Kathy Judkins  
Sent from my iPad

II116-A -1

Access to individual parcels and adjacent land uses will be maintained during construction. The pole replacement referenced in the comment was considered routine maintenance and did not involve any upgrades to the voltage capacity of the transmission lines. For a discussion of pipeline safety and potential mitigation measures to prevent damage to the pipeline, see Section 3.9 of the Phase 2 Draft EIS. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.

II116-A -2

The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1.

II116-A -3

Access to individual parcels and adjacent land uses will be maintained during construction. PSE will work with individual homeowners to discuss construction access and potential tree removal to identify opportunities to minimize impacts associated with the project. For additional information, see Section 5.1.2 of the Final EIS.

II116-A -4

Please see response to comment II120-A-1.

II116-A -5

Comment noted.

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7/6/2017

Weebly Email Service Mail - Energize Eastside EIS/Phase 2 Draft EIS Comments



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside EIS//Phase 2 Draft EIS Comments**

1 message

**Vestal, Jo** <jvestal@williamskastner.com> Wed, Jul 5, 2017 at 3:43 PM  
 To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>  
 Cc: "Vestal, Jo" <jvestal@williamskastner.com>

Please accept the following comments:

- II117-A-1 | There have been significant developments on a number of fronts since PSE assessed the need for this project. The impact of these developments on the need for the project should be re-evaluated before going forward with this very costly, environmentally unfriendly and possibly unnecessary project.

Microsoft is one of PSE's largest customers. It has at least 10 million square feet of office space in Bellevue and Redmond for which it needs electricity, not to mention the electricity Microsoft requires to run their programs and provide services to their customers. Recently Microsoft announced it will get its electricity elsewhere from a greener source, not from PSE. What impact does this have on PSE's projection of ever increasing demand for its electricity in this area? I understand that a number of PSE's other large users have decided or are deciding to cease obtaining their electricity from PSE and obtain it from greener sources.

The impact of these new decisions by these large electrical users to go elsewhere for electricity and consequent significant lessening of demand for PSE electricity in this region should be factored into the determination of whether there is any need for PSE's proposed project.
- II117-A-2 | Additionally, recent developments in energy storage and reductions in cost should be reconsidered as they would seem to provide alternatives to undertaking this extremely disruptive and environmentally insensitive project.
- II117-A-3 | I am also concerned about the environmental and aesthetic impact of cutting down the number of trees that apparently will be required for this project.
- II117-A-4 | I am also concerned specifically about the Willows Option and do not agree with the conclusion that it would not result in significant adverse impact, particularly in the aesthetic environment. As the Phase 2 Draft EIS reports, Somerset is an area with "higher visual sensitivity." Residents of Somerset have designed and oriented their homes to focus on the incredible scenic views over Lake Washington to downtown Seattle and out to the Olympic peninsula and its mountains with snow-capped peaks. They have undergrounded all electrical lines (except the existing PSE corridor), have landscaped their property to enhance their views and to deal with this existing condition. Residents of Somerset have all agreed to abide by legally enforceable covenants not only protecting their views from encroachment, but also prohibiting them from taking action that would encroach on their neighbors' views. Now PSE is proposing its expansion to take action which is clearly antithetical to the values of all Somerset residents as reflected in their covenants. PSE proposes to almost double the height and increase the circumference of the poles which support the transmission lines (See Figure 3.2 – 19, KVP 13 showing Somerset Drive with existing pole height of 44 feet vs. proposed pole height of 85 feet.) This would be extremely disruptive and would impact anyone in Somerset east of the transmission corridor with a scenic view to the west and not just those 200 – 400 feet east of the transmission corridor as claimed by the Draft EIS. It is also apparent, from Figure 3.2 – 19 KVP 13 that PSE is proposing not just to use taller poles, but also to reconfigure the transmission lines superstructure so that there is increased view blocking structure.
- II117-A-5 | In Willow 2 option, PSE is proposing to create a corridor through Factoria and Coal Creek Parkway for one transmission line formerly going through Somerset, but to utilize the corridor through Somerset for the other transmission line. This makes no sense. If PSE is going to create a new corridor through Factoria, where they report low viewer sensitivity, for one line, why don't they just reroute both of the lines which currently go through Somerset through Factoria? This would avoid the significant adverse impact to Somerset scenic views in this area of high visual sensitivity, and instead route both lines where there is low viewer sensitivity.
- II117-A-6 | Finally, while PSE has recently come out with an inventory of trees that will be impacted, it is impossible from what we have been provided to assess the aesthetic impact of what could essentially be a clear cut of trees close to the power line corridor. In Bellevue we particularly value our trees for environmental and aesthetic reasons and cannot allow PSE to create a scar of clear cut or disfigured trees running through the city. If trees need to be impacted, it must be done by an arborist with the goal of preservation of our beautiful and environment sustaining trees.

Josephine B. Vestal

Address: 4433 – 137<sup>th</sup> Avenue SE

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d14ec48c00c697&siml=15d14ec48c00...> 1/2

- II117-A -1 | As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").
- II117-A -2 | See response to comment II15-A-2.
- II117-A -3 | The option-specific estimates for tree removal are incorporated into the Phase 2 Draft EIS analyses for scenic views and aesthetic environment (Section 3.2), water quality (Section 3.3), plants and animals (Section 3.4) and greenhouse gas (Section 3.5). The ecosystem services provided by trees were also evaluated in Section 3.10.
- II117-A -4 | The Phase 2 Draft EIS states that the Willow 1 Option would result in significant adverse impacts to the aesthetic environment (see Section 3.2.5.11 of the Phase 2 Draft EIS). However this has not changed with design refinements provided for PSE's Proposed Alignment as analyzed in the Final EIS (see Section 4.2). It is correct that the poles would be taller (by approximately 20 feet in the Somerset neighborhood) and wider (1.5-4.5 feet more in diameter than existing conditions) (see Section 4.2.5.6 of the Final EIS). All other options evaluated in the Phase 2 Draft EIS were not brought forward for analysis in the Final EIS. The Somerset covenant language is considered in the Phase 2 Draft EIS analysis as it has created a unique neighborhood character through height restrictions (see Section 3.2.5.9). The 200 to 400 feet of potential scenic view impacts was determined based on a GIS analysis that identified locations where new scenic view obstruction could occur (See Figure C-6 in Appendix C of the Phase 2 Draft EIS). An updated scenic view impacts analysis was conducted for PSE's Proposed Alignment that used revised maximum pole heights. However, it was still determined that a less-than-significant impact to scenic views would occur (see Section 4.2.5.6 of the Final EIS).

7/6/2017 Weebly Email Service Mail - Energize Eastside EIS/Phase 2 Draft EIS Comments  
 Bellevue, WA 98006  
 E-mail: [jvestal@wkg.com](mailto:jvestal@wkg.com)

**Josephine B. Vestal**  
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 WASHINGTON OREGON ALASKA

II117-A -5 The Phase 1 and Phase 2 Draft EISs explored a range of reasonable alternatives, as required by the SEPA process. The Willow 2 Option was explored in the Phase 2 Draft EIS because much of the existing corridor travels through residential areas, and the residents expressed concern about the aesthetic impacts in the area. Therefore, PSE developed alternate routes to explore the potential to expand the lines beyond the existing corridor. The routes chosen were in areas that were more commercial than the existing corridor and which already had utilities, including transmission and distribution lines. Please note that the Willow 2 Option, as presented in the Phase 2 Draft EIS, was not brought forward for additional analysis in the Final EIS; PSE's Proposed Alignment, as analyzed in the Final EIS, is entirely within the existing corridor.

II117-A -6 The tree inventory was conducted by The Watershed Company. The results of the inventory were included in the scenic views and the aesthetic environment assessment (see Section 3.2.5 of the Phase 2 Draft EIS).

As stated in Section 3.4.5 of the Phase 2 Draft EIS, the number of trees removed could be lower than the estimates provided because PSE could choose to trim or prune rather than completely remove trees in a manner that ensures compliance with NERC standards. Therefore, the estimate represents a worst-case assessment. Tree removal estimates have been updated in the Final EIS for PSE's Proposed Alignment. It is estimated that 3,600 trees would need to be removed or pruned (see Section 4.4 of the Final EIS).

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4649 137<sup>th</sup> Ave NE  
Bellevue, WA 98005

July 5, 2017

City of Bellevue, Development Services Department  
Attn: Heidi Bedwell, Environmental Planning Manager  
P.O. Box 90012  
Bellevue, WA 98009-9012

Dear Ms. Bedwell,

II118-A-1

I am attaching to this email written comments in response to the Phase 2 Draft EIS for the PSE "Energize Eastside" project. I would like to thank the City for extending the deadline for these comments, allowing people to have more time to review the lengthy DEIS document.

II118-A-2

We live in the Trails End division on the east side of Bridle Trails park. The PSE easement designated as the route for this project passes through our back yard, as does the Olympic Pipeline, which overlaps the PSE easement. I would like to say that when we bought this house in 2004 that we obviously accepted the fact that these two easements passed through our yard, however, we never expected the existing lines on wooden poles would be replaced by the massive industrial power poles that PSE is proposing.

II118-A-3

In our opinion, the aesthetic and visual impact of the project has been grossly understated in this DEIS. But while this is our opinion, I am more concerned about the methodological inadequacies of objectively measuring the visual impacts of this project – not just in our neighborhood, but along most of the proposed route. Although I am not an expert, it is clear there is a fundamental lack of rigor in assessing the aesthetic and visual impacts, seemingly with the intent of finding most of these impacts as "less than significant" in order to push the project through. I have provided specific details outlining these inadequacies and suggestions for correcting them.

II118-A-4

We have other concerns as well, including lack of evidence or transparency about the need for this project, safety concerns with co-locating the high voltage lines with a jet-fuel pipeline, and the impact on wildlife in our densely-wooded neighborhood. But I believe many of these concerns have been raised by other neighbors and by CENSE, of which we are members.

Thank you for receiving our comments. I will be happy to discuss them further if they need clarification or if you or your colleagues would find that useful.

Best regards,

Deron Ferguson (CENSE member)  
[email serves as signature]

- II118-A -1 Comment noted.
- II118-A -2 Comment noted.
- II118-A -3 See response to comment II90-B-4.
- II118-A -4 Comment noted. For more information regarding concerns about co-location with the Olympic Pipeline system, see Section 3.9 of the Phase 2 Draft EIS; and for more information on the potential impact to wildlife, see Section 3.4 of the Phase 2 Draft EIS. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Project Objectives Topic).

**1. Presentation of project need and analysis of alternatives is insufficient**

EIS document location: Page 1, last paragraph:

*"Based on federally mandated planning standards, PSE's analysis found that the existing transmission system could place Eastside customers and/or the regional power grid at risk of power outages or system damage during peak power events that typically occur in cold or hot weather as early as the summer of 2018 (PSE, 2017). PSE's analysis concluded that the most effective solution was to add a 230-to-115 kV transformer within the center of the Eastside to relieve stress on the existing 230-to- 115 kV transformers that currently supply the area."*

**Comment:**

The reference cited in this paragraph (PSE, 2017), referring to PSE's analysis of alternatives for the project, does not appear to be listed in the References section of the DEIS. Documents posted on the Energize Eastside website only relate to the needs assessments for the project and do not discuss alternatives to a transmission line for responding to periods of peak electricity demand. For example, battery storage is a technology that is successfully being used right now in Southern California, enabling the utility there to not only respond to peak demand, but to use *lower cost* energy stored during periods of surplus supply to satisfy the demand, a practice known as "peak shaving," which ultimately saves money for customers. There is no assessment of battery storage or any alternative other than a transmission line presented either in this DEIS or in the Energize Eastside publicly available documents.

One may argue that this is not an issue relevant to the DEIS for commenting. However, it *is* relevant, because we are asking stakeholders (including eastside residents) to accept what amount to be subjective judgments about the aesthetic, visual and other non-quantifiable impacts for the project. The understanding of the need for this industrial grade powerline through our residential areas cannot be separated from perceptions about its impact. If I, as an impacted resident, have a high degree of confidence that building this powerline is the only way for the utility to reliably supply enough power to the eastside, then I will perceive the visual impact of a 100-foot industrial power pole differently than if I were skeptical about the need for the project or whether all alternatives were adequately explored.

**Request:**

This DEIS needs to provide a summary of the analysis of alternatives to the powerline, including cost figures and technical comparisons that make it clear the powerline is the only practicable alternative. To demonstrate the need, provide a time series chart indicating actual power consumption in the eastside since the year 2000 and include additional series depicting the forecasted levels of demand for recent forecast years (the last 4 forecasts would be sufficient). Provide a table indicating the forecast confidence intervals (forecast minima and maxima) by year and errors from actual consumption, so that stakeholders can form some understanding of accuracy of the forecasts underpinning the need for this project.

II118-A -5 The cited source is listed in the Phase 2 Draft EIS References chapter, on page 8-2 (as PSE 2017).

II118-A -6 See response to comment II120-A-1.

II118-A -7 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see Topic OBJ).

II118-A-8

If an analysis of alternatives to the powerline has not been done, or is outdated, it should be completed before finalization of this DEIS. That analysis should come from the collaboration of the multiple stakeholders (the utility, cities, citizen groups, and relevant professionals), rather than being left to the utility.

**2. Exaggerated need for 230 kV power line from two directions (north and south)—or, lack of discussion around implied risk of failure of the line**

EIS document location: Page 1, last paragraph:

*"...This would need to be fed by new 230 kV transmission lines from the north and south. By having lines from two different directions, a substation can continue to be supplied even if one line goes down."*

**Comment:**

This statement provides the rationale for building north and south segments of the proposed 230 kV powerline, suggesting there will be times when either the north or south segment will "go down." It is not clear what is meant by the phrase, "one line goes down"—is this meant in a literal sense, where the line collapses to the ground, or just that it will at times be de-energized? It seems unlikely that a 230 kV transmission line would literally fall down, however, if this is enough of a risk to warrant building the line from two directions, it should be discussed and assessed as a risk. Yet, I didn't find any discussion of that scenario anywhere in the DEIS. How often do 230 kV lines fall down? We have horses on our property and the Olympic jet-fuel pipeline just steps away from the power line; such an event could be far more deadly with a 230 kV line than it would be with the current lower voltage line.

II118-A-9

If the "one line goes down" statement refers to de-energizing of the power line, then the event would either be controlled by PSE, for example for maintenance, or due to a system failure, in which case it should be quantified how often this is likely to occur and what the impacts will be. If the impacts are likely to be only temporary, then why do we need both a north and a south segment? If a line "going down" is unlikely or infrequent, then the statement implies that only one 230 kV line feeding the Richards Creek substation is actually needed from one direction, not two lines from two directions.

Perhaps this design is in response to reliability standards set forth by NERC or other bodies, such as the "N-1" redundancy principle, where if one segment of a power transmission line becomes disabled, the remaining segments can carry the load. It still does not follow that we necessarily need two segments of a 230 kV powerline leading to a substation, given that the current 115 kV line would still be in place and operational should the 230 kV line fail.

II118-A -8

The Phase 1 Draft EIS explored a range of reasonable alternatives, as required by the SEPA process. Section 2.2 of the Phase 2 Draft EIS contains a discussion of other alternatives that were considered but ultimately not brought forward for additional analysis in the Phase 2 EIS analysis.

II118-A -9

The term "if one line goes down" was not meant literally. While theoretically possible, it is very rare that a transmission line falls to the ground. The reason for a second line is to ensure that if, for any reason, the power supply from one line has to be shut off, such as for maintenance or due to a fault or equipment damage somewhere up the line, power can immediately be restored via the second line. The two lines come from different directions so that damage on one line, such as a pole being damaged by a vehicle, would not disable both of the circuits feeding the substation. This is referred to as a "power grid"- a system of interconnected circuits that can be fed from more than one direction. Most substations are fed by at least two and sometimes three transmission lines.

A single 115 kV line would not be capable of supplying all of the circuits in the central Eastside that the proposed transformer would serve, if the 230 kV line supplying it were shut off, so it would not provide adequate backup.

II118-A -10 See response to comment II141-A-5.

II118-A-9

**Request:**

Describe more clearly the basis for the need for both north and south segments of the proposed 230 kV power line. Include details of how often 230 kV lines fail and the likely impacts of failure. Quantify the risk of failure and the potential effects of failure in very close proximity to a jet-fuel pipeline. Explain the reason for excluding from the EIS any alternative that eliminates either the north or south segment of the power line.

**3. Inadequacies in methods and a lack of rigor in the analysis of long-term (operation) aesthetic impacts.**

EIS document location: Appendix C – Scenic Views and Aesthetic Environment Methodology

Statement in paragraph 2, p. C-1: *“A number of methodologies were reviewed to inform the methodology used for this project. For this project, the assessment of impacts was generally based on methods described in the Federal Highway Administration (FHWA) Guidelines for Visual Impact Assessment (FHWA, 2015). FHWA guidelines do not specify thresholds for determining significant impacts, nor do state or local regulations. Therefore, significance was assigned based on criteria similar to those described in The State Clean Energy Program Guide: A Visual Impact Assessment Process for Wind Energy Projects (Vissering et al., 2011)*

II118-A-10

**Comment:**

Although it appears there were “a number of methodologies reviewed,” there is no description of why the FHWA guidelines were chosen and what elements of that methodology made it the best choice for evaluating the siting of an industrial-level transmission line through residential neighborhoods. There should be at least some discussion of the methodologies and the rationale for selection of a methodology.

The criteria for determining significance of visual impacts appears to be derived from a study of [wind energy projects](http://cesg.org/assets/2011-Files/States-Advancing-Wind-2/CESA-Visual-Impacts-Methodology-May2011.pdf), which is in fact a completely different context from the varied use, residential urban and semi-urban environment of “Energize Eastside.” The source, Vissering et al, 2011 (<http://cesg.org/assets/2011-Files/States-Advancing-Wind-2/CESA-Visual-Impacts-Methodology-May2011.pdf>) is in fact not even from a peer reviewed journal and, rather than representing any form of consensus among scientists in this field, appears to be little more than an “overview” level document. The authors themselves state in the first sentence of that document, “Many excellent methodologies have been developed over the past half century for evaluating scenic quality and visual impacts of development projects.”(p. 4), yet for some reason the EIS consultants conducting the aesthetic impact portion of this DEIS chose this overview document as their guide for the critically important task of determining thresholds for significant impacts.

Furthermore, the authors of Vissering et al, 2011, themselves suggest several additional methods that would potentially be very useful for this DEIS:

II118-A-10

**Public participation and surveys:** the stakeholders in this project could employ a responsibly designed, carefully validated survey as a reasonably low-cost approach for gathering residents' perceptions about the project and its aesthetic impact.

**Numerical assessment systems:** such a system would involve specific quantitative metrics for determining the actual impact, rather than resorting to the broad generalizations and assumptions used in this DEIS. For example, simply generalizing viewer sensitivity based on census estimates of relative population density along the power line is *not sufficient*.

**Professional peer review or panel review:** as Vissering et al suggest, "a panel of experts is asked to review the visual impacts of a particular project in addition to an aesthetic impact professional hired by the developer. This approach can provide a more robust and diverse discussion of the issues than is presented by a single analyst."

It is noted that the EIS consultant team met with partner city staff in August 2016 to establish the criteria for determining when impacts were "less-than-significant" or "significant." (Appendix, p. C-20) This in my opinion does not qualify as a "professional peer review" but rather simply permits the heavy application of subjective descriptions, as opposed to objective measurements, to the tremendously important "threshold of significance" used throughout the report. Such criteria should be determined by an objective, multifactor approach, rather than the subjective outcome of a closed-door, one day workshop with staff from the partner cities.

A cursory literature search through peer reviewed journals returned dozens of relevant articles and books illustrating appropriate and valid methods for measuring visual impacts of power lines in urban and semi-urban settings such as the eastside. For example, the DEIS team should find the following (and its references to further articles) useful: "Methodology for the assessment of the impact of existing high voltage lines in urban areas", 2010. Sumper, A. et al, *Energy Policy*, Volume 38, Issue 10, Pages 6036-6044.

**Request:**

Improve the measurement accuracy of aesthetic impacts of this project, using a carefully selected and fully explained set of valid methods drawn from reliable, peer reviewed literature. At least consider using some or all of the additional methods described above, which come from the source originally cited in this DEIS, Vissering et al 2011.

**4. The use of census data to quantify "residential density" as the main parameter for defining "viewer exposure" is flawed.**

EIS document location: Section 3.2.3

This section describes how the EIS consultants used Census ACS 2014 block group data to

II118-A -11 During the Partner City Workshop in August 2016, it was determined that high, medium, and low density areas should be assigned at the jurisdiction level and be relative to the other census blocks crossed by the segment and/or option when applicable. The reason for doing this was to recognize that certain jurisdictions have higher residential density throughout (e.g., Bellevue versus Renton). However, if the transmission line were to cross a neighborhood with high residential density in Renton, compared to the City as a whole, it should be recognized as such without comparing it to jurisdictions that have a higher population density to start with.

Future population density was considered, including plans for redevelopment along Bel-Red road and future Link Light Rail stations (such as the Spring District) for high-density employment and residential centers and additional recreational users associated with the Eastside Rail Corridor. Please see the viewer sensitivity discussions in Sections 3.2.5.6 and 3.2.5.7 of the Phase 2 Draft EIS. The areas with the most pronounced visual impacts are zoned single family and no change to existing density in those areas is anticipated.

As noted in the analysis, most viewers who will be able to see the proposed transmission line already next can see the existing line. Therefore, the impacts are general qualitative differences in the views of those viewers, and the qualitative differences are discussed. Areas where additional viewers will be affected are also discussed; generally these are at a distance from the line and the impacts will be less-than-significant. In the Final EIS, Section 4.2 describes in greater detail that areas where viewers who presently cannot see the transmission line would be significantly affected by the proposed transmission line.

measure population density, which in turn was categorized into three levels of “viewer extent,” including the categories of “Low”, “Moderate,” and “High.”

**Comment:**

We assume this categorization of density levels follows an equal-count classification (one third of census block groups in “low”, one third in “moderate,” and one third in “high”), however the classification is not described, nor is there any map or table presented that displays the variation of this metric. The classification scheme can make a big difference, depending on how the underlying data is distributed. However, the bigger problem with this approach is that using residential density in this way does not accurately quantify the extent of “viewer exposure” for a project like this in an urban setting.

While the population in a given area may be *relatively* low compared to the areas immediately around it, or even within the city in general, it does not necessarily follow that the number of impacted viewers will be “low.” In fact, the EIS does not provide any absolute level of population density or “viewer extent” that it defines as “low.” **Collapsing a relative measurement of population density into three levels of classification insures that one third of the block groups will be classified as “low” viewer extent.**

I1118-A-11

This method is especially suspect given that the EIS uses as its methodological guidance documents that pertain to measuring the impacts of highway construction and wind farms, both of which are far removed from the types of area or land use contexts of the current project. Those sources are more likely to relate to very low density found within rural contexts as a beginning point for establishing population density thresholds.

In reality, it is probably more accurate to classify viewer sensitivity in *all* areas impacted by this project as either “moderate” or “high,” or perhaps even as “high” and “very high”—we have no baseline population density or value of “viewer extent” presented as a reasonable or expert-accepted benchmark. In the North Bellevue segment alone, there are approximately 150 residential parcels within 200 feet of the current right of way, including multi-unit parcels like the Sixty-01 condominiums at 140<sup>th</sup> Ave NE and Old Redmond Road.

Another problem with the approach is “compartmentalization” of visual impacts by arbitrarily defined segment boundaries. Along the entire route, the number of households likely reaches well above 1,000. *All* of these viewers are impacted by this project, and since the project is not divisible by segment (we can’t just build some of the segments and still achieve the project objectives), then the visual impacts to *all* of these viewers should be the primary unit of measure. That amounts to a much larger impact than the set of compartmentalized impacts across segments characterized in the DEIS, which in fact seems to have involved cutting and pasting findings from one segment section to the next.

II118-A-11

**Request:**

Objectively determine the number of households that would meet thresholds of “low,” “moderate,” and “high” viewer extent (not just arbitrarily chosen levels of census block-level population density). These thresholds should be derived from prior, similar studies. Quantify the actual number of viewers impacted by this project and translate that measure to the actual harm done. The quantification of viewers impacted over the long term should include not only present viewers, but an estimate of future viewers of the project over its lifetime.

**5. The assessment of the visual impacts on the North Bellevue segment is inaccurate.**

EIS document location: Section 3.2.5.4, pp. 3.2-43 to 3.2-45

This section describes the long-term visual and aesthetic impacts to the North Bellevue segment. In particular, the EIS states that

*“Contrast with the natural environment will be minimal because the 95-foot poles would in most cases be shorter than the surrounding vegetation or would appear shorter than surrounding vegetation due to vegetation density (see Figure 3.2-9)...*

*Viewer Sensitivity: Sensitive viewers along the Bellevue North Segment are primarily residential viewers and users of the two unnamed trails and Viewpoint Park. In general, because of the high density of tall vegetation, only residential viewers close to the transmission line would be able to view it. The closer viewers are to the transmission line, the less likely they are to view the lines because increasing the existing pole height by 35 feet would raise the lines out of their line of sight. The presence of dense vegetation also reduces the likelihood that the transmission line would be visible from any of the recreational resources, except where it directly crosses them. In addition, none of these resources are identified as having scenic qualities, and a transmission line already crosses these resources. The Bridle Trails Subarea Plan protects the wooded, natural, rural, and equestrian character of the subarea, and it encourages retention of vegetation on the lower slopes of the bluff adjacent to SR 520 at approximately 136th Avenue NE to provide a visual separator between residential areas and the freeway (City of Bellevue, 2015d). It is estimated that approximately 0.5 percent of trees in the Bridle Trails Subarea as a whole would be removed for the project. No trees would need to be removed directly north of SR 520. Overall, viewer sensitivity is considered low.”*

II118-A-12

**Comment:**

With respect to the Bellevue North segment, this statement is **vastly inaccurate**. In fact, it reads like a narrative defense of the installation of industrial power poles where it is anticipated that people don’t want them, rather than an assessment of actual impacts. This passage dismisses the impacts on the aesthetic value of this neighborhood by declaring, essentially, that we can write off the importance of the people who live there and anyone who happens to be using the trails throughout the neighborhood. It is difficult to imagine that building an industrial-grade powerline through the neighborhood is in accordance with the Bridle Trails Subarea Plan which “protects the wooded,

II118-A -12 See response to comment II77-A-57.

II118-A-12

natural, rural, and equestrian character of the subarea.” If the city intends to follow the Bridle Trails Subarea Plan, then the impact depicted in Figure 3.2-9 is definitely out of alignment with that plan.

“Vegetation” (aka *trees*) higher than 15 feet will be removed from the right of way, exposing views to power poles which are currently fully or partially obscured from direct view. (The current 115 kV management practice is to remove or trim trees higher than 25 feet, not 15 feet.) These poles will be metallic, not wooden, and will have an industrial appearance, rather than the current wooden poles, which blend better with the natural surroundings—not perfectly, obviously, but much better the industrial power poles.

The statement above from the EIS is referring to the surrounding trees outside of the managed right of way, including large numbers of tall Douglas Firs and Western Red Cedars, many over 90 feet. On page 3.4-6, referring to the vegetation management standards for 230 kV lines, the EIS states:

*“Trees outside of the Managed Right-of-Way within the Danger Tree Zone could also be trimmed or removed based on some combination of tree height, species, health, and distance from the wires. For this analysis, it was assumed that trees with a height of 70 feet or greater with the potential to fall or contact the powerlines would be removed.”*

II118-A-13

This indicates that some indeterminate number of these trees referred to above as “surrounding vegetation” could be removed because they have the potential to fall or contact the powerlines, thus contradicting the premise that the new power lines would be shielded from view by that vegetation.

There are no estimates of which or how many of these trees would be removed, and they are not counted in the on-line inventory as surveyed trees, so we currently have no idea of how many “danger zone” trees will be removed, either during powerline construction or in the near-term following construction, as a result of having to manage vegetation for a 230 kV powerline instead of the current 115 kV powerline.

If, on the other hand, PSE makes a correction to this language to state that they will not remove many or any of the surrounding trees in the “danger zone,” then a measurement of the risk of not removing them, based on the impact of trees of this height falling on a 230 kV line, as opposed to the existing 115 kV line, should be included in the EIS. During our living next to the powerline over the past 12 years, we have witnessed at least two “danger zone” tree falls on the 115 kV line. What will be the increase in risk of damage due to electrical arcing to the Olympic Pipeline, possibly causing damage that goes undetected, from a tree falling on the 230 kV line?

**Request:**

- Correct the finding that there will be a “less than significant” impact to the aesthetic environment in the North Bellevue segment – it will in fact be a significant impact resulting in a high contrast from the current environment due to greater visibility of poles, removal of trees and vegetation over 15 feet, and installation of industrial-looking metal poles where there were previously wooden poles. This cannot be argued as being a low impact or low

II118-A-14

II118-A -13 See response to comment 007-B-3.

II118-A -14 See response to comment II77-A-57.

II118-A-14	contrast from the current environment.
II118-A-15	<ul style="list-style-type: none"> <li>Clarify the plans for managing large trees in the area outside of the managed right of way, the "danger zone," in the North Bellevue segment. Either the finding of "less than significant" visual impact or the stated management plan is incorrect.</li> </ul>
II118-A-16	<ul style="list-style-type: none"> <li>Assess the risks of one of these trees falling on the higher (230 kV) voltage powerline, especially with regard to proximity to the Olympic Pipeline, including the risk and impact of not detecting damage to the pipeline should a tree fall and result in arcing.</li> </ul>
II118-A-17	<p><b>6. No assessment is provided of reduced resilience of tree stands to high winds after clearing selected large trees</b></p> <p><b>Comment:</b> Trees that have matured in thick stands or groves, such as the decades-old Douglas Firs along the west side of the managed right of way in the North Bellevue Segment, have developed resiliency to high winds over the course of their growth. Removal of mature trees from the edges of these stands will leave the remaining trees more vulnerable to blowdown. As a result we will likely see higher rates of blowdown in the years following the powerline construction, leading to higher rates of habitat and property destruction and higher risks to the powerline itself.</p> <p><b>Request:</b> The DEIS should assess these longer term impacts of tree removal to <i>remaining</i> trees, including the extended impacts. This should be done for all applicable segments of the powerline, not just the North Bellevue Segment.</p>
II118-A-18	<p><b>7. No assessment is provided relating to the potential for audible noise of a 230Kv power line</b></p> <p><b>Comment:</b> This DEIS lacks any discussion of the corona-related noise that will likely emanate from these power lines. The new lines will operate at twice the voltage from the current lines and will likely produce corona-related crackling and hissing noises, especially during periods of peak demand and wet weather. Many homes located close to the power line will be within earshot of this noise. Wildlife will likely avoid the area because of it.</p> <p><b>Request:</b> Provide realistic estimates of the noise levels that will be produced by this project, including minima and maxima under different conditions, as well as measurement of the negative environmental impacts, including impacts on wildlife and human enjoyment of outdoor areas near the lines. Many homes along the power lines in the North Bellevue segment have horses, so an analysis of potential impacts on horses' wellbeing needs to be included.</p>

II118-A -15	See response to comment 007-B-3 and response to comment II77-A-57.
II118-A -16	Risk is assessed in the Phase 2 Draft EIS, Section 3.9. Risk has two components, probability and potential harm. Each of these components of risk is described in detail. The possibility of a tree falling on the lines and causing an arc that reaches the pipeline is a component of the probability. Because of the clearing that is done around the transmission lines, it is unlikely that this would occur, but it is possible that a tree outside of the managed right-of-way could grow tall enough and then fall over onto the line. If such an event were to occur, and it was substantial enough to cause a rupture of the pipeline, it could damage the environment. The potential damage from such a release from the pipeline is discussed in the Phase 2 Draft EIS, Section 3.9, and in section 4.9 of the Final EIS.
II118-A -17	See response to comment II77-A-50.
II118-A -18	As stated in Section 9.9 of the Phase 1 Draft EIS, there would be no significant and unavoidable construction-related or operational adverse noise impacts.

7/6/2017

Weebly Email Service Mail - Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside**

1 message

**Cheryl Jordan** <cj@orijunate.com>  
To: info@energizeeastsideeis.org  
Cc: Karl Ma <kma@orionlightinc.com>

Wed, Jul 5, 2017 at 9:19 AM

I am concerned and oppose the current proposed plan presented by PSE for several reasons (in no particular order):

- II119-A-1 | 1. We are customers of PSE who currently provides our residence with both gas and electric utilities.
- II119-A-2 | 2. I am not convinced that there is even a need for such an expensive infrastructure as opposed to less intrusive or expensive alternatives
- II119-A-3 | 3. I do not believe the proposed plan is safe both because of the proximity to the massive fuel line. I do not believe that the risk inherent in both the installation and existence of the proposed lines is warranted given the potentially devastating harm which would result of there is a gas explosion.
- II119-A-4 | 4. I am concerned that PSE is not looking at alternative methods of solving the issues it claims "may" happen in order to make profits for PSE
- II119-A-5 | 5. I am worried that PSE is forcing this community to foot the bill for an obsolete system in order to recoup guaranteed profits which the community ultimately has to pay for
- II119-A-6 | 6. I believe that the proposed poles and wires will be a blight on the area
- II119-A-7 | 7. The proposed plan will significantly reduce the value of my property. I do not believe that the original easement allows such structures and/or that the parties involved in the original easement contemplated allowing PSE to put in new massive poles and wires.
- II119-A-8 | 8. My daughter is a qualified individual with a disability and medical condition as defined by the Americans with Disabilities Act as well as other state and federal discrimination laws. She is effectively homebound due to chronic pain and headaches. The proposed plan would require the installation of wires that will emit significantly increased EMFs which could aggravate my daughter's condition. As such she would be precluded from having an equal opportunity to live in and enjoy our residence and to receive full access to gas and electric services without such EMF exposure. If the proposed plan is approved, we will have to investigate what options are available for us to enforce our daughter's rights under the ADA.
- II119-A-8 | 9. I do not believe that the City of Bellevue and its Council are trying to do what is best for the community. Instead, it seems that people who do not live in this community will be the primary beneficiaries at a significant cost to the community.

If you would like me to further explain on any of the above items, please feel free to contact me via email or regular mail.

Cheryl Jordan  
2200 135<sup>th</sup> Place SE  
Bellevue, WA

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=IEZPUTRTRfxl.en.&view=pt&search=inbox&th=15d138ef5b155e3d&siml=15d138ef5b155...> 1/1

- II119-A -1 | Comment noted. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Project Objectives Topic).
- II119-A -2 | See response to comment II8-A-1.
- II119-A -3 | The Phase 1 Draft EIS explored a range of reasonable alternatives, as required by the SEPA process. Section 2.2 of the Phase 2 Draft EIS contains a discussion of other alternatives that were considered but ultimately not brought forward for additional analysis in the Phase 2 EIS analysis.
- II119-A -4 | Comment noted.
- II119-A -5 | Comment noted.
- II119-A -6 | See economic discussion on property values in Section 10.7.1.4 of the Phase 1 Draft EIS. Also see response to comment 007-B-8.
- II119-A -7 | Extensive health studies have not found a causal link between adverse health effects and EMF from electrical transmission lines (see Section 8.6.1.4 of the Phase 1 Draft EIS).
- II119-A -8 | Comment noted.

10435 NE 15<sup>th</sup> St  
 Bellevue, WA 98004  
 July 5, 2017

City of Bellevue  
 Development Services Department  
 Attn: Heidi Bedwell, Environmental Planning Manager  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

**RE: ENERGIZE EASTSIDE  
 Phase Two EIS Comments**

Dear Ms. Bedwell:

I am writing to submit comments on the Phase Two EIS for Energize Eastside. I am concerned about the excessive cost and significant adverse environmental impacts of PSE's proposal. I find the EIS lacking an honest and thorough consideration of the merits of alternatives and mitigation measures.

The Phase 2 Draft EIS (Section 1.3) states, *"The lead agency is responsible for ensuring that a proposal that is the subject of environmental review is properly defined. The process of defining the proposal includes an understanding of the need for the project, to enable a thorough understanding of the project's objectives."*

I find that the EIS is incomplete in failing to objectively compare and evaluate viable alternatives that are in-use elsewhere in the U.S. to solve the problem that PSE has described – a transmission deficiency during peak electrical demand. There are less expensive, safer, more environmentally sound alternatives available to the City of Bellevue.

**Navigant Research** published a report (June 2017) on how the industry is adopting "non-wires alternatives" instead of more transmission lines. The report states that grid management and distributed energy resources (DER) technologies have improved. It says these types of projects, known as non-wires alternatives (NWAAs), are ready to become a bigger piece of the transmission and distribution investment picture based on advancements in DER technology and utility willingness to try new means of infrastructure replacement.

One alternative that PSE should consider to solve their peak demand problem is battery storage. This storage would also provide the added benefits of increased reliability and reduced carbon emissions. Although PSE has not proven or technically justified the need for Energize Eastside, they could provide a scalable battery storage project to satisfy any concerns about "rolling blackouts".

**The EIS needs to address the following questions:**

1. How will the City of Bellevue explain why batteries can, or cannot, meet the Eastside's peak demand needs?
2. How will the City of Bellevue ensure it is working on behalf of its citizens to provide reliable, fairly-priced electricity by examining viable alternatives?
3. How will the City of Bellevue justify excessive infrastructure environmental damage (and economic consequences) in the face of lower cost, more reliable, safer alternatives?

I appreciate this opportunity to comment on the Phase Two EIS. Thank you.

Sincerely,

Ann Schroeder Osterberg

II120-A-1

II120-A-2

II120-A -1 The Phase 1 Draft EIS explored a range of reasonable alternatives, as required by the SEPA process. Alternative 2 in the Phase 1 Draft EIS included energy conservation and the use of technologies other than transmission lines, including battery storage, to accomplish the project objectives. To ensure a timely solution, PSE would need to build its own peak generation facilities and/or battery storage facilities. PSE found that transmission-level battery storage technology was not sufficiently developed at this time to address the full need for the Eastside. For a more detailed explanation of why battery technology was not included as an alternative in the EIS process, see Section 2.2.7 of the Phase 2 Draft EIS.

II120-A -2 The City of Bellevue is the Lead Agency for the SEPA EIS. SEPA requires that an EIS explore a range of reasonable alternatives that could accomplish the project objectives at a lower environmental cost. The Phase 1 Draft EIS describes the potential use of batteries and limitations of current technology for meeting the project objectives. Chapter 2 of the Phase 2 Draft EIS describes the alternatives considered but not carried forward.

The EIS is required as part of the permitting process for the Energize Eastside project. Bellevue and the other Partner Cities will adhere to their permitting processes when evaluating the Energize Eastside project. Before a permit is approved, PSE must meet the conditions for the permitting processes in each of the applicable jurisdictions, which in all jurisdictions include consideration of environmental consequences, including environmental safety risks related to the project. In some cases, criteria for approval include consideration of the project's contribution to utility reliability. Neither SEPA nor the permitting process require that the EIS address utility pricing or project cost. The environmental impacts identified in the Phase 2 Draft EIS and Final EIS will be considered by the applicable jurisdictions during this process, and, if the permits are approved, potential mitigation measures listed in the EIS could be included as conditions of the permit.

As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

Heidi Bedwell  
 Environmental Planning Manager  
 City of Bellevue  
 PO Box 90012  
 Bellevue, WA 98009-9012

Hello Ms. Bedwell,

My name is Eric Bidstrup, and I am a Bellevue resident. After careful review of the EIS and other publicly available information I am submitting my comments and feedback on the Energize Eastside Phase 2 Environmental Impact Statement (EIS). I am shocked and dismayed at the lack of thoughtful analysis provided by Puget Sound Energy in both the Phase 1 and Phase EIS. As employee of the City of Bellevue, I look to you to satisfy the responsibilities of your position to champion the best interests of Bellevue residents with an objective and independent perspective.

I1121-A-1

This letter outlines the extensive concerns I found in the Phase 2 EIS. The Phase 2 EIS **fails** to satisfy its stated objectives (per section 1.7), **fails** to provide specific **details** describing "project level alternatives" (per intro paragraph Chapter 1), and **fails** to provide comprehensive facts in many of the sections covered. In short, the Phase 2 EIS is a **failure**, and as concerned citizen I propose that a supplemental EIS should be provided to address the shortcomings in the Phase 2 EIS.

Please note that I am a member of CENSE (<http://cense.org>) and consent to have my feedback made publicly available to CENSE other organization.

Thank you for serving the public good, and for your time and attention in reviewing my feedback.

-Eric Bidstrup  
 13714 SE 43<sup>rd</sup> ST  
 Bellevue, WA 98006  
 email: [ericbidstrup@gmail.com](mailto:ericbidstrup@gmail.com)  
 Phone: (425) 785-8578

I1121-A -1 The Partner Cities believe that the Draft EIS contains project-level details and a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA. As discussed in the Phase 2 Draft EIS, environmental information was compiled based primarily on scientific and industry specific literature reviews and discussion with knowledgeable resource agencies and experts. Assumptions made in the analysis were explained so that the reader could understand what was assumed and why.

A supplemental EIS may be required for a project only when there are new alternatives or when: (a) There are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts; or (b) There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. Neither of these conditions apply here.

As noted in Chapter 1 of the Phase 2 Draft EIS, while this is a project-level EIS, it is being prepared at an early stage of design development for the project. This is consistent with rules that intend for SEPA to be "*integrated with agency activities at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to seek to resolve potential problems*" (WAC 197-11-055). This means that information about the project is approximate and subject to change and refinement as the design is developed.

The EIS is an environmental disclosure document that supports decision-making during the permit review process and in the imposition of mitigation measures. The EIS is intended to identify alternatives that could attain or approximate PSE's objectives at a lower environmental cost and disclose potential significant adverse environmental impacts associated with the alternatives identified. The Energize Eastside EIS does not advocate for or against the project, but rather presents an analysis of potential environmental impacts from the proposed project and a range of reasonable alternatives.

I1121-A-2

**Summary:**

This letter provides feedback on the Energize Eastside Phase 2 Environmental Impact Statement (EIS) in the following areas:

1. Failing to provide adequate justification of need (Section 1.3)
2. EIS failing to satisfy its stated objectives (Section 1.7)
3. Omitting analysis of seismic risk (Section 1.10)
4. Not offering or evaluating alternative solutions (Chapter 2)
5. Ambiguity in route and pole placement (Section 3.1/4.1/5.1)
6. Incomplete economic analysis (Section 3.10/4.10/5.10)

I1121-A-3

**Failing to provide adequate justification of need (Section 1.3)**

PSE asserts that the electrical infrastructure must be upgraded to provide necessary reliability, and that energy demand is growing. PSE has failed to provide sufficient detailed data to defend these claims, and public data exists to contradict their claim. PSE cites several studies (as listed on <https://energizeeastside.com/need>) to support their claims. I'll comment on each claim:

**Reliability:** As noted even in the Phase 1 EIS, Energize Eastside will provide no increased reliability benefit to the Eastside. The assumptions used in the load flow study that PSE claims to have run (but has not publicized the methodology used) would result in power outages in the entire Puget Sound Region regardless if Energize Eastside is built. Therefore, under the "no action" alternative, the EIS should conclude that a decision not to build Energize Eastside will not result in any more blackouts on the Eastside than if Energize Eastside were to be built. Yet this is not what the EIS record states.

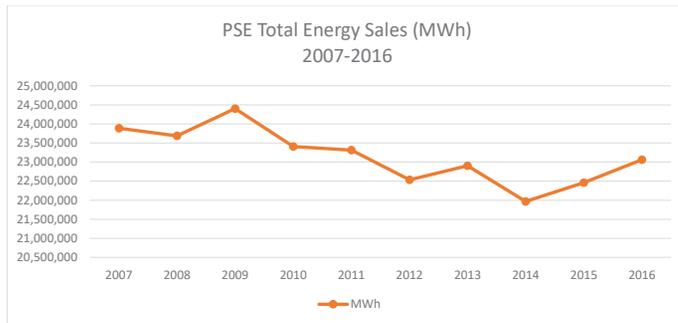
**Demand:** The United States Securities and Exchange Commission (SEC) [requires PSE to publish annual reports \(Form 10-K\)](#) that provide useful historical data on PSE financial performance, information on Electric Utility Operating Statistics, and information on Electric Supply. The 10-K forms don't offer forecasts, but are useful to assess historical demand and rate of change in demand. Examining Form 10-K from PSE from 2007-2016 provides useful insights on how **actual electrical demand has decreased 3.5% from 2007-2016** while the regional population has *increased* by 11%. Additional data published on the [City of Bellevue website](#)<sup>1</sup> from PSE further documents decreases in electrical demand on the Eastside.

<sup>1</sup> Please see the "Bellevue Community Electricity Use (kWh)" chart

I1121-A -2 See responses to the numbered comments in the letter below.

I1121-A -3 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

II121-A-3



While I won't claim demand will never increase, the factual data showing the actual rate of demand increase is not as urgent as PSE claims.

**EIS failing to satisfy its stated objectives (Section 1.7)**

As noted in section 1.7 "OBJECTIVES FOR THE ENERGIZE EASTSIDE PROJECT", some of the objectives listed are as follows:

- Find a solution that can be feasibly implemented before system reliability is impaired.
- Be of reasonable project cost.

II121-A-4

Obviously with claims of system reliability failures occurring in the next 5-9 months, no solutions will be deployed in sufficient time to avert those. Time will tell if the accuracy of those forecasts is any better than the "accuracy" of demand forecasts that were proven wrong by actual demand. In terms of feasibility, PSE has failed to provide any alternatives beyond the core "Alternative 1" and the "No action" alternative. Failure to offer additional alternatives, such as use of recently emerging battery technologies, is a failure of the Phase 2 EIS to meet its state purpose (see [this article](#) on how Southern California Edison was able to improve reliability with a sustainable solution).

In terms of project cost, PSE has already invested over \$26M USD, and the project has not even been fully approved and permitted! While PSE has failed to provide detailed cost estimates, conservative estimates would be that that Energize Eastside would cost at least \$300M USD, which when financing over 40-65 years will cost somewhere between \$1-2B USD. Given a lack of other alternatives, it is impossible for anyone to assess "reasonable" project costs.

II121-A-5

**Omitting analysis of seismic risk (Section 1.10)**

In section 1.10, for "Earth" the Phase 2 EIS notes: "Soils and geology were analyzed in the Phase 1 Draft EIS because seismic and geotechnical hazards (including ground shaking, liquefaction, landslides, coal mines and other hazards) are present throughout the area. However, impacts under all alternatives would be less-than-significant with regulatory compliance, and implementation of industry standards, geotechnical recommendations, and best management practices (BMPs)". However, this fails to address the fact that the

II121-A -4 See response to comment II2-B-11. PSE is planning to phase the project so that a portion of it could be constructed quickly. The objectives including the timeline are those of the applicant. The purpose of the EIS is to evaluate the applicant's proposal.

II121-A -5 See response to comment II20-A-1 for information on seismic risks. See response to comment II114-A-5 for information on emergency response capabilities. It is acknowledged that in the event of a large seismic event that ruptures the Olympic Pipeline system, there could be immediate life safety concerns along the alignment if the spilled fuel were to ignite. Such a seismic event would likely have widespread, regional impacts with multiple demands on emergency responders and issues related to access because of damaged transportation infrastructure. It is important to note that these risks exist currently and are not expected to increase with the Energize Eastside project. Based on the results of the Phase 1 analysis, the Phase 2 Draft EIS did not include additional analysis on Earth resources (e.g., seismic hazards). In response to comments received on the Phase 2 Draft EIS, the Final EIS includes additional information on Earth resources. While the conclusion remains the same as in the Phase 1 Draft EIS, Section 4.11, Earth, of the Final EIS provides additional discussion of the risks related to seismic activity and additional discussion of mitigation measures.

II121-A-5

Olympic Pipeline is collocated with current and proposed increased capacity transmission lines. It is previously established that Olympic has failed to adequately monitor and correct defects with pipeline due to corrosive effects from electromagnetic fields from current transmission lines. Increasing transmission capacity will increase pipelines exposure to electromagnetic fields. Failing to assess increased risks of pipeline safety due to seismic activity in the Cascadia subduction zone would appear to be a serious omission. **Note this is not simply an academic concern to me, my home is located ~150 feet away from the Olympic Pipeline and current transmission lines so this is a significant concern for my family's safety.** The tragic loss of life in the 1999 Bellingham pipeline explosion occurred in a less densely populated area than Somerset. [The Bellingham Herald documented the short timelines](#) from Olympic first noticing something was amiss to the explosion that killed 3 children. First responders to a pipeline explosion would be summoned from Sea-Tac airport, and in a scenario with a major seismic event and exacerbated risk from Energize Eastside, a pipeline explosion could burn unchecked for some time with incalculable loss of life. This seems worthy of at least performing risk assessment in the EIS. I would propose a supplemental EIS address this scenario.

II121-A-6

#### Not offering or evaluating alternative solutions (Chapter 2)

PSE has neglected to provide any alternatives beyond the core "Alternative 1" and the "No action" alternatives. This is equivalent to having a "free election" with a single candidate on the ballot, presenting only an illusion of choice. Perhaps if PSE had made a good faith effort to research other alternatives and presented this information to the public, the Energize Eastside proposal could be more persuasive. Very recent advances in battery, solar, and wind technology are being adopted by other power companies across the company and across the world. In May 2017, [BPA canceled plans for a 500kV transmission](#) line citing escalating costs and supply demand below forecasts. With documented facts noted earlier on PSE energy demand failing to meet projected forecasts, and less expensive alternatives available to increase reliability, it raises serious questions on PSE ethics and integrity in continuing to pursue Energize Eastside while other utilities have reassessed their needs.

II121-A-7

#### Ambiguity in route and pole placement (Section 3.1/4.1/5.1)

In the area in which I live, Somerset neighborhood in South Bellevue, PSE continues to enumerate 4 possible routes (Oak 1, Oak 2, Willow 1, and Willow 2 – the latter being PSE's preferred route). These are the same options enumerated in the Phase 1 EIS, and it is surprising and disappointing that selection of specific route remains ambiguous at this late stage in the EIS process. At this stage, I expected to see specific proposals for pole locations, pole designs, and a list of the specific trees that would be removed. Without these specifics, it is difficult for anyone to evaluate or offer informed comment on the environmental impact of this project. I'd request this be rectified and another draft be published for public comment, or request a Supplemental EIS to document this information.

The EIS mentions a report produced by the safety consultant DNV-GL, but fails to address the top two findings of the report: first, that PSE's preferred route (known as "Willow 2") violates pipeline safety standards and has an "unpredictable risk range." Second, that PSE's alternate route ("Willow 1") could only be made safe with significant design changes. These facts have direct bearing on the environmental impact of the project, I request that these issues receive clearer treatment in the EIS, or are addressed in a supplemental EIS.

On pole placement, the EIS website offers misleading and inaccurate information (<http://www.energizeeastsideeis.org/mappolelocations.htm>). The map provided does show pole placements, but with a disclaimer that "Accuracy and completeness of the information on this map is not guaranteed". This ambiguity fails to address the goals of the EIS in providing specific information that allows the public to offer

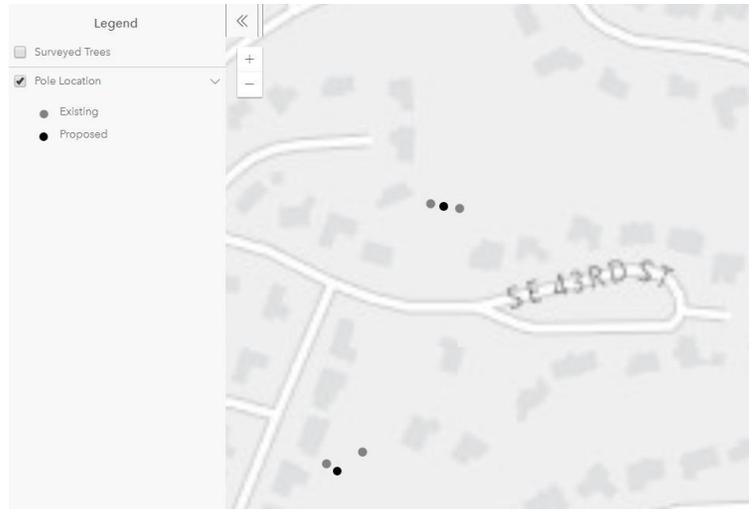
II121-A-6 See response to comment II15-A-2.

II121-A-7 The specifics of the design and exact placement of poles would be determined during the local permitting process. The Phase 2 Draft EIS covers details of the project as it was known at the time of publication and reflects information based on the early stages of design. Project design has been refined for the Final EIS for PSE's Proposed Alignment (which is similar to the Willow 1 Option as presented in the Phase 2 Draft EIS), with more site-specific information presented on the route, pole types, pole locations, and vegetation clearing requirements. The Partner Cities believe the information provides sufficient detail to allow for a reasonable evaluation of potential impacts under SEPA.

The DNV GL analysis examined two routes: the existing transmission line corridor (Willow 1) and a route that combines parts of the existing corridor with the Newport Way area (Willow 2). For Willow 1, the analysis found that with optimized conductor geometry and with both lines operating at 230 kV, the induced AC potentials and theoretical AC current densities satisfied accepted reference levels. For Willow 2, and for either route operating at 230 kV/115 kV, the analysis predicted that AC corrosion potential would be in the "unpredictable" range and field monitoring and/or mitigation would be required to confirm that current densities remain within acceptable levels. Willow 2 was not carried forward as an alternative in the Final EIS. The route followed by Willow 1 is PSE's Proposed Alignment in the Final EIS and includes operating both lines at 230 kV at the outset.

The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular collocated pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering by PSE. The Phase 2 Draft EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational (Stantec, 2017).

informed comment. Furthermore, the pole placement shown in my local neighborhood would indicate new poles being installed directly atop the Olympic pipeline (See drawing below). I can only assume this is inaccurate information that precludes me from offering informed comment or feedback. I request a supplemental EIS to provide specific details on route selection and pole placement.



II121-A-7

**Incomplete economic analysis (Section 3.10/4.10/5.10)**

The Phase 2 EIS section on economic impact is narrow in scope, fails to address the full scope of economic impact of Energize Eastside, and fails to include pertinent studies on property value impact that are more relevant to this area vs. those cited. I'll elaborate on each of those areas.

II121-A-8

Section 3.10 of the EIS primarily focuses on economic impact to revenue to cities impacted via loss of property tax revenue via depreciated assessed property value (AV), and notes that property tax rates would be raised to cover lost revenue to each city. The Phase 2 EIS cites a single study<sup>2</sup> conducted in the Salt Lake City area with a statistically significant finding of ~2-5% negative impact on property tax values for homes notes within 300 meters of 138kV power lines. PSE asserts this study shows no negative impacts from 345kV lines, but fails to discuss the study also notes this is due to specific large green belt requirements for the 345kV lines in the Salt Lake City study. PSE also failed to include reference to recent study *more relevant* to Energize Eastside<sup>3</sup> project

<sup>2</sup> Tatos 2016

<sup>3</sup> [Bottenmiller & Wolverson 2013](#)

II121-A -8

A number of studies regarding the potential impacts to property values were reviewed for the Phase 1 Draft EIS (see Chapters 10 and 11). Section 3.10.1 of the Phase 2 Draft EIS states that "the effects on property values are highest for properties nearest the lines, and tend to diminish over time after the project is constructed. A study published in 2016 found similar results except that it found the effects to vary over time (rather than steadily diminishing) and to be more pronounced for some facilities. The results over the entire 2001–2014 sample period indicate both statistically significant effects from 138 kV and 69 kV lines but no negative effects from 345 kV lines. A slight positive effect was noted for properties within 50 meters of 345 kV lines (Tatos et al., 2016)." This study, *Property Value Impacts from Transmission Lines, Subtransmission Lines, and Substations*, found that some homes are positively impacted by transmission lines that have greenways beneath. Others are impacted negatively, depending on the type of transmission line and distance to the transmission lines or substation. The EIS Consultant Team highlighted the findings of this study because it examined 125,000 home sales over a 14-year period. See response to comment II121-A-10 regarding applicability of *The Price Effects of HVTLs on Abutting Homes* study.

reported that for *higher priced homes in the Seattle area* had a **11.2% negative impact** when abutting a high voltage transmission line.

The EIS references the overall property assessed values for Bellevue, Kirkland, Newcastle, and Renton, and portion of the property taxes that fund city governments (in addition to schools, King County, Library, EMS, etc.). Newcastle is examined as a “worse case/most impact city” scenario and notes \$3.8M of property tax revenue funds 50.2% of Newcastle city government annual budget. I see the following problems with this methodology:

1. No specific data is provided on the impact of EE on property tax revenue for Newcastle (or any other city), even though the EIS notes 86 homes in Newcastle immediately adjacent to transmission lines. **This data should be provided in the EIS.**
2. The EIS focuses on impact to City government budget, but fails to note any reduction in property tax income also has a **negative impact on other public services:** public schools (that actually receive a larger percentage of property tax revenue than city governments!!!), libraries, King County, and emergency services.

The EIS cites a study<sup>4</sup>, created and funded by a consortium of energy companies (Electric Power Research Institute) which claims that negative impact on property values diminishes with time. This conclusion is **not supported by other studies, and is also not supported by common sense understanding** “If anyone was considering 2 identical houses, one next to a transmission line and one not – would you pay equal value for each home” (2<sup>nd</sup> paragraph 3.10.4.1)

The EIS also addresses the value of lost *ecosystem services* (Section 3.10.3 & 3.10.4.3). Individual trees as well as groups of trees provide ecological benefits and environmental values. Trees improve air quality by absorbing CO2 and potentially harmful gases, such as sulfur dioxide and carbon monoxide, from the air, and releasing oxygen. Trees also store carbon, reduce soil erosion, remove pollutants, and provide food and habitat for birds and other wildlife. Each year, an acre of trees absorbs the amount of carbon produced by driving a car for 26,000 miles, and an individual urban tree contains about four times more carbon than individual trees in forests. **Approximately 9,400 trees were inventoried in the study area in 2015 and 2016.** The EIS references a model<sup>5</sup> that assigns cost/value to the carbon storage provide by tree, replacement tree costs, and “services value<sup>6</sup>” totaling in aggregate approximately \$18.7 million in one-time cost and \$37,858 in annual services value for all segments in aggregate. The actual values from this model would be less than that amount and determined by the actual route selected. **The position PSE assumes is that since the 7,779 trees in the Bellevue portions of the route constitute less than 0.2 percent of the total urban tree cover for all of Bellevue, and therefore are “not considered to be a large amount”.** I have the following concerns with this methodology:

1. Even if PSE were to replace the existing tree at “structural value costs” of \$18.6M, it would take years/decade for new plantings to grow and mature to provide the same level of ecosystem services as the current trees.
2. The costs of ~\$18.7M will ultimately be passed along to PSE rate payers, and with questionable energy demand for the project, and other alternatives available to meet demand, this is an avoidable cost that should not burden ratepayers.

<sup>4</sup> Mullins 2003

<sup>5</sup> The Watershed Company, 2016b

<sup>6</sup> Gross Carbon sequestration, avoided runoff, and pollution removal

I1121-A -9

It is correct that it would take time to regain the ecosystem services currently provided by mature trees within the existing corridor that would be removed as a result of the project. The Partner Cities could take this into account in determining what mitigation should be required for impacts to the overall tree canopy in Bellevue. Even in consideration of this, the impact is not considered significant in Bellevue.

Potential mitigation measures for reducing impacts associated with tree removal are detailed in Section 3.4.6 of the Phase 2 Draft EIS and 4.4.6 of the Final EIS. The \$18.7 million cost cited in the comment is not expected to come to pass because none of the alternatives require removing all of the study area trees. However, it is possible that PSE may need to pay between \$5.5 and \$10.6 million to replace trees. The cost would depend on the segments/options selected. Assuming the impacts evaluated in the Phase 2 Draft EIS, PSE's Proposed Alignment would potentially result in a loss of \$5.5 million in structural tree value (See Table 3.10-7). Tree replacement cost, as it relates to constructing the project, would likely be incorporated into project-related costs and recovered via rates as allowed by the WUTC. Refer to Key Theme ECON-4 in the comment summary included as Appendix J of the Final EIS.

As allowed under SEPA (WAC 197-11-448), the EIS does not evaluate the overall project costs cited in the comment. The specific economic information provided was considered relevant because it helped in assessing other potential environmental impacts such as tree loss and land use, and in considering the potential costs that could be associated with mitigation for visual impacts, specifically the potential cost of undergrounding the transmission lines.

II121-A-9 The EIS only speaks to economic direct impact to city governments and ecosystem services, and potential economic impact to “requesting parties” for any underground portion of the proposed routes. **The EIS is silent on what the economic impact of this project will be to PSE customers.** Public information posted on an [Energize Eastside web page](#) claims “Once the project is built and added to the annual capital budget, we expect that \$1 to \$2 of the average monthly bill for residential customers will go towards paying for the project”. I see the following omissions in EIS:

1. PSE is a utility chartered with serving public energy needs. **PSE should be forthcoming with detailed information on overall forecasted project costs for Energize Eastside, and amounts already identified in PSE capital budgets.** The current statements amount to a “just trust us” approach.
2. Analysis by an independent utility financing expert hired by CENSE concluded<sup>7</sup> that assuming project costs of around \$250 million (best estimates given an absence of data from PSE) that the total cost to customers would require **\$31-32 million in incremental annual PSE revenue**, which would **accrue to an aggregate total between of \$1.45-2.03 billion dollars<sup>8</sup>** over the lifetime of the transmission line.

II121-A-10 **The EIS fails to address the economic impact to property owners from reduced property values.** In “The Price Effects of HVTLs on Abutting Homes<sup>9</sup>”, it’s noted that in a study of homes of similar values to the areas impacted by Energize Eastside, *higher priced homes in the Seattle area* had a **11.2% negative impact** when abutting a high voltage transmission line. Quoting the article: “Given the Seattle Study Area higher-priced home subset’s \$1,035,105 average treatment group sale price, the Seattle Study Area’s typical abutting, higher-priced home **would have sold for \$130,882** more if not abutting an HVTL.” CENSE has the following concerns:

1. In the EIS, no reference is made of the environmental impact to economics of property owners who will be negatively impacted by reduced property resale values.

**This failure to fully assess the broad economic impact of Energize Eastside in multiple dimensions is unacceptable and I request a supplemental EIS to rectify this omission.**

**Summary**

II121-A-11 PSE has consistently been unwilling to engage in an open and transparent process, and to engage the public and their customers in a meaningful dialog on how best to satisfy customer needs. There is no shortage of information that raises questions and doubts about the Energize Eastside project. I have not previously been active nor vocal in public or political causes, but as a resident who lives adjacent to the existing transmission lines as I have learned more about PSE (and their parent company Macquarie) I was outraged over how PSE has attempted to promote this project that I remain convinced is not the best approach to satisfy the best interests of our community.

<sup>7</sup> See <http://cense.org/Lifetime%20Cost.pdf>

<sup>8</sup> Depending on term, see link above for details

<sup>9</sup> [Bottenmiller & Wolverson 2013](#)

II121-A -10 Chapter 10 of the Phase 1 Draft EIS acknowledges that the sale prices of higher priced homes are more affected by proximity to high power transmission lines than are lower priced homes. The study cited in the comment, however, does not address whether the replacement of lower voltage with higher voltage lines has resulted in a greater negative effect than the existing lines have at present. Based on the studies cited in the EIS and the study cited in this comment, it is reasonable to assume that the existing transmission line has affected property sale prices and would continue to do so under the No Action Alternative. Although the EIS acknowledges that some reduction of property values is likely, it would be speculative to assume, based on these studies, that replacement of the transmission line would cause an additional reduction in sales price of the same amount as has already been incurred as a result of developing homes in the vicinity of the existing lines. Because impacts to property values are not an element of the environment that must be analyzed under SEPA, specific impacts to property values that could be caused by the project were not included in the Phase 2 analysis or Final EIS. Instead, the Phase 2 Draft EIS, like the Phase 1 Draft EIS, focuses on whether a hypothetical decrease of \$10 million in assessed property value would significantly affect tax revenues for the affected communities, thereby affecting public services. This information is provided so decision-makers can evaluate whether to consider a mitigation measure (such as undergrounding) to offset environmental impacts.

II121-A -11 Comment noted.

Energize eastside EIS phase 2 comments, July 5<sup>th</sup> 2017

The following is submitted on behalf of myself, my family, my community, my City of Newcastle, and CENSE.

Brian Elworth  
8605 129<sup>th</sup> Ct SE  
Newcastle Wa, 98056

I1122-A-1

The draft phase 2 energize eastside EIS is grossly defective in that it fails to address significant environmental impacts of the proposed energize eastside project, particularly in regard to safety. In some cases, it identifies the gaps but otherwise ignores them. In other cases, it hides, obscures, or otherwise masks them. What is Bellevue's plan to conduct a comprehensive environmental impact assessment of the proposed energize eastside project to fully address safety issues?

I1122-A-2

The draft phase 2 EIS relies heavily on the error saturated and uncorrected draft phase 1 EIS. Much like a rickety house built on a crooked and crumbling foundation, the draft phase 2 EIS collapses under its own weight. Properly, the draft phase 1 EIS should be corrected and completed first. Then the drafting of the phase 2 EIS should begin. The measure of quality should be content instead of page count.

Errors and omissions in the EIS must be corrected if the document is to be indicative of the true environmental impact. Contrary, incorrect, and/or unsupported statements in the document must be purged. Some sections of the EIS shows significant laps in factual accuracy. This greatly undermines the credibility of the document and the process by which it was generated. Complete truth should be the overarching objective.

I1122-A-3

SEPA Handbook section 3.3 states "The lead agency is responsible for the content of the EIS..." What that means is, regardless of its source, every word, sentence, paragraph, diagram, figure, and table in the EIS is owned by Bellevue. If Bellevue puts it in the EIS, Bellevue owns it and is responsible for its accuracy. This implies a trust that declarations of fact are vetted by Bellevue for accuracy and completeness. The EIS should meet the basic standards for research integrity. Anything less is betrayal of trust.

Washington Administrative Code WAC 197-11-400 states:

"An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality."

The City of Bellevue as lead agency on PSE's proposed energize eastside project must adhere to the highest standards of integrity, transparency, objectivity, and thoroughness in the conduct of the EIS process in compliance with spirit, intent, and letter of the WAC. Bellevue has accepted the responsibility to address safety risks, safety risk mitigations, and safety risk mitigation impacts of the proposed project. The cities and residents of Redmond, Kirkland, Newcastle and Renton are depending on Bellevue as the lead agency and should be treated fairly and respectfully by Bellevue in this EIS process. This requirement in the WAC is not intended to be merely a suggestion. It is a rule Bellevue is obligated to abide by.

I1122-A -1

The Partner Cities believe that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA. Risks to human health, safety, and the environment as a result of the Energize Eastside project are described in Sections 3.8 and 3.9 of the Phase 2 Draft EIS.

I1122-A -2

The comment does not provide sufficient detail to allow a response. Note that the Phase 2 Draft EIS does provide some corrections to information in Chapter 7, Errata, and the Final EIS includes corrections in Chapter 3, Errata.

I1122-A -3

The Phase 1 Draft EIS, Phase 2 Draft EIS, and Final EIS were prepared under the direction of the Environmental Coordinator for the City of Bellevue (as Lead Agency), in consultation with the Co-Lead Agencies, the Partner Cities of Kirkland, Newcastle, Redmond, and Renton.

II122-A-4 The overall quality of the EIS with regard to safety risks, safety risk mitigation, and safety mitigation impacts is shockingly and inexcusably poor. This calls attention to Bellevue's standards of ethics regarding its lead agency responsibilities to citizens in the region affected by PSE's proposed energize eastside project. What are Bellevue's criteria for assessing compliance with its standards of ethics? What is Bellevue's assessment of its compliance against that criteria regarding conduct of the EIS process?

II122-A-5 If the concept of research integrity is not well understood or the process is unclear, one source of guidance is the book "On Being a Scientist: A Guide to Responsible Conduct in Research" National Academies Press. Another resource is "Responsible Science, Volume I: Ensuring the Integrity of the Research Process." A number of other references can be found at: <http://www.nap.edu/catalog/12192/on-being-a-scientist-a-guide-to-responsible-conduct-in>.

II122-A-5 What research integrity training and mentoring on the proper conduct of research is being provided to the individuals who are responsible for the content of the EIS to assure the EIS is objective and factual? If no formal training or mentoring is in place what is the plan to rectify this process deficiency and provide an EIS for public review that is compliant with basic research standards of integrity?

II122-A-6 Starting with publication of the draft phase 1 EIS and continuing through the draft phase 2 EIS Bellevue has demonstrated a very strong bias against the needs and best interests of the people affected by PSE's proposed energize eastside project. If Bellevue cannot act in a truly impartial and non-advocate capacity, Bellevue should recuse itself from administering the EIS so that a neutral party can create a new, complete, objective, and impartial environmental impact statement.

II122-A-6 Throughout the EIS, Bellevue relies extensively on ignorance as a substitute for safety. The EIS masks many unbounded safety risks and provides absolutely no management of those risks. If safety risks are not managed, mitigations cannot be established. If mitigations are not established, impact assessments can't be made. This is plain and simple common sense. The choice here is to succeed or to fail. Why has Bellevue chosen to fail its safety obligations? What is Bellevue's plan to conduct a comprehensive safety analysis?

II122-A-7 The energize eastside EIS website (<http://www.energizeeastsideeis.org/phase-2-draft-eis.html>) states:  
 "The phase 2 Draft EIS is a project-level evaluation. It includes details of the proposed development at specified geographic locations with detailed analysis of potential environmental impacts."

II122-A-7 But the EIS mostly fails to meet the claim that it contains "detailed analysis of potential environmental impacts." The EDM Services Inc report in the EIS identifies gaps where information on the magnitude of the safety risks is not available. These gaps are essentially unbounded safety risks. The EIS fails to identify the safety risk mitigation for these unbounded safety risks. The EIS fails to address the impact of the mitigation of these unbounded safety risks. Again, Bellevue appears to equate ignorance with safety. Ignorance is the antithesis of safety. There is an expression "What you don't know may kill you." In this case, the more appropriate expression is "What you don't know may kill us." Putting your head in the sand is not mitigation. What is Bellevue's plan to address these gaps in the information necessary to assess safety risks?

II122-A-8 The DNV GL 2016 report identifies a number of unmitigated safety risks. The EIS fails to address any of these safety risks, the safety risk mitigations, and the safety risk mitigation impacts. The validity of that

II122-A -4 The comment is not specific enough about any deficiency to allow for response.

II122-A -5 All members of the EIS Consultant Team are professionals in their respective fields. The prime firm, ESA, has extensive experience preparing SEPA documents and is responsible for quality assurance of the documents it produces, including scientific integrity.

II122-A -6 The Energize Eastside EIS does not advocate for or against the project, but rather presents an analysis of potential environmental impacts from the proposed project and a range of reasonable alternatives.

The comment does not mention any specific "unbounded risks," therefore it is not possible to respond. The EIS does list many safety risks, including ones that are very remote, and also lists potential mitigation to reduce those risks.

II122-A -7 See response to comment II47-C-2. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.

I1122-A -8 The DNV GL analysis provided PSE with a detailed assessment of AC interference based on the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for more detailed engineering by PSE. The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study completed by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used to achieve an optimal transmission line route and powerline configuration to minimize the AC interference risks on the Olympic Pipeline system is consistent with industry practice. However, Stantec recommended that additional analysis be performed in the detailed design stage of the project to verify mitigation needs for the project prior to transmission line energization (Stantec, 2017). These measures were incorporated into Section 3.9.7.2 of the Phase 2 Draft EIS (and updated Section 4.9.8.2 of the Final EIS).

Even with reasonable worst-case assumptions, the results of the risk assessment completed for the Phase 2 Draft EIS indicated that there would be a very small increase in total risk. With the implementation of measures to mitigate potential construction risks described in Section 4.9.4 of the Phase 2 Draft EIS (and updated Section 5.9.4 of the Final EIS), these risks would be even lower.

Per federal law, Olympic is responsible for the maintenance and safe operation of the pipelines; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission lines and providing information to Olympic, the responsibility for protecting the pipelines from corrosion lies with Olympic.

In regards to the question on Bellevue's plan to conduct a comprehensive safety analysis addressing various safety risks cited in the comment, see Sections 3.9 and 4.9 of the Phase 2 Draft EIS for discussion on co-location and construction-related safety risks, see response to comment I1114-A-5 for discussion on effects on public services in case of a pipeline rupture, see response to comment I1122-A-41 regarding intentional destructive acts, and see response to comment 004-C-8 regarding mechanical failures.

II122-A-8 report is based on unproven claims made by PSE and Olympic. There are very significant impacts that will result from the process of validating these PSE and Olympic claims both initially and continually. The EIS fails to assess these impacts. What is Bellevue’s plan to address these impacts?

The safety related information in the EIS appears to be a casual and incomplete dabbling on a scattering of safety issues. There is no evidence in the EIS that Bellevue is conducting the proper comprehensive safety analysis. A safety risk assessment must be comprehensive and follow a disciplined and documented approach. The safety risks must be managed. Mitigation solutions must be engineered. The impact of those mitigations must be defined. It is Bellevue’s ethical responsibility to uphold protection of the public from the proposed energize eastside project. What is Bellevue’s plan to conduct a comprehensive safety analysis including the collocation safety risks, safety risks caused by inadvertent or unintentional errors, safety risks caused by mechanical failures, safety risks caused by intentional destructive acts, damage containment, and disaster recovery in the near term and through the entire life of operation of the proposed project?

II122-A-9 A cursory review of FEMA and Homeland security guiding principles identifies “Long-Term Vulnerability Reduction” as a key “Mitigation Core Capability.” The collocation of a 230 kilovolt high energy ignition source with a high pressure hazardous liquid petroleum pipeline fuel source in high population areas (R-6 and higher zoning) is completely contrary to FEMA guiding principles. Bellevue, through the EIS, fails to identify the impact of compliance with this FEMA guidance. What is Bellevue’s plan to address these safety issues and resulting impacts?

II122-A-10 The Department of Homeland Security Transportation Security Administration’s Pipeline Security Practice Observations dated September 19, 2011 lists a number of applicable Pipeline Security Smart Practice Observations for Risk Analysis. Has Bellevue conducted the risk analysis specific to the to determine mitigation impact? Has Bellevue at least conducted the risk classification? What is Bellevue’s plan to address these safety issues and resulting impacts?

II122-A-11 There are many quality processes and methodologies such as Failure Modes and Effects Analysis (FMEA), Hazard and Operability Analysis (HAZOP), and Anticipatory Failure Determination (AFD) which could be employed by a true safety engineer to assess the safety risks of the proposed energize eastside project. Tossing a couple of consultant reports in the EIS is not a methodology. It is little more than a smoke screen obscuring very significant, high impact, and unbounded safety risks. As evidenced in the EIS, Bellevue appears to reject any formal process to assess safety risks. This is an unacceptable breach of ethics by Bellevue. What is Bellevue’s corrective action plan to identify its safety analysis process failures and produce a comprehensive safety risk assessment, safety risk mitigation assessments, and safety risk mitigation impact assessments?

II122-A-12 Safety is a topic subject to evolution and of forward thinking. Automobile seat belts were not required until 1968, three years after the first pipeline was installed in the corridor. Child safety seats didn’t exist back then. Bicycle helmets did not exist back then. Although known to be a persistent toxic pollutant in the 1940s, DDT wasn’t completely banned until the time the second pipeline was installed. The dangerous effects of electrical transmission line induced AC corrosion of hazardous liquid pipelines were not understood until the 1970s after the second pipeline was installed. Until the Bellingham Olympic

II122-A -9 The commenter refers to Presidential Policy Directive 8 (National Preparedness), which describes the federal government’s approach to preparing for the threats and hazards that pose the greatest risk to the security of the United States. Responsibility for implementing this plan rests with the Department of Homeland Security and federal agencies. This high level guidance for federal agencies makes no reference to co-located utilities as being among the threats that pose the greatest risks to the security of the country. In general, from a SEPA perspective, preparedness or resilience is addressed specifically in SEPA documents to the extent resilience plans (goals and policies) are integrated into community comprehensive plans. Recognizing the public safety component of resilience, the Phase 2 Draft EIS analyzes and describes potential pipeline safety impacts and includes mitigation measures to reduce potential risks. See response to comment II7-A-1 for information on the pipeline safety risk assessment completed for the Phase 2 Draft EIS.

II122-A -10 The Transportation Security Administration (TSA) Pipeline Security Smart Practice Observations is a tool for pipeline security professionals seeking concepts or ideas to improve their security program. These smart security practices are geared toward pipeline security professionals working in the pipeline industry. This comment is outside the scope of the EIS because the purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE’s Energize Eastside project, not the ongoing operation of the Olympic Pipeline system.

II122-A -11 Two of the methods mentioned by the commenter, Hazard and Operability (HAZOP) analysis and, to a lesser extent, Failure Modes and Effects Analysis (FMEA), are techniques sometimes used by pipeline companies in conducting pipeline safety risk assessments. These are typically used in the safety assessment of new pipeline systems or modifications of existing pipeline systems. The pipeline safety risk assessment conducted by EDM Services to evaluate risk associated with potential interaction of PSE’s proposal with existing pipelines, utilized standard Qualitative Risk Assessment and Quantitative Risk Assessment methods commonly used in the pipeline industry. The AC Interference Study conducted by DNV GL to evaluate electrical interference from several route and configuration options with the objective of determining the option that would minimize AC interference on the pipelines, utilized existing industry methods and standards. The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study. Based on Stantec’s experience and industry standards, it was their opinion that the technical approach used in the analysis is consistent with industry practice.

I1122-A-12

Pipeline explosion (June 10 1999) the hazardous liquid pipeline safety standards were ineffective, incomplete, and left up to the operator to comply with or ignore:

"Olympic, Equilon and several employees faced a seven count indictment after the investigation in 2002. The companies pleaded guilty to several of the charges, leading to a \$112 million settlement, a record at the time. This was the first conviction against a pipeline company under the 1979 Hazardous Liquid Pipeline Safety Act."

[https://en.wikipedia.org/wiki/Olympic\\_Pipeline\\_explosion](https://en.wikipedia.org/wiki/Olympic_Pipeline_explosion)

I1122-A-13

A lot has been learned over the last half century regarding a variety of safety issues. Contrary to PSE's demonstrated beliefs, past ignorance is not a justifying precedent. Looking forward from a safety perspective, what is the wisdom of collocating of a 230 kilovolt high energy ignition source with a high energy hazardous liquid petroleum pipeline fuel source in high population areas? Without the necessary safety risk mitigations, there is none. The risks are greatly compounded by PSE incompetence and disregard for safety. How is Bellevue addressing safety as a topic subject to evolution and of forward thinking?

On March 9, 2016 at 1:40 AM, PSE single-handedly destroyed a large portion of a block in the Greenwood district. PSE caused \$3,000,000 of destruction. PSE destroyed or damaged 12 businesses. PSE destroyed livelihoods. PSE caused the injury of 9 firefighters. PSE planted that time bomb 12 years prior to the explosion. This is undeniable gross incompetence by PSE. This is undeniable gross disregard for property and human safety by PSE. This is not a rare oversight. The WUTC discovered there are over 40,000 more similar ticking time bombs planted by PSE. This is undeniable systemic incompetence by PSE. These dangers are inflicted on Puget Sound communities by a foreign owned monopoly that has proven itself to be degenerate.



(Mike Siegel/The Seattle Times)



Q13

**Examples of PSE's disregard for safety**

PSE was fined \$1,500,000 for 17 violations of pipeline safety regulations (<https://www.pipelinelaw.com/wp-content/uploads/sites/19/2016/10/WUTC-Investigation-Report.pdf>). This was a small slap on the wrist for a company with more than \$3,000,000,000 [annual revenues](#).

"...PSE called the fines 'disappointing and excessive' and reiterated that the pipe was damaged by people in a space where they were not supposed to be." (Seattle Times Mar 28, 2016).

PSE was quick to whine and quick to play blame game for their incompetence. This clearly shows that, besides incompetence, PSE has no moral compass, and no ethical standards.

I1122-A -12 As the commenter acknowledges, pipeline safety regulations have evolved over the years, often in response to pipeline incident findings. Some of these incidents, and the resulting changes to pipeline regulations, are described in Section 3.9.1 of the Phase 2 Draft EIS. See Appendix I-5, Pipeline Safety Technical Report, in the Phase 2 Draft EIS for additional information. There are measures PSE can take on their own transmission system to reduce operational impacts, as well as mitigation measures to minimize risk during construction (see Sections 4.9.8 and 5.9.4 of the Final EIS). The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system.

I1122-A -13 See response to comment I17-A-1.

PSE made the following statement as part of the public record to Newcastle City Council and Planning Commission meeting, February 2, 2016 (one month prior to PSE’s explosion):

“First of all, we should all remember that there are significant Federal standards that guide us both on pipeline work and on high voltage electric work. Those standards specify how pipelines have to operate with great detail including their safety procedures testing their pipes to make sure aging hasn’t worn them so that they’re safe, solid, and secure for all of us.”  
[http://newcastlewa.gov/UserFiles/Servers/Server\\_4026035/Media/Audio/Council\\_Meeting/2016/City\\_Council\\_Meeting\\_2016.02.02\\_LEVELED.mp3](http://newcastlewa.gov/UserFiles/Servers/Server_4026035/Media/Audio/Council_Meeting/2016/City_Council_Meeting_2016.02.02_LEVELED.mp3)

PSE’s actions speak much louder (explosively louder) than their words. Evidenced by the destructive force unleashed by PSE on Greenwood, PSE is not interested in following the law, is not interested in public safety, and is not interested in the public’s best interest. Therefore, the danger in PSE’s systemic technical incompetence in electrical engineering on PSE’s proposed energize eastside project is compounded by their systemic incompetence in pipeline safety.

PSE’s incompetence and untrustworthiness magnifies the numerous unbounded safety risks in PSE’s proposed energize eastside project. Bellevue must assess all safety risks, safety risk mitigations, and safety risk mitigation impacts in the context of PSE’s extreme incompetence and disregard for safety. The EIS is severely defective in that it relies on, and promotes, PSE’s dishonesty. The foundation of the EIS must instead be verifiably factual information. What is Bellevue’s plan to vet and discard PSE’s unsupported claims?

Bellevue’s naivete and the real world are light-years apart. Does Bellevue expect to fool anyone into believing “Risk to the public is not likely from constructing or operating the project near pipelines due to extensive safety policies and regulations” (Page 1-32 – draft phase 1 EIS)? But rules only apply if you apply them. Conversely, rules don’t apply if you don’t apply them. PSE doesn’t apply them. The collocation of the energize eastside project with the hazardous liquid pipeline is a continuous and unmitigated danger to our community.

The Puget Sound region is home to a community of the world’s smartest people in science, engineering, software, computers, medicine, aerospace, and manufacturing as well as many other fields. Professionals in the Puget Sound region are leading-edge problem solvers and whose many accomplishments are unrivaled anywhere else in the world.

In stark contrast, is the electrical utility, the PSE monopoly. PSE is so incredibly backwards and incompetent they can’t forecast electrical need accurately, they are ignorant about any sort safety methodology, they have no sense of customer value, they are the dirtiest electrical utility in the entire state of Washington, they operate one of the dirtiest electrical power plants in the entire United States, and worst of all is they have no cognizance or concern in regard to any of this.

Washington is considered a green state and its policies are likewise aligned. In contrast to that mindset, we have Bellevue promoting one of the worst black smudges: PSE’s coal fired energize eastside project. Bellevue should instead use its leadership role to promote intelligent solutions, sustainable solutions, and environmentally aware solutions.

II122-A -14 Information on PSE’s responsibilities and requirements in relation to this project is included in Sections 4.9.8.1 and 5.9.4.1 of the Final EIS. For PSE, national and state standards, codes, and regulations and industry guidelines govern the design, installation, and operation of transmission lines and associated equipment. In addition to these standards, codes, regulations, and guidelines, Sections 4.9.8.2 and 5.9.4.2 list additional measures that PSE has indicated it will use, and other mitigation measures the EIS Consultant Team has identified to provide additional safety assurances. The Partner Cities will use the Final EIS to support any permit decisions required. The Partner Cities, in issuing permits, can decide that additional conditions and mitigation are required, such as reporting of compliance efforts by PSE.

II122-A-14

2.1.2.2 Overview of the New 230 kV Transmission Lines page 2.13 states:

“In addition to the height and diameter of the poles, the diameter of the conductor (i.e., wire) will also increase. The wire on the existing corridor is currently 1.063 inches in diameter; the wire diameter of the proposed new wires will be 1.545 inches to accommodate the increased voltage.”

II122-A-15

Bellevue puts up quite a bit of a smoke screen here. The required conductor diameter is dependent on the amount of current it is required to carry. Conductor diameter has nothing to do with the voltage contrary to Bellevue’s misrepresentation. Per the DNV GL study, the worst case maximum current is 1315 Amps. However, PSE intends to replace the existing conductor with Falcon/ACSS which has working capacity of 2576 Amps. This conductor has almost twice the current carrying capacity as required to support the worst-case demand. The increased diameter of this replacement conductor adds significantly to the visual blight. There are many other choices in conductors that support the current carrying capacity requirements but are smaller diameter and therefore less of a blight than Falcon/ACSS.

II122-A-16

This clearly indicates that PSE is scaling the capacity of their proposed energize eastside project well beyond the requirements they state for the project. Energize eastside appears to be PSE’s cover story for its undisclosed agenda. Bellevue is directly responsible for propagating a misrepresentation of the facts and obscuring rather than highlighting the discrepancy between PSE’s planned conductor sizing and actual need. Why does Bellevue choose to obscure and hide the truth here?

II122-A-17

EIS Pipeline Safety EIS Appendix I-5 Section 1.1.2 Page 8 indicates a breach in the hazardous liquid pipeline induced by AC current from energize eastside can continuously spew over 26,000 gallons of toxic and flammable petroleum per hour (8% of the 333,000 gallons per hour flow rate) while meeting federal leak detection standards. In a residential area, this is completely unacceptable.

II122-A-18

Further, the EIS fails to state how much toxic and flammable liquid continues leaking from corrosion perforations caused by induced AC current from PSE’s proposed energize eastside project after leak detection is triggered. Is it the 372,162 gallons or some other value? The EIS is defective, in that it ignores the impact of a sustained but undetected leak caused by induced AC current from PSE’s proposed energize eastside project.

II122-A-19

Pipeline Safety EIS Appendix I-5 Section 1.1.3 Page 9 states:

“OPL did not provide specific details regarding the precise type and location of their mainline block valves and related facilities within this segment. OPL treats these data as confidential information which is not available for public disclosure due to potential security risks”

II122-A-20

In other words, the risk is so high Bellevue cannot be trusted and is not allowed to access the information to assess it. Bellevue cannot determine the sufficiency of pipeline control needed for safe collocation of the energize eastside project. This is no excuse to ignore this safety issue. The EIS is defective, it ignores the criticality of this impact. There is no assessment in the EIS regarding pipeline shutoff requirements or alternative mitigations that would be necessitated by the corrosion stress and electrical fault stress induced by the transmission lines and structures in PSE’s proposed energize eastside project. The collocation of the energize eastside project with the hazardous liquid pipeline is a continuous and unmitigated danger to our community. What is Bellevue’s plan to address these safety issues and resulting impacts?

II122-A -15 The Phase 2 Draft EIS states that the larger conductor diameter is needed "to accommodate the increased voltage." This is a simplification, meant to indicate that the 230 kV line needs to be larger than the existing line. It could have been written more accurately as "to accommodate the increased load on the higher voltage 230 kV lines." The remainder of the comment has to do with the actual capacity of the proposed conductor. This is not a subject under review in the EIS. The purpose of the EIS is to evaluate the probable significant environmental impacts of PSE's proposed project. There are no significant impacts that are directly related to the diameter of the conductors. It is recognized that the weight of the lines is related to the structural strength of the poles that support them.

II122-A -16 The wire on the existing corridor is currently 1.063 inches in diameter; the wire diameter of the proposed new wires will be 1.545 inches to accommodate the increased voltage (see Section 2.1.2 of the Phase 2 Draft EIS). Although the wire diameter would increase, changes in wire diameter are not expected to be perceivable and therefore are not considered as part of this analysis (see Attachment 1 of Appendix C of the Phase 2 Draft EIS). This is also supported by the simulations provided in Attachment 2 of Appendix C.

II122-A -17 See response to comment OO4-F-2.

II122-A -18 Section 1.1.2 of Appendix I-5 (Pipeline Safety Technical Report) of the Phase 2 Draft EIS indicates that the normal flow rate of the 20-inch Olympic pipeline is 7,900 barrels per hour (333,000 gallons per hour). This section does not discuss the specific leak detection thresholds of Olympic’s system; such information was requested of Olympic but not provided. However, Olympic did respond that its PLDS (Pipeline Leak Detection System) meets or exceeds state and federal requirements for pipeline leak detection including WAC 480-75-300 (see Section 1.1.3 of Appendix I-5 in the Phase 2 Draft EIS). WAC 480-75-300 requires that each pipeline operator’s leak detection system be capable of detecting a leak equivalent to 8% of the maximum flow in 15 minutes. As a result, a 26,000 gallon spill must be identified in less than 15 minutes. This release flow rate would not be “continuous.”

It should also be noted that PSE's proposal will not change Olympic's leak detection system, which is currently in place.

II122-A -19 There are a number of components to a pipeline operator's leak detection system. Olympic's Pipeline Leak Detection System (PLDS) is just one such component. Should a very slow unintentional release occur, below the threshold of this system, there are other methods of detection. Some of these include:

- Pipeline Patrols – 49 CFR 195.412 requires pipeline operators to inspect their pipeline rights-of-way at intervals not exceeding 3 weeks, but at least 26 times per calendar year. Very small leaks such as this can be identified during these inspections. For example, discolored vegetation is often indicative of a small release.
- Over-Short Accounting – In addition to the real time leak detection, such as Olympic's PLDS, pipeline operators maintain over-short accounting of pipeline gains and losses; these are cumulative accountings over longer periods of time (e.g., 24 hours, 7 days, monthly, etc.). A small, long-term release can be identified by continued losses in these accountings.

It should also be noted that such slow, long-term releases seldom pose a fire or explosion risk to the public; the released contents are most often dispersed into the air (evaporation) or into the soil. This current risk would remain under the No Action Alternative.

II122-A -20 See response to comment OO4-A-8.

I1122-A-21

Pipeline Safety EIS Appendix I-5 Section 1.1.4 Page 9 states:

“OPL considers specific details regarding OPL’s emergency response procedures as confidential information not available for public disclosure due to potential security risks.”

In other words, the risk is so high Bellevue cannot be trusted and is not allowed to access the information to assess it. This is no excuse to ignore this safety issue. The EIS is defective, it ignores the criticality of this impact.

I1122-A-22

Bellevue fails to address the enormous safety risks involved in emergency response such as fire protection posed by the collocation of the 230 kilovolt transmission lines, supporting conductive metal towers, and the high-pressure petroleum pipelines.

BPA warns of the danger of fire under, or adjacent to, transmission lines:

“Smoke and hot gases from a large fire can create a conductive path for electricity. When a fire is burning under a power line, electricity could arc from the wire, through the smoke and to the ground, endangering people and objects near the arc. BPA does not permit burning within the right-of-way. Field burning and other large fires in and around power lines can damage power lines and cause power outages. Water and other chemicals used to extinguish those fires should never be directed toward a power line.”

<https://www.bpa.gov/news/pubs/generalpublications/lusi-living-and-working-safely-around-high-voltage-power-lines.pdf>

During the North Cascades fires that started in August of 2015, the National Association of Conservation Districts stated:

“The smoke from the fire was so thick that the particles in the air were conducting electricity.”  
<http://www.nacdn.org/resources/forestry/featured-stories/washington-doing-its-part-to-calm-fires>

Seattle City Light spokesman Scott Thomsen explains:

“You would have an arc of electricity that you could see bright flashes and sparks coming off the line as the electricity is trying to get to ground and it’s trying find a faster path to get to ground than going down the metal wire. So, if there’s enough material around it that can conduct electricity and gives it a shorter path to where it wants to go, it will follow that path.”  
<http://www.opb.org/news/article/wildfire-shuts-down-hydropower-on-the-skagit-river-what-you-need-to-know/>

Great River Energy CoOp (Minnesota) safety rules state:

- Fires should not be started under a power line. Smoke and hot gases from fires can create a conductive path for electricity.
- It is possible that the power line could flash to the ground through hot air and smoke, which is a serious safety hazard.

<http://www.swce.coop/operations/documents/safetyaroundpowerlines.pdf>

I1122-A -21 Olympic’s Facility Response Plan is not made available to the public. Rather, it is shared with federal, state, and local officials, including emergency planning agencies and first responders, to strengthen and coordinate planning and prevention activities, with certain key information redacted due to potential security risk. The plan provides guidelines to prepare for and respond to a spill from the Olympic Pipeline system. The Facility Response Plan, which received final 5-year approval by Ecology in 2016, serves as Olympic’s oil spill contingency plan under WAC 173-182. The Facility Response Plan is based on the Northwest Area Contingency Plan (Regional Response Team 10 and Northwest Area Committee, 2016), as approved by Ecology and the federal Pipeline Hazardous Materials Safety Administration.

I1122-A -22 See response to comment I1114-A-5.

Electrical Safety Handbook for Emergency Responders revised fifth edition 2013 (New Mexico Public Regulations Commission)

- Intense fire and dense smoke enable electricity to jump to the ground
- Approach limits must be increased because of arc-over hazard and dangers of step potential
- In proximity to a fire, the arc-over hazardous zone is 50 feet on either side of 230 kilovolt power lines
- Arc over can be through the tower or directly to the ground

Also from the handbook, foam cannot be used on electrical equipment since it's conductive [http://www.nmprc.state.nm.us/transportation/pipeline/docs/Electrical\\_Safety\\_Handbook\\_for\\_Emergency\\_Responders\\_2013.pdf](http://www.nmprc.state.nm.us/transportation/pipeline/docs/Electrical_Safety_Handbook_for_Emergency_Responders_2013.pdf).

Foam is the one and only effective way to suppress a petroleum fire. But since foam is conductive, the mere presence of a PSE collocated 230 kilovolt transmission line prevents any viable attempt at safely suppressing a pipeline fire. As shown in Figure 1, the PSE collocated 230 kilovolt transmission lines straddling the pipeline creates an electrocution zone of death extending 50 feet from the 230 kilovolt transmission lines and supporting structures. When a catastrophic rupture of the hazardous liquid (petroleum) pipeline occurs, PSE's collocated 230 kilovolt transmission line could prevent any subsequent disaster recovery.

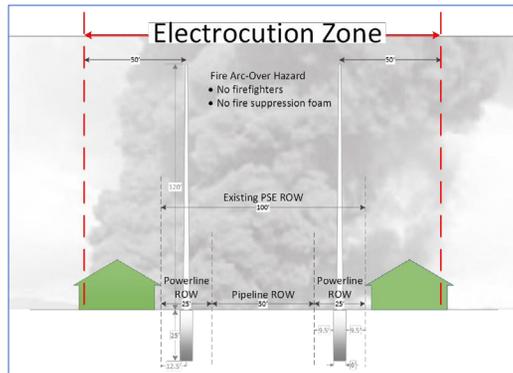


Figure 1 PSE's Electrocution Zone

I1122-A-22

Why does Bellevue ignore this safety issue? What is Bellevue's corrective action plan to identify its safety analysis process failures and produce a comprehensive safety risk assessment, safety risk mitigation assessment, and safety risk mitigation impact assessment for all emergency response and disaster recovery scenarios?

II122-A-24

Since PSE is the sole design authority, safety risk is unbounded. On March 23, 2016, PSE threatened Newcastle that if setbacks for the towers from the pipeline corridor were required, PSE would zigzag the six high voltage conductors across the collocation corridor, crossing both hazardous liquid pipelines in multiple locations. PSE stated:

“And so, for example, if a 50-foot setback is adopted, then non-standard designs would be necessary. So, under this scenario, if existing transmission lines that are behind City Hall now were to meet such a standard, then we’d have about 20 houses that we’d need to condemn. And we’d zigzag throughout the corridor to make that happen.”  
[http://newcastlewa.gov/UserFiles/Servers/Server\\_4026035/Media/Audio/Planning\\_Commission/2016/Planning\\_Commission\\_Meeting\\_2016.03.23.mp3](http://newcastlewa.gov/UserFiles/Servers/Server_4026035/Media/Audio/Planning_Commission/2016/Planning_Commission_Meeting_2016.03.23.mp3)

This would be at the worst case dangerous crossing angle. No rational person on planet earth would ever suggest such a dangerous configuration. But this is exactly what PSE stated on record they will do if we try to establish safe margins to protect ourselves in Newcastle. This is another mark of PSE’s complete incompetence, disregard for safety, and disregard for the public’s best interests. The DNV GL 2016 report does not address this very dangerous configuration. Bellevue’s EIS also does not address this very dangerous configuration. Bellevue has done insufficient research into the options that PSE’s considers viable. Bellevue’s EIS is deficient in not identifying the safety risks, safety risk mitigations, and the safety risk mitigation impact of the options PSE may pursue. What is Bellevue’s plan to research the options that PSE’s considers viable, and identify the safety risks, safety risk mitigations, and the safety risk mitigation impact?

Pipeline Safety Appendix I-5 Section 1.4 Page 12 states:

“...there have been a few significant pipeline incidents. Five (5) of these incidents have resulted in changes, and proposed changes, to the Federal pipeline regulations which should further improve pipeline safety.”

This is the typical after-the-fact response to preventable disasters. As is chronic of federal policy, no action is taken until after a disaster occurs. Those proposed changes may not ever be adopted. At best, they are some future state not the current state. Therefore, they are irrelevant to the currently proposed energize eastside project. There are many pending changes being considered by PHMSA to address incomplete and deficient safety standards regarding detection of defects and repair of pipeline defects. But again, they have no bearing at this time and are therefore irrelevant as regulatory controls for safety of PSE’s proposed energize eastside project.

II122-A-25

Because of this, preemptive safety mitigation must be applied down at the local level. The EIS is defective in that it ignores this issue. Collocation of a high energy ignition source with a high energy fuel source in a high population area is reckless. It is inexcusable that Bellevue does not conduct a complete fact-finding assessment of the safety issues. Why does Bellevue add irrelevant filler material to the EIS while ignoring the real issues? What is Bellevue’s plan to address these safety issues and resulting impacts?

II122-A-26

The draft phase 2 EIS continues down the same path of ignorance established by Bellevue in the draft phase 1 EIS in which page 1-32 states: “Risk to the public is not likely from constructing or operating the project near pipelines due to extensive safety policies and regulations.” That statement is, in essence,

II122-A -24 See response to comment II36-A-2 in regards to the Newcastle setback. For PSE’s Proposed Alignment, as analyzed in the Final EIS, the Newcastle Segment would not feature "zigzagging" poles throughout the corridor.

II122-A -25 See response to comment 004-B-2.

II122-A -26 Information on PSE’s responsibilities and requirements in relation to this project is included in Sections 4.9.8.1 and 5.9.4.1 of the Final EIS. For PSE, national and state standards, codes, and regulations and industry guidelines govern the design, installation, and operation of transmission lines and associated equipment. In addition to these standards, codes, regulations, and guidelines, Sections 4.9.8.2 and 5.9.4.2 list additional measures that PSE has indicated it will use, and measures the EIS Consultant Team has identified to provide additional safety assurances. The Partner Cities will use the Final EIS to support any permit decisions required. The Partner Cities, in issuing permits, can decide that additional conditions or mitigation are required, such as reporting of compliance efforts by PSE. Olympic, as the pipeline operator, is responsible for operating and maintaining their pipelines in accordance with federal standards. Therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipeline from corrosion lies with Olympic.

See response to comment II113-A-2 regarding operational risks.

See response to comment II61-A-7 regarding construction risk. It is true that despite regulations in place, pipeline incidents can and do occur. It is important to note that as a result of the Bellingham and other pipeline incidents, the National Transportation Safety Board (NTSB) made a number of recommendations that resulted in new gas pipeline regulations requiring improvements in gas pipeline integrity management. As a result of this new federal legislation, the State of Washington passed the Underground Utilities Damage Prevention Act in 2011 that increased requirements for pipeline operators operating in the State of Washington. See Section 3.9.1.2 of the Phase 2 Draft EIS for additional information.

II122-A-26

completely meaningless since it is completely unsupported. The Bellingham disaster occurred 5 years after the initial pipeline damage. The project leading to the Bellingham disaster was very closely monitored. A cursory review of data from US DOT Pipeline and Hazardous Materials Safety Administration on hazardous pipeline shows numerous incidents and the associated cost of damage while "extensive safety policies and regulations" were place:

- ELECTRICAL ARCING FROM OTHER EQUIPMENT/FACILITY (06/12/2010 - 09/09/2015)
  - \$68,772,650
- THIRD PARTY EXCAVATION DAMAGE (01/09/1996 - 12/08/2015)
  - \$144,702,203
- UNSPECIFIED CORROSION (10/28/1997 - 11/19/2009)
  - \$6,062,845
- Miscellaneous
  - \$160,674,585
- Injuries and fatalities (02/27/1996 - 06/22/2015)
  - 34 injuries (8 in 06/10/1999 Bellingham Olympic Pipeline disaster)
  - 37 deaths (3 in 06/10/1999 Bellingham Olympic Pipeline disaster)

Why does Bellevue ignore the historical truth and make its unsupported claim regarding risk to public safety?

In Chapter 8 References Environmental Health – Pipeline Safety page 8-15, the EIS cites DNV GL 2015. Criteria for Pipelines Co-Existing with Electric Power Lines. Final Report No. 2015-04. Prepared for the INGAA Foundation. Prepared by S. Finneran. October.

But the EIS is grossly defective in it doesn't apply the criteria. Per the reference:

- Severity Ranking of HVAC Interference – High
- Relative Severity of HVAC Interference – Very High
- Relative Severity of HVAC Corrosion – Very High
- Relative Severity of HVAC Collocation Length – High
- Relative Severity of HVAC Crossing Angle – High

The EIS is defective, in that it ignores the criticality of the collocation safety risks and mitigation impact. What is Bellevue's plan to address these safety issues and resulting impacts?

Using the criteria from the DNV GL 2015 report, a reasonable separation distance between the power line high energy ignition source and the pipeline high energy fuel source to meet a goal of a low or very low severity ranking would be 500 feet or greater. This separation would mitigate a substantial portion of the safety risks and would significantly reduce the time and expense required fully assess the safety risks, risk mitigations, and mitigation impacts that are otherwise mandatory for the collocation. This, or a provably equivalent safety margin must be provided. Bellevue's EIS is defective in that it fails to establish adequate safety margins and fails to assess the impact of providing the safety margins.

In a perfect storm scenario, an arc to ground from a transmission line failure, weather, lightning or other event allows the hazardous liquid pipeline to be energized to the point of rupture requiring the pipeline to be shut down. But given the pipeline is energized at lethal potential, there is no automatic or manual

II122-A -27

The risk ranking referenced by this commenter attempts to assist with identifying the susceptibility of a pipeline to AC interference based on several factors. Once identified as a potential risk, a detailed study including modeling is required to determine the actual AC interference levels the pipeline would be exposed to, to quantify the actual risks, and to design required mitigation. The pipelines were identified as requiring a detailed study, which was completed by DNV GL as part of the AC Interference Study completed for the project.

II122-A -28

Regarding severity rankings from DNV GL 2015, see response to comment II122-A-27.

Regarding the potential for the pipeline to be "energized" to the extent that it could not be shut down, with the proposed shield wire, in the event of arcing to the pipeline, energy should be transferred to ground where it can dissipate safely without causing damage at the point of discharge.

Regarding construction risks and mitigation measures included in the Phase 2 Draft EIS, see responses to comments II61-A-7 and II9-A-6.

As part of the risk assessment completed for Phase 2 Draft EIS, natural forces (e.g., seismicity, lightning strikes, and extreme weather) were considered as potential causes of pipeline damage (see Section 3.9.3.3).

The commenter also brought up concerns related to insulation damage, or coating stress, in the event of a phase-to-ground fault caused by lightning. The DNV GL analysis provided PSE with a detailed assessment of AC interference based on the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for more detailed engineering by PSE. The Phase 2 Draft EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference during the detailed design stage and again after the project is constructed and operational (Stantec 2017). For example, the EIS includes the following mitigation measure "Fully assess the safety and coating stress risks for phase-to-ground faults at powerline structures along the entire area of collocation, including both inductive and resistive coupling." See Section 4.9.8.2 of the Final EIS for additional information.

I1122-A-28

means to shut it down. This runaway situation is quite possible. The mitigation for this is physical separation. Other collocation issues:

- Immediate or latent damage to the pipeline during construction.
- Latent damage to the pipeline due to forces transmitted from the towers to the footing, and to the soil adjacent to the pipeline. The mitigation for this is physical separation.
- Other immediate or latent mechanically induced failures
- Immediate or latent electromagnetically induced failures
- Damage to the pipeline cathodic protection insulation through heating caused by lightning strikes to towers conducted to the ground adjacent to the pipeline.
- Collateral damage
- Natural events

In regard to facilities sharing a corridor, The Corridor Concept Theory and Application by Charles H. Weir, C.L.S., P.E.N.G and June P. Klassen states:

“The disadvantages include: Increased Disaster Potential. Should a natural catastrophe, a subversive action, or major facility failure occur, the potential for multiple facility failure is increased due to proximity.”

It also states:

“The major conflict between power transmission lines and pipelines in corridors is an unavoidable result of proximity. Spacing between these two facilities should be in the range of 30 metres due to voltage and resultant current flows which may be induced in a pipeline from adjacent powerlines.”

I1122-A-29

The mitigation for this is physical separation. Clearly, the collocation of the energize eastside project with the hazardous liquid pipeline is a continuous and unmitigated danger to our community.

An article was published in the Newcastle News on Jan 6, 2017 titled: “Study: Energize Eastside, pipeline can safely coexist”. An excerpt from the article states:

“A recent study shows the Energize Eastside project can safely coexist in the same corridor that contains an Olympic Pipeline Co. channel carrying fuel to SeaTac Airport, according to a Puget Sound Energy news release. DNV GL, described as a national pipeline safety consulting firm, completed the PSE-commissioned study”

This report is referenced in the EIS as DNV GL 2016.

This article highlights PSE’s total incompetence regarding safety, its continued ignorance of safety issues, and its complete lack of any ethics and integrity with regard to protecting public safety.

A letter to the editor was published in the Newcastle News on Feb 3, 2017 titled: “Puget Sound Energy’s report on pipeline safety has holes”. The letter states:

“PSE bases its weak hypothesis on a report it cites from DNV GL. That report only addresses a subset of the electromagnetic safety issues regarding collocation of the proposed Energize Eastside project with the petroleum pipeline. Further, electromagnetic related safety issues are

Regarding lateral forces, design of pole foundations consider a limit of deflection due to loading conditions. As a result, even the highest conductor loads will cause a minimum amount of deflection in the surrounding soil. As indicated in Section 4.9.8 of the Final EIS, PSE would continue to coordinate with Olympic, including providing pole designs and locations for Olympic’s review.

Other aspects of this comment do not cite any specific deficiencies in the EIS and therefore cannot be addressed.

I1122-A -29

As described in Section 3.9.1.4 of the Phase 2 Draft EIS, PSE retained DNV GL (the author of the report “Criteria for Pipelines Co-Existing with Electric Power Lines”) to develop a detailed analysis of risks and recommendations for the Energize Eastside project. This study (“A Detailed Approach to Assess AC Interference Levels Between the Energize Eastside Transmission Line Project and the Existing Olympic Pipelines, OLP16 & OPL20”), referred to in the EIS as the AC Interference Study, was used in preparing the analysis for the Phase 2 Draft EIS. The study included recommendations related to the design of pole locations, layout, and configuration to mitigate potential electrical interference-related impacts on the pipelines. As noted in the comment, several industry guidance documents have presented general parameters for locating transmission lines and pipelines in shared corridors, which are conservatively high limits used to determine when an engineering assessment, such as the one prepared by DNV GL for the project, may be required. The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering by PSE, as described in Section 4.9.8 of the Final EIS. The EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational.

only a subset of the full spectrum of safety issues raised during the EIS process. The validity of the DNV GL report is dependent on information that was not independently verified and was provided by a very dubious source (PSE). The DNV GL report essentially concludes the safety risks cannot be completely assessed until the project is complete and operating.

To base their conclusion on so little information on such a small part of the overall safety risk created by the propose Energize Eastside project shows PSE’s systemic ignorance of the magnitude of the safety problem and the impact on the community, and points to a large gap in PSE’s technical competence.

Safety is something that must be proven, not assumed. Safety is something that must be analyzed and design in, not added on after something bad happens. All safety risks must be mitigated with adequate margin. PSE claims victory but Energize Eastside isn’t even at square one yet.

Newcastle News was fundamental in drawing local attention to the safety issues that resulted in Olympic Pipelines disaster in Bellingham on June 10, 1999. It’s unfortunate the attention was after lives were lost and the damage was done. Media and public pressure brought about many positive safety changes. For Energize Eastside, we need to do the same, but before the fact.”

The validity of the DNV GL 2016 report is predicated on a 75 mil (thousandths of an inch) coal tar pipe coating thickness and 100% integrity of the coating. Per the DNV GL 2016 report:

“Additionally, research has indicated the highest corrosion rates occur at ‘holidays’ with surface areas of one to three square centimeters.”

For the 20-inch diameter hazardous liquid pipeline within Newcastle, there is over 30 million square centimeters of surface for the 20-inch hazardous liquid pipeline (20 inch diameter x 3.14 x 1.2 mile x 5280 feet per mile x 12 inches per foot x 6.45 square centimeters per square inch ~ 30.7 million square centimeters).

This is over 30 million possible undetected failure points within Newcastle for the 20-inch hazardous liquid pipeline. The 16-inch hazardous liquid pipeline aggravates this problem with an additional 24.6 million points of potential disaster. In case it’s not obvious, a ‘holiday’ in this case is a bad thing, not a good thing. In total, there are over 55 million one-square-centimeter potential failure points within Newcastle alone, a failure at any single one square centimeter area would be disastrous. A single coating void or gap in any one of the 55 million square centimeters of pipe surface is an unbounded safety risk. For reference, the area of the face of a penny is about 2.8 square centimeters. The EIS is defective in that it fails to address critical safety issue of coating flaws, the mitigation for this issue, and the impact of this mitigation.

How will PSE initially and periodically assess the coating is intact and is no less than the stated thickness? The referenced DNV GL 2016 report states that allowable test voltage for holiday detection of a 75 mil coal tar coating is 10,825 volts. What is the impact of this initial and periodic assessment? The EIS is defective in that it does not address required frequency, methodology and impacts. What is Bellevue’s plan to address these tests and resulting impacts to conduct the tests?

Section 4.9.3 of the Phase 2 Draft EIS (and updated Section 5.9.3 of the Final EIS) describes potential pipeline safety risks related to construction activities. As described in this section, with PSE’s awareness of the pipelines within the corridor, Washington State’s Damage Prevention Law and “one-call” locator service, and Olympic’s procedures to prevent third party damage, the increased risk posed to the pipelines during construction is relatively low. Even with reasonable worst-case assumptions, the results of the risk assessment indicated that there would be a very small increase in total risk during construction. With implementation of measures to mitigate potential construction risks described in Section 5.9.4 of the Final EIS, these risks would be even lower.

II122-A -30 The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study prepared by DNV GL. Based on Stantec’s experience and industry standards, it is their opinion that the technical approach used in the analysis is consistent with industry practice. Stantec has reviewed this comment and noted that the more coating holidays and the poorer the coating, the less susceptible a pipeline is to AC interference, and especially AC corrosion. The poor coating allows the AC current to discharge to the ground, reducing the AC voltage on the pipelines by effectively “mitigating” or “grounding” the pipelines. The AC corrosion and AC interference risks on a bare pipe are minimal. AC corrosion did not become a major concern in the industry until the introduction of high quality, thin coatings such as FBE, which typically would have few, small holidays (i.e. in the one square centimeter range). The greatest corrosion risks occurs at small holidays as they result in the highest AC current densities. With the same AC voltage level, the AC current density decreases as the holiday size increases, and therefore so does the risk of AC corrosion.

II122-A-30

The DNV GL report refers to NACE SP0188-2006 "Discontinuity (Holiday) Testing of New Protective Coatings" for the calculation that the coating on the hazard liquid pipeline should withstand 10,825 Volts. Since that value is for new coatings and the pipeline is 45+ years old, the calculation is worthless. It is essentially baseless pseudo-science.

Per the Materials Performance Magazine article "Protecting a Pipeline When Its Coating Has Aged" dated March 1, 2107):

"Coatings are the main tools for protecting a pipeline against external corrosion, but they will weaken due to age and other factors. "All coatings have a service life," says NACE International member Jeffrey L. Didas, a NACE-certified Specialist in coatings as well as cathodic protection (CP) and corrosion, and a senior corrosion engineer with MATCOR, Inc. (Chalfont, Pennsylvania). "Over time a coating will age and deteriorate due to soil stress, pipe movement, temperature changes of the pipe, and wet/dry, flood/drought conditions," he adds. Didas notes that major pipeline construction from the 1940s to the 1960s mainly used coal tar enamel or asphalt enamel coatings for pipelines."  
<http://www.materialsperformance.com/articles/coating-linings/2017/03/protecting-a-pipeline-when-its-coating-has-aged>

I1122-A-31 Bellevue has an ethical responsibility to produce a factual Environmental Impact Statement. It is a complete betrayal of public trust to proliferate baseless pseudo-science in the EIS. The EIS is defective in that it does not address the critical safety issue of cumulative age effects and deterioration of the coating and the impact of mitigation. Why does Bellevue hide the defective analysis in the reports that it references? What is Bellevue's plan to address this safety issues and resulting impacts?

I1122-A-32 The validity of the DNV GL report is predicated on peak current of 1315 Amps. How will this be continuously controlled and independently monitored and verified? What is the impact of providing this control and monitoring? The EIS is defective in that it does not address the critical safety issue of peak load limit enforcement and the impact of mitigation. What is Bellevue's plan to address this safety issues and resulting impacts?

I1122-A-33 The DNV GL report does not address the existing condition of the high pressure hazardous liquid pipeline including discontinuities, patches, and other repairs. Since these discontinuities cause deviations in the induced current flow, they affect corrosion rates and patterns in the locality of the discontinuities and magnify localized corrosion stress points on the high pressure hazardous liquid pipeline. Welding repairs with dissimilar materials including the filler material and grain structure change due to heating, melting, and fusing of the materials lead to the potential of localized corrosion. The EIS is defective in that it does not address this critical safety issue and the impact of mitigation. What is Bellevue's plan to address these safety issues and resulting impacts?

I1122-A-34 The referenced DNV GL 2016 report describes corrosion rates but not corrosion depth rate. The report fails to address the non-uniformity of current density and the high current density at flaws in the pipeline coating. The report states that below 20 Amps per square meter (meter<sup>2</sup>) current density, corrosion does not occur. This statement is extremely misleading in that it only applies to uniform current flow through the surface of the pipe. There are 10,000 square centimeters in a square meter (1 meter<sup>2</sup> = 10,000 centimeter<sup>2</sup>). Where average surface current over a square meter is concentrated at a square centimeter coating flaw the current density is magnified 10,000 times. At 20 Amps per square

I1122-A -31 Validating Olympic's system operation is outside of the scope of the EIS for the Energize Eastside project. Olympic, as the pipeline operator, is responsible for operating and maintaining their pipelines in accordance with federal standards. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system. However, there are measures PSE can take on their own transmission system to reduce operational impacts, as well as mitigation measures to minimize risk during construction. These mitigation measures are included in Sections 4.9.8 and 5.9.4 of the Final EIS.

I1122-A -32 See response to comment OO4-C-2.

I1122-A -33 Coating holidays in the pipeline are not considered "discontinuities." They are considered in the model via the coating resistance that was used. The poorer the coating and the more holidays, the more paths the AC current has to get to "ground," and therefore, the less AC induction voltage along the pipeline.

The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system. In addition, Olympic is responsible for protecting the pipelines from corrosion, independent of PSE's Energize Eastside project.

I1122-A -34 In their analysis, DNV GL considered the current density on a worst-case one square centimeter coating holiday and the measured soil resistivity, along with the induced AC potential from the model, which is consistent with industry practice and very conservatively high for the age of the Olympic pipelines. Thus, the small coating holiday is already used in this calculation and the final number for current density. Note that amps per meter squared (amps/m<sup>2</sup>) is the unit of measure used in the industry. The statement that corrosion does not occur below 20 amps/m<sup>2</sup> was taken from the NACE State of the Art Report regarding findings and conclusions from a 1986 German study of AC corrosion. It is generally agreed in the industry that the risk of AC corrosion at less than 20 amps/m<sup>2</sup> is low.

I1122-A-34

meter, one square centimeter coating flaw per square meter of surface would result in a localized current density equivalent to 20,000 Amps per square meter at each coating flaw as shown in Figure 2. This concentration of current density at a coating flaw accelerates the rate of corrosion through the hazardous liquid pipeline wall.

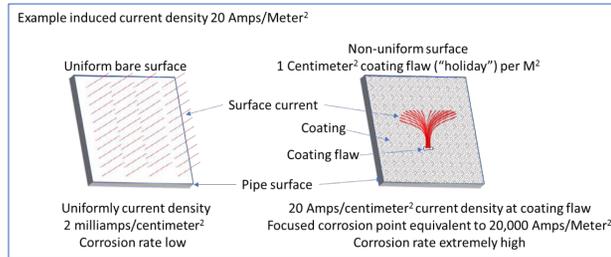


Figure 2 PSE's accelerated corrosion of the hazardous liquid pipeline at a coating flaw

Why does Bellevue gloss over this critical corrosion issue?

Corrosion depth rate is a significant safety risk issue. Corrosion depth rate indicates how rapidly the high pressure hazardous liquid pipeline wall is penetrated and fails. Per the Journal of Research of the National Institute of Standards and Technology Volume 115, Number 5, September-October 2010 corrosion depth rates have been measured as high as 1 millimeter per year. Per section 1.1.2 of the EDM services report in the draft phase 2 EIS the 20-inch outside diameter pipeline "is constructed of API 5L X52 grade, 0.250-inch wall thickness." The section states:

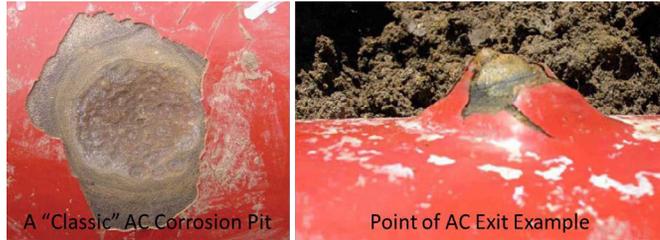
"This pipeline was internally inspected using a high resolution deformation and high resolution magnetic flux leakage tool in April 2014. The next planned internal inspection is early 2019".

This is a five-year interval between inspections. During this interval, corrosion depth at a one square centimeter flaw in the pipeline coating could penetrate 5 millimeters (0.197 inches) into a 0.250 inch thick pipe wall. This leaves 0.053 inches (13 sheets of paper thickness) of corroding material holding back 500 PSI of toxic and flammable hazardous liquid. 79% of the pipeline wall thickness would be corroded away. That applies to a pipe that is in new condition with uniformly full wall thickness. The scenario is much worse for a nearly half century old pipe that isn't in new condition. This is a life-threatening game of chance where PSE always wins and we lose. Why does Bellevue condone this gamble?

The EIS is defective in that it does not address this critical safety issue and the impact of mitigation. What is Bellevue's plan to address this safety issue and resulting impacts?

I1122-A -35 As described in the DNV-GL report, the equation recommended by NACE uses the thickness of the pipeline coating, not the wall thickness.

The purpose of the DNV-GL study was to assess the potential for AC interference between the transmission lines and the pipeline(s), which was used to inform the design. The intent of the study was not to determine the AC corrosion rate. It is extremely difficult to determine the AC corrosion rate due to the number of variables involved in this complex interaction. AC corrosion is a time-based phenomenon, and the AC potential and AC current density vary directly with the transmission line loads, which are constantly changing. The DNV-GL study looked at the likely worst-case operational conditions (peak loads and soil resistivity) to assess the theoretical current density. By using the Willow 1 route (PSE's Proposed Alignment) and operating both lines at 230 kV, the modeled current density would be below 20 A/m<sup>2</sup>, which is in the low likelihood of AC corrosion range.



Induce AC corrosion examples from "AC Corrosion and Mitigation" Mike Ames Director Technical Operations Chapman Engineering Oct 20/21, 2015 KCC Pipeline Safety Seminar Manhattan, KS

The referenced DNV GL 2016 reports seems to imply that inspection is somehow equivalent to, and a substitute for, prevention. With the high corrosion stress on the pipeline caused AC current induced by PSE's proposed energize eastside project, there is reasonable probability that neighborhoods will be deep in petroleum well before the inspection that might have prevented it. Why does Bellevue's put us at this risk?

The DNV GL 2016 report states:

"Considering the 230 kV/115 kV loading scenario, the maximum induced AC potential for OPL16 and OPL20 was approximately 17 volts and 19 volts, respectively, which is greater than the NACE 15 volt safety threshold. Based upon the model results, after the transmission lines are energized field monitoring and/or mitigation by the pipeline operator may be needed to confirm these AC potentials are less than the 15 volt safety threshold."

This is complete irresponsibility by DNV GL to brush off violation of the NACE 15 volt safety threshold as a pipeline operator problem. It is a huge breach of ethics for Bellevue to ignore this.

Phase 2 EIS section 3.9.7.2 "Potential Mitigation Measures" states:

"Inform Olympic when loading scenarios are expected to be at their greatest to ensure that Olympic conducts field monitoring and/or mitigation for AC potential greater than 15 volt and AC current density greater than 20 amps per square meter throughout the project."

Potentially informing the pipeline operator that someone may get electrocuted is not a mitigation. Why does Bellevue promote the endangerment of pipeline workers? What is Bellevue's plan to address the electrocution safety hazard and resulting impacts? Bellevue's general wishy-washy arm-waving approach that potentially maybe someone could maybe do something when something bad happens maybe is not a mitigation strategy and does not support determination of mitigation impacts. It is a huge breach of ethics for Bellevue to ignore serious mitigation issues. The EIS is defective in that it does not address this critical safety issue and the impact of mitigation. What is Bellevue's plan to address identify all required mitigation measures and the impact of those measures?

Would Bellevue advocate someone designing and building a brand-new school bus, loading it with children and driving down the freeway to see if the steering and brakes work? Would Bellevue advocate

I1122-A -36 The DNV GL analysis examined two routes: the existing transmission line corridor (Willow 1) and a route that combines parts of the existing corridor with the Newport Way area (Willow 2). For Willow 1, the analysis found that with optimized conductor geometry and with both lines operating at 230 kV, the induced AC potentials and theoretical AC current densities satisfied accepted industry levels. For either route operating at 230kV/115kV, the analysis predicted that AC potentials would exceed the 15 volt safety threshold and field monitoring and/or mitigation would be required to confirm these AC potentials are less than the threshold. While PSE's Proposed Alignment presented in the Final EIS (Willow 1, 230 kV/230 kV) was chosen because it requires the least amount of mitigation to address induced currents, all of PSE's options and alignments evaluated in the Phase 2 Draft EIS could be operated safely. Operating both lines at 230 kV at the outset (instead of 230 kV/115 kV) results in the lowest induced AC potentials of the routes/configurations analyzed.

I1122-A -37 As described in Section 4.9.8 of the Final EIS, certain mitigation measures necessarily would need to be identified and implemented after the project is energized or during peak winter load conditions in order to ensure that mitigation measures are appropriate based on measured field conditions. This, and other measures, were recommendations in DNV GL's AC Interference Study (2016). Stantec Consulting Services, Inc. (Stantec) completed a technical review of DNV GL's AC Interference Study at the request of the EIS Consultant Team. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used to achieve an optimal transmission line route and powerline configuration to minimize the AC interference risks on the Olympic Pipeline system is consistent with industry practice. While Stantec did not recommend changes to the mitigation measure that is the topic of this comment, Stantec recommended that additional analysis be performed in the detailed design stage of the project in order to verify other mitigation needs for the project prior to transmission line energization (Stantec, 2017). See Section 4.9.8 of the Final EIS for further information.

II122-A-38

someone designing and building a brand-new aircraft, loading it with passengers then going full throttle down the runway to see if it flies? If not, how can Bellevue possibly advocate PSE's proposed energize eastside project given, per DNV GL "Final mitigation design, if necessary, should be based on field data collected after the system is energized"? By then, it's much too late.

Phase 1 Draft Scoping Report, Attachment 1 states PSE's objective for proposing their energize eastside project. On page 6 PSE states:

"M. Must address all relevant PSE equipment violations  
PSE will only accept solutions that will solve any existing or future anticipated loading issues of PSE equipment. PSE's normal and emergency thermal operating limits, and potential consequences of violating those limits, are discussed above."

On page 2 of the same attachment PSE states:

"N-1-1 & N-2 Thermal and Voltage Performance – NERC and WECC standards  
This refers to system performance with two contingencies in the system. This could be due to an emergency, as part of scheduled maintenance or system improvements, or a combination. The system must perform without violations of thermal and voltage limits with two contingencies occurring."

Draft phase 1 EIS paragraph 2.2.1.1 "Applicable transmission planning standards and guidelines, including mandatory NERC and WECC standards" discusses power system reliability for various failure scenarios which would include single circuit failures. Those are the scenarios that should be fully analyzed and proven safe. But the PSE funded DNV GL study completely sidesteps those scenarios. Table 7 on page 18 of the DNV GL 2016 study referenced in the EIS does not include the 230/0 and 0/230 Winter Peak Load Scenarios on any segment of the entire Proposed EE corridor. That sleight of hand is a very devious omission.

Per DNV GL's conclusions:

"PSE should notify the pipeline operator when there are planned outages on the individual circuits, as the AC induction effects on the pipeline may be magnified when only one circuit (of the double circuit transmission lines) is energized."

This is a slippery way of saying it's dangerous to operate one circuit when the other not operating. Being unsafe to operate the single circuit, one failure cascades into two failures. Therefore, an N-1 failure is an N-2 failure. The message is 0/230 and 230/0 scenarios are a danger to the pipeline and its operation. Because of the danger in these scenarios, PSE's proposed energize eastside project essentially reduces system reliability as compared to the existing system. Why does Bellevue ignore the impact of reduced reliability?

Why does Bellevue ignore this collocation safety risk issue? What is Bellevue's corrective action plan to identify its safety analysis process failures and produce a comprehensive safety risk assessment, safety risk mitigation assessment, and safety risk mitigation impact assessment for all operational scenarios?

II122-A -38 The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering by PSE. The Phase 2 Draft EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational (Stantec, 2017). Mitigation measures have been further refined in the Final EIS.

II122-A -39 The DNV GL report made recommendations for initial design based on their findings. These were intended to reduce the potential for AC interference with the pipelines. They also recommended additional analysis after the project is constructed. Additional analysis prior to construction is included in the mitigation measures, because PSE and/or Olympic may be able to take additional steps to reduce interference through design measures or through adjustments to the protection systems already on the pipelines. See Section 4.9.8 of the Final EIS for additional information on mitigation measures.

During at least part of the construction, safety precautions would require a 0/0 scenario. But that puts PSE in its claimed 'blackout' situation. Seems like PSE has created its own conundrum. Like trying to put bigger tires on a moving vehicle. There is no practical safe way to do that. What is Bellevue's plan to address the resulting impacts?

Draft phase 1 EIS paragraph 2.2.1.1.5 "Substation Planning and Security Guidelines" states:

"...In other words, based on security threats to the physical electric infrastructure, it is not reasonable or prudent to 'put all your eggs in one basket.'"

PSE's proposed energize eastside project does exactly that — "put all your eggs in one basket." and violates the FERC order Bellevue claims is a mandate. A physical attack on one circuit prevents safe operation of the parallel circuit. This is effectively an N-2 condition and is driven by the safety risk of AC induction effects hazardous liquid pipeline from single circuit operation.

A very simple attack using a drone to lift and drag a conductor or dump conductive chaff to short a phase to the conductive tower jeopardizes the integrity of the hazardous liquid pipeline and disables power facilities to the point of unreliable operation. This same type of attack on the existing transmission lines is completely mitigated because an attempt to short a phase to a wood structure is relatively harmless. Why does Bellevue ignore the impact and mitigation for security threats? What is Bellevue's corrective action plan to identify its safety analysis process failures and produce a comprehensive safety risk assessment, safety risk mitigation assessment, and safety risk mitigation impact assessment for physical attack scenarios?

II122-A-41

The DNV GL 2016 report Table 7 does not reflect the pole configuration being proposed by PSE and therefore its conclusions are worthless. Why does Bellevue allow this discrepancy and propagate erroneous information in its EIS? What is Bellevue's plan to address this discrepancy?

II122-A-42

The DNV GL 2016 report states:

"Considering the expected fault current of 25 kA and either an Alumoweld or OPGW shield wire on the transmission lines, the predicted coating stress voltage was well below the expected coating breakdown voltage for the coal tar coated pipeline segments. Additionally, the maximum arcing distance was calculated for the collocated pipeline segments, based upon the maximum single-phase-to-ground fault current returning to ground at a single pole. The maximum arcing distance was found to be 13 feet, considering an OPGW shield wire on the transmission lines."

II122-A-43

DNV GL neglects to state how the arcing distance was derived but it appears inconsistent with the DNV GL 2015 Report.

Table 4 in the DNV GL 2016 report contains Bulk Soil Resistivity Data Summary

Pipeline Name	Minimum Resistivity (ohm-cm)	Maximum Resistivity (ohm-cm)	Average Resistivity (ohm-cm)	Average Pipe Burial Depth (ft.)	Bulk Resistivity Depth (ft.)
OPL16	6,607	402,174	101,251	4	5
OPL20	6,607	402,174	100,564	4	5

II122-A -41 Public safety risks associated with intentional destructive acts are discussed in the Phase 1 Draft EIS as an unlikely but possible worst-case scenario. However, the project is not expected to increase the risk of terrorist or other malicious attacks. In addition, the proposed transmission line would be equipped with systems to prevent a fault of the type described from being conducted to the pipelines. If such a fault were to occur, it would likely cause a power outage.

II122-A -42 See response to comment 004-B-5.

II122-A -43 As described in Section 8 of the AC Interference Study (DNV GL, 2016), the maximum arcing distance was obtained using the maximum soil resistivity and the maximum fault current for each region. As described in DNV GL (2015), the arcing radius is primarily a function of the fault and the local soil resistivity magnitude. The same equation described in the DNV GL (2015) for calculating arc distance was used in the AC Interference Study (DNV GL, 2016). The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study completed by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach and equation used to derive the arcing distance are consistent with industry practice. However, Stantec recommended that additional analysis using an additional equation (the CEA regression formula) be performed in the detailed design stage of the project to verify mitigation needs (Stantec, 2017). Furthermore, in areas where the pipeline would be within the arcing distance (determined based on modeling of detailed design), PSE would incorporate mitigation measures into the project design to prevent ground fault arcing to the pipelines (see Section 4.9.8 of the Final EIS for these, and other mitigation measures).

The DNV GL 2015 report provides the arc distance equation.

$$r_a = 0.08 \sqrt{I_{ac} \times \frac{\rho}{100}} \quad \text{If } \rho \leq 100,000 \text{ } \Omega\text{-cm}$$

$$r_a = 0.047 \sqrt{I_{ac} \times \frac{\rho}{100}} \quad \text{If } \rho > 100,000 \text{ } \Omega\text{-cm}$$

Where:  $r_a$  = arc distance in m  
 $\rho$  = soil resistivity in  $\Omega\text{-cm}$   
 $I_{ac}$  = the fault current in kA

II122-A-44

Applying this DNV GL 2015 documented equation indicates the arc distance based on the 25 kA fault current is 14.9 feet not 13 feet. But the circuit fault current is not the only concern. Lightning strikes can have median peak values of 34 kA. ([http://www.techadvantage.org/wp-content/uploads/2014/03/4B\\_Mara.pdf](http://www.techadvantage.org/wp-content/uploads/2014/03/4B_Mara.pdf)). Using the lightning strike value as more representative of fault currents that must be tolerated with sufficient safety margin indicates the arc distance is 17.4 feet. Bellevue should at least perform a rudimentary sanity check on a consultant's data before dumping that data in the EIS. What is Bellevue's corrective action plan to identify its safety analysis process failures and produce a comprehensive safety risk assessment, safety risk mitigation assessment, and safety risk mitigation impact assessment?

II122-A-45

As the high pressure hazardous liquid pipeline ages and is replaced, the location of the replacement may be anywhere within the defined pipeline corridor. That requires the transmission line towers nearest approach to the edge of the defined pipeline corridor is a minimum of 17.4 feet. This places the transmission line towers dangerously close to the edge of the transmission line corridor and within 5 feet of existing or future residential structures. Bellevue's EIS is defective in that it fails to identify this safety risk and fails to identify the impact of providing an adequate safety margin. What is Bellevue's plan to address this safety issue and resulting impacts?

II122-A-46

While performing an inadequate and shallow study of the proposed transmission line collocation with the high pressure hazardous liquid pipeline, Bellevue also completely ignores the dangers of collocation of the proposed power lines with residential utility infrastructure. Why does Bellevue ignore potential hazards of this collocation? What is Bellevue's corrective action plan to identify its safety analysis process failures and produce a comprehensive safety risk assessment, safety risk mitigation assessment, and safety risk mitigation impact assessment that includes collocation of the transmission lines with residential utility infrastructure?

II122-A-47

The DNV GL 2016 report does not address the increase in conductivity of soil when it becomes ionized. During a flashover, as the soil between the conductive transmission line support structure and the hazardous liquid pipeline becomes ionized, the dissipation pattern of the arc energy becomes asymmetric and is directed to the pipe.

II122-A -44 The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study prepared by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used in the analysis is consistent with industry practice. Stantec has reviewed this comment and noted that it is standard industry practice to consider the powerline fault current when assessing the arcing risk from a powerline structure to a pipeline, as it is a significantly longer duration than a lightning strike.

DNV-GL was asked to confirm the formula they used to calculate arc distance. Using the fault value that represents standard industry practice, the arc distance calculates to 13 feet. As confirmed by Stantec, the fault value used by DNV-GL addresses the likely system fault that would be expected on the transmission lines.

Consideration of lightning protection follows the National Electric Safety Code (NESC) and Rural Utilities Service (RUS) standards wherein it is recommended that shield wires are used in those isokeraunic areas that are above 20. The majority of Washington State has an isokeraunic level of less than 20, and the isokeraunic level is less than 10 in the project area. Although it is beyond the RUS standard safety recommendations, PSE proposes the inclusion of shield wires for the Energize Eastside project, providing a higher safety factor for lightning strikes than required by the NESC. This additional safety equipment provides a low resistance path to carry the majority of the system fault current along the line to ground at several locations, rather than entering the ground at a single location, as would be the case with the existing system.

- II122-A -45 This EIS evaluates the construction of the Energize Eastside transmission lines, not the construction or relocation of the Olympic Pipeline system. If the pipelines were relocated in the future, it would be the responsibility of the pipeline operator to ensure the safety of the pipeline location. The proposed transmission lines relative to the existing pipelines has been considered. The separation required from the pipelines and from adjacent structures is dependent on a number of factors, including soils, pole heights and spacing, pole and circuit design, and other factors. As described in Section 3.9.1.4 of the Phase 2 Draft EIS, PSE retained DNV GL (the author of the report "Criteria for Pipelines Co-Existing with Electric Power Lines") to develop a detailed analysis of risks and recommendations for the Energize Eastside project. This study ("A Detailed Approach to Assess AC Interference Levels Between the Energize Eastside Transmission Line Project and the Existing Olympic Pipelines, OLP16 & OPL20"), referred to in the EIS as the AC Interference Study, was used in preparing the analysis for the Phase 2 Draft EIS. The study included recommendations related to the design of pole locations, layout, and configuration to mitigate potential electrical interference-related impacts on the pipelines (see Section 4.9.8 of the Final EIS for information on these, and other mitigation measures). Per federal law, Olympic is responsible for the maintenance and safe operation of the pipeline; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipelines from corrosion lies with Olympic.
- II122-A -46 The comment does not provide sufficient detail to allow a detailed response. The Phase 1 Draft EIS addressed impacts to utilities, including electrical, natural gas, petroleum, water, wastewater, stormwater, and telecommunication lines resulting from construction and operation of PSE's proposal. The Phase 1 Draft EIS acknowledged that there is a risk of damage whenever construction or operations and maintenance occur near buried natural gas lines. However, that risk is not considered an unavoidable significant impact because the probability of damage occurring is minimized by conformance with industry standards, regulatory requirements, and construction and operational procedures that address safety. Mitigation measures to avoid or reduce potential utility impacts are listed in Section 16.8 of the Phase 1 Draft EIS, including coordination with other utility providers, identification of the location of other utilities prior to construction, and other measures, which would address impacts to residential utility infrastructure.

I1122-A -47 The commenter is correct that as the soil becomes ionized, the dissipation pattern of the arc energy becomes asymmetric and is directed to a nearby pipeline. However, this is also all considered in the arcing distance calculations. As long as the pipeline is outside of the maximum calculated arcing distance, then the risk has been mitigated. The Canadian Energy Pipeline Association (CEPA) published a report called A/C Interference Guideline Final Report, which summarizes the use of the Sunde equation to calculate the lightning arcing distance and a regression formula developed in Canadian Electricity Association (CEA) report 239T817 to assess the arcing distance due to a lightning initiated power arc (i.e., from powerline fault current). The DNV report only uses the Sunde equation for this assessment, while Stantec recommended that they also consider the CEA regression formula. This recommendation is included as a mitigation measure in Section 4.9.8 of the Final EIS. Based on the DNV GL recommendations, PSE revised the design from that presented in the Phase 2 Draft EIS to ensure that all poles would be at least 13 feet from the pipelines, because this was the maximum calculated arc distance necessary to prevent arcing between the poles and the pipelines, based on soil conditions in the corridor. If the modeled conditions are correct, there would be no risk of arcing damage. However, soil conditions are quite variable; therefore, actual arc distances could vary. Actual arc distances will be measured at each pole once the poles are installed. Where necessary, pole grounds would be installed to provide adequate separation from the pipelines. See Final EIS Section 4.9.8, *Mitigation Measures*.

I1122-A-47

From A/C Interference Guideline Final Report JUNE 2014 (<http://cepa.com/wp-content/uploads/2016/11/AC-Interference-Guidelines-Final-Report-FOR-PUB.pdf>) on the risk of arcing:

"If an arc develops between the faulted structure and the pipeline (sometimes called a flashover) or a lightning initiated arc to the pipe is sustained through the ionized soil path by the powerline voltage, then substantial damage can be done to the pipeline coating, pipe wall (through melting), and to pipeline facilities such as isolation fittings, bonding cables, transformer rectifiers, and monitoring equipment. There are a number of reported cases of pipeline rupture during powerline faults caused by melting of the pipe wall."

Why does Bellevue ignore this ionization safety risk? What is Bellevue's plan to address this safety issue and resulting impacts?

I1122-A-49

The current in a lightning stroke is not only greater than the current in a circuit fault it also has a much faster rise time of around 3 microseconds (0.003 milliseconds) versus 4 milliseconds for a circuit fault. The voltage drop across the shield wire is the inductance of the wire times the current rise time (Ldi/dt). Since the lightning stroke current rise time is about 1000x faster than the circuit fault current rise time, the shield wire impedance for a lightning stroke is about 1000x higher than for a circuit fault. The significance here is for a lightning strike directly on the conductive tower the shield wire is 1000x less effective at bleeding off current as compared to a circuit fault to the tower. Why does Bellevue ignore the impact of lightning events? What is Bellevue's plan to address this safety issue and resulting impacts?

I1122-A-50

The replacement of the insulating wood transmission line support structure with tall conductive metal towers, essentially lightning rods grounded near the hazardous liquid pipeline, while removing the lightning dissipating natural tree canopy is a gross breach of safety common sense. How does Bellevue assess this safety impact?

I1122-A-51

The DNV GL report does not address the failure or disruption impacts on the Supervisory Control and Data Acquisition (SCADA) system resulting from the current and voltage induced on the high pressure hazardous liquid pipeline by faults or lightning strikes in the transmission lines. Remote monitoring and control of the pipeline is completely lost when the SCADA is disabled which could occur at the time it is most needed. Why does Bellevue ignore this issue? What is Bellevue's corrective action plan to identify its safety analysis process failures and produce a comprehensive safety risk assessment, safety risk mitigation assessment, and safety risk mitigation impact assessment regarding pipeline operation?

To be a successful business, DNV GL must provide customer satisfaction. Customer satisfaction requires that DNV GL products meet the customer's criteria for quality. One important quality is that their products align with the customer's objectives. Failing to meet that criteria is contrary to any sound business strategy. So, it would be foolish to expect DNV GL to make a full disclosure where it may run counter to its customer's objectives. However, Bellevue does exactly that; it expects the DNV GL to be complete and truthful. In this case the customer is PSE and the product is a report: "AC INTERFERENCE ANALYSIS – 230 KV TRANSMISSION LINE COLLOCATED WITH OLYMPIC PIPELINES OPL16 & OPL20". The EIS references the DNV GL report created and tailored specifically for its customer, PSE. But sometimes it comes down to a question of profits versus ethics.

I1122-A -49 Stantec Consulting Services, Inc., reviewed this comment and provided technical input at the request of the EIS Consultant Team. It is not standard industry practice to consider an arc related to lightning only because of the extremely short duration of the lightning event. It is expected that the follow-through current powerline fault current could result in significantly more damage due to the longer duration. In their technical review of DNV GL (2016), Stantec recommended that DNV GL use equations included in the Canadian Electricity Association (CEA) Report 239T817, which do consider the difference between an arc due to "flashover" and a lightning initiated" arc (Stantec, 2017). Both of these arcing distances are due to the powerline fault current. This recommendation is included as a mitigation measure in Section 4.9.8 of the Final EIS.

I1122-A -50 Steel poles act as a grounding rod and direct lightning current into the ground where it dissipates into the earth. This is due to the conducting characteristics of steel and the surface area in contact with the soil. Replacement of wood poles with steel poles and a shield wire would actually help to decrease or mitigate AC interference on the pipelines, as the fault current would be distributed via multiple structures (paths) instead of all the fault current discharging via one path to earth. It is expected that some of the trees removed are taller than the existing transmission poles, but the vast majority of the trees to be removed are shorter than the existing poles and therefore would not "dissipate" lightning as suggested by the comment.

I1122-A -51 To address this comment, the EIS Consultant Team consulted with Olympic representatives. Olympic's SCADA equipment is protected by standard power surge protection to mitigate damage from this type of event. In addition, Olympic maintains both on-site and off-site redundancy in its SCADA system. In the unlikely event of surge damage at one control center, control can be assumed through an unaffected control center. Please note that Olympic's SCADA system is currently in place and PSE's proposal would not affect Olympic's SCADA system. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system.

Is DNV GL above such lapse of ethical standards? Apparently not. From [http://www.mlive.com/news/index.ssf/2017/06/dnv\\_enbridge\\_line\\_5\\_study\\_coi.html](http://www.mlive.com/news/index.ssf/2017/06/dnv_enbridge_line_5_study_coi.html) posted June 22, 2017:

“The state of Michigan abruptly fired contractor Det Norske Veritas Inc (DNV GL) this week, saying the work the company had been doing since last summer was tainted by a conflict of interest and the appearance of improper influence on the outcome by Enbridge, which the state had tried to avoid.”

II122-A-52

Bellevue dumps or references reports from various services in the EIS without performing a critical review and comprehensive analysis of any of the reports to validate the stated claims. The DNV GL 2016 report is a notable example. Then hiring one service to gloss over the gloss-overs of another service adds pages but adds no value. What is Bellevue’s plan to perform a critical review and comprehensive analysis to validate the objectivity and accuracy of claims documented in the EIS and to verify the ‘information’ Bellevue publishes in the EIS is not compromised by conflicts of interests?

EIS phase 2 volume 1 Section 3.9.4 Major Risks to Public from Unintentional Pipeline Release states:

“EDM Services (2017) used a number of reasonable assumptions and data inputs, including the estimated release rate and pipe contents of the Olympic Pipelines, to model a release and subsequent pool fire as described in Sections 7.1 and 8.3 of their report (see Appendix I). Based on these inputs, EDM Services estimated the following maximum release volume: 372,162 gallons.”

II122-A-53

There is no derivation of this quantity in the referenced sections. How was this value determined? A side note on spill release volume in the same section states:

“For reference, the Bellingham incident of June 10, 1999 released about 237,000 gallons of gasoline. Because the release migrated along a waterbody, pool fire characteristics were different than the depiction in Figure 3.9-7.”

II122-A-54

The Figure 3.9-7 depiction is in no way representative of the terrain and waterways in Newcastle. The depiction does not address Lake Boren, Boren Creek, May Creek, and the storm sewer drains whose outflow goes into Lake Washington. All these are downhill from sections of the hazardous liquid pipeline that would be subject to the induce AC corrosion stress. The stated volume, 372,162 gallons, would cover almost 14 acres an inch deep in toxic and flammable liquid. Bellevue’s EIS is defective in that it fails to identify the extreme damage potential and fails to assess the impact of providing an adequate safety margin. Although suppressed in the EIS by Bellevue, PSE’s proposed energize eastside project places excessive and unnecessary stress on the hazardous liquid pipeline. Bellevue’s gross misrepresentation and trivialization of the resulting impact of a breach in the hazardous liquid pipeline caused by the transmission line collocation is unacceptable. What is Bellevue’s corrective action plan to identify its safety analysis process failures and produce a comprehensive safety risk assessment, safety risk mitigation assessment, and safety risk mitigation impact assessment with regard to toxic and flammable petroleum spills from sections of the hazardous liquid pipeline that would be subject to the induce AC corrosion stress?

II122-A-55

The fault damage and arcing damage paragraphs on page 3.9-43 of volume 1 are complete fabrications. They state that fault damage and arcing damage through an essentially nonconductive wooden pole (no

II122-A -52 The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study completed by DNV GL. Based on Stantec’s experience and industry standards, it is their opinion that the technical approach used to achieve an optimal transmission line route and powerline configuration to minimize the AC interference risks on the Olympic Pipeline system is consistent with industry practice. However, Stantec recommended that additional analysis be performed in the detailed design stage of the project to verify mitigation needs for the project prior to transmission line energization (Stantec, 2017). These measures were incorporated into Section 3.9.7.2 of the Phase 2 Draft EIS (and updated Section 4.9.8.2 of the Final EIS).

II122-A -53 See responses to comments II30-A-4 regarding pool fire size/configuration and II130-A-3 regarding spill size estimates used in the risk assessment.

II122-A -54 See response to comment II30-A-4. Information on potential impacts to water bodies is presented in Section 4.9.6 of the Final EIS. Information on steep slopes is presented in Chapter 3 of the Phase 1 Draft EIS. The Final EIS includes additional information on fault/rupture hazards, liquefaction hazards, and landslide hazard areas (see Section 4.11).

II122-A -55 The assumptions referenced by the commenter were included to provide a reasonable worst-case analysis of risks under PSE’s proposal. As stated in Section 3.9.5.4 of the Phase 2 Draft EIS, using these assumptions likely understates the existing risk (No Action), thereby overstating the actual difference in risk between the No Action Alternative and Alternative 1. Even with these assumptions, the likelihood of a pipeline rupture and fire would remain low, and no substantial change in risk has been identified.

action alternative) is the same as through a conductive steel tower (alternative 1). The section is titled No Action Alternative but is muddled by a discussion of alternative 1. These sections make two incoherent conclusions:

II122-A-55 “Because no data were available from Olympic to estimate the coating stress voltages on the existing Olympic Pipelines within the existing 115 kV corridor, the existing pipelines were assumed to have the same coating stress voltages and potential for coating stress-caused pipeline releases as for Alternative 1,”

and

“Because no data were available from Olympic to estimate the arc distances for the existing Olympic Pipelines within the existing 115 kV corridor, the existing pipelines were assumed to have the same ground fault arc distances and potential for arc-caused pipeline releases as for Alternative 1.”

Why does Bellevue rely on its avoidable ignorance as a basis for such ludicrous conclusions? Bellevue’s EIS is defective in that it promotes ignorance and obfuscation to mask critical safety issues. What is Bellevue’s plan to address this safety issue and resulting impacts?

II122-A-56 Throughout the draft phase 1 and phase 2 EIS Bellevue dances around the subject of cathodic protection, interaction of induces AC current, and protection shortfalls but provides absolutely zero environment impact assessment. Why does Bellevue avoid addressing this impact? What is Bellevue’s plan to address the impact to the hazardous liquid pipeline corrosion protection systems?

PSE projects that electrical power demand will begin to exceed peak power capacity by the year 2017. PSE further projects demand will exceed capacity by approximately 10% by 2022. The key point emphasized by PSE is the projected demand is based on days where the air temperature is 23°F or lower.

II122-A-57 The question is whether the occurrence of the conditions is so frequent that PSE’s intended solution with its enormous impacts is warranted and there are no alternatives, or is there something being left unsaid that indicates less aggressive solutions may be viable?

The NOAA National Climatic Data Center has a database of daily minimum temperatures for Station GHCND:USW00024233 SEATTLE TACOMA INTERNATIONAL AIRPORT WA US. Figure 3 is a summary of 16170 daily minimum temperature measurements in a period between January 1, 1970 and April 9, 2014. The horizontal scale is the daily minimum temperature in one-degree Fahrenheit increments from the lowest measured value in the period (7°F) to 23°F. The vertical scale ranges from 0% to 100% and is the percentage of the period in which each minimum temperature was recorded.

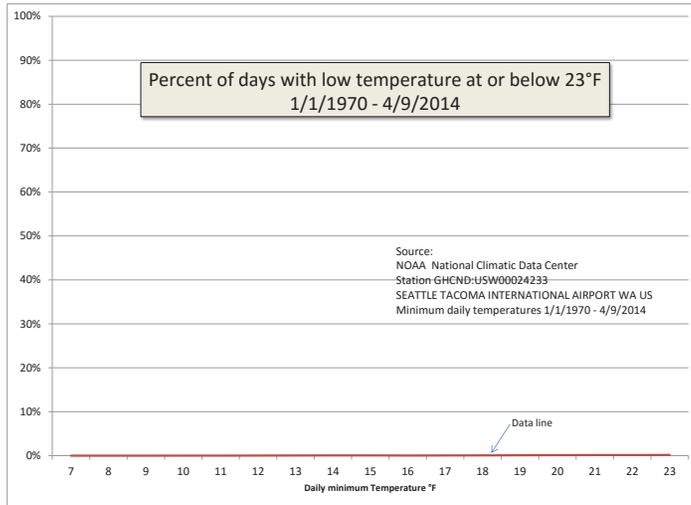
II122-A -56 Cathodic protection and electrical interference (including discussion of AC current density and AC-induced corrosion) are addressed in Sections 3.9.3.3 and 3.9.5 of the Phase 2 Draft EIS. Mitigation measures to support Olympic’s determination of cathodic protection requirements for their pipelines are included in Section 4.9.8 of the Final EIS. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE’s Energize Eastside project, not the ongoing operation of the Olympic Pipeline system. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipeline; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipeline from corrosion lies with Olympic.

II122-A -57 See response to comment II2-B-8. As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, or whether the environmental costs are justified by the stated need. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”).

The comment mischaracterizes some aspects of the probability of conditions that PSE found warranted need for this project. PSE has stated that the conditions that peak demand times in summer and winter were problematic, not just winter. It is acknowledged that failure of components of PSE’s system simultaneously with a high demand period due to high or low temperatures is not a common event. As noted in the Phase 1 Draft EIS, however, having one component of its system down for planned maintenance is relatively common throughout the year. Attempting to specifically predict or estimate the probability of events that could lead to load shedding is nearly impossible because of the number of potential scenarios and permutations. While the exact probability of such an event is not of concern under SEPA, it is acknowledged that it is possible that in any given year, it might not occur.

The potential cost per day of a power outage due to load shedding if the project is not built has been calculated by in a report prepared by Nexant for PSE, and could be compared to the costs cited in the comment. See Puget Sound Energy Energize Eastside Outage Cost Study (2015).

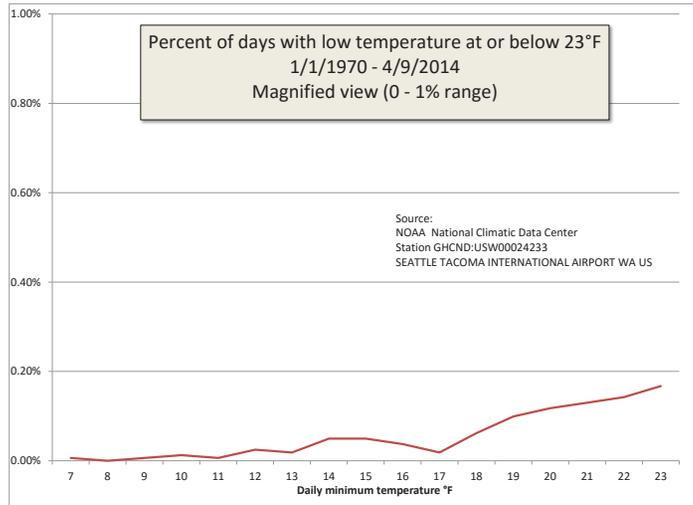
I1122-A-57



**Figure 3 Annual minimum ambient temperature day history**

Since the occurrences of 23°F and lower temperatures days are extremely infrequent an expanded view of the bottom 1% is provided in Figure 4.

I1122-A-57



**Figure 4 Annual minimum ambient temperature day history - Expanded view**

As can be deduced from the charts, the extreme conditions identified by PSE are very infrequent. The total percentage of days with minimums at or below 23°F is 0.95% (less than 1% of the time, or 3.5 days per year) for the entire period. This suggests that the problem stated by PSE is potentially solvable within the realm of smart power management policies without resorting to the unnecessary options within PSE’s narrow solution space. PSE has offered no defensible justification for excluding employment of a smart power management approach.

At less than one percent rate of occurrence, the number of days (that meet the conditions for which PSE claims this project is needed) over a ten-year period is  $0.95\% \times 365 \text{ days per year} \times 10 \text{ years} = 34.7 \text{ days}$ . PSE claims the cost will be as high as \$290 million. That cost spread across the number of occurrences in a ten-year period is  $\$290 \text{ million} / 34.7 \text{ days} = \$8.36 \text{ million per day}$  for each low temperature day. PSE claims the periods of peak electrical demand are from 6:00 AM to 10:00 AM and from 5:00 PM to 9:00 PM. That is a total of 8 hours per day. Dividing \$8.36 million by 8 hours leaves the consumers paying over \$1 million dollars an hour. This is a very poor value to the customer and an unnecessary expense. PSE has offered no defensible justification for promoting such an expensive and limited value solution over lower cost, lower impact, and much higher value solutions.

PSE statements during CAG process and PSE documentation:

- PSE states peak demand shortfall under a transmission line failure condition is 55 Megawatts (MW)
- PSE projected demand is based on days where the air temperature is 23°F or lower
- PSE states peak demand occurs in two 4 hour periods (8 hours total per day)
- PSE intends to add 1407 MW (for N-1-1 conditions, two of four routes failed)
  - Replace 1620 Amp cable (Tern/ACSS/AW 795) with 2576 Amp cable (Falcon/ACSS/AW 1590)
  - 115 kV (line to line) /  $\sqrt{3}$  = 66.4 kV line to neutral
  - 66.4 kV x 1620 Amp x 3 phases = 645 MW existing capacity
  - 230 kV (line to line) /  $\sqrt{3}$  = 132 kV line to neutral
  - 132 kV x 2576 Amp x 3 phases = 2052 MW expanded capacity
  - 2052 MW – 645 MW = 1407 MW total increase from existing to expanded capacity under N-1-1 conditions

Background:

- NOAA National Climatic Data Center has a database of daily minimum temperatures for Station GHCND:USW00024233 SEATTLE TACOMA INTERNATIONAL AIRPORT WA US
- Summary of 16170 daily minimum temperature measurements in a period between January 1<sup>st</sup> 1970 and April 9<sup>th</sup> 2014 by NOAA indicates air temperature is at or below 23°F a total of 3.5 days on average per year

Analysis:

- PSE claimed need: 55 MW x 8 hours per day x 3.5 days per year = 1520 MW hours (MWh)/year
- PSE intended increase in capacity: 1407 MW x 24 hours per day x 365 day per year = 12,325,320 MWh per year
- Percent increase in energy capacity vs need: 12,325,320 MWh / 1520 MWh = 810,876%
- Conversely, percent increase energy needed vs capacity: 1520 MWh / 12,325,320 MWh = 0.0123%

Figure 5 shows the relative scale of PSE's proposed project versus PSE's statement of need during the CAG process. To be clear, the percent increase in capacity vs need as stated above is over 800,000 percent. An increase of this magnitude will never ever be needed in the PSE customer base area.

If the capacity were scaled to the height of the Space Needle (605 feet) the need could be represented by a stack of 15 pennies (0.895 inches). If those pennies were placed on the ground at the base of the Space Needle, they would be too small to see from the top. Can Bellevue even begin to grasp the ridiculousness of PSE's proposed solution?

Why does Bellevue believe such an absurdly large growth in capacity is needed while rejecting more reasonable alternatives?

I1122-A -58 See response to comment OO4-F-2.

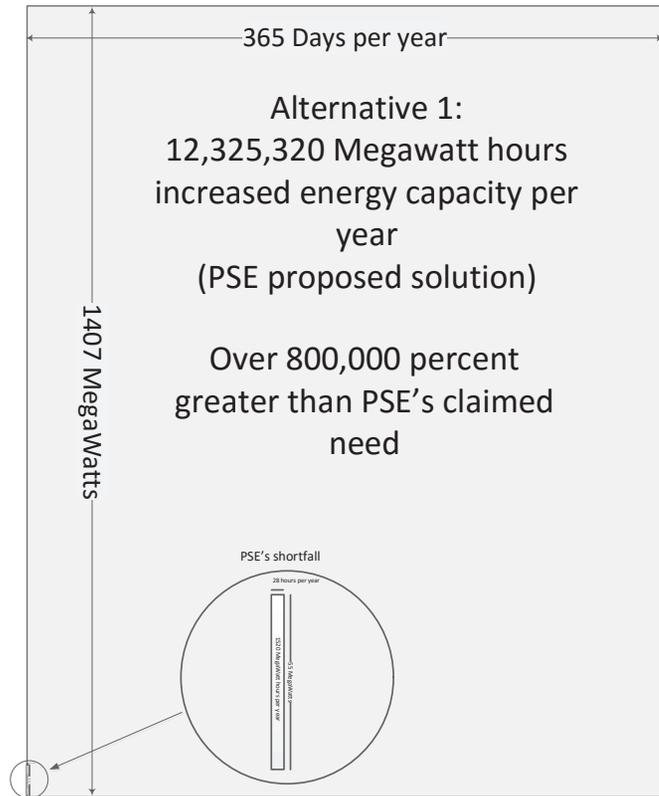


Figure 5 PSE's solution versus stated need in perspective

II123-A-1

Comment	Timestamp	First Name	Last Name
<p>The cost of this infrastructure investment is being passed to consumers effectively as an energy tax. This is a tax which Eastside residents cannot vote on and do not benefit from. Eastside residents have no representation in this decision but simply must pay a higher rate.</p> <p>When supply increases, the price should go down. In this case PSE is promising a rate increase.</p> <p>For this infrastructure investment, PSE will receive tax benefits and will likely be able to leverage the assets to reduce its cost of capital.</p> <p>The economics do not benefit Eastside residents but clearly benefit PSE.</p>	<p>7/8/2017 16:47:37</p>	Lekshmi	Venu

II23-A -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

7/11/2017

Weebly Email Service Mail - Cense



Energize Eastside EIS <info@energizeeastsideeis.org>

**Cense**

1 message

**Lucy Pevehouse** <l.pvhse@gmail.com>  
 To: Info@energizeeastsideeis.org

Fri, Jul 7, 2017 at 5:31 PM

TO: Ms. Heidi Bedwell

What you propose to do in our neighborhood is intrusive and almost too awful to contemplate. My home will be directly adversely affected by this project.

Are you prepared to be financially responsible for the lawsuits which you will surely engender resulting in payments to those you have harmed?

None of you live in the path of this proposed invasion so you probably do't care about its detrimental affect on other people. If you lived here you wouldn't like it either.

Please reconsider what you are proposing to do to our beautiful neighborhood not just fro a financial point of view but from a moral one This is just NOT THE RIGHT THING TO DO.

Would it be possible for you to look into other alternatives than the one you are now considering? You could go underground in those areas which abut residences Surely the small added cost would not be significant for a company such a yours and would be very much appreciated by the homeowners. You would reap much "good will" and appreciation. That is something to be considered.

I am appealing to your better nature. Please don't go ahead with this project.

Lucy Pevehouse  
 13623 NE 32nd Place

II124-A-1

II124-A -1 See response to comment II6-A-1. The EIS is an environmental disclosure document that supports decision-making during the permit review process and in the imposition of mitigation measures. The EIS is intended to identify alternatives that could attain or approximate PSE's objectives at a lower environmental cost and disclose potential significant adverse environmental impacts associated with the alternatives identified. The Energize Eastside EIS does not advocate for or against the project, but rather presents an analysis of potential environmental impacts from the proposed project and a range of reasonable alternatives.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCiZi4.en.&view=pt&search=inbox&th=15d1f9c1182060f2&siml=15d1f9c1182060f2> 1/1



7/11/2017

Weebly Email Service Mail - Phase 2 EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Phase 2 EIS**

1 message

**Tim Wissner** <timwissner@gmail.com>  
 To: info@energizeeastsideeis.org  
 Cc: eis@cense.org

Thu, Jul 6, 2017 at 3:44 PM

Ms. Bedwell,

Please add my comments to the Energize Eastside discussion.

II125-A-1

1. The overall plan and specifics are inadequate, with regard to the following:

1. The need for this project hasn't been sufficiently supplied. Questions regarding the validity of the project continued to be ignored or unsatisfactorily answered. PSE's interests are clearly in financial conflict with the community, so a 3rd party should evaluate the need for this project (chosen by somebody neutral to PSE, its owners, affiliates, or partners)

II125-A-2

2. Where is the study on impact on property values? If it does exist, it needs to be made available and audited by a independent 3rd party (chosen by somebody neutral to PSE, its owners, affiliates, or partners). In fairness, your organization can't be a valid source of information.

II125-A-3

3. Where is the information and 3rd party validation (chosen by somebody neutral to PSE, its owners, affiliates, or partners) that shows the project is safe in all respects related to earthquakes, and the Olympic Pipeline?

II125-A-4

4. If power is sold out of state, or out of the country, is it sourced from 100% renewable sources? If so, how is this validated? If not, then we should not be generating power at the expense of the environment.

II125-A-5

5. Why is the project moving forward without the support of the community or the paying customers?

Thank you.  
 Tim Wissner

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II125-A -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

II125-A -2 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1. The City of Bellevue hired a consultant team comprised of qualified firms with extensive experience conducting independent analysis and preparing SEPA EISs; for additional information, see response to comment II36-A-5.

II125-A -3 The Phase 1 and Phase 2 Draft EISs were prepared under the direction of the Environmental Coordinator for the City of Bellevue (the City), in consultation with the co-lead agencies, the Partner Cities of Kirkland, Newcastle, Redmond, and Renton. As the Lead Agency under SEPA, the City's responsibilities are to provide full disclosure of the expected environmental impacts of the Energize Eastside project and to document objective analysis of those impacts, so that decision-makers have adequate environmental information for the permitting and decision-making process. The City hired a consultant team comprised of qualified firms with extensive experience conducting independent analysis and preparing SEPA EISs. The EIS Consultant Team is comprised of subject matter experts that are qualified to analyze the elements of the environment that are included in the EIS. For specialized analysis related to electrical transmission and pipeline safety, the EIS Consultant Team has involved engineers, scientists, and scholars in appropriate fields. To evaluate changes in pipeline safety risk that would occur as a result of the Energize Eastside project, EDM Services, a firm specializing in pipeline risk and system safety, was retained to conduct a probabilistic pipeline risk assessment. The EIS Consultant Team also retained Stantec Consulting Services, Inc. (Stantec) to perform an independent, technical review of the AC Interference Study prepared by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used in the analysis is consistent with industry practice.

See response to comment II20-A-1 for information on how seismic risks were addressed in the Phase 2 Draft EIS and Final EIS. For PSE, national and state standards, codes, and regulations and industry guidelines govern the design, installation, and operation of transmission lines and associated equipment. In addition to these standards, codes, regulations, and guidelines, Section 4.9.8 of the Final EIS lists additional measures that PSE has indicated it will use, and measures the EIS Consultant Team has proposed to provide additional safety assurances. The Partner Cities will use the Final EIS to support any permit decisions required. The Partner Cities, in issuing permits, can decide that additional conditions are required, such as reporting of compliance efforts by PSE.

II125-A -4 How PSE generates the power that would be transmitted through the Energize Eastside project is not within the scope of this SEPA review.

II125-A -5 State law requires that public agencies conduct SEPA review on a project prior to issuance of permits. The EIS is not a permit, but rather a document designed to inform agency decision makers before they issue permits. An agency cannot deny a project through this process based on the project being unpopular. State law requires that jurisdictions review permits that are submitted to them.

7/11/2017

Weebly Email Service Mail - Energize Eastside Project - DEIS COMMENTS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside Project - DEIS COMMENTS**

1 message

Suzanne Halverson- Meston <suzannehalversonmeston@gmail.com>  
 To: "info@EnergizeEastsideEIS.ORG" <info@energizeeastsideeis.org>

Thu, Jul 6, 2017 at 1:30 PM

Ms. Heidi Bedwell, Senior Planner  
 Land Use Division - Development Services  
 450 110th Ave NE  
 Bellevue Washington

Re: EE DEIS - Chapter 3.10 Economics

Dear Ms. Bedwell

My name is Suzanne Meston. I am a Bridle Trails native; educated in Bellevue; have an MBA from Notre Dame and currently a Director at AT&T. My family and I live at 13800 40th Street, Bellevue 98005.

In all my experience, I have never seen the Economics of a project of this magnitude justified with such lack of facts; inappropriate correlation of data; and use of national and academic studies that are at best tangentially related. Let me briefly share my point of view.

The Economic chapter is shortest of all chapters comprised of only 13 pages, 4 to 5 are about New Castle. This is curious. A couple more pages are about Undergrounding. This, too, is curious. Considering the subject of "Economics", the detail about expenses, property values, revenues, value of trees, costs etc etc your coverage is totally inadequate to draw any kind of conclusions, let alone "less than significant". It appears that the authors decided to include this chapter as a result of Phase 1 comments and then selectively pick topics i.e. New Castle, Undergrounding to address or minimize those issues, while never fully analyzing "the Economics".

The decrease in property values to homeowners and revenues to the city has been completely downplayed. There are no local studies and any local facts are weak at best. I had a real hard time understanding how you have inventoried this corridor for trees; assessed all impacts and then use a 2014 Meidan Home Value for all of Bellevue i.e. \$538,000 to determine impacts. EE goes through Bridle Trails, Somerset, Lake Hills and many very expensive housing areas. Visual impacts are downplayed and discounted.

When I googled "Ecosystem Services Evaluation" criteria and methodology, once again I found the methodology dated; reasoning academic and frankly every view of the environment that we in Bellevue hold important downplayed. If the mitigation of 300

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I1126-A -1 SEPA does not require that an economic analysis be included (see WAC 197-11-448). It allows the Lead Agency to include economic information it believes would be helpful to decision-makers. The EIS Consultant Team included topics raised as a concern during the scoping process that the Lead Agency determined could be helpful.

The Phase 1 Draft EIS (Chapter 10, Land Use and Housing, and Chapter 15, Public Services) discusses economic issues evaluated, methods used, and the reasons those were selected. The Phase 2 Draft EIS expanded on the analysis presented in the Phase 1 Draft EIS with a similar analysis focused on Newcastle and on the costs of undergrounding as a potential mitigation measure. PSE has stated that its tariff requires that any cities and/or property owners requesting underground alignments ("requesting parties") would be required to pay the marginal cost for undergrounding the lines. Site-specific data (including information gathered from local brokers and real estate agents) were not used in the analysis of property tax revenues.

A 2016 study (*Property Value Impacts from Transmission Lines, Subtransmission Lines, and Substations*) was reviewed that reinforced the conclusion of the Phase 1 Draft EIS that a negative effect on property values is expected from the presence of transmission lines. The findings of this study, however, do not suggest that the replacement of lower voltage with higher voltage lines would result in a greater negative effect than the existing lines have at present. The Phase 1 Draft EIS analysis found no studies specifically on the subject of increasing the pole height or voltage on an existing corridor. The studies reviewed had inconclusive or inconsistent findings on how property values could be impacted by changes in views due to the increased pole heights (see Section 11.6.1.4 of the Phase 1 Draft EIS).

The 2014 median home value for all of Bellevue was used in the Phase 1 Draft EIS because the analysis was conducted to determine city property tax implications for a median home if the assessed value within the jurisdiction were to decrease by \$10 million as a result of the project (see Table 3.10-4). Chapter 10 of the Phase 1 Draft EIS recognizes that higher-end properties are more likely to experience a reduction in selling price than lower end properties (see Section 10.7.1.4).

The mitigation of tree removal on NE 148th St was based on the specific size and species of the trees affected, and the cost the City

II126-A

COMMENT

RESPONSE

7/11/2017

Weebly Email Service Mail - Energize Eastside Project - DEIS COMMENTS

trees on 148th was worth nearly \$1,000,000 to PSE and the City of Bellevue, what is the mitigation of 4000+/-?

II126-A-1

Until you provide a meaningful Economic Assessment of Energize Eastside, this DEIS is unsatisfactory and I believe you are doing an injustice to the citizens of Bellevue, the city of Bellevue and, yes, even to PSE.

Thank you for your consideration. I look forward to your response.

Sincerely,  
Suzanne Meston

expected to replace them with similar trees. The Energize Eastside EIS did not examine how the tree inventory for that project differed from the one for Energize Eastside. The methodology used to provide values for several ecosystem services (carbon storage and sequestration, avoided runoff, and pollution removal) and for the cost of replacement of trees (structural value) were based on United States Forest Service (USFS) i-Tree Eco software (USFS, 2016), a peer-reviewed software program that calculates these values by identifying the cost to replace the ecological services provided by a tree based on species and trunk diameter at breast height. Other optional variables used to inform the software include height and health of each tree.

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7/11/2017

Weebly Email Service Mail - PSE- energize eastside



Energize Eastside EIS <info@energizeeastsideis.org>

**PSE- energize eastside**

1 message

**Kelly Bach** <kellynjames@comcast.net>  
To: info@energizeeastsideis.org

Thu, Jul 6, 2017 at 3:55 PM

Dear Ms. Bedwell,

My name is Kelly Bach. I am a nurse at Children's Hospital. I, too, am a mother of three children and live in Bridle Trails. I will not take a lot of your time or that of the EIS team. BUT, I must tell you from my experience I cannot accept your analysis of health and safety risks.

II127-A-1

From a health professionals standpoint, your EMF analysis significantly downplays "potential" risks. Unfortunately, I live and breath those kinds of potentials that are real for children and often wonder how much risk you or those writing reports with little knowledge would take to make sure your child does not contract cancer, leukemia, heart failure etc?

I wonder why your report does not include the complete analysis and detail of the DNV-GL report having to do with corrosion of pipe lines; colocation issues and scenarios having to do with leaks, potential explosions, time required to stop the fire etc?

I wonder why there is no earthquake analysis when EE's placement is on the Seattle fault line?

II127-A-2

In fact, I wonder why Olympic Pipeline has not provided a chapter about their position; safety risks; health issues and their assurance(s) and assessment that co location has less than significant impacts. Incidentally, what does that mean?

Please provide a chapter which uly addresses these concerns. This chapter should NOT be just individual subjects. It should be an assessment that combines all of the Risks and all of the Health hazards.

If built, this HUGE project will be around for 40 years when your children and mine are middle aged. Over this time span, would you take the risk for your children and grand children that there would no EMF impacts; pipeline accidents etc.... I ask that you please take my concerns and those of other CITIZENS into consideration.

Repectfully,  
Kelly Bach

Sent from my iPhone

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15d1a1e12501e2c9&siml=15d1a1e12501...> 1/1

II127-A -1 Extensive health studies have not found a causal link between adverse health effects and EMF from electrical transmission lines (see Section 8.6.1.4 of the Phase 1 Draft EIS).

II127-A -2 The findings of the DNV GL report were considered in the pipeline safety risk assessment conducted by EDM Services (see Appendix I-5 of the Phase 2 Draft EIS). The DNV GL report was also used in preparing the analysis for the EIS. Recommendations from that analysis are included in Section 4.9.8, *Mitigation Measures*, of the Final EIS.

Also see response to comment II20-A-1 for information on how seismic risks were addressed in the Phase 2 Draft EIS and Final EIS.

To address concerns about potential interaction between the Energize Eastside transmission lines and Olympic Pipeline system, PSE and Olympic have coordinated regarding the project since 2012, and both have indicated they would continue to coordinate through final design, construction, and operation. PSE and Olympic meet regularly to discuss, identify, and mitigate potential threats to the integrity of the pipelines. Over the course of these ongoing discussions, the project plans have evolved to minimize the potential for impact. Olympic also provided information for use in the Phase 2 Draft EIS. See Section 4.9.8.1 of the Final EIS for additional information on Olympic's roles and responsibilities. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system. Regarding the portion of the comment requesting an explanation of what less-than-significant impacts means, please see Section 3.9.5 of the Phase 2 Draft EIS, which includes the definitions of thresholds of significance used in the Phase 2 Draft EIS.

The specific causes and consequences concerning human health effects (from exposure to EMF) and public safety risks (related to potential pipeline damage) are appropriately addressed in separate chapters in the EIS.

7/11/2017

Weebly Email Service Mail - Public comment on Opposition to Energize Eastside EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Public comment on Opposition to Energize Eastside EIS**

1 message

**Julie Beffa** <j.e.beffa@gmail.com> Thu, Jul 6, 2017 at 8:38 PM  
To: hbedwell@bellevuewa.gov, info@energizeeastsideeis.org, Don Marsh <don.m.marsh@hotmail.com>

In accordance with the extended Public comment period, I am submitting my objection to all proposals that pertain to the Energize Eastside project by PSE.

I attended the public hearing in at the City of Bellevue on May 25/2017 on the EIS Phase 2 Draft EIS and was very disappointed with the lead city's agreement to allow this environmentally destructive undertaking to go forward with little measured documentation and proof of its need. PSE has staged and managed this project to come up with desired results to show a demand for additional power requirements, and have refused to discuss alternatives. Energy efficiency in the last 20 years has improved considerably, and the demand level by an independent study shows the level is flat.

There is much documentation available by several scientific companies that this project does not need to be built. It will be obsolete before it's finished, not to mention that approximately 5,400 inventoried trees will be removed, the installation of 100ft. towers, and loss of property values will have a devastating effect on our communities. All in all, the presentation appears as an outdated attempt in light of cutting edge energy technology to boost the bottom line of this foreign-owned corporation. Our old Puget Energy was sold in 2007 to the Macquarie Consortium.

Julie Beffa  
9110 NE 21st Place  
Clyde Hill, WA 98004

I1128-A -1 Comment noted.

I1128-A-1

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7/11/2017

Weebly Email Service Mail - Phase 2 DEIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Phase 2 DEIS**

1 message

**Gloria Northcroft** <glorianorthcroft@yahoo.com>

Thu, Jul 6, 2017 at 3:40 PM

Reply-To: Gloria Northcroft <glorianorthcroft@yahoo.com>

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

Cc: "council@bellevuewa.gov" <council@bellevuewa.gov>

Heidi Bedwell  
Environmental Planning Manager  
City of Bellevue Development Services Department  
P.O. Box 90012  
Bellevue, WA 98009

Dear Ms. Bedwell,

My name is Gloria Northcroft. I live in the Horizon View neighborhood. My neighbors and I strongly support Energize Eastside.

I am writing to express my concern regarding the Phase 2 DEIS option of a no action or delay scenario that has been proposed. It is important that the Energize Eastside project which would impact Bellevue as well as Renton, Newcastle, Kirkland and Redmond be started as initially planned. A delay to start the project could result in unacceptable rolling blackouts. The option proposed in the DEIS study along the existing utility corridor seems to be the best option.

Our growing communities need reliable power. Our hospitals, schools and the increasing number of businesses need reliable power.

So again, I am asking that Bellevue support the energize Eastside initially proposed option utilizing the existing corridor.

Thank you,  
Gloria Northcroft

Gloria Northcroft R.Ph., M.S.  
G&G Life Sciences Consultant, LLC  
P: 425-643-6620  
C: 206-979-5435  
[www.gglsc consultant.com](http://www.gglsc consultant.com)

I1129-A -1 Comment noted.

I1129-A-1

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**Clyde Moore, P.E.**

8436-129th Place Southeast  
Newcastle, WA 98056-1764

Email: [cnmoore@farallonconsulting.com](mailto:cnmoore@farallonconsulting.com)  
Telephone: (425) 757-0111

July 6, 2017

To: City of Bellevue, Co-Lead Agencies, and PSE

Re: [Comments on Phase 2 Draft EIS, Energize Eastside Project](#)

II130-A-1

I am a resident of the Olympus neighborhood in Newcastle who lives downgradient from and less than 500 feet east of the easement containing two parallel high-pressure liquid-fuel pipelines operated by Olympic Pipeline Company. Because PSE is considering constructing new towers to support a 230 kV transmission line in the same easement, I am very concerned about the potential for ruptures of the liquid-fuel pipelines and the release of flammable high-pressure fuel during excavations for construction of the foundations for the new towers, as well as other construction activities. A rupture of one of the liquid-fuel pipelines could pose a severe hazard to anyone downgradient of the rupture, including construction workers, residents, motorists, pedestrians, hikers, or bicyclists.

For clarity, I precede each comment with a letter designation.

A. The SEPA Rules at WAC 197-11-425(4) state: "The text of an EIS (WAC 197-11-430(3)) normally ranges from thirty to fifty pages and may be shorter. The EIS text *shall* not exceed seventy-five pages; except for projects of unusual scope and complexity, where the EIS *shall* not exceed one hundred fifty pages." (Italics are for emphasis. Notice that use of the word "shall" indicates a requirement.)

II130-A-2

The text of an EIS is defined at WAC 197-11-430(3) as the description of alternatives plus the discussion of affected environment, impacts, mitigation measures and significant adverse impacts. In the Energize Eastside Phase 2 DEIS, the text of the EIS (Sections 2 through 6) is 495 pages long. Even if the approximately 120 pages of figures and tables is subtracted out, the text of the EIS is 2.5 times the maximum page limit allowed under SEPA. It even exceeds the maximum allowed length of a NEPA EIS, which is 300 pages (40 CFR 1502.7).

There are good reasons for the page number limits in the SEPA and NEPA rules. EISs are intended to be concise documents, easily read and understood by decisionmakers. The text of the Phase 2 DEIS is interminable, with no focus on what is really important. And the fact that the page numbering is not consecutive, and even differs in style from chapter to chapter, makes it extremely difficult to find the information you would most like to review. The Summary is little help, due to its own wordiness and difficult-to-read format.

I request that the Phase 2 DEIS be edited to meet the SEPA requirement for maximum number of pages for projects of unusual scope and complexity; and reissued for public review.

II130-A-3

B. The SEPA Rules at WAC 197-11-794 state: "The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impacts would be severe if it occurred."

II130-A -1 See response to comment II7-A-1.

II130-A -2 Due to the complexity of the project, the range of alternatives, and the depth of analysis required, the EIS is of a reasonable length to provide the public with an appropriate analysis of the environmental impacts required under SEPA. The Partner Cities believe that the Phase 2 Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA. Other commenters stated that the EIS analysis was not thorough or detailed enough, and the Partner Cities found the analysis to be unbiased, accurate, balanced, and thorough.

II130-A -3 As the commenter noted (and as SEPA Rules [WAC 197-11-794] state), even though a pipeline incident occurring as a result of PSE's proposal is a low probability event, the EIS Consultant team did complete a pipeline safety risk assessment to provide the public and decision-makers information on potential risk, to the extent that information could reasonably be developed. This additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers construction risks, and electrical interference risks related to corrosion, fault conditions, and arcing. Section 4.9 of the Phase 2 Draft EIS describes potential pipeline safety risks related to construction activities.

Also see response to comment II77-A-24.

Page two

- II130-A-3
 

The SEPA Rules at WAC 197-11-080(b) state: “If information relevant to adverse impacts is important to the decision and the means to obtain it are speculative or not known, then, the agency shall weigh the severity of possible adverse impacts which would occur if the agency were to decide to proceed in the face of uncertainty. If the agency proceeds, it shall generally indicate in the appropriate environmental review documents its worst-case analysis and the likelihood of occurrence, to the extent this information can reasonably be developed.”

Potential hazards due to a leak in a pipeline carrying unrefined oil don’t come close to the severity of the potential hazards posed by the rupture of one of the Olympic high-pressure liquid-fuel lines. For evidence of this, one need only remember that in 1999 a severe rupture of the Olympic pipeline, followed by accidental ignition of gasoline vapors, caused the death of three people in a sparsely populated area of Whatcom County. That rupture was attributed to human error, as well as a faulty computer system and pressure-relief valve. The impacts would have been far greater in more densely developed and populated areas like Renton, Newcastle, and Bellevue.

None of the risk analyses in the Phase 2 DEIS include a worst-case situational analysis. In the Final EIS, every risk analysis must include a worst-case situational analysis.
- II130-A-4
 

C. The Phase 2 DEIS describes a Facility Response Plan (p. 3.9-17) that provides guidelines for responding to a pipeline spill, and received approval by Ecology in 2016. It seems far more appropriate that this document be carefully reviewed and approved by the appropriate Fire Marshall(s), as the fire departments would make the emergency response to any spill.
- II130-A-5
 

D. The Phase 2 DEIS page (p. 3.9-17) refers to Code Red emergency notification software systems acquired by King County and Bellevue. These systems should have all resident and business locations and contact information verified prior to commencement of construction; and should actively monitor construction activities and be prepared to make appropriate notifications. The systems should make near-continuous updates to wind speed and direction information (not just once per day). Phone or email notifications may be fatally slow, and should be supplemented by horn or siren warnings similar to those available for coastal tsunamis. Additional Code Red emergency notification software systems must be acquired and prepared as above for the Energize Eastside project locations not protected by the Bellevue and King County systems.
- II130-A-6
 

E. Section 3.9 refers to providing hand-held fire extinguishers. Relying on hand-held fire-extinguishers is woefully inadequate for the type of fires that could result from a pipeline leak and ignition of a flammable liquid fuel— tantamount to using a hand-held fire extinguisher to control an oil tanker fire. Sufficient fire-fighting equipment to control a worst-case fire must be present at all times during construction activities adjacent to the liquid-fuel pipeline.
- II130-A-7
 

F. The Phase 2 DEIS discusses risks of pipeline rupture due to Outside Force/Excavation (p. 3.9-24) and especially discusses surcharge loading. I am familiar with a wide variety of auger technologies used for excavating for foundations. High torque augers have the capability to “roll” large underground rocks/boulders. An underground boulder that is rolled can exert tremendous

- II130-A -4
 

Olympic’s Facility Response Plan is shared with federal, state, and local officials, including emergency planning agencies and first responders (Fire Departments), to strengthen and coordinate planning and prevention activities, with certain key information redacted due to potential security risk. As described in Section 3.9.2 of the Phase 2 Draft EIS, the plan provides guidelines to prepare for and respond to a spill from the Olympic Pipeline system. The Facility Response Plan, which received final 5-year approval by Ecology in 2016, serves as Olympic’s oil spill contingency plan under WAC 173-182. The Facility Response Plan is based on the Northwest Area Contingency Plan (Regional Response Team 10 and Northwest Area Committee, 2016), as approved by Ecology and the federal Pipeline Hazardous Materials Safety Administration. The plan will not be changed as a result of the Energize Eastside project.
- II130-A -5
 

The Bellevue and King County fire departments regularly maintain their Code Red emergency notification software systems to ensure accurate contact information. The Code Red system, once initiated, triggers an immediate warning system to listed phone numbers. Section 5.9.4 of the Final EIS identifies potential mitigation measures during construction activities to minimize risk of unintended pipeline rupture.
- II130-A -6
 

In Section 3.9.1 of the Phase 2 Draft EIS, fire extinguishers were mentioned in relation to a Washington State’s Utilities and Transportation Commission (UTC) report on Olympic violations and areas of concern. It is a requirement of 49 CFR 195.430 that adequate firefighting equipment be maintained at each pipeline pump station. UTC has the responsibility to determine the requirements for firefighting equipment in accordance with federal law and regulations. Potential effects on public services, including emergency response, were described in Section 15.4 of the Phase 1 Draft EIS. See also response to comment II90-F-7.
- II130-A -7
 

As stated in the comment, there is the potential to encounter boulders during foundation excavation. The Final EIS includes additional mitigation measures PSE is planning to use to address this potential. These measures include use of VAC truck/equipment to dig past the depth of the pipelines before any auguring type equipment could be utilized. Also, hand digging is an option in more difficult access areas. Lateral forces on the pipeline from a ‘rolled’ boulder are not expected using the excavation techniques identified.

Page three

II130-A-7 point-force pressure on a pipe. The Final EIS should include an evaluation of how to anticipate, prevent, and discover any unusual pipeline forces from auguring.

II130-A-8 G. The Phase 2 DEIS describes Hazardous Liquid Pipeline Data (beginning p. 3.9-17) and purports to perform an analysis of various risks of pipeline failure and resulting public injuries and deaths. This analysis makes a clear statement that the estimates of flammable liquid pool sizes and vapor plume sizes are based on flat terrain, which yields the smallest size pools and vapor plumes. A clear statement is also made that the analysis does not consider that the flammable liquids would transfer into: paved streets with confining curbs and gutters, storm drain catch basins and pipes, creeks, ponds, or lakes. Flammable liquid flow into or onto these surface water flow features would tremendously increase the size and extent of the flammable liquid pools and vapor plumes. The size of flammable liquid pools and vapor plumes are directly related to the risks of injuries and fatalities from fires. EDM estimated the maximum release of flammable liquid could be 372,162 gallons – that is roughly 62 tanker-trucks full, and definitely a significant risk.

Yet the analysis continues using erroneous assumptions, and ends in statistical predictions of the likely risk of injuries and fatalities from pipeline rupture and fire. This seems like a car manufacturer evaluating the risk of injury and death while driving their top model, but with the stipulation that no driver will go over 30 mph or face on-coming traffic.

The risk analysis in the Phase 2 DEIS is totally inadequate. The Final EIS analysis must include a more realistic one that includes appropriate assumptions and worst-case situation combinations. Ninety percent of the proposed pipeline routes are hilly, and in densely developed neighborhoods with all of the storm-water features mentioned above.

II130-A-9 H. The Phase 2 DEIS discusses the potential for flash fires from flammable liquids (p. 3.9-30), and claims that the limited evaporation rate of gasoline limits potential vapor migration when the gasoline is in a pool. The Final EIS needs to analyze a worst-case flash-fire situation in combination with other coincidental occurrences such as: a pipeline with internal flammable liquid pressure at 650 psi, and a crack rupture (producing flammable liquid atomization) occurring with the longest possible shut-off response time, during strong winds, in a densely developed neighborhood. The Walnut Creek incident in 2004 appeared to have a combination of coincidental elements that exacerbated the seriousness of the incident.

II130-A-10 I. Similarly, the Final EIS should also evaluate the risk from a complete pipeline rupture with internal flammable liquid pressure at 650 psi; occurring with the longest possible shut-off response time; and producing a leak volume of 372,162 gallons. It should be further assumed that: (1) this worst-case leak occurs during a strong wind in a densely developed neighborhood with 2 miles or more of downgradient ground or water surface beginning adjacent to the proposed new transmission line; and (2) that the neighborhood has many interconnected surface water features (including paved streets with curbs and gutters, catch basins and interconnected storm-drain piping, creeks, ponds and lakes).

As part of that analysis, the Final EIS should provide the following information:

II130-A -8 The risk assessment summarized in Sections 3.9 and 4.9 of the Phase 2 Draft EIS (and included in Appendix I-5) used available information and reasonable worst-case assumptions consistent with industry practice to provide a reasonable examination of this risk to help the public and decision-makers understand potential impacts. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions. See response to comment II130-A-3 for information on how the spill size was estimated for the risk assessment. See response to comment II30-A-4 for information on how the pool fire size was estimated. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system.

II130-A -9 In the Walnut Creek incident, gasoline was released onto the ground. The leak was identified by the pipeline operator's leak detection system within seconds, and the pipeline was shut-down. The gasoline flowed into a trench, where a large diameter (69-inch diameter) water line was being constructed. The gasoline was ignited by welders in the trench who were constructing the water pipeline. This scenario is similar to the pool fires presented in the Phase 2 Draft EIS.

The situation that the commenter requests be addressed in the Final EIS appears to be a torch fire, not a flash fire. Such a torch fire could be created by a very small release, where the refined petroleum product was vaporized as it was released from the pipeline. Such a torch fire results in a localized hazard that is clearly visible and avoided by persons due to the radiant heat flux. If we understand this comment correctly, this would not result in a worst-case scenario. It should also be noted that PSE's proposal will not change this potential risk (torch fire), which exists currently.

Page four

I1130-A-10

- a. What is the location of the valves that shut-off flow and relieve pressure in the fuel pipelines in the event of a rupture during construction of the new power poles and foundations? (Please show locations on a map.)
- b. When were these valves last tested and closed, and how long did it take to close them?
- c. Will these valves be tested immediately before construction begins, and at regular intervals during construction?
- d. Will a "smart pig" be used to determine the condition of the pipe immediately before construction begins?
- e. Will a "smart pig" be used to verify pipeline safety during excavation for the new tower foundations, and during all construction activities?
- f. Provide a map of the potential impact zones where fuel and fuel vapor could travel following a rupture anywhere along the construction zone, considering the volume and type of fuel released, the type of pipeline rupture, the slope of the ground surface, the storm-water flow pathways near the rupture, pavement - curbs and gutters, catch basins and piping, wind velocity and direction.
- g. What provisions (such as the Code Red implemented by King County and Bellevue) will PSE make for evacuating residents and other persons at risk within the impact zones if a rupture occurs, and maintaining that evacuation?
- h. What provisions will be made for containment of fuel from a rupture?
- i. What provisions will be made to reduce the potential for ignition of the vapor plume and liquid from a rupture?
- j. What provisions will be made for extinguishing vapor and liquid fires should they occur?
- k. If the proposed new transmission line is constructed in the same easement as the existing high-pressure liquid-fuel lines, PSE cannot guarantee with certainty that there would be no human error or equipment failure that could result in a severe rupture of the fuel lines and potential ignition of flammable fuel. Because the impacts of a severe rupture and fuel ignition could be catastrophic in the densely-populated neighborhoods near the pipeline easement, the EIS should regard these impacts as significant regardless of the likelihood of occurrence. To mitigate these potential impacts, I recommend at a minimum that the liquid-fuel lines be completely depressurized during excavation for and construction of tower foundations.
- l. Verify that the Final EIS, including my comments, have been provided to the appropriate fire marshals for their review, comment and approval.

I1130-A-11

J. The Phase 2 DEIS Section 3.9.5.4 (p. 3.9 – 44) discusses pipeline safety risks due to operation of the pipeline and due to pipeline coating stress. There needs to be an evaluation and discussion of increased risks during construction.

I1130-A-12

K. The Phase 2 DEIS Section 3.9.6 Long-term Impacts on Resources (p. 3.9 – 48) discusses risks of hazardous liquid spills into the environment. The claim is made that light fuels, including gasoline, evaporate in a few days and leave a residue that tends not to persist long-term in the environment, lasting up to a few weeks. As a soil and groundwater remediation engineer, I know that nothing could be further from the truth. Billions of dollars are spent in the U.S. every year remediating gasoline spills, some of them over 30 years old with fuel residuals still present in soils and construction materials. The Final EIS must not include such a clearly erroneous claim.

I1130-A -10 The risk assessment summarized in Sections 3.9 and 4.9 of the Phase 2 Draft EIS (and included in Appendix I-5) used available information and reasonable worst-case assumptions consistent with industry practice to provide a reasonable examination of this risk to help the public and decision-makers understand potential impacts. See response to comment I1130-A-3 for information on how the spill size was estimated for the risk assessment. See response to comment I130-A-4 for information on how the pool fire size was estimated.

According to the Bellevue Fire Department Standards of Response Coverage, flow and pressure are controlled by computers in Olympic's Control Center in Renton. Check valves, hand-operated valves, and remotely operated valves are utilized throughout the system. Check valves prevent backflow, hand-operated valves are shut by Olympic personnel in the field (this can take over an hour depending on traffic), and remotely operated valves are controlled by Olympic's Control Center in Renton (which can take approximately 45 to 90 seconds to completely close using a computer-enhanced system) (Bellevue Fire, Undated).

The Lead Agency and the EIS Consultant Team contacted Olympic during the development of the Phase 1 Draft EIS, and made additional inquiries during the project-specific phase of the Phase 2 Draft EIS. Certain information (such as valve locations, operation, and testing) was not available from Olympic for use in the Phase 2 Draft EIS. As project applicant, PSE does not have the ability to require Olympic to publicly release information. Validating Olympic's system operation is outside of the scope of the EIS for the Energize Eastside project. Olympic, as the pipeline operator, is responsible for operating and maintaining their pipelines in accordance with federal standards. Section 4.9.8 of the Final EIS includes mitigation measures addressing coordination between PSE and Olympic.

Potential effects on public services, including emergency response, were described in the Phase 1 Draft EIS. Additional information on the Code Red emergency notification system was included in Section 4.9.2.2 of the Final EIS. See response to comment I1130-A-5 related to questions on the Code Red system. As SEPA Lead Agency, the Environmental Coordinator consulted with various city departments, including the Bellevue Fire Department, to prepare response to comments, such as this one.

I1130-A -11 Pipeline safety risks during construction are described in Section 4.9 of the Phase 2 Draft EIS.

I1130-A -12 The section referenced by the commenter describes the potential for environmental harm if a release entered or directly occurred in a water body. While gasoline breaks down very quickly, usually lasting only days to weeks in the environment, jet fuel usually lasts days to weeks in the environment, and diesel fuel is somewhat persistent lasting one month to a year in the environment. This has been clarified in the Final EIS (Errata).

II130-A-13

*Page five*

- L. The Phase 2 DEIS Section 4.9 Environmental Health – Pipeline Safety needs to be rethought and rewritten based upon the new worst-case risk analyses requested in my previous comments.
- M. The SEPA lead agency (or other appropriate agency) must verify that all proposed potential mitigation measures discussed in Section 4.9.4.2 of the Phase 2 DEIS (p. 4.9-9) are actually implemented. These include the use of “soft-dig” methods for excavations, including auguring, within 25 feet of the pipeline; and development by PSE of an Adjacent Use Protection Plan for activities near “sensitive” zones in order to protect the general public from construction-associated risks.

I appreciate the opportunity to comment.

Clyde Moore

II130-A -13 Sections 4.9.8 and 5.9.4 of the Final EIS describe potential mitigation measures, including the preparation of a mitigation and monitoring report to be filed with the Partner Cities documenting all consultations with Olympic, mitigation measures to address safety-related issues, and a monitoring plan that identifies how mitigation measures will be monitored to ensure that mitigation related to construction activities and operation are followed. Because the risks associated with the transmission lines and pipelines are not expected to increase substantially as a result of construction of the Energize Eastside project, no additional measures for protecting adjacent uses is proposed as mitigation. The Partner Cities will use the Final EIS, including mitigation measures identified in the EIS, along with other information in their decision-making regarding permit issuance and imposition of conditions on permits.

7/11/2017

Weebly Email Service Mail - EIS 2



Energize Eastside EIS <info@energizeeastsideeis.org>

**EIS 2**

1 message

**Esther Moloney** <esmol@msn.com>

Thu, Jul 6, 2017 at 11:09 PM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

II131-A-1

I can't believe that anyone with a good conscience could approve the electrical high power poles above aging fuel pipelines so close to Tyee Junior High School and Somerset Recreation Club and also with the knowledge that the area is near an earthquake fault zone. Why could anyone possibly approve this project?

II131-A-2

I do believe that PSE is trying to make sure they can sell their company. They must realize this project is not necessary especially with the knowledge that homeowners and businesses are all curbing their use of electrical power. In addition many are installing solar panels and in the not too distant future efficient solar roof tiles along with their own electrical storage devices.

Thank you.

Esther Moloney

4551 135<sup>th</sup> PI SE

Bellevue, WA 98006

II131-A -1 See response to comment II7-A-1.

II131-A -2 Comment noted.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15d1baae9b54d5c1&siml=15d1baae9b54...> 1/1



RECEIVED

JUN 16 REC'D

Development Services

June 14, 2017

Mr. John Stokes, Mayor  
Ms. Heidi Bedwell, "Energize Eastside" Environmental Planning Manager  
City of Bellevue  
Development Services Department  
P.O. Box 90012  
Bellevue, Washington 98009-9012

Re: Comments Regarding Phase 2 Draft EIS for "Energize Eastside" Project That Is Dangerous and Costly To Bellevue and Other Eastside Citizens, Is Unneeded From An Energy Demand Point of View and Is Ridiculously Named To Create A Falsely Image To Create Profits For Foreign PSE Shareholders

Dear Mayor Stokes and Ms. Bedwell,

Being a citizen of and property owner in Bellevue, I strongly urge that the City of Bellevue take the "no action alternative" with respect to PSE's proposal to install new high power transmission lines through Bellevue communities and alongside the aging Olympic Pipelines, traversing broad swaths of the Seattle Fault in the South Bellevue (U.S. Geological Service – Pacific Northwest Urban Corridor Geologic Mapping Project) as well as areas of potential liquefaction along Coal Creek Parkway (King County Local Hazards Map).

Proposals related to the Willow #2 and Willow #1 options are especially egregious and ill-advised because the Phase 2 Draft EIS and the PSE consultant's studies failed to adequately address the life safety issues and other concerns listed below despite having been repeatedly raised by numerous members of the public in the past.

With all due respect and notwithstanding all of the other issues and concerns about PSE's proposal, to allow a new project of this magnitude to be built in this seismically active area in South Bellevue with the Olympic Pipelines nearby would be the height of irresponsibility. I cannot imagine that City of Bellevue officials would sanction and approve this if they considered what could be sacrificed to create profits for PSE through the sale of energy to Canada.

As part of the Phase 2 Draft EIS process, extensive testimony from independent experts and other documentation has already been submitted

I1132-A -1 See response to comment 001-A-4 for information on how Willow 2 and 1 were considered in the Phase 2 Draft EIS and Final EIS. See response to comment I120-A-1 for information on how seismic risks were considered in the Phase 2 Draft EIS and Final EIS. As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program; it is a disclosure document to help decision-makers evaluate an applicant's proposal and determine appropriate mitigation. The Energize Eastside EIS does not advocate for or against the project, but rather presents an analysis of potential environmental impacts from the proposed project and a range of reasonable alternatives.

I1132-A -2 Comment noted.

I1132-A-1

I1132-A-2

I1132-A-2

that demonstrates that the proposed PSE project is unsafe for many reasons, unneeded, expensive, and will visually blight Bellevue and Eastside neighborhoods that it touches.

I1132-A-3

Demonstrating their contempt for the citizens of Bellevue, PSE's Willow 2 Route – has a segment (Segment 2) that would string high power transmission lines (built to 230,000 volt standards) in Bellevue along narrow SE Newport Way over or near churches, schools, daycare, residential neighborhoods, bus stops and walking paths for middle school students and other residents. This is in addition to other lines to be built on steep slopes in the Somerset area, impacting views and lowering property values for many homeowners. The Willow 2 Route is completely unacceptable and represents a threat to safety as well as a huge denigration of the quality of life for neighborhoods and citizens not only in South Bellevue, but along the entire length of the proposed high transmission line corridors.

I1132-A-4

To be frank, it has been disheartening to see the actions to date of the City of Bellevue compared to other municipalities, such as Newcastle. The City of Bellevue adopted the "Energize Eastside" slogan of PSE for its EIS website providing an air of endorsement at worst or creating confusion at best. The PSE website is [www.energizeeastside.com](http://www.energizeeastside.com), while the city's website sounds almost exactly the same: [www.energizeeastside.org](http://www.energizeeastside.org). Some Bellevue citizens believe that the City has endorsed the PSE proposal from the very start and that City officials view the EIS merely as a nuisance required by law.

Bellevue citizens are questioning if City officials are capable of representing the interests of the public in a fair and open manner on a wide variety of issues in dealings with PSE. Some people wonder if this entire EIS process is nothing more than a charade to provide cover for PSE and government staff who want to keep their jobs and make it appear as if they are taking the public's views into account.

I honestly hope that I can put my faith in you both and the City Council and that the City of Bellevue will make the right decision on behalf of the citizens. Please advise regarding the final determination made by the City of Bellevue.

Sincerely,  
  
 Charles Barnes  
 13305 SE 43<sup>rd</sup> Street  
 Bellevue, Washington 98006

I1132-A -3

The Willow 2 Option was not brought forward for additional analysis in the Final EIS; PSE's Proposed Alignment, as evaluated in the Final EIS, is entirely within the existing corridor.

I1132-A -4

The Energize Eastside EIS does not advocate for or against the project, but rather presents an analysis of potential environmental impacts from the proposed project and a range of reasonable alternatives. The correct URL for the Energize Eastside EIS project website is <http://www.energizeeastsideeis.org>. Using the project name developed by the applicant avoids confusion that could occur if the EIS were to use a different name.

7/11/2017

Weebly Email Service Mail - Relook at the EIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Relook at the EIS**

1 message

**Margaret Moore** <mmooreii@comcast.net>  
 To: Energize Eastside EIS <info@energizeeastsideeis.org>  
 Cc: CENSE <mail@cense.org>, bmooreii@comcast.net

Thu, Jun 29, 2017 at 11:38 AM

June 29, 2017

City of Bellevue -- Development Services Department  
 Attn: Heidi Bedwell, Environmental Planning Manager  
 PO Box 90012  
 Bellevue, WA 98009-9012

I am responding to the opportunity to enter my concerns with the City of Bellevue about the EIS process regarding the PSE Energize Eastside proposal. I am deeply concerned that what is currently proposed by PSE will cause drastic and irreparable harm to our environment and the community we appreciate. I believe the current EIS study has not adequately considered all possible repercussions from allowing the PSE project to go ahead as planned.

II133-A-1

My primary concerns include:

- The destruction of hundreds of long-standing trees through the path of the power lines. Even if these trees are replaced by young trees elsewhere, losing these mature trees will greatly impact the ability to cleanse the environment of CO2, as well as destroy the beauty of our "city in the park" that we treasure.

II133-A-2

- I do not believe the potential for a horrendous accident as the result of stringing increased-voltage power lines along the high-pressure gas line right of way has been adequately evaluated. The pipeline is aging while the voltage is potentially increasing. There have been far too many accidents involving PSE and gas in recent years to be able to say that this cannot happen here...in the middle of a densely populated area including schools. While PSE says that actual construction of the new lines should not be a problem, we have had that assessment from them previously in other situations to very poor ends.

II133-A-3

- I do not believe the seismic potential for great damage involving the PSE lines and the high-power gas line have been adequately considered.

- The entire PSE proposal is a problem, primarily because it is driven to maximize foreign corporate profits through very specific infrastructure enhancements. No alternative solutions were allowed in the community review. The PSE case for future power needs is generated by questionable data which it will not share with independent evaluators, fearing the case will not hold up due to clear evidence that the PSE Energize Eastside case is biased, error-ridden, and most-likely unnecessary due to declining demand through increased energy efficiencies. Potential outages and variable demand can be handled better through other means than more high-power lines.

I encourage the City of Bellevue to request reevaluation of the current EIS statement to include a much broader consideration of alternatives or, in the best case, deny PSE the right to string a horrible line of high-power poles with increased voltage along an 18 mile stretch of the Eastside. It's an out-moded, ill-considered approach to 21<sup>st</sup> century needs. CENSE has offered to provide additional review at its own expense to help the City have a clearer picture of the possibilities for a truly adequate solution to our energy needs for the foreseeable future. Please let CENSE help.

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZ4.en.&view=pt&search=inbox&th=15cf525d594cb8d8&siml=15cf525d594cb... 1/2

II133-A -1 The carbon storage of trees is described in Section 3.10.3 in the Phase 2 Draft EIS. Additionally, tree removal was considered as part of the assessment of impacts to the aesthetic environment (see Section 3.2 of the Phase 2 Draft EIS).

II133-A -2 It is correct that some amount of risk is always inherent with transmission lines and pipeline systems. The Phase 2 Draft EIS addresses this by presenting an estimate of the probability of a pipeline incident occurring, including before the project is built, while it is being constructed, and during operation. The pipeline safety risk assessment considered national incident data on similar pipeline systems to estimate the probability of pipeline failures, both under existing conditions (115 kV transmission lines) and with new 230 kV transmission lines. In many cases, and in particular for pipeline damage caused by construction activities, incidents in the national database occurred as a result of failure to follow proper procedures. Even with reasonable worst-case assumptions used in the risk assessment, and in consideration of rates of pipeline incidents from all causes of damage, the results indicated that there would be a very small increase in total risk with the Energize Eastside project. With implementation of the mitigation measures described in Section 4.9.8 of the Final EIS, conditions related to potential for fault damage on the pipeline due to coating stress and arc distances would likely improve over the existing operational baseline risk. This does not dispute the fact that the potential public safety impacts could be significant in the unlikely event a pipeline incident were to occur as a result of electrical interference or construction damage.

Information on PSE's responsibilities and requirements in relation to this project are described in Section 4.9.8.1 of the Final EIS. For PSE, national and state standards, codes, and regulations and industry guidelines govern the design, installation, and operation of transmission lines and associated equipment. In addition to these standards, codes, regulations, and guidelines, Section 4.9.8.2 lists additional measures that PSE has indicated it will use, and measures the EIS Consultant Team has proposed to provide additional safety assurances. The Partner Cities will use the Final EIS to support any permit decisions required. The Partner Cities, in issuing permits, can decide that additional conditions are required, such as reporting of compliance efforts by PSE.

II133-A -3 See response to comment II32-A-1. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Project Objectives Topic).



COMMENT

RESPONSE

7/11/2017

Weebly Email Service Mail - Re:look at the EIS

Sincerely,

Margaret R. Moore

4707 135<sup>th</sup> PL SE

Bellevue, WA 98006

[425-747-1388](tel:425-747-1388)

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZi4.en.&view=pt&search=inbox&th=15cf525d594cb8d8&siml=15cf525d594cb...> 2/2

7/11/2017

Weebly Email Service Mail - comment on Phase 2 Draft EIS for Energize Eastside



Energize Eastside EIS <info@energizeeastsideeis.org>

**comment on Phase 2 Draft EIS for Energize Eastside**

1 message

**J Wilson** <jenniferwilson@outlook.com>

Tue, Jun 27, 2017 at 6:42 PM

To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>

To Whom it May Concern:

I write in opposition to PSE's proposed Energize Eastside project. I am concerned about many aspects of the proposed plan (including the fact that so few specifics have been included in the proposed plan). But my first and foremost concern has to do with safety, and the proposed high-voltage power line's proximity to the aging Olympic gas pipeline system. Phase 2 of the Draft EIS has done nothing to mitigate my concerns.

As noted by CENSE, "The DNV-GL pipeline safety report says that PSE's preferred route has 'unpredictable risk range.'" As a parent who will be sending a child to a middle school (Tyee) that has the pipeline in question running along its property -- the pipeline runs on school property, close to the school building, and in the corridor between the school building and the street where many parents drop off or wait to pick up their children from school -- I find an "unpredictable risk range" completely unacceptable.

I1134-A-1

How can PSE, and the Bellevue City Council, ignore a clear and obvious risk such as this? Why would they think of approving building high-voltage power lines in such a location? Would you approve a building design for the Grand Connection that had an "unpredictable risk range"? Matters of conscience aside, granting permits for this project should make the City of Bellevue, and its City Council and staff, legally liable should a disaster occur such as that which happened in Bellingham, WA in 1999. The basic definition of recklessness is acting with a "wilful disregard" of the risk to others. If the city moves forward with this project, aware of its risks, how is that anything other than reckless action? Perhaps legal liability is not a big deal for a rich foreign-owned company like PSE, but what would it mean for the City of Bellevue, and for the City Council members who vote to grant permits to this project?

I will also re-iterate comments I made on the earlier Draft EIS:

I1134-A-2

--BP, the operator of the Olympic Pipeline, noted that "the location of the pipelines may be found anywhere within the easement from the center of the right-of-way to either side" and as a result recommended against route segments Oak and Willow.<sup>[1]</sup> Yet Oak and Willow are the only two routes still being considered.

I1134-A-3

--As noted by CENSE, the Bellevue Fire Department writes in their Standards of Response Coverage, "Given that pipeline incidents continue to occur in this country, and many for undetermined reasons, the community is still at risk. The combination of a highly flammable liquid, in large quantities, and in [an] urban environment translates into a significant consequence risk that approaches the 'catastrophic' level."<sup>[2]</sup> Thus, local emergency responders feel this is a dangerous proposition.

I1134-A-4

-- Most importantly, this entire proposed power line lies upon a major fault line. As recent media attention has shown, and as has been confirmed by national government agencies, the Pacific Northwest is long overdue for a major earthquake. A high voltage power line on top of an aging gas pipeline that runs through almost exclusively residential neighborhoods will cause a catastrophic and easily predictable loss of life. In the Somerset and Eastgate neighborhoods alone, aside from running through many residents' back yards, the pipeline/powerline combination runs underneath and above the neighborhood swim and tennis pool. The combination runs over and below the public Tyee Middle School, where many hundreds of local children spend 8-9 hours a day, 5 days a week studying. The combination runs right alongside a Bright Horizons daycare facility, where our community's youngest, most vulnerable (and least likely to be successfully evacuated) members spend their days year-round, as well as the private Chestnut Hill Academy. Somerset/Eastgate is

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCiZ4.en.&view=pt&search=inbox&th=15cec5d87b8c5f11&siml=15cec5d87b8c5f11> 1/2

I1134-A -1

See response to comment 001-A-4. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system.

I1134-A -2

Olympic has been working cooperatively with PSE to evaluate the impact of any changes or modifications to its project plans to ensure that Olympic remains in compliance with all applicable regulatory requirements and that the pipelines can be operated safely. Olympic has indicated that, based on their understanding of PSE's project plans, there would be no need for Olympic to relocate its pipelines to satisfy the federal standards governing pipeline safety. Further, Olympic has indicated that with effective planning, ongoing coordination, project execution in accordance with developed plans, and adherence to Olympic's integrity and maintenance plan, the project can be accomplished in a way that ensures the continued safe operation of Olympic's pipelines in the shared corridor (Olympic, 2016).

I1134-A -3

See response to comment I190-F-7.

I1134-A -4

As the commenter notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks. Sections 4.9.8 and 5.9.4 of the Final EIS include mitigation measures for the Partner Cities to consider during their permit review.

See response to comment I120-A-1 for information on how seismic risks were considered in the Phase 2 Draft EIS and Final EIS.

I1134-A

COMMENT

RESPONSE

7/11/2017

Weebly Email Service Mail - comment on Phase 2 Draft EIS for Energize Eastside

I1134-A-4

but one of the many potentially-impacted neighborhoods.

CENSE, of which I am a member, has offered reasonable, cheaper alternatives to the PSE plan. Please listen to local residents and their safety concerns, not to PSE (which is concerned only with its financial bottom-line)

Sincerely,  
Jennifer Wilson  
14312 SE 45th Street  
Bellevue, WA 98006

[1] For a copy of the letter from the Olympic Pipeline Company, follow the link at the following web address: <http://sane-eastside-energy.org/2014/04/02/olympic-pipeline-company-opposes-transmission-lines-over-its-pipelines-for-several-reasons-including-safety/>

[2] [http://www.bellevuewa.gov/pdf/Fire/Standards\\_of\\_Coverage.pdf](http://www.bellevuewa.gov/pdf/Fire/Standards_of_Coverage.pdf), p. 66

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCIZI4.en.&view=pt&search=inbox&th=15cec5d87b8c5f11&siml=15cec5d87b8c5f11> 2/2



7/11/2017

Weebly Email Service Mail - Comments on Phase 2 DEIS



Energize Eastside EIS <info@energizeeastsideeis.org>

**Comments on Phase 2 DEIS**

1 message

Carol Berry <cberry8@sbcglobal.net>  
To: info@energizeeastsideeis.org

Thu, Jul 6, 2017 at 8:52 PM

II135-A-1

Our family moved to Newport Hills in 1960 and been actively involved in the Community for over 50 years. We have experienced many positive changes in the area from the development of Factoria Mall and numerous residential communities, and the construction of three bridges- I-90 and two 520 bridges too. However for a number of years the Eastside Energy Project, has unified our region to collectively convey concerns due to numerous adverse impacts to our Eastside Communities. However, we understand that if the project is permitted; PSE will enhance its Corporate economic value due to both the expansion of the transmission system and the ability to import power from Canada and distribute it through Western States (e.g. especially to California). This project has both short and long term impacts and we would like to recommend that the City of Bellevue and PSE look at other alternatives such as Storage and other transmission/distribution options that would not significantly impact our residents, their homes, and our environment. The Eastside Energize project should not be permitted.

The following is a list of comments on the documents for the Phase 2 DEIS for the "Energize Eastside" Project.

II135-A-2

**Overall Project**-Regarding the Phase 1 DEIS, and now "Phase 2"; we expected to receive comprehensive responses during the Phase 1 of the Draft Environmental Impact Statement process. However, these comments were not addressed in the Phase 1 FEIS, since it was not prepared. Per the comment on the DEIS, we would like to have an explanation of why the Phase 1 FEIS was not prepared. We are unsure if a combined DEIS/FEIS for Phase 1 and now the DEIS/FEIS Phase 2's will occur. This question needs to be addressed and if there is not a combined document, an explanation must be given and all previous comments responded to in the Phase 2 DEIS/FEIS documents. This process is not consistent with Washington State Department of Ecology's State Environmental Policy Act (SEPA) guidelines and we would like an explanation, legal justification, and examples of other DEIS (for similar proposed actions) that have been recently prepared following that same approach.

The following is a list of comment on the Phase 2 DEIS for the "Energize Eastside".

**Letter**

II135-A-3

It stated that the "City of Bellevue and its partner Eastside Cities (Kirkland, Newcastle, Redmond, and Renton) are jointly conducting a phased environmental review process..." It should be noted that the large number Residents of these Cities (e.g. Somerset area in Bellevue, and parts of Newcastle) have joined CENSE and are not partners of this project and/or partner of the City that they reside in either. That label is not a reasonable word to use- adjacent or nearby cities is more accurate.

**Draft Environmental Impact Statement**

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCiZ4.en.&view=pt&search=inbox&th=15d11b2e02c328634&siml=15d11b2e02c32...> 1/4

II135-A -1

Comment noted.

II135-A -2

As described in Section 1.4.1 of the Phase 2 Draft EIS, the Energize Eastside EIS makes use of flexibility provided under SEPA (WAC 197-11-060 (5)) for phased review of a project. The Phase 1 Draft EIS analysis is a voluntary expansion of the EIS process to better inform decision-makers about the environmental consequences of various approaches that could be taken to address PSE's objectives. No regulatory decision or approval was or will be made, or is required, based on the Phase 1 Draft EIS other than the use of its conclusions to help form the scope for the Phase 2 Draft EIS. No action, as defined under SEPA, was taken on the Phase 1 Draft EIS. As such, the City of Bellevue, as Lead Agency, and the Partner Cities, determined that a Phase 1 Final EIS was not required. The information presented in the Phase 1 Draft EIS did help narrow the scope of issues to be covered in the Phase 2 Draft EIS, and to ensure that the decision-making process is transparent and consistent with the commitment made by the City of Bellevue to the public. This approach is consistent with the requirements for Phased Review outlined in WAC 197-11-060 (5)(c). This Final EIS provides responses to the comments received on the Phase 1 and Phase 2 Draft EISs. While the Partner Cities or EIS preparers are not aware of any specific examples of the same process, this approach is consistent with SEPA rules (WAC 197-11).

II135-A -3

The "Partner Cities" term is based on the local jurisdictions that could potentially be affected by the project and the fact that the municipalities of these cities are a part of the SEPA EIS process; not whether the entire population, or every group, that resides within each city is in support of the project. These principal jurisdictions have entered into an interagency agreement to share or divide responsibilities of the SEPA Lead Agency under WAC 197-11-944. These cities will collaboratively manage environmental review of the proposal through the EIS process.

7/11/2017

Weekly Email Service Mail - Comments on Phase 2 DEIS

**Fact Sheet**

II135-A-4

Project Location Section-The document states that "The project involves improvements to PSE's electrical grid in the Eastside area of King County, to address a deficiency in electrical transmission capacity". The Project location section should only state the project location details and not mention any details regarding the projects or its issues or the proposed action.

**Project Description**

II135-A-5

"The purpose of the project is to address a projected deficiency in transmission capacity resulting from growth in electrical demand, which could affect the future reliability of electrical service for the Eastside". Based on the Phase 1 DEIS, the projected deficiency in transmission capacity analysis and growth in demand was inaccurate. The demand in the City of Bellevue and region is being reduced based on energy efficiency products, etc. In addition, the City of Bellevue and PSE have not researched and evaluated alternatives such as increasing the use of Storage Batteries, locating alternative Energy Facility(s) in the area, use of BPA's and/or Seattle City Light Transmission/distributions systems, and the utilization of other transmission/distribution options in the corridor that would eliminate impacts to all Cities (e.g. Place transmission and distributions lines in Roadway corridors and/or in underground T/D systems, etc.).In addition, the region's exploration of other potential power generation systems (e.g., Solar and Waste-to-energy Facilities) should be that could be located in the City of Bellevue or nearby in King County.

**Introduction, Summary, and Purpose and Need**

II135-A-6

"The energy deficiency that is expected on the Eastside, and is expected to negatively affect electric service reliability for PSE's Eastside customers within the next few years" is an incorrect statement. Per PSE statements in Public meetings and the previous DEIS/FEIS, it was stated that the energy requirements for the study area are decreasing. In addition, the use of storage batteries, additional energy facilities, and the utilization of the BPA T/D corridor could enable more power to be provided if needed, especially during seasonal increasing requirements. Also, due to increasing population and employment, other viable power generation systems could be located within the City of Bellevue or along key T/D corridors to prevent any reliability issues and increase service.

"Based on federally mandated planning standards, PSE's analysis found that the existing transmission system could place Eastside customers and/or the regional power grid at risk of power outages or system damage during peak power events that typically occur in cold or hot weather as early as the summer of 2018 (PSE, 2017)." What are these planning standards? For example, the past outages in the Factoria/Somerset area occur in the winter months usually occur due to transmission line being hit by falling , not due to peak power demand issues. This issues needs to be adequately addressed.

The following is an overview of the Elements of the Environment that are not evaluated and are not adequately evaluated in the DEIS. However per our assessment, we are requesting that additional analysis occur and key mitigation measures be provided to reduce any/all impacts to the region.

**Key Elements of the Environment not evaluated and should be included in the Phase 2 EIS**

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCiZi4.en.&view=pt&search=inbox&th=15d1b2e02c328634&siml=15d1b2e02c32...> 2/4

II135-A -4

The additional information is included to provide adequate context to explain the extent of the study area.

II135-A -5

As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

The Phase 1 Draft EIS explored a range of reasonable alternatives, as required by SEPA . Numerous options, including the ones cited in the comment, were explored in the Phase 1 Draft EIS. Please see Section 2.2 of the Phase 2 Draft EIS for a detailed explanation of why certain alternatives were not carried forward for analysis.

II135-A -6

The EIS authors are not aware of a previous "DEIS/Final EIS" for this project, other than the Phase 1 Draft EIS, which did not include statements from PSE that energy requirements for the study area are declining. The project description included in the Phase 1 and Phase 2 Draft EISs was reviewed by PSE. Any statement made by PSE in other contexts are not part of this review. The EIS authors are not aware of any other context in which PSE has indicated that the energy needs within the Eastside are declining. The commenter may be referring to PSE's overall service area, but PSE's Integrated Resource Plan projects a small increase in demand in its overall service area as well (PSE 2015).

The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see Topic OBJ).

The planning standards are discussed in the Phase 1 Draft EIS Chapters 1 and 2.



7/11/2017

Weekly Email Service Mail - Comments on Phase 2 DEIS

- II135-A-7

The following Elements of the Environment were not evaluated in this document.

**Earth** - This is significant due to the seismic issue along the I-90 corridor and gas pipeline that is located adjacent to the existing and proposed line along the Newcastle, Somerset, and Factoria area. The geologic and seismic issue should be further evaluated. Since the alignment of the existing corridors are parallel this is no longer allowed per environmental regulations. The proposed action should not be permitted based on this alignment issue.
- II135-A-8

**Public Services /Utilities and Energy/Natural Resources** -Since this is a project to provide power via a local Utility (PSE) to the Eastside area, this section should be included.

Also, due to the location of the T/D system hundreds of trees will be eliminated. This will cause a significant loss in habitat and a reduction of plants and animals (e.g., See the Plant and Animal Section--especially birds- eagles) in the region.

**Key Elements of the Environment inadequately analyzed in the Phase 2 EIS**

The following Elements of the Environment were evaluated in this document.
- II135-A-9

**Land Use and Housing-** There are about 783 single-family and 3,440 multi-family residences in the study area, with the highest density areas in the Bellevue Central and Bellevue South Segments. As a result of this density, the impacts provide the greatest impact on the residents in the segments. The T/D line placement will adversely impact the location of many of the homes both due to the aesthetic/visual and noise impacts.
- II135-A-10

**Aesthetic/ Visual Quality** - The current transmission corridor transects Somerset, Woodridge and other residential communities which have both scenic views and higher visual quality. An increase in number of poles and power pole height would have a negative impact in all communities that this system will be located in and affect the property values, aesthetics, and other impacts. These impacts cannot be mitigated and will significantly reduce the property values of all homes (see the Economic Element) throughout the corridor.
- II135-A-11

**Historic and Cultural Resources** - There are hundreds of unevaluated historic resources in the corridor. They need to be assessed and a study done regarding whether they should be registered as Historic Structures. All of these homes and other structures in the proposed corridor need to be evaluated, so that no further impacts will occur. An adverse impact due to construction or location of the placement of the poles, and/or removal of part or all of these structures will have significant impacts.
- II135-A-12

**Environmental Health-** EMR –EMR exposure in a number of locations along the existing corridor has been measured and is significant. The noise from the power lines/transformers and the electromagnetic radiation that is been produced has adversely impacted the health (e.g. cancer, etc.) of a number of residents along the corridor. At the Somerset Recreation Club, the noise from

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCiZi4.en.&view=pt&search=inbox&th=15d1b2e02c328634&siml=15d1b2e02c32...> 3/4

II135-A -7 Earth, Public Services, Utilities and Energy, and Natural Resources were identified in the Phase 1 Draft EIS as elements of the environment that would not be significantly affected by the proposed project. According to WAC 197-11-440(6)), these elements do not need to be included in the Phase 2 Draft EIS. Section 3.9, Pipeline Safety, of the Phase 2 Draft EIS includes an analysis of risks associated with the Olympic Pipeline system in the context of seismic activity.

Although the EIS is not a permit, it is an environmental disclosure document that supports decision-making during the permit review process and in the imposition of mitigation measures. The EIS is intended to identify alternatives that could attain or approximate PSE's objectives at a lower environmental cost and disclose potential significant adverse environmental impacts associated with the alternatives identified.

II135-A -8 PSE's existing corridor provides habitat and migration corridors for area wildlife, as well as specific critical habitat areas (wetlands, streams, ponds, and their associated buffers) (see Section 3.4 of the Phase 2 Draft EIS). PSE will be required to follow applicable regulations. Appendix D in the Phase 2 Draft EIS lists the applicable critical areas regulations that will be followed, Additionally, federal, state, and local regulations and plans are described in detail on pages 4-4 through 4-9 of the Phase 1 Draft EIS. Impacts would occur as a result of the project; however, with mitigation, impacts would be less-than-significant. See Section 3.4.3.1 of the Phase 2 Draft EIS for the definition of less-than-significant and significant impacts. Mitigation measures are outlined in Section 3.4.6 of the Phase 2 Draft EIS and Section 4.4.6 of the Final EIS.

As part of PSE's Avian Protection Program (PSE, 2016b), PSE would relocate bird nests that are protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. A brochure describing PSE's Avian Protection Program is available from PSE's website at [https://pse.com/aboutpse/PseNewsroom/MediaKit/4483\\_Avian\\_program\\_brochure.pdf](https://pse.com/aboutpse/PseNewsroom/MediaKit/4483_Avian_program_brochure.pdf). There is also a mitigation measure listed in the Phase 2 Draft EIS and Final EIS that describes the provision of nesting platforms in isolated areas away from power lines when nests need to be removed from power structures.

- II135-A -9 See the discussion on visual impacts for the Bellevue Central and Bellevue South Segments in Section 3.2 of the Phase 2 Draft EIS, and the noise impact discussion for Alternative 1A in Chapter 9 of the Phase 1 Draft EIS.
- II135-A -10 There would be a 50% reduction in the number of H-frames under the Oak 2 and Willow 2 Options; however, these options (as evaluated in the Phase 2 Draft EIS) have not been brought forward for additional analysis in the Final EIS. PSE's Proposed Alignment, as evaluated in the Final EIS, is entirely within the existing corridor and is similar to the route followed by the Willow 1 Option as evaluated in the Phase 2 Draft EIS. According to the Phase 2 Draft EIS, there would be 30% fewer monopoles than the existing number of H-frames under Willow 1 in Somerset. In residential neighborhoods where a new transmission line would be placed (i.e., along the Bypass Option routes), there would be an increase in the number of power poles. Under all of the segments and options, there would be an increase in pole height over existing conditions. Aesthetic impacts are evaluated in Section 3.2 of the Phase 2 Draft EIS. The economic impacts to property values are evaluated programmatically in the Phase 1 Draft EIS (see Chapters 10 and 11) and further evaluated in the Phase 2 Draft EIS (see Section 3.10).
- II135-A -11 The Phase 2 Draft EIS addresses the analysis of individual properties (see Section 3.7). PSE is conducting a historic property inventory field assessment and an archaeological field survey, and has committed to completing the analysis prior to construction. PSE will comply with applicable analysis and survey requirements as determined in consultation with DAHP, affected Tribes, and any additional consulting parties, as defined in 36 CFR Part 800.2. The potential eligibility of unevaluated historic resources is determined by DAHP, affected Tribes, and any additional consulting parties.

7/11/2017

Weekly Email Service Mail - Comments on Phase 2 DEIS

II135-A-12 the power lines can be heard and vibration felt. Noise -There is a significant noise/vibration issues due to the existing transmission system along the corridor and potentially all new lines and facilities that will be constructed in the corridor.

II135-A-13 Pipeline – The Olympic Pipeline is located in the transmission line in the corridor. During construction, the pipeline is located in many areas and is not in the middle of the corridor, and in some cases is located close to many single family residences and in roadway corridors too. The proximity may create significant impacts during construction and placement of the new transmission structures to those residences and other facilities.

II135-A-14 **Economic Analysis-** For this project, the residential/commercial properties that are in close proximity to the transmission lines/pole, the construction impacts, view and aesthetic impacts, EMF issues in the area near the line, etc.— all needs should be individually evaluated and an assessment provided to identify the effect on the structure, property values, and a decrease property taxes. The property tax reduction will have a negative impact on the region's revenue source. This section should also include an economic assessment of other properties that are near the corridor and may have impacts due to views, etc. that may also impact the property values. Mitigation measures also need to be provided.

II135-A-15 **Plant and Animals** - The proposed action will remove a large number of trees and adversely impact the habitat along the corridor. This will minimize the number insects (e.g., bees and butterflies), birds (e.g., There are several nesting pairs of Bald Eagles that nest along the corridor (e.g. Newport Shores area), and mammals that exist along the corridor too.

Carol Berry

II135-A -12 Extensive health studies have not found a causal link between adverse health effects and EMF from electrical transmission lines (see Section 8.6.1.4 of the Phase 1 Draft EIS). In addition, as noted in the Phase 2 Draft EIS, calculated magnetic field levels generated by the proposed project would be well below reference guidelines, and are not considered a significant impact to environmental health.

Noise impacts were assessed programmatically in the Phase 1 Draft EIS (see Chapter 9). It was determined that impacts to noise would be less-than-significant. Therefore, potential noise impacts were not evaluated further in the Phase 2 Draft EIS or the Final EIS.

II135-A -13 See response to comment II7-A-1.

II135-A -14 SEPA does not require that an economic analysis be included. It allows the Lead Agency to include economic information it believes would be helpful to decision makers. The EIS Consultant Team included topics highlighted as a concern during the scoping process, and the Lead Agency determined it could be helpful. This included a programmatic evaluation of impacts to property values (see Chapters 10 and 11 of the Phase 1 Draft EIS) and evaluation of impacts to tax revenue, ecosystem services, and the cost of undergrounding the line (see Section 3.10 of the Phase 2 Draft EIS). It was determined that the impacts associated with increased EMF would be less-than-significant (see Section 3.8 of the Phase 2 Draft EIS).

Mitigation for economic impacts from a project is not required under SEPA; however, potential impacts to city revenues due to decreased assessed value for property could be mitigated by an adjustment to the mil rate for all taxpayers or a reduction in expenditures to match the reduced revenues.

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=veUcgTCiZ4.en.&view=pt&search=inbox&th=15d1b2e02c328634&siml=15d1b2e02c32...> 4/4

I1135-A -15 Most of the project alignment occurs in areas that produce a variety of human-induced disturbances to animal species. Larger wire sizes for the 230 kV lines would be more visible to flying species, resulting in increased avoidance behavior, which is expected to reduce direct impacts from collision. The 230 kV lines would be higher above the ground, which would minimize potential impacts to low-flying insects and other ground-oriented species from increased light flashes or heat from the wires. Through their PSE Avian Protection Program, PSE will mitigate for the direct loss of nesting and roosting habitat for protected species (i.e., eagles, osprey, and other raptors). Mammals protected under federal, state, and local regulations will be protected. A brochure describing PSE's Avian Protection Program is available from PSE's website at [https://pse.com/aboutpse/PseNewsroom/MediaKit/4483\\_Avian\\_program\\_brochure.pdf](https://pse.com/aboutpse/PseNewsroom/MediaKit/4483_Avian_program_brochure.pdf).

7/12/2017

Weebly Email Service Mail - Reposting public comments



Energize Eastside EIS <info@energizeeastsideeis.org>

**Reposting public comments**

1 message

**Brian** <br98799@comcast.net>  
To: info@energizeeastsideeis.org

Mon, Jun 5, 2017 at 8:16 PM

City of Bellevue,

I1136-A-1

Twice I have submitted comment only to have those comments discarded or locked behind a gmail account. That to me is not providing proper access by the public to contribute to the public record. I am resubmitting comments that have been discarded or otherwise made inaccessible. Please post my comments in an appropriate manner such that they are accessible through the <http://www.energizeeastsideeis.org/> website. As nothing identified in these comments has been corrected in the most recent EIS publication, these comments apply equally to the Phase 2 draft.

Thank you,

Brian Elworth

**2 attachments**

**PSE Project 1506014.pdf**  
606K

**DEIS comments 160313 R1.pdf**  
3729K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=iufS2U4Cs3s.en.&view=pt&search=inbox&th=15c7b67b5177dfc5&siml=15c7b67b5177d...> 1/1

I1136-A -1 None of the comments received during scoping or during the public comment periods on the Phase 1 Draft EIS or Phase 2 Draft EIS have been discarded. All comments received have been posted on the Energize Eastside EIS website.

### EIS for PSE's Energize Eastside Project

#### Scope

The scope of the EIS for PSE's Energize Eastside Project should include the aesthetic impacts of the project during destruction/construction and at completion. The negative aesthetic impact extends from the neighborhoods, to the cities, and to the region. The broader scoping question is what social value does this project provide? Does this project raise the standard of living for the general population? Does it improve environmental stewardship? Does it efficiently apply limited resources such as monetary and land resources to the most critical needs? PSE's proposed project, as well as the alternatives, need to be weighed in these terms in the EIS.

Safety is the utmost critical consideration and one that was completely ignored by PSE during the CAG process. The EIS should include all impacts caused by the mitigation of safety hazards. Like smoking, lead paint and asbestos consumer product safety, a lot has been learned in the last few decades about transmission lines, hazardous liquid pipelines, and the catastrophic interactions between collocated high energy sources. If we could apply to past decisions what we know now about these interactions, likely we would not have allowed the existing thin safety margins. Like any new demolition/construction project, the new design and construction process must meet current 'code' not the obsolete standards applied and grandfathered along in the past.

The project should not impose safety risks, Therefore the EIS should include complete mitigation of safety risks including:

- Electromagnetic
  - Corrosion from induced AC currents
  - High energy events, e.g., lightning, arcing, structure failure
- Thermal
  - Immediate breach - transmission line has 10,000 times the arc voltage needed to melt ductile iron pipe
  - Latent damage – Event of sufficient energy to rupture cathodic protection insulation
- Mechanically induced failure
  - Immediate rupture
  - Construction induced latent failure, e.g., Bellingham disaster
  - Long term stress from forces on transmission line structure

The project provides a 4X increase in energy available to aggravate a line fault condition. The mitigation for this is physical separation. But worse, the key change in the supporting structure is replacement of the relatively insulating wooden supports with highly conductive metal supports. The mitigation for this is physical separation. In addition, the AC magnetic field in the power lines induce a current in adjacent

6/14/2015 1 of 18

I1136-A -2 Short-term (construction) impacts to Scenic Views and the Aesthetic Environment are discussed in Section 4.2 of the Phase 2 Draft EIS.

The "social value" of the project and other topics listed in the comment are outside the scope of the SEPA process.

parallel pipes causing corrosion and shock hazard for personnel contacting the pipe and its fittings and valves. The mitigation for this is physical separation.

The Corridor Concept Theory and Application by Charles H. Weir, C.L.S., P.E.N.G and June P. Klassen state: "The major conflict between power transmission lines and pipelines in corridors is an unavoidable result of proximity. Spacing between these two facilities should be in the range of 30 metres due to voltage and resultant current flows which may be induced in a pipeline from an adjacent powerlines" The mitigation for this is physical separation.

Chevron states: "All overhead cable should maintain a minimum height of 20 feet above grade for a distance of 25 feet each side of the pipeline. No part or portion of mechanical supports and service drops, including poles, towers, guy wires, ground rods and anchors, should be within 25 feet of the existing pipeline" ([www.chevronpipeline.com/pdf/Guidelines\\_for\\_Property\\_Development.pdf](http://www.chevronpipeline.com/pdf/Guidelines_for_Property_Development.pdf)).

PSE's project locates the three phase conductors on the side of the towers towards the center of the ROW, i.e., towards the pipeline. Worse yet, the conductors are stacked in a vertical configuration. A review of three phase transmission line magnetic field equations shows this configuration produces the highest magnetic field strength vertically towards the pipeline ROW. The mitigation for this is physical separation.

In a perfect storm scenario an arc to ground from a transmission line failure, weather, lightning or other event allows the hazardous liquid pipeline to be energized to the point of rupture requiring the pipeline to be shut down. But given the pipeline is energized at lethal potential, there is no automatic or manual means to shut it down. This runaway situation is quite possible. The mitigation for this is physical separation.

Other colocation issues:

- Immediate or latent damage to the pipeline during construction. The mitigation for this is physical separation.
- Latent damage to the pipeline due to forces transmitted from the towers to the footing, and to the soil adjacent to the pipeline. The mitigation for this is physical separation.
- Damage to the pipeline cathodic protective insulation through heating caused by lightning strikes to towers conducted to the ground adjacent to the pipeline. The mitigation for this is physical separation.

In a following discussion the topic of Inadequate Power Line Right Of Way Width is further addressed showing the geometry of the proposed tower locations. What should be clear in all of this is the transmission line corridor is too narrow for safe installation and operation of PSE's proposed project. The corridor must be about 2.5X its current size. The EIS must address this impact.

The EIS should include safety codes per RCW 81.88 including relevant inputs from CCOPS sanctioned by RCW 81.88.140

I1136-A -3 The Phase 2 Draft EIS refers to existing state regulations regarding pipeline safety, which includes RCW 81.88. These regulations apply to pipeline operators. The CCOPS duties extend to review and comment on proposed rules for pipeline operation, not to project review of a proposed transmission project. The integrated resource plan is described in the EIS. WAC 480-100-238 relates to planning for energy supply, which is a separate issue from PSE's proposal to increase transmission capacity. The environmental benefits of the project are outside the scope of the SEPA process.

The comments below regarding alternatives were provided in the Phase 1 Draft EIS comment period as well. The comment summary included as Appendix J in the Final EIA includes responses to the comments regarding alternatives (see "Topic ALT").

I1136-A-3

6/14/2015 2 of 18

I1136-A-3

The EIS should identify which alternative are consistent with WAC 480-100-238 Integrated resource planning

The EIS should include positive environmental impacts where current ongoing environmental impacts are reduced.

### Alternatives

There are many known good alternatives to PSE's proposed project. Unfortunately, due to PSE's control over the City of Bellevue, the process is being rushed thereby preventing full consideration all the potential alternatives. It is a certainty the best alternatives have not been thought of yet.

### Conversion from 115 kV AC to 120 kV AC

In a following discussion the topic of Line Voltage calculation is addressed. Summarized here, since power is a function of the voltage squared, PSE's stated shortfall can be addressed by replacing the transformers at each end of the transmission line segment with 120 kV AC. This will provide the full capacity PSE states is needed and the environmental impact will be essentially zero.

### High Voltage Direct Current (HVDC) electrical power transmission

One of the most wasteful methods to transfer electrical energy is via an alternating current (AC). The waste is caused by loss of energy from the resultant Electromagnetic Field (EMF) and the high loss through the 'skin effect'<sup>1</sup> of conductors. But this is the prevalent method of electrical power transmission.

A much more efficient method is to use Direct Current (DC). DC transmission lines have been employed in the U.S. since the 1960's. Current technologies for DC/AC conversion are orders of magnitude better and lower cost since the early deployments. Current technologies allow for cost effective AC/DC conversions for even short DC transmission lines.

In the transmission line corridor that PSE has selected for its proposed project, the two three-phase (three-wire) AC circuits can be converted to three DC (two-wire) circuits with no transmission line rewiring. The net benefits include:

- Higher capacity – The lines can run at peak voltage which is 163 kV for a 115 kV nominal (RMS) circuit. This provides twice the power ( $162 \text{ kV}^2$  vs  $115 \text{ kV}^2$ )
- Greater redundancy – Additional circuit provides 50% increase in redundancy
- Lower resistive loss – DC currents flow through the whole conductor unlike AC which only flows through a small layer at the surface of the conductor<sup>1</sup>.

<sup>1</sup> Skin effect is the term used to describe AC current flow in a conductor. AC current travels through the outer portion (skin) of a conductor in contrast to DC current which travels through the entire conductor. The consequence is there is much greater loss (approximately twice the loss) with AC current versus DC current for the same size conductor.

6/14/2015 3 of 18

- Lower reactive loss – DC lines are not subject to loss through radiation unlike AC lines
- No induced current corrosion in pipelines – DC lines don't produce the alternating magnetic field that causes induced currents
- Greater grid resiliency – DC sections in AC networks allow more graceful recovery from outages because AC phase matching is not required unlike all-AC networks
- Zero negative environmental impact – net impact is positive due to elimination of alternating magnetic fields
- Lower cost than PSE's proposed project

### DC underground

This has all the advantages of the DC alternative but it additionally eliminates overhead wiring. This alternative was dismissed without supporting data in section 2.5.4 of PUGET SOUND ENERGY Eastside 230 kV Project Underground Feasibility Study PROJECT NUMBER: 130155. PSE chose to study an antiquated approach to undergrounding and DC conversion, and consequently rejected that as too expensive.

### Cooperate with Seattle City Light

PSE highlights Seattle City Light (SCL) letter of June 2, 2014 stating SCL "prefers not to utilize SCL's transmission lines for PSE's native load service needs." But PSE has never formally submitted a documented request to SCL for cooperative power sharing under the limited failure condition that PSE proposed project allegedly addresses. In lieu of PSE's apparent inability to formulate such a request, the City of Bellevue as lead agency should submit a request to SCL. The request should state the true need:

- If a major PSE transmission line fails, and
- If the ambient temperature falls below 23°F, then
- Up to 55 MW additional power is needed on the eastside during two four-hour peak periods per day

The request should further outline:

- The combination of ambient temperature and peak period stated above amounts to 28 hour per year average (NOAA data 1970 – 2014)
- The loan of power is repayable to SCL the same day or within a week worst case
- The intertie improves reliability of both services with minimal impact

### Make regional power requirements the one and only priority for regional power utilities

PSE is playing a game of mixing and matching regional regulations and inter-regional power transmission. Eliminate alternatives that are excessive or irrelevant to PSE's customer base. Supplying

6/14/2015 4 of 18

power over U.S. borders is not PSE's or its customer's responsibility. The federal government is obligated to provide those resources.

### Conversion to PUD to promote forward thinking regional solutions

RCW 54, authorized the establishment of public utility districts to "conserve the water and power resources of the State of Washington for the benefit of the people thereof, and to supply public utility service, including water and electricity for all uses." ([www.wpuda.org](http://www.wpuda.org)). This law was enacted in 1931 against bitter opposition by Puget Power, the precursor to PSE. Efforts were made about 70 years ago to convert Puget Power region to a PUD but the effort failed.

Under certain circumstances, the granting of franchise monopolies for regional services provides value to the recipient of those services. Efficiency, elimination of duplicity, and coordinated management are some of the potential benefits. Some of the potential downsides are lack of competition, profit motivated wasteful expenses, entrenchment in obsolete processes and technologies, tunnel vision approaches to maintaining and improving services, and self-serving manipulation of rules and regulations.

Under the current circumstances none of the benefits and all of the downsides are evident in PSE's electrical energy monopoly. Now and looking forward, we will be victims of needless projects like Energize Eastside that degrade the environment, drain financial resources, and only benefit PSE. PSE has migrated away from renewable hydroelectric energy towards coal-fired sources. This is the opposite direction we need to be headed. We pay far too much for power and then pay 10% more for the privilege of having PSE deliver it. ([http://www.wpuda.org/PDF\\_files/PSE%20Rate%20Comparison.pdf](http://www.wpuda.org/PDF_files/PSE%20Rate%20Comparison.pdf))

PSE is only responsible to its owners. A PUD is only responsible to its customers. The consequential difference is PSE's objective is to squeeze the maximum allowable profit from its customers whereas the PUD's objective is to provide the best service and value to its customers.

PSE's objective:

- Profit

PUD's objective:

- Better forecasting
- Better management
- Better service
- Better efficiency
- Better environmental stewardship
- Better value
- Better security

The Energize Eastside project would never come into existence under PUD control. PSE stated to the CAG last year that eastside customer demand was just under 650 MW in 2012. In the EIS process, PSE

6/14/2015 5 of 18

shows eastside customer demand is just under 600 MW in 2014. Per PSE, power demand has dropped by about 50 MW in two years from 2012 to 2014. PSE currently has in place a power transmission capacity that is over 200% greater than any forecasted peak load in the foreseeable future. Clearly PSE has no ability to accurately forecast the shortfall they currently state. A PUD would be motivated to use proper techniques and accurate data to model and forecast energy demands. PSE's management to provide service and efficiency is motivated solely to increase owner profits. A PUD would manage services to embrace newer proven technologies, improve efficiencies, and move forward in a positive and sustainable direction. PSE places profits from its coal-fired sources above concern for the environment. A PUD would be responsive to its stakeholder, its customers, to seek sustainable energy sources and storage and bring its carbon footprint to near zero. PSE creates and promotes unnecessary projects through fear and obfuscation. PSE derives huge profits from these made-up projects. A PUD would focus on projects of true need, seeking the least costly, least invasive, and most valuable solutions. A PUD would not allow the power grid to be controlled by foreign nationals. There is significant risk in allowing ownership, and therefore control, of the local power grid by entities that have no allegiance to the U.S.

### Energy storage

The traditional approach for electrical power transmission is to size the network from generation source to point of use for the worst case peak demand. This concept is rapidly becoming obsolete in light of the fact that peak generation capacity and peak usage don't necessarily coincide. This is particularly evident with 'green' technologies such as wind or solar renewable energy alternatives to fossil fuel. These alternatives are being mandated and rapidly adopted to reduce electrical power generation carbon dioxide footprint.

But wind energy based generation is asynchronous to electrical power usage. Diurnal solar radiation energy is synchronous, but out of phase, with electrical power usage. Peak capacity of these green resources that goes unused is effectively wasted energy. With its antiquated mindset, PSE has absolutely no way to capture this lost power. Doubling of the voltage on a power line will not solve the problem. In fact, an infinite electrical power transmission capacity will not solve that problem. But the problem is solvable.

The concept of storage of a resource near the point of use has been around for quite a while. Examples can be found in old western movies where a steam locomotive would be stopped at a water tower (a water stop) to quickly refill tanks for the boiler with water. The water tower provided storage and high water flow (peak rate of demand) at the point of use. Facilities for refilling the water tower storage, e.g. pumps and pipes, needed to be sized only large enough to meet the average rate of use which is very much less than the peak rate of use.

Today, the concept is applied by domestic water utilities. Water resources are stored near point of use to support peak rate of demand but are replenished at a very much smaller average rate of demand. Water utilities wisely apply this concept to sizing the piping infrastructure rather than sizing the entire distribution network from source to point of use for worst case peak demand.

6/14/2015 6 of 18

Obviously, if a similar concept of storage could be applied to electrical energy distribution, wasted excess power distribution capacity could be utilized to improve service, improve reliability, and meet future needs. The electrical power transmission system could terminate at local storage facilities and be sized to meet the average demand at the storage facility rather than the peak demand.

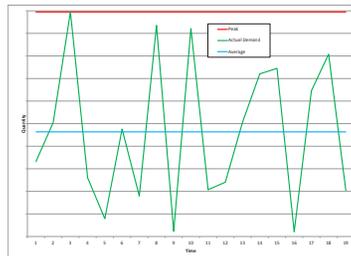


Figure 1 is a notional depiction of a time varying resource demand plotted on the green line. The red line represents the peak demand (highest of values plotted on the green line). The blue line is the average demand (average of the values plotted on the green line). In this example, it can be seen that the average demand is very much less (about half) of the peak demand.

Figure 1

In appendix H of its 2013 Integrated Resource Plan (May 31, 2013) PSE states average electrical power consumption for 2012 is 2,437 MW (Mega Watts) and peak electrical power demand in 2012 is 4,837 MW. Restating those values, the average electrical power consumption for 2012 is  $2,437/4,837 = 55.5\%$  of peak demand. An electrical power transmission line with a capacity to continuously support peak demand has 44.5% wasted capacity (100% - 55.5%). This is PSE's approach. Ratepayers are forced to pay for installation and maintenance of that unusable capacity.

Looking forward to PSE forecast, the problem is gets worse. PSE's estimate for 2033 average electrical power consumption is 3,719 MW estimates peak electrical power consumption is 7,113 MW. Based on those estimates, the average electrical power consumption for 2033 is  $3,719/7,113 = 52.3\%$  of peak demand. If PSE continues using their obsolete methodology, the capacity will be wasted 47.7% of the time (100% - 52.3%).

Historically this has been a difficult problem to solve as there has not been an economically viable method to store electrical energy near the point of use. This will continue to be a problem for utilities that are stuck in the past and have an economic interest in staying that way.

The fundamental question is: when will point-of-use large-scale electrical energy storage be viable? The answer is the technology is commercially available and is being employed today. One such product of new technology is referred to as a "flow battery". In a battery, energy is stored in a chemical form. The

6/14/2015 7 of 18

battery converts the chemical energy to electrical energy to power to an electrical load<sup>2</sup>. A rechargeable battery can reverse this process by receiving electrical energy (reversing the flow of power) and converting to chemical energy. In a typical battery the chemical (electrolyte) is contained within the battery which can produce power until the energy in the electrolyte is depleted. The energy capacity of the battery is limited by its physical size. In a flow battery, the electrolyte is stored outside the battery and is pumped through the battery to produce power. The energy capacity of a flow battery is limited by the size of the storage tank. This decouples energy storage capacity from energy conversion rate. The battery is sized for the power demand, e.g., Mega Watts, and the storage tanks are size for the duration of the need, e.g., Mega Watt hours.

The U.S. Department of Energy (DOE) addressed this in a report titled Grid Energy Storage released December 2013. In it, the DOE identifies the need to focus on energy storage for a wide variety of reasons including, improvement of power grid utilization, improvement power grid reliability, reduction in wasted transmission capacity, and reduction of greenhouse gas emissions. From the report:

*Energy storage can reduce the need for major new transmission grid construction upgrades as well as augment the performance of existing transmission and distribution assets. DOE estimates that 70% of transmission lines are 25 years or older, 70% of power transformers are 25 years or older, and 60% of circuit breakers are more than 30 years old. 4 Extending the capability of the transmission grid—for example by pre-positioning storage on the load side of transmission constraint points—makes the grid more secure, reliable, and responsive. Additionally, distributed storage can reduce line-congestion and line-loss by moving electricity at off-peak times, reducing the need for overall generation during peak times. By reducing peak loading (and overloading) of transmission and distribution lines, storage can extend the life of existing infrastructure.*

*Energy storage will also play a significant role in emergency preparedness and increasing overall grid resilience. An August 2013 White House report, 5 written in conjunction with the Office of Electricity Delivery & Energy Reliability, details the integral role that energy storage will play in enhancing grid resilience and robustness related to weather outages and other potential disruptions*

*Storage technology can help contribute to overall system reliability as large quantities of wind, solar, and other renewable energy source s continue to be added to the nation's generation assets, furthering the goals of reducing greenhouse gas emissions and increasing energy security. Additionally, storage technology will be an instrumental tool in managing grid reliability and resiliency by regulating variable generation and improving microgrid and smart-grid functionality. For micro- and smart-grid technologies, storage can provide redundancy options in*

<sup>2</sup> Power is the flow of energy (quantity of energy divided by time) and is commonly measured in Watts (W), kilowatts (kW, 1000 Watts), or megawatts (MW, 1,000,000 Watts). Quantity of energy is the level of power times the duration of the power and is commonly measured in Watt-hours (Wh), kilowatt-hours (kWh) or megawatt-hours (MWh).

*areas with limited transmission capacity, transmission disruptions, or volatile demand and supply profiles<sup>3</sup>.*

Further, Federal Energy Regulatory Commission (FERC) Order 755, 784, and 792, specifically address and encourage energy storage as a method to provide instant on-demand capacity to improve the electrical power transmission network.

Going back to PSE’s IRP, the peak demand supported in 2012 (4,837 MW) is significantly greater than the average demand forecasted for 2033 (3,719 MW). Therefore if PSE customers were served by a forward thinking electrical utility that applied storage technology over the next 18 years as that technology evolves and improves, the need for increasing electrical power transmission capacity vanishes. The current capacity supports 100% the 2033 projected average demand with 30% spare (4,837/3,719 = 130%). Besides eliminating the blight and wasted ratepayer money on additional excess transmission capacity, electrical energy storage allows less expensive off-peak power to be purchased and stored until needed. Also less dependence is needed on dirty power sources such as the coal-fired Colstrip Generating Facility in Montana<sup>4</sup>. So how much would it cost? With current technology, the cost would be as low as \$400/kW. Using a more conservative \$500/kW the following table shows the cost per year to provide storage capacity adequate to support PSE’s claimed demand. The costs are based on the assumption that there is zero progress in the state of storage technology over the next eight years. Given the global demand and developments in storage technology, this is an unlikely assumption. If the DOE cost target is achieved, the cost would eventually drop to \$100/kW.

Year	Demand (MW)	Capacity (MW)	Shortage (MW)	Storage cost (\$M)	Storage cost cum (\$M)
2018	715	710	5	\$2.5	\$2.5
2019	720	710	10	\$5.0	\$7.5
2020	725	710	15	\$7.5	\$15.0
2021	760	710	50	\$25.0	\$40.0
2022	770	710	60	\$30.0	\$70.0

Is it reasonable that this storage capability could be established? On October 17, 2013 the California Public Utilities Commission mandated a target of 1,325 MW storage capability by the year 2020. The

<sup>3</sup> The concept of grid energy storage has been employed since the 1890’s in the form of Pumped Storage Hydroelectricity (PSH) where hydroelectric reserves are replenished during low power demand periods and consumed during peak demand periods. PSH facilities are somewhat limited in that they are not necessarily located at the point of use.

<sup>4</sup> The Colstrip Generation Facility is 20% owned by PSE and is a significant source of mercury, particulate matter, regional haze and coal ash pollution.

<sup>5</sup> On August 16, 2013 the city of Seattle sent a letter to Dave Danner, Chair – Washington Utilities and Transportation Commission urging the UTC to “require that PSE strengthen its efforts to reduce greenhouse gas emissions and move away from carbon-based energy sources.” The letter was signed by Michael McGinn Seattle Mayor, Mike O’Brien Chair Energy and Environment Committee, Sally J. Clark Seattle City council President Vice Chair Energy and Environment Committee, Tim Burgess Member Energy and Environment Committee.

additional capability needed to meet PSE’s claimed peak demand in 2020 is 15 MW. This represents about 1.1% of California’s mandate. (15/1,325).

**Assessment of PSE’s problem statement**

**Capacity increase need assessment**

There are serious issues regarding the path being pursued by PSE in resolving a claimed shortfall in supporting projected power demand. These issues include:

- Insufficient data to support the claimed shortfall
- No justification for limiting the scope of solutions
- Serious flaws in the selection of criteria for selected candidate options

**Worst case temperatures**

PSE projects that electrical power demand will begin to exceed peak power capacity by the year 2017. PSE further projects demand will exceed capacity by approximately 10% by 2022. The key point emphasized by PSE is the projected demand is based on days where the air temperature is 23°F or lower.

The question is whether of the occurrence of the conditions is so frequent that PSE’s intended solution with its enormous impacts is warranted and there are no alternatives. Or is there something being left unsaid that indicates less aggressive solutions may be viable?

The NOAA National Climatic Data Center has a database of daily minimum temperatures for Station GHCND:USW00024233 SEATTLE TACOMA INTERNATIONAL AIRPORT WA US. Figure 2 is a summary of 16170 daily minimum temperature measurements in a period between January 1<sup>st</sup> 1970 and April 9<sup>th</sup> 2014. The horizontal scale is the daily minimum temperature in one-degree Fahrenheit increments from the lowest measured value in the period (7°F) to 23°F. The vertical scale ranges from 0% to 100% and is the percentage of the period in which each minimum temperature was recorded.

6/14/2015 10 of 18

I1136-A -4 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see “Topic OBJ”).

I1136-A-4

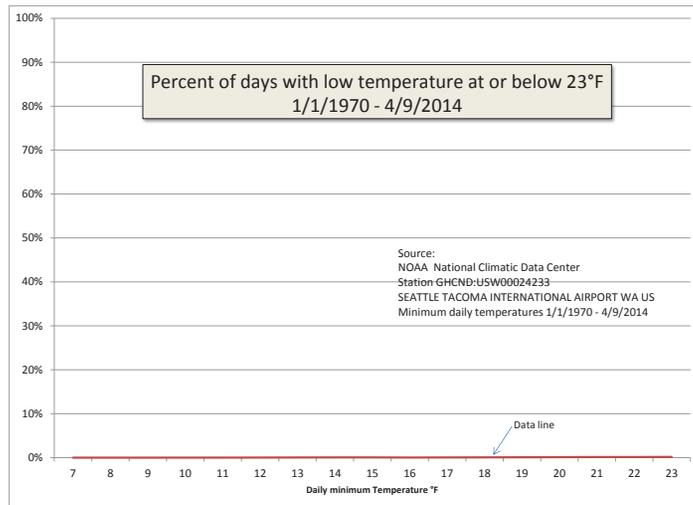


Figure 2

Since the occurrences of 23°F and lower temperatures days are extremely infrequent an expanded view of the bottom 1% is provided in Figure 3.

6/14/2015 11 of 18

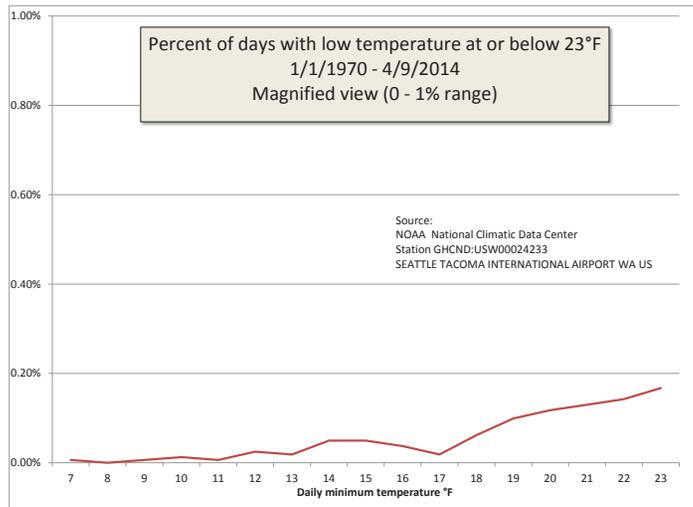


Figure 3

As can be deduced from the charts, the extreme conditions identified by PSE are very infrequent. The total percentage of days with minimums at or below 23°F is .95% (less than 1%) for the entire period. This suggests that the problem stated by PSE is potentially solvable within the realm of smart power management policies without resorting to the unnecessary options within PSE’s narrow solution space. PSE has offered no defensible justification for excluding employment of a smart power management approach.

At less than one percent rate of occurrence, the number of days (meeting the conditions for which PSE claims this project is needed) over a ten year period is:  $.95\% \times 365 \text{ days/year} \times 10 \text{ years} = 34.7 \text{ days}$ . PSE claims the cost will be as high as \$290 million. That cost spread across the number of occurrences in a ten year period is  $\$290 \text{ million} / 34.7 \text{ days} = \$8.36 \text{ million per day}$  for each low temperature day. PSE claims the periods of peak electrical demand are from 6:00 AM to 10:00AM and from 5:00 PM to 9:00 PM. That is a total of 8 hours per day. Dividing \$8.36 million by 8 hours leaves the consumers paying over \$1 million dollars an hour. This is a very poor value to the customer and an unnecessary expense. PSE has offered no defensible justification for promoting such an expensive and limited value solution over lower cost, lower impact, and much higher value solutions.

6/14/2015 12 of 18

Figure 4 shows the relative scale of PSE's proposed project vs PSE's statement of need during the CAG process.

PSE statements during CAG process and PSE documentation

- PSE states peak demand shortfall under a transmission line failure condition is 55 MegaWatts (MW)
- PSE projected demand is based on days where the air temperature is 23°F or lower.
- PSE states peak demand occurs in two 4 hour periods (8 hours total per day)
- PSE intends to add 3200 MVAR From PSE PROJECT NUMBER:130155 STL 085-1244 (SR-02) 130155 (03/31/2014) MM (~2560 MW of additional capacity @ 80% PF)

Background

- NOAA National Climatic Data Center has a database of daily minimum temperatures for Station GHCND:USW00024233 SEATTLE TACOMA INTERNATIONAL AIRPORT WA US.
- Summary of 16170 daily minimum temperature measurements in a period between January 1<sup>st</sup> 1970 and April 9<sup>th</sup> 2014 by NOAA indicates air temperature is at or below 23°F a total of 3.5 days on average per year

Analysis

- PSE claimed need: 55 MW x 8 hours/day x 3.5 days/year = 1520 MW hours (MWH)/year
- PSE intended increase in capacity: 2560 MW x 24 hours/day x 365 day/year = 22,425,600 MWH/year
- Percent increase in capacity vs need:  $22,425,600 \text{ MWH} / 1520 \text{ MWH} = 1,475,765\%$
- Conversely, percent increase needed vs capacity:  $1520 \text{ MWH} / 22,425,600 \text{ MWH} = 0.0068\%$

To be clear, the percent increase in capacity vs need as stated above is almost 1.5 million percent. An increase of this magnitude will never ever be needed in the PSE customer base area.

6/14/2015 13 of 18

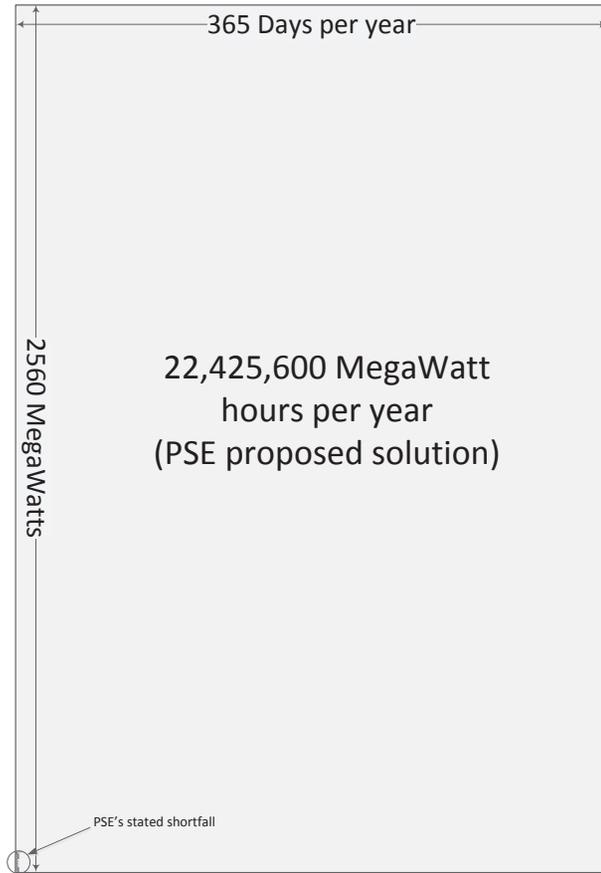


Figure 4

6/14/2015 14 of 18

### Line Voltage Calculation

PSE states that electrical power demand will exceed supply by 10% in the year 2022 yet concludes the only solution is to double the power line voltage. This non-sequitur has been raised in writing and also verbally to PSE with no satisfactory answer. In the second case, the electrical engineering expert for the project claimed to be “a little rusty” on the arithmetic involved in the calculation and was unable to understand.

The fundamental relationship between power, voltage, and resistance (load) for which PSE is “a little rusty” is: the power (in Watts) is equal to the square of the voltage (in volts) divided by the resistance (in Ohms). This is a basic scientific principle used by engineers and is not re-definable by PSE:

$$\text{Power} = \frac{\text{Voltage}^2}{\text{Resistance}}$$

The important relationship in this discussion is power is proportional to the square of the voltage. Therefore if voltage is double, power is quadrupled (2 squared is four). So PSE claims the future electrical power demand will be today’s capacity plus 10% more, i.e., 100% + 10% = 110%. But doubling the voltage from 115kV to 230kV provides 400% of current supply per the quadrupling explained above. Clearly, 400% is not equal to 110%.

So what is the correct voltage increase required to meet the future demand claimed by PSE? An equivalent expression for the power-voltage relationship described above is the voltage is proportional to the square root of the power (by taking the square root of both sides of the equation). PSE’s claim of future electrical power demand, i.e., 110% of today’s capacity, can be met with the square root of 110% or 104.9% of the 115kV voltage. This is only 120.6kV not 230kV.

120kV electrical power transmission lines are used in the US and throughout the world. The existing 115kV transmission lines are compatible for use with 120kV equipment. PSE has offered no defensible justification for excluding employment of this low cost, low impact approach.

### Safety

#### Inadequate Power Line Right Of Way Width

Figure 5 is a diagram of the current PSE power line Right Of Way (ROW) and the Olympic Pipeline Hazardous Liquid Pipeline ROW through the Olympus residential community in Newcastle. This is a segment of the proposed route ‘M’. The hazardous liquids consist of highly flammable petroleum products (kerosene, jet fuel, diesel fuel, and gasoline). The liquid is pumped at very high pressure

6/14/2015 15 of 18

(approximately 1400 pounds per square inch) through two pipelines within the pipeline ROW. In the Olympus neighborhood, the hazardous liquid pipeline ROW is 50 feet wide and centered within the 100 foot wide PSE power line ROW.



Figure 5

Figure 6 shows the nominal location of 120 foot tall monopole towers on 6 foot diameter footings to support the proposed 230kV lines. The footings must be placed in undisturbed soil to be able to withstand lateral forces on the monopole. A minimum margin of undisturbed soil around the footing is required and must be within the PSE power line ROW. As can be seen, the footings can only be located within the outer 25 foot margins of the 100 foot wide PSE power line ROW without directly violating the hazardous liquid pipeline ROW. The edge of the footing is potentially within 9.5 feet of existing and future residential structures given the current 100 foot wide easement. This is far too narrow.

6/14/2015 16 of 18

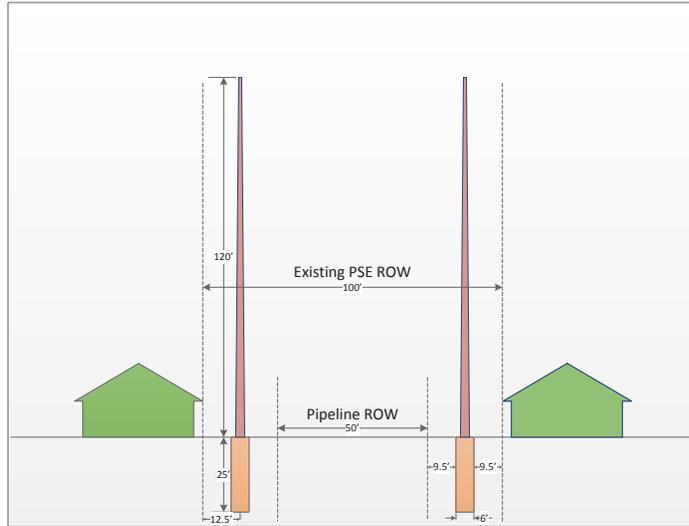


Figure 6

Modern standards of the U.S electrical power industry for 230kV power lines include a minimum 150 foot ROW (nominally 75 feet on each side of the power line support centerline). As an example, PPL Electric utilities with 1.4 million customer and 48,000 miles of power lines in central and eastern Pennsylvania requires the 150 foot ROW (ref PPL Electric Utilities Transmission Line design Criteria Version 0 12/18/2012. Other example include: Tri-State Generation and Transmission Association, Public Services Company of Colorado Comanche Transmission Project; Duke Energy Transmission Rights of Way – Ohio, Kentucky & Indiana.

PSE is ignoring modern standards in the selection of 230 KV power line routes through existing 100 foot ROWs. PSE points to historical examples where this has been done. These are artifacts of obsolete and outdated standards. PSE's error is compounded by the location of the monopole supports. The location at the edge of the existing easement leads to an extremely skewed ROW offset with only 12.5 feet between the support centerline and the ROW boundary.

The Bonneville Power Administration publishes their safety standards for transmission line installation (<http://www.bpa.gov/news/pubs/GeneralPublications/lus-Living-and-working-safely-around-high-voltage-power-lines.pdf>). They state: "BPA operates one of the world's largest networks of long-

6/14/2015 17 of 18

I1136-A -5 PSE will design the transmission system to be in compliance with NESC guidelines and per local zoning ordinance, as summarized in Section 3.1.1.1 of the Phase 2 Draft EIS.

I1136-A-5

distance, high-voltage lines, ranging from 69,000 volts to 500,000 volts. This system has more than 200 substations and more than 15,000 miles of power lines." One of their most critical safety requirements is:

**"Pipes and cables should not be installed closer than 50 feet to a BPA tower, any associated guy wires or grounding systems. These grounding systems are long, buried wires that are sometimes attached to the structures and can run up to 300 feet along the right-of-way."**

Figure 7 shows the proper extent of a 230kV power line ROW adjacent to a pipeline consistent with BPA standards. Although not as rigorous as other U.S electrical power industry standards it does present a moderate safety solution. As can be seen, the existing ROW has insufficient width to accommodate the proposed 230kV power line. Clearly, the application of common sense modern standards precludes the routing of the 230kV power line through route 'M' within the existing corridor.

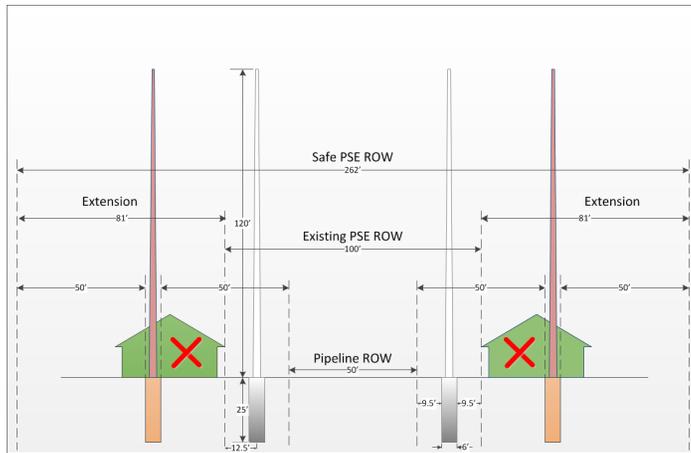


Figure 7

The EIS must address the impact of implementing this safety requirement. The transmission line corridor must be wide enough such that no tower will be within 50 feet of pipes including utility, hazardous liquid, or residential pipes. The current corridor is 100 feet wide. It must be expanded to approximately 260 ft (2.5X) to ensure adequate safety. The EIS must address this impact.

6/14/2015 18 of 18

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Development Services



INVESTMENT/DEVELOPMENT - BROKERAGE - PROPERTY MANAGEMENT

June 15, 2017

Heidi Bedwell  
Environmental Planning Manager  
City of Bellevue  
PO Box 90012  
Bellevue WA 98009-9012

Re: Energize Eastside – Phase 2 DEIS.

Dear Ms. Bedwell:

As a resident of southeast Bellevue, owner of a business based in Bellevue, and managing member companies which own various properties throughout the city, I would reiterate my comments in March, 2016 on the vital importance to our community of maintaining stable electric service. I also believe that the existing utility corridor as described in the Phase 1 report remains the most efficient, least costly and least disruptive alternative.

I1137-A-1

With respect to Phase 2 of the DEIS, Chapters 2 and 6 identify as one alternative the possibility of delaying the project. This is a bad idea for a number of reasons, including risks of increased cost and interruption of service. For the 'No Action' alternative to be viable, one would have to conclude that the service area will never see any growth in demand. Ridiculous.

I1137-A-2

The EIS adequately documents the need for these improvements and sets forth reasonable mitigation measures. As one concerned about the economic health of our region, I believe we need to clear the way for this project as soon as possible.

I1137-A-3

Sincerely yours,

Robert C. Wallace

Cc: Brad Miyake, Bellevue City Manager

Energize Letter 6-15-17,6/15/2017 Wallace Properties, Inc., PO Box 4184, Bellevue, WA 98009  
Phone (425) 455 9976 / Fax (425) 646 3374 / e-mail: r.wallace@wallaceproperties.com

- I1137-A -1 Comment noted.
- I1137-A -2 Comment noted.
- I1137-A -3 Comment noted.

Energize Eastside EIS Phase 2 Additional Comments July 6, 2017

II138-A-1

The EIS does not cover the impact of the fiber optic communication line. Also, it does not cover the impact of the use of PSE poles for cell tower antennas and ground equipment on the PSE easement.

A supplemental EIS needs to be issued to indicate the impact on Land Use, Scenic and Aesthetic, and Economic concerns.

II138-A-2

**Land Use:** Some cell tower antennas are located on private property. This brings a commercial activity into residential neighborhoods which are incompatible with residential zoning, resulting in increased traffic and parking for many maintenance visits with unmarked vehicles on a frequent basis.

II138-A-3

**Scenic and Aesthetic:** Use of PSE poles for cell use needs mitigation for unsightly intrusion on private neighboring property.

II138-A-4

**Economic:** PSE should not profit by permitting use of cell equipment on private easements. This results in PSE being unjustly enriched to the detriment of adjacent property owners. The adjacent property owners unfairly receive no compensation for Scenic, Aesthetic and Land Use impact.

II138-A-5

**Noise:** Mitigation needs to be identified for 230 KVA noise generated by corona discharge or other causes that may be attributed to 230 KVA lines.

II138-A -1 Information on the fiber optic cable and cell tower equipment is presented in Chapter 16 of the Phase 1 Draft EIS, as well as Section 2.1.1.2.2 of the Phase 2 Draft EIS (in the subsection titled "Telecommunications Equipment and Other Underbuild Components"). The fiber optic cable would be within the shield wire, which is shown in all of the visual simulations in the Phase 2 Draft EIS and Final EIS. Additionally, RCW 80.54, along with the statutes implementing regulations (chapter 480-54 WAC), regulate attachments to electrical distribution poles. The Final EIS provides additional description of the cellular installations in Section 4.2.

II138-A -2 As part of the Energize Eastside project, existing co-located cellular equipment could be reinstalled on the proposed poles. Therefore, this would not be considered an introduction of a new use in residential zones. Co-located cellular equipment are an allowed use in the zoning districts through which the project traverses. Vehicular trips associated with maintenance of cellular equipment are not anticipated to change, and continue to be infrequent. Information on the fiber optic cable and cell tower equipment is presented in Chapter 16 of the Phase 1 Draft EIS, as well as Section 2.1.2.2 of the Phase 2 Draft EIS (in the subsection titled "Telecommunications Equipment and Other Underbuild Components"). Additional discussion is included in Section 4.2 of the Final EIS.

II138-A -3 Upon completion of construction of the proposed project, PSE would work with telecom companies to reinstall cellular equipment onto the 230 kV poles, per local jurisdiction regulations. Generally, the project is expected to reduce visual clutter as compared to existing conditions. A potential mitigation measure limiting the number of poles that could have cellular equipment installed is identified in the Final EIS, Section 4.2.6 and Appendix M.

I1138-A -4 As stated in Chapter 2 of the Phase 2 Draft EIS, "PSE hosts telecommunications (telecom) equipment, which is owned and operated by other providers. The telecom companies' use of transmission line infrastructure is regulated by state law, specifically, RCW 19.28. Additionally, RCW 80.54 regulates attachments to electrical distribution poles. PSE and the Partner Cities have limited authority over the telecom underbuild equipment." PSE has indicated that the project would not increase the number of telecom facilities in the transmission corridor. Existing providers have been offered the opportunity to place telecom facilities on the new poles.

In addition, SEPA does not require that an economic analysis be included; therefore, profits from leasing space on poles are not analyzed. Mitigation measures have been provided in the EIS to address land use and aesthetic impacts (see Sections 3.1.6 and 3.2.6 of the Phase 2 Draft EIS and Section 4.2.6 of the Final EIS).

I1138-A -5 Corona was analyzed as a part of the Phase 1 Draft EIS, Section 9.3. The potential impacts of corona noise for the proposed 230 kV transmission lines were found to be relatively low for nearby residential environments. The maximum corona noise of a 230-kV line outside at ground level is approximately 29 dBA, which is approximately 10 dBA below the federal housing interior noise goal. While corona noise from the project may be audible in very quiet areas, it is expected to be virtually the same as existing corona noise levels. As stated in the Phase 1 Draft EIS, corona noise is generally a concern for transmission lines operating at 345 kV or above. Corona noise from the transmission lines is expected to remain well below the limits required by local noise regulations, and below levels that would warrant mitigation.

July 3,2017 page 1

Comments on Energize Eastside Phase 2 Draft EIS

Comments by Norman J. Hansen 3851 136th Ave. NE, Bellevue 98005 Board Member of CENSE, Coalition of Eastside Neighborhoods for Sensible Energy and Bridle Trails Community Club, Board Member

Scenic and Aesthetic:

The methodology on assessing the scenic and aesthetic aspects is totally inadequate. Many property owners have significant mature trees that obscure the existing poles and wires. With cutting and pruning this will result in opening view to an industrial type wires and structures to invade the sanctuary of many property owners.

Property owners living in the immediate vicinity will be drastically and unfavorably affected.

The pedestrian view will also change major neighborhood character perception.

**Recommendation:** The EIS final needs to address each specific property especially with the property owners for potential scenic and aesthetic impact and needed mitigation. The EIS should cover undergrounding as the only way to completely mitigate the view. This is also supported by the Bellevue city council in Phase 1 comments.

Land Use:

The project with 100 foot towers is drastically out of scale with single family neighborhoods. Bellevue Land Use code limits height on many residential zoning areas to 35 feet.

I1138-B -1 The scenic views and aesthetic environment analysis notes that trees provide a visual buffer that minimizes the degree of contrast produced by poles. As a result, vegetation removal has the potential to increase the degree of contrast produced by the project depending on how much vegetation is removed and how densely vegetated the area is under existing conditions. A description of how vegetation removal was considered as part of the scenic views and aesthetic environment analysis is provided in Section 3.2.5.1 of the Phase 2 Draft EIS. Residential viewers were considered to be sensitive viewers (see Section 3.2.3.3 of the Phase 2 Draft EIS), and impacts to residential viewers were evaluated as part of the assessment (see Section 3.2.5). Impacts to pedestrians were not specifically evaluated (see Table 3.2-1 of the Phase 2 Draft EIS, Affected Population). However, impacts to pedestrians were still captured because most pedestrians traversing the study area would also be considered residents, workers, shoppers, etc. Impacts to neighborhood character were evaluated as part of the analysis, particularly where there was policy in place supporting the preservation of existing neighborhood character (see Section 3.2.5 of the Phase 2 Draft EIS).

It is beyond the scope of an EIS to provide property-level impact assessment and mitigation. Undergrounding is proposed as a potential mitigation strategy (see Section 3.2.6 of the Phase 2 Draft EIS and Appendix M of the Final EIS), in addition to other potential mitigation options.

I1138-B -2 A review of zoning districts and electrical utility facilities is provided in Appendix B of the Phase 2 Draft EIS. In Bellevue, for example (and as referred to in the comment), electrical utility facilities are conditionally permitted in every applicable zoning district. For an analysis on the cost of undergrounding, see Section 3.10 of the Phase 2 Draft EIS.

I1138-B-1

I1138-B-2

July 3,2017 page 2

The existing 50 foot poles were installed many years ago as far back as 1929 when our area was sparsely populated. Now with the Eastside becoming a modern city the best practices should be adopted.

I1138-B-2

**Recommendation:**

The best practice and reliability with new or expanded transmission lines is to underground. Other areas such as San Diego Gas and Electric and New Jersey Public Power and Light are undergrounding 230 K lines. New technology has made undergrounding economically doable for a few dollars more.

**Underground Option EIS Phase 2 page 2-53: Comments;**

The reason for not analyzing undergrounding as potential mitigation is totally inadequate and does not reflect current technology.

The EIS fails to recognize that a preferred underground route is different than the overhead route.

I1138-B-3

Latest 230 K underground route shows that a double circuit can be installed in a 3 foot wide trench 6 feet deep down the middle of a public road. One possible underground route would be on low traffic roads such as NE 80th in Redmond connecting with 116th Ave. NE to the abandoned Burlington Railroad ROW. San Diego Gas and Electric is currently installing 12 miles of 230K lines at the rate of 150 feet per day or approximately one mile in 30 days. Vaults are installed every 1600 to 1800 feet in one day.

I1138-B -3 The Phase 2 Draft EIS acknowledges that transmission lines could be placed in a different alignment than what was evaluated for overhead lines. This is summarized in Section 2.2.2 of the Phase 2 Draft EIS. Beyond the cost of new right-of-way, underground lines requires larger conductors, and are more costly to construct, repair, and maintain. Also see response to comment I16-A-1, which identifies the reasons for not evaluating undergrounding as an option in the Phase 2 Draft EIS and how the added cost would be borne by the "requesting party."

July 3, 2017 page 3

II138-B-3

Why use 100 feet of easement on private property when only 3 feet is needed on public Right Of Way (ROW). Overhead lines is a poor use of land for modern cities.

**Economic:**

II138-B-4

Energize Eastside unjustly enriches PSE as a private monopoly at the expense of Eastside citizens. They pay no property taxes on the private property easement used. Currently they use 55 feet of vertical height. It is doubtful that the original easements permitted 100 feet of air rights. They are unnecessarily using 9 million square feet of private property that has better uses when a 3 foot trench can suffice. The current EIS is very much inadequate in the economic evaluation of private property impacts. Energize East Side would unnecessarily over burden the existing easement.

**Recommendation:** The final EIS needs a much expanded economic analysis on private property and neighborhood character.

**Plants and Vegetation:**

II138-B-5

The loss of substantial and old growth trees is irreplaceable in most lifetimes. In addition, neighborhood character such as Bridle Trails is immensely affected. Bridle Trails also has a special tree Land Use Code to protect significant trees from development. This should also be embraced by PSSE when serving their customers first.

**Recommendation:** The final EIS needs to better analyze the impact not only on air quality but on neighborhood perception of desiring to enjoy the treed nature of the neighborhood.

II138-B -4

SEPA does not require that an economic analysis be included. It allows the Lead Agency to include economic information it believes would be helpful to decision makers. The EIS Consultant Team included topics highlighted as a concern during the scoping process and the Lead Agency determined could be helpful. This included a programmatic evaluation of impacts to property values (see Chapters 10 and 11 of the Phase 1 Draft EIS) and evaluation of impacts to tax revenue, ecosystem services, and the cost of undergrounding the line (see Section 3.10 of the Phase 2 Draft EIS). The Partner Cities have determined that no additional economic analysis is necessary for this project.

II138-B -5

More details regarding the removal of significant trees has been included in the Final EIS; see Section 4.4. Section 3.4.1.2 of the Phase 2 Draft EIS describes BCC 20.20.900, the regulation that applies to tree retention and replacement in the Bridle Trails Subarea. Tree removal was considered as part of the assessment of impacts to the aesthetic environment (see Section 3.2 of the Phase 2 Draft EIS).

7/12/2017

Weebly Email Service Mail - Fw: Energize Eastside Phase 2 Draft EIS Comment Letter



Energize Eastside EIS <info@energizeeastsideeis.org>

**Fw: Energize Eastside Phase 2 Draft EIS Comment Letter**

1 message

**Joan Nolan** <joansn64@hotmail.com>  
To: "Info@energizeeastsideeis.org" <Info@energizeeastsideeis.org>  
Cc: "eis@cense.org" <eis@cense.org>

Mon, Jul 3, 2017 at 3:35 PM

The attached letter has a error. Please replace RCW 173-201A with WAC 173-201A.

Thank you.

---

**From:** Joan Nolan <joansn64@hotmail.com>  
**Sent:** Saturday, July 1, 2017 10:37 AM  
**To:** Energize Eastside EIS  
**Subject:** Energize Eastside Phase 2 Draft EIS Comment Letter

Please accept the attached Energize Eastside Phase 2 Draft EIS Comment Letter. Also attached is a copy of the Proposed Poles Points map with orange rectangles observed 6-24-17 on the Energize website, which we could not find on the website today.

**4 attachments**



**EIS 6-29-17 pg 1 of 3 001.jpg**  
916K



**EIS 6-29-17 pg 2 of 3 001.jpg**  
1051K

**EIS 6-29-17 pg 3 of 3 001.jpg**

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=iufS2U4Cs3s.en.&view=pt&search=inbox&th=15d0a984000e8a84&siml=15d0a984000e...> 1/2

7/12/2017

Weebly Email Service Mail - Fw: Energize Eastside Phase 2 Draft EIS Comment Letter

844K



Google Earth Proposed Pole Points Map (6-24-17) 001.jpg  
790K

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City of Bellevue, Development Services Department,  
Attn: Heidi Bedwell, Environmental Planning Manager  
P.O. Box 90012, Bellevue, WA 98009-9012

RE: Phase-2 Draft EIS  
City of Bellevue EIS File Number: 14-139122-LE

June 29, 2017

Dear Ms. Bidwell:

This letter for the Phase 2 Draft EIS" File Number: 14-139122-LE follows up on comment letters for Phase 1 and the first Phase 2 Scoping sent June 14, 2015 and May 30, 2016 respectively. We will try not to repeat previous comments, which remain unsatisfactorily answered. This letter will discuss some new observations on the new Official Phase 2 Draft EIS and focus mainly on Section 3.3 Water Resources.

Our overall comment is that the EIS document is insufficient as it does not provide enough information to evaluate water resource impacts. The maps PSE provided online on (viewed June 24) were "Pole Locations and Surveyed Trees" with tree and pole locations indicated by dots, and a Google Earth GIS map with orange rectangles indicating pole locations. Both of these did not show the exact locations of footings on the landscape to the point that it cannot be deciphered what are new and/or existing locations. The Pole Location and Surveyed Trees map also appears inaccurate regarding tree number and location. Right on our own property the orange rectangle Google Earth map did not show an orange rectangle identifying the existing poles.

The maps and the overall EIS document lack site-level information on where plants and soil needs to be moved in order to install the larger pole towers. Due to this lack of site level information, it cannot be fully and clearly determined whether tower construction will be in wetlands or whether construction will impact any streams along the proposed corridors. Sometimes wetlands are localized which is why it is particularly important to site truth, accurately delineate, and map all parcels.

I1139-A -1 The specifics of the design and exact placement of poles would be determined during the local permitting process. The Phase 2 Draft EIS covers details of the project as it was known at the time of publication and reflects information based on the early stages of design. Project design has been refined for the Final EIS (presented as PSE's Proposed Alignment), with more site-specific information presented on the route, pole types, pole locations, and vegetation clearing requirements. The EIS Consultant Team and Partner Cities believe this information provides sufficient detail to allow for an evaluation of potential impacts under SEPA. In addition, the Energize Eastside EIS website library provided an interactive map that shows approximate pole locations and trees that are proposed to be removed [www.energizeeastsideeis.org/library.html](http://www.energizeeastsideeis.org/library.html). See also Chapter 4 of the Final EIS for details of impacts from PSE's Proposed Alignment. Wetland and stream delineation reports can be found under Phase 2 Materials, PSE Background Documents.

I1139-A-1

II139-A-2

According to Section 3.2 the Watershed Company delineated wetlands, but some were done through "reconnaissance" and will be delineated later during permitting. Therefore this EIS cannot say with authority whether wetlands are impacted or not. Further on page 3.3-13 it is stated that in wetlands PSE will minimize new permanent maintenance roads by only connecting to existing roads. How much new impervious area will be created with these roads? Regarding trees PSE inventoried some 5,400 out of 10,400 to be removed including those in sensitive areas. However, again, the "Pole Locations and Surveyed Trees" tree count and location appears inaccurate. PSE does acknowledge temporary construction environmental impacts that are to be minimized through BMPs and mitigation, though the mitigation is not specified. PSE also mentions some new cleared areas and impervious in wetlands such as by the Richards Road substation; again we could not find information on new impervious quantified. The PSE Vegetation Plan includes pruning and topping of trees in critical areas, but though pruned and topped trees provide shade they may not contribute enough to system potential shade.

II139-A-3

The EIS often describes impacts as being "less than significant" because they will comply with regulatory mitigation measures. However mitigation for stream and wetland buffers may not necessarily be "less than significant". The EIS does not provide information on specific mitigation actions; which may be offsite or at a completely different location and may not act to address concerns at the specific project site. Section 3.5.8 confirms that trees may be planted off-site or in-lieu fee. Mitigation information should be detailed.

II139-A-4

EIS Section 3.4.1 Plants and Animals Relevant Plans, Policies, and Regulations is missing two relevant regulations: the Endangered Species Act and Washington State RCW 173-201A. These cover beneficial uses of water including threatened and endanger salmonid species and water quality including temperature. The effects of tree removal, soil disruption, impacted aquatic habitat, increased flashy stormwater flows from impervious, decreased base flows from impervious, all act to decrease shading, increase suspended sediment in wetlands and streams, and reduce hyporheic and ground water flows. This acts to increase stream temperature, stress the kind of benthic invertebrates that fish like to eat, disrupt riparian habitat, and potentially hurt threatened and endangered salmonid

II139-A-5

II139-A -2

All wetlands not delineated during the EIS phase will be delineated as part of the permitting process. The pole location will be adjusted to avoid impacts to wetlands where possible. Any impacts to wetlands will require mitigation to a level of no-net-loss and per local critical areas ordinances.

PSE will rely on existing roads to access the corridor to the extent possible, and any new permanent roads would be short segments connecting to existing roads. New roads would include stormwater treatment systems that meet state and local requirements. Therefore, impacts of these roads on stormwater runoff and water quality would be less-than-significant.

II139-A -3

The specifics of the design and exact placement of poles would be determined during the local permitting process. The Phase 2 Draft EIS includes details of the project as it was known at the time of publication and reflects information based on the early stages of design. Project design has been refined for the Final EIS for PSE's Proposed Alignment (which includes a route similar to the route of the Willow 1 Option as analyzed in the Phase 2 Draft EIS), with more site-specific information presented on the route, pole types, pole locations, and vegetation clearing requirements. The EIS Consultant Team believes the information provided is adequate for evaluating potential impacts under SEPA. Please refer to the Energize Eastside EIS website library, the EIS team has provided an interactive map which shows approximate pole locations and trees that are proposed to be removed <http://www.energizeeastsideeis.org/library.html>. See also Section 4.4.3 of the Final EIS for details of impacts from PSE's Proposed Alignment. Vegetation Impact Analysis reports can be found under Phase 2 Materials, PSE Background Documents. Additional detail regarding impervious surface and impacts to loss of shade along streams is included in the Final EIS.

II139-A -4

The impacts described are considered less-than-significant due to the small scale of the impacts. Whether mitigation is provided on- or off-site, compliance with existing regulations was determined to be adequate to mitigate these impacts. Mitigation measures are listed in detail to the greatest extent possible at this stage of the project. Because specifics of the design would be determined closer to the time that the project is constructed, the mitigation measures that the permitting jurisdictions require as a condition of permit approval will be established at a later date.

I1139-A -5 As stated in Section 3.4.1, Relevant Plans, Policies, and Regulations, of the Phase 2 Draft EIS, the list of regulations is in Tables 6-1 and 6-2 in the Phase 1 Draft EIS. This list includes the Endangered Species Act. WAC 173-201A is the administrative rules for Water Quality Standards for Surface Waters of the State of Washington. It includes the rules for how to implement RCW 90.48. RCW 90.48 is listed in the Phase 1 Draft EIS, but WAC 173-201A was not; it has been included in the Errata of this Final EIS (see Chapter 3).

II139-A-5

species. Intact wetlands and streams help provide cooling water that support aquatic species. These affects are localized.

II139-A-6

Further coal power plants increase carbon dioxide emissions and contribute to global warming. There is much scientific evidence [University of Washington's Climate Impact Group for one] that shows that this raises affects stream temperatures right here in the Puget Sound lowlands. Again this temperature rise contributes to conditions lethal to fish such as salmonids historically found in Bellevue, Newcastle, Redmond, and Renton streams.

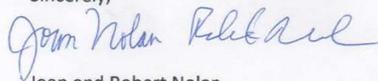
II139-A-7

Under this Phase 2 EIS PSE has elected the high voltage transmission line alternative. In this alternative coal usage remains a primary energy source, reportedly one third of PSE's energy sources. Inexplicably PSE dropped the EIS Phase 1 2B alternative from this Phase 2 Draft EIS that provided for battery usage and demand response which could significantly reduce or even eliminate the use of fossil fuels. EIS 3.5 on Carbon Emissions does not discuss the connection between increased air temperature through climate change and increased stream temperatures and the impact to threatened and endangered fish.

II139-A-8

Finally we ask why does PSE insist on using an unneeded antiquated powerline solution that will scar landscapes with ugly towers, and leave ratepayers and property owners having to pay the large cost?

Sincerely,



Joan and Robert Nolan  
 CENSE Contributors  
 4700 133<sup>rd</sup> Avenue SE  
 Bellevue, WA 98006  
 (425) 746-4931

II139-A -6

The purpose and need for the project is to address a deficiency in electrical transmission capacity during peak periods and improve the reliability, not to increase power production, or to transmit power from new or different sources, so such impacts are not analyzed in the EIS. The EIS analyzes the potential impacts of the proposal (new transmission line) and alternatives, but it is not intended to analyze regional generation. Therefore, information and analysis on impacts of coal-based generation are not included because they are outside the relevant scope of the EIS analysis.

Section 3.5, Greenhouse Gases, of the Phase 2 Draft EIS addresses potential impacts of the project on greenhouse gas emissions, and includes appropriate mitigation measures. In addition, Chapters 4-6 describe potential impacts to the environment based on short-term impacts, cumulative impacts, and significant unavoidable adverse impacts, respectively.

II139-A -7

See the response to comment II139-A-6. Alternative 2 was not brought forward for further consideration in the Phase 2 Draft EIS because PSE determined that it did not meet the project objectives, in particular that it would not meet PSE's performance criterion for serving 10 years or more after construction (electrical criterion #1 - see Chapter 1 Phase 1 Draft EIS). The Phase 2 Draft EIS describes alternatives not carried forward for additional analysis in Section 2.2.

II139-A -8

As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

My name is Christina Aron-Sycz and I own my home at 13725 NE 34th Place, Bellevue, WA, 98005. Please find herein my comments on the Phase 2 Draft EIS for Puget Sound Energy's proposed 230,000 volt transmission line through 18 miles of the Eastside branded by their marketing department as "Energize Eastside". At the end of the document I also re-submit all of my phase 1 comments, none of which have been responded to. I therefore resubmit them on this date as comments on the phase 2 DEIS.

I am a member of the board of CENSE.org.

**Comments on Phase 2 Draft EIS**

This draft EIS is lacking in myriad ways including clarity, substance, rationality, and falters on a legal basis many times. It also demonstrates significant bias towards the project applicant, Puget Sound Energy (PSE).

This EIS does not comply with multiple state SEPA rules and established procedures. These can be found here <http://www.ecy.wa.gov/programs/sea/sepa/lawandrule.htm>

It does not comply with WAC 197-11-030 (b), (c) and (g)

*(b) Find ways to make the SEPA process more useful to decision makers and the public; promote certainty regarding the requirements of the act; reduce paperwork and the accumulation of extraneous background data; and emphasize important environmental impacts and alternatives.*

This EIS has cast aside many important environmental impacts and alternatives as submitted by CENSE.org in this and the previous comment period.

*(c) Prepare environmental documents that are concise, clear, and to the point, and are supported by evidence that the necessary environmental analyses have been made.*

The Phase 2 DEIS fails even the criteria for "unusually complex projects". By its very nature (hundreds of pages of materials, including far exceeding 150 pages of pure text) it fails to be a document that can be reasonably studied by the average resident.

<http://www.ecy.wa.gov/programs/sea/sepa/faq.htm>

**Q: Are there page limits for an EIS?**

*A: Yes, the text of an EIS shall not exceed 75 pages, except for proposals of unusual scope or complexity, which shall not exceed 150 pages [WAC 197-11-425(4)]. If appendices and background material exceed 25 pages and together the entire EIS would exceed 100 pages, they must be bound in a separate volume.*

*(g) Identify, evaluate, and require or implement, where required by the act and these rules, reasonable alternatives that would mitigate adverse effects of proposed actions on the environment.*

From section 1-1 of DEIS: "PSE's analysis concluded that the most effective solution...". The EIS is giving all the credit to PSE in assuming that PSE's analysis of effective solutions was free from any bias regarding how much profit each potential "solution" could yield. CENSE.org has provided multiple, realistic scenarios that would cost far less than Energize Eastside and which would yield greater reliability. Yet PSE never proposed these solutions. Why? There is no financial incentive to pursue those options by the state of Washington compared to building *transmission*

I1140-A -1 The comment does not cite any specific deficiencies, or otherwise explain why the EIS fails to comply with SEPA, and therefore cannot be addressed.

I1140-A-1

*infrastructure.* The EIS staff in this instance needs to give a detailed explanation of 1) what was included in the scope of PSE's "analysis", and 2) what criteria were used in determining the "conclusion".

II140-A-2

It does not comply with WAC 197-11-055

*(c) Appropriate consideration of environmental information shall be completed before an agency commits to a particular course of action (WAC 197-11-070).*

As the last of the environmental impact statements open to comment by the public, this EIS does not comply with giving "appropriate consideration of environmental information" to the public due to 1) a serious lack of study of pipeline safety in both corrosion and project construction.

It does not comply with WAC 197-11-060, (3) **Proposals.**

*(iii) Proposals should be described in ways that encourage considering and comparing alternatives. Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions. A proposal could be described, for example, as "reducing flood damage and achieving better flood control by one or a combination of the following means: Building a new dam; maintenance dredging; use of shoreline and land use controls; purchase of floodprone areas; or relocation assistance."*

Again, this EIS is biased towards the applicant in that it does not adequately compare alternatives. See comments by CENSE.org in both phase 1 and 2.

**(4) Impacts.**

*(c) Agencies shall carefully consider the range of probable impacts, including short-term and long-term effects. Impacts shall include those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer.*

This EIS fails to "carefully consider" the range of probable impacts of 1) construction near the pipeline and 2) corrosion risk.

II140-A-3

It does not comply with WAC 197-11-080

*(4) Agencies may rely upon applicants to provide information as allowed in WAC 197-11-100.*

This code means that the EIS staff **could be asking PSE to furnish much more supporting documentation, study details and data than the EIS staff is currently requiring of PSE. This is a failure on the part of the EIS staff to produce a truly unbiased and sound EIS.**

From the phase 2 DEIS:

*"The project involves improvements to PSE's electrical grid in the Eastside area of King County, to address a deficiency in electrical transmission capacity."*

II140-A-4

1. This statement is biased towards the applicant because it already implies that the project will bring about "improvements". The DEIS is lacking here because it does not state how the "improvements" will be measured or what kind of "improvements" electric customers will see. Based on the fact that PSE is using a needs scenario for this project that does not conform to any federal, state or local standards of emergency electrical provision preparedness, this statement is without merit, in addition to being biased.
2. "Deficiency" - again, based on the fact that PSE is using a needs scenario for this project that does not conform to any federal, state or local standards of emergency electrical provision preparedness, this statement is without merit, in addition to being biased. The

II140-A -2

An analysis of pipeline safety is included in Section 3.9 of the Phase 2 Draft EIS. Consistent with WAC 197-11-055, the EIS is being prepared prior to any agency action. The proposal has been clearly defined in Chapter 2 for the Phase 1 Draft EIS and the Phase 2 Draft EIS. Please refer to WAC 197-11-060(3)(b)(ii): "A proposal by a lead agency or applicant may be put forward as an objective, as several alternative means of accomplishing a goal, or as a particular or preferred course of action." In this case, the applicant has proposed a preferred course of action.

II140-A -3

The Energize Eastside EIS complies with the SEPA process in having PSE supply the information allowed under WAC 197-11-100.

II140-A -4

In this context, improvement is meant simply to describe the increase in electrical capacity. The term "deficiency" is a term the applicant has used in stating the project objectives. The EIS is not intended to determine whether there is a need for the project, but review of PSE's planning model and results found that it was conducted in accord with standard industry practice. Therefore, the term "address a deficiency" accurately describes PSE's objectives for the project.

II140-A-4 EIS staff needs to recognize and address the bias and lack of technical knowledge regarding power planning criteria in these key introductory statements.

*"The purpose of the project is to address a projected deficiency in transmission capacity resulting from growth in electrical demand"*

II140-A-5 1. The "projected deficiency" cited here has never been vetted. It comes directly from the applicant themselves, and PSE does not cite any credible source to support their extremely high needs and growth projections. The city of Seattle is growing at an equal pace to the Eastside, yet their growth projections are **five times lower than the applicant's projections**. Therefore, simply stating "growth in electrical demand" demonstrates bias towards the applicant and unfairly frees them from any burden of proof. It essentially allows them to "write their own check". Our country and its government is designed as a system of checks and balances. In this instance, the EIS staff is demonstrating an unwillingness to "check" PSE for the sake of what is reasonable and prudent.

*"PSE would also continue its energy conservation program systemwide and for the Eastside."*

II140-A-6 1. I have done years of research on how PSE operates. PSE is not required to achieve any specific conservation targets. They set their own targets. PSE does not receive anywhere the level of financial incentive from the state of Washington for conservation as for transmission projects. In using this statement, the EIS staff needs to be more transparent to the public how PSE's conservation program actually works if it is going to rely on it as a core concept of the "no action" alternative.

Page 1-1  
*"Based on federally mandated planning standards,..."*

II140-A-7 The EIS staff either 1) has not taken the time to correctly understand how federally mandated planning standards work or is 2) intentionally showing bias towards the applicant. Either way, the foundation upon which this entire project is based is highly inaccurate and PSE is utilizing obfuscation in the hopes of allowing a project with extremely high revenues to be built. The EIS staff **must include here a full description of what the actual federally mandated planning standards are. PSE's reference to NERC and WECC standards do not fulfill this description because PSE's needs scenario far exceeds anything required at a federal, state or local level.**

Sincerely,  
Christina Aron-Sycz

II140-A -5 PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers in identifying future demand. As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

The EIS Consultant Team did review PSE's planning methods and found them to be in alignment with industry standards.

II140-A -6 This comment was intended to indicate that the project would not affect PSE's conservation program approach. In other words, their current approach was used as a baseline.

II140-A -7 As discussed in the Phase 1 and Phase 2 DEISs, the EIS consultant team did review the planning model and found that PSE had used standard planning practices. In determining the capacity deficiency for 2024, PSE used best available data and industry-standard utility planning modeling. This information is contained in the Stantec Review Memo on the Eastside Needs Assessment Report and the Independent Technical Analysis of Energize Eastside, which are both found on the project website (<http://www.energizeeastsideeis.org/library.html>).

I1140-A-8

March 14, 2016  
 Response to Draft EIS for Energize Eastside  
 Written by Christina AronSycz  
 on behalf of CENSE.org and  
 Christina AronSycz  
 13725 NE 34th Place  
 Bellevue, WA 98005

#### Introduction

This document is a response to the Draft EIS of PSE's Energize Eastside project. I am a board member of CENSE.org, and I represent the views and opinions of CENSE.org. I also serve as President of the Shadow Wood Lane homeowner's association. The Energize Eastside project will have a tremendous negative impact on two of the thirteen homes in our association.

I have devoted over a year and a half to an indepth study of all aspects related to the Energize

Eastside project. After all this time, I continue to be stunned by what PSE is attempting to build through the heart of the Eastside and the lack of thorough and truly independent analysis by industry experts retained by the City of Bellevue.

I am saddened that PSE is able to dictate the criteria for such a tremendous project (both in terms of its cost and impact on the entire city) and the City of Bellevue continues to fail to independently examine and evaluate these criteria. There is no meaningful due diligence by the authorities, including you, the EIS team, and Ms. Carol Helland, who is the SEPA officer in charge of the project. As a result, the Energize Eastside project has fundamental flaws. Its proposed execution, as Alternative 1A, represents a failure of the local government to fulfill its key role of an arbiter and enforcer of applicable WAC regulations.

#### Problems with Selection of 19 Project Criteria

Section 2.2 of the DEIS describes in detail PSE's objectives for building Energize Eastside. It lists 19 criteria: 15 electrical and 4 nonelectrical criteria that Alternative 1A (Energize Eastside as proposed by PSE) or any other alternative project must meet. These criteria were proposed by PSE itself. The DEIS does not contain any discussion whatsoever whether these 19 collective criteria have merit or are even reasonable and the only logical basis for accepting them is PSE's claim that PSE must meet "applicable transmission planning standards and guidelines".

Despite absence of any indepth analysis of the reasons for these criteria, they are the backbone for the entire 711 pagelong DEIS. Every alternative is vetted against these 19 points and no alternative can satisfy them completely, except for Alternative 1A.

I1140-A -8 This comment was submitted as a comment letter in Phase 1 of the Draft EIS process. See Appendix J of the Final EIS, which contains the comments and responses for the Phase 1 Draft EIS.

The most shocking element of DEIS is that 18 out of 19 criteria come directly from PSE's own Supplemental Eastside Study Solutions Report ("Supplemental Report"). This Supplemental Report was not written prior to the proposal of Energize Eastside. Instead, PSE published the Supplemental Report nearly two years after the Energize Eastside project was announced. The Supplemental Report is of questionable trustworthiness. Not only does it lack independent analysis and vetting but it is a self-serving document clearly designed to support a previously proposed project. The timing of the Supplemental Report suggests that PSE commissioned it to exaggerate the electrical needs of the Eastside to ensure that their project (Alternative 1A) gets built.

Problems with Certain Selected Criteria

Section 2.2 of the DEIS states:

"Electrical Criteria Summary

The project would meet the following criteria:

1. Applicable transmission planning standards and guidelines, including mandatory North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) standards (e.g., NERC TPL-001-4 and WECC TPL-001-WECC-CRT-2)"

The DEIS claims that "PSE's criteria are based on regulations for utilities and prudent, safe industry practices." The DEIS references two documents in support of this criteria: (1)

"Applicable transmission planning standards and guidelines, including mandatory North American Electric Reliability Corporation ("NERC") and (2) Western Electricity Coordinating Council ("WECC") standards (e.g., NERC TPL0014 and WECC TPL001WECCCRT2)".

Comment by Rich Lauckhart: NERC TPL00104

is the national requirement. Local (e.g.

WECC) areas can add further criteria if accepted by FERC. WECC TPL001CRT2

is the

local criteria proposed by WECC and approved by FERC. There is nothing substantive in the local criteria that would appear to be directly related to Energize Eastside. It is also not clear what TPL0014

stated requirement would be violated if Energize Eastside is not built

Comment by Christina AronSycz:

Pursuant to WAC 197110603(

a) "agencies shall make

certain that the proposal that is the subject of environmental review is properly defined. "

The DEIS violates WAC 197110603(

a). A properly defined proposal would include

extensive explanation for each of the 19 criteria supported by an independent third party analysis. The criteria PSE "wants" to include here and the criteria PSE is required to meet  
 1 Comments in RED have been authored by Richard Lauckhart, former VP of transmission planning for Puget Power. His full credentials are available at the end of the LauckhartSchiffman

Load Flow Study in attachment 2.

are two vastly different things. Instead of pressure testing these criteria, using independent experts, the City of Bellevue chose to rely on PSE to dictate what the parameters of the project should be. Because PSE has a major financial stake in the project, it cannot be solely trusted to provide the necessary and objective criteria without substantive verification by an independent 3rd party. The sheer size and cost of the project demands an indepth analysis by independent third parties of its every aspect. PSE has a proven track record of breaking rules and cheating the public (including its own customers)<sup>2</sup> and it is absolutely imperative that the lead agency acts in a truly impartial manner by writing a DEIS which does not simply accept PSE's 19 criteria in a "no questions asked" fashion as the current DEIS does.

"2. Within study period (2015–2024);"

Comment by Rich Lauckhart: PSE is saying if the need materializes by 2024, PSE needs to start working on it now. That can make sense if there is a long lead time on some solution options. This sounds like the lead time on building a nuclear plant, not a transmission line.

"3. Less than or equal to 95 percent of emergency limits for lines;"

Comment by Rich Lauckhart: This is not consistent with TPL0014.

This criteria seems to be a PSE desire that is not required.

"4. Less than or equal to 90 percent emergency limit for transformers;"

Comment by Rich Lauckhart: This criteria is not consistent with TPL0014.

This criteria seems

to be a PSE desire that is not required .

"5. Normal winter load forecast with [both] 100 percent and 75 percent conservation;"

Comment by Rich Lauckhart: This criteria has nothing to do with a TPL0014 requirement. If

conservation can be done, then it should be done. Why would PSE study with less than the maximum amount of conservation? The NWPPC suggests building a few emergency backup peaker plants to be used if the conservation does not materialize.

"6. Normal summer load forecast with 100 percent conservation;"

<sup>2</sup> <http://www.seattletimes.com/seattlenews/>

[psechargingtoomuchattorneygeneralcontends/](http://www.seattletimes.com/seattlenews/psechargingtoomuchattorneygeneralcontends/)

Comment by Rich Lauckhart: PSE is a big heavy winter peaking utility. If the winter peak can be reliably served, summer should not be a problem because the load is so much lower in the summer. For the Eastside, the peak winter load of 400 MW drops to 280 MW in the summer.

"7. Adjust regional flows and generation to stress cases similar to annual transmission planning assessment;"

Comment by Rich Lauckhart: This is bogus. The 2013 ColumbiaGrid Planning Assessment said this case is for informational purposes only and there does not need to be any fixes to problems found from this case study because the case exceeds NERC Reliability Criteria.

"8. Take into account future transmission system improvement projects that are expected to be in service within the study period;"

Comment by Rich Lauckhart: This makes sense as long as there is a very high probability that

future transmission system improvement projects will actually be in place. What future transmission system improvement projects is PSE thinking will be in place that will impact the EE study?

Comment by Christina AronSycz:

The DEIS does NOT provide this critical information and must be amended to show what transmission system improvement projects will be in place.

"9. Minimal or no redispatching of generation;"

Comment by Rich Lauckhart: This is a bogus criteria. FERC has stated that redispatching of

generation is the logical first step in solving a problem. Where did PSE come up with this criteria? If redispatch is cheaper and less environmentally problematic, why would it not be the preferred solution?

"10. No load shedding;"

Comment by Rich Lauckhart: There are instances in TPL0014 tables (and footnote 12 to

tables) where it is OK to interrupt Firm Transmission and have certain kind of load loss. This criteria [PSE's claim of no load shedding] is more stringent than TPL0014.

"11. No new Remedial Action Schemes"

Comment by Rich Lauckhart: This is a bogus criteria. TPL0014 allows for Remedial Action

Schemes (aka Corrective Action Plans) such as Automatic Generation Tripping... see e.g. 2.7.1 bullets in TPL0014.

DEIS Impermissibly Limits Reasonable Alternatives

This DEIS fails to meet WAC 19711070

which states " (1) Until the responsible official issues a

final determination of nonsignificance or final environmental impact statement, no action concerning the proposal shall be taken by a governmental agency that would:

- (a) Have an adverse environmental impact; or
- (b) Limit the choice of reasonable alternatives."

This DEIS fails to comply with WAC 19711070

because this DEIS has unlawfully limited the choice of reasonable alternatives to PSE's preferred project. As discussed above, PSE has a material financial stake in pursuing Alternative 1A. The DEIS reflects that preference. Alternative 2 does not represent a reasonable alternative mandated by the law. Many suggestions and comments written by industry experts were submitted by CENSE.org in the initial scoping phase, yet these suggestions were prematurely discarded. It is astounding that the lead governmental agency of Bellevue has taken steps in effect limiting the choice of reasonable alternatives before issuance of a final determination of nonsignificance or final environmental impact statement.

Furthermore, Alternative 2 as currently described in the DEIS fails to meet any industry standard for "reasonable". See Attachment entitled "Alternative 2B" as supporting documentation and full discussion of the deficiencies of Alternative 2 and CENSE.org's suggestions for an

alternative that has merit.

The City of Bellevue Failed to Revise the Scope of EIS

DEIS fails to comply with the following criteria and must be corrected:

WAC 19711408

“Scoping.

(5) The lead agency shall revise the scope of an EIS if substantial changes are made later in the proposal, or if significant new circumstances or information arise that bear on the proposal and its significant impacts.”

“Significant new circumstances or information” have arisen that bear on the proposal and its significant impacts. This has occurred in the following two ways:

1. CENSE.org independently contracted with two industry experts, Roger Schiffman and Richard Lauckhart, to perform a load flow study using industry standards, based on PSE’s own data. The load flow study shows that the need for the project has been grossly exaggerated. The study further asserts that PSE has potentially made false claims regarding the threshold compliance requirements. The study shows that PSE has created an impossible set of electrical standards that far exceed federal criteria. See Attachment 2 for a complete copy of the Load Flow Study by Schiffman and Lauckhart.

2. “Significant new circumstances or information” have also arisen in the form of information submitted by Don Marsh on behalf of CENSE.org regarding a proposed Alternative 2B which corrects multiple material deficiencies in Alternative 2 as currently described in the DEIS. The new Alternative 2B proposed by CENSE.org contains new and improved solutions compared with Alternative 2 that it meets the criteria for “significant new information”.

DEIS Should Not Be Accepted by the City of Bellevue

This DEIS fails to meet the following criteria and must be corrected:

WAC 19711420

“EIS preparation.

For draft and final EISs and SEISs:

(1) Preparation of the EIS is the responsibility of the lead agency, by or under the direction of its responsible official, as specified by the lead agency’s procedures. No matter who participates in the preparation of the EIS, it is the EIS of the lead agency. The responsible official, prior to distributing an EIS, shall be satisfied that it complies with these rules and the procedures of the lead agency.”

As outlined above, this DEIS does not comply with multiple WAC rules and procedures. As such it cannot be accepted in its current form and content and must be remedied.

Conclusion

A DEIS is just that a

DRAFT. Now is the time for the lead governmental agency to correct serious and material deficiencies in the scope of background work, vetting of project criteria. It is also time to overhaul Alternative 2 in a manner that will make it reasonable and realistic. I look forward to seeing the improvements in the final EIS based on my comments as well as the hundreds of comments from CENSE supporters



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July 6, 2017

City of Bellevue  
 Development Services Department  
 Attn: Heidi Bedwell, Environmental Planning Manager  
 P.O. Box 90012  
 Bellevue, WA 98009-9012

Re: Energize Eastside DEIS Phase 2

Dear Ms. Bedwell,

Puget Sound Energy, Inc. (“PSE”) thanks the City of Bellevue (“City”) and Partner Cities for the opportunity to comment on the Energize Eastside Project Phase 2 Draft Environmental Impact Statement (“DEIS”).

I1141-A-1

The need for the Energize Eastside Project has been established.<sup>1</sup> Electricity demand on the eastside is outgrowing the capacity of the existing grid, which is now 50 years old. Without this upgrade, “significant adverse impacts to utilities (e.g., rolling blackouts) would occur under the No Action Alternative if capacity increases are not implemented.” DEIS at 1-10. A pattern of temporary outages during high demand periods (which generally align with unusually hot and cold weather) can impact regional economic growth and the health and safety of vulnerable populations. See DEIS at 2-57 (“it is also possible that the awareness of the risk of outages could discourage development within the Eastside that would place the Partner Cities at an economic disadvantage to other jurisdictions in the region.”). With this in mind, PSE remains committed to the construction of the Energize Eastside Project.

I1141-A-2

PSE appreciates the City’s and Partner Cities’ rigorous review of the Energize Eastside Project, and respectfully submits the following and attached comments. See Attachment A (containing a table of PSE’s annotated comments).

**A. The DEIS process determined that Willow 1 is the least impactful route overall.**

<sup>1</sup> PSE/Quanta Technologies, *Supplemental Eastside Solutions Study Report Transmission System King County* (May 2015); PSE/Quanta Technologies, *2015 Supplemental Needs Assessment Report* (April 2015); Utility System Efficiencies, Inc., *Independent Technical Analysis of Energize Eastside for the City of Bellevue, WA* (April 28, 2015); PSE, *2013 Needs Assessment Report* (Oct. 2013); Exponent, *Electrical Reliability Study Phase 2 Report* (Feb. 2012) (prepared for City of Bellevue).

I1141-A -1 Comment noted.

I1141-A -2 Comment noted.

II141-A-2

The DEIS confirms that both Willow 2 and Willow 1 are viable routes. The Willow 1 route, however, was found to be the least impactful route.<sup>2</sup> The purpose of an EIS is to fully inform decision-makers of potential significant adverse impacts. It also serves to fully inform PSE as well as the public and other affected stakeholders. In light of the DEIS's findings, PSE is considering the impact discussion raised in the EIS before deciding whether to proceed with the Willow 1 or Willow 2 route.

II141-A-3

Safety is PSE's highest priority and PSE has a statutory duty to provide safe and reliable power. RCW 80.28.010(2). When a transmission line and a petroleum pipeline are co-located, interaction can occur between the two utilities that can increase safety risks. See DEIS Chapter 3.9. Here, PSE and BP have successfully maintained co-located utilities for decades. The DEIS and independent experts concluded that all route alternatives analyzed could be constructed and operated safely. However, the less interaction between the transmission and pipeline, the less mitigation is required to ensure safe operation.<sup>3</sup> Based on the results in the DEIS, the Willow 1 option would result in the least potential interaction with the BP Pipeline and as a result the least impact. Because of this finding, PSE is further evaluating its route preference.

II141-A-4

By using the Willow 1 option, which is generally located in the existing corridor, PSE would also greatly reduce tree impacts. As reported in the DEIS, the Willow 1 route requires the removal of over 600 fewer trees than the Willow 2 route. Of these 600 fewer trees, more than 500 are significant trees, so Willow 1 impacts 500 fewer significant trees.<sup>4</sup> DEIS at 3.4-30. PSE understands the high value that residents in the Partner Cities place on trees, which further supports proceeding with the permitting of the Willow 1 route. Beyond pipeline safety mitigation and tree preservation concerns, the Willow 1 option is also less impactful with respect to greenhouse gases and recreation than the Willow 2 option.

<sup>2</sup> See City of Bellevue, *Impacts During Operation—Bellevue South Options*, available at [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/e2\\_phase\\_2\\_deis\\_boards\\_final.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/e2_phase_2_deis_boards_final.pdf).

<sup>3</sup> PSE works collaboratively with Olympic to address pipeline safety concerns. Olympic has informed PSE that after the system is energized, it will collect field data to assess whether the installation of AC grounding or similar systems is needed. Following this analysis, Olympic plans to implement appropriate mitigation measures as needed where there is co-location between the pipeline and the transmission line.

<sup>4</sup> The tree removal values in the DEIS reflect a conservative approach to potential vegetation impacts. Final design may further reduce the number of trees that would need to be removed.

II141-A -3 Comment noted.

II141-A -4 Comment noted.

PSE Energize Eastside  
DEIS Phase 2  
Page 3 of 12

All routes analyzed provide safe, viable alternatives for Energize Eastside. PSE is using all information gathered through the DEIS process, including technical reports and public comments, to determine the most appropriate route that minimizes overall environmental impact.

**B. Energize Eastside does not cause significant adverse aesthetic impacts.**

The DEIS does not apply a recognized, peer-reviewed, uniform methodology for evaluating the potential for aesthetic impacts, and contains erroneous conclusions with respect to aesthetic impacts in Somerset. The DEIS also fails to adequately assess the context in which PSE proposes to construct the Energize Eastside Project and thereby overstates the significance of aesthetic impacts in Somerset.

The Energize Eastside Project is a transmission line upgrade in an existing urban managed right-of-way or utility corridor. Counties and cities establish utility corridors to plan for the siting of electric facilities. *See RCW 36.70A.150 (requiring identification of lands useful for public purposes including utility corridors)*. Corridors for electric facility use serve the public interest of all citizens, as is reflected in the City of Bellevue's Comprehensive Plan, which sites the Energize Eastside Project in the existing utility corridor. *See City of Bellevue Comprehensive Plan, Utilities Element, Map UT-7.*

PSE's utility corridor was established in the 1920s and 1930s, which predates the incorporation of Bellevue and Newcastle, specifically to site transmission facilities.<sup>5</sup> The corridor does not limit the height, pole configuration, or voltage of the electric facilities, but rather represents a land use and system planning consensus on where transmission lines should be located. As a part of the existing environment, all potential SEPA impacts must be assessed against the existing transmission line and the existing property rights granted with the establishment of a utility corridor. *See, e.g., Chuckanut Conservancy v. Washington State Dep't of Nat. Res.*, 156 Wn. App. 274, 292–93, 232 P.3d 1154, 1163 (2010).

The DEIS identified significant adverse environmental impacts to aesthetics with respect to 10 pole locations proposed as part of the Willow 1 route in Somerset and the portion of the line traversing the City of Newcastle. The DEIS explains, "[t]here is no widely accepted definition of significant visual effects" and adopts significance criteria "similar to those described in *The State Clean Energy Program Guide: A Visual Impact Assessment Process for Wind Energy Projects*." DEIS at 3.2-25.<sup>6</sup>

<sup>5</sup> The City of Bellevue was incorporated in 1953. The City of Newcastle was incorporated in 1994.

<sup>6</sup> The DEIS should acknowledge that a major limitation on the application of this Guide is that it is designed to assess utility scale wind energy projects and explicitly recommends that smaller projects, like a transmission line upgrade, "usually justify a

I1141-A -5 A uniform methodology for visual impact assessment (VIA) of transmission lines sited in urban environments does not exist, and there is no standard VIA methodology for transmission lines. As a result, a number of methodologies were reviewed to inform the methodology used for this project. The Bureau of Land Management (BLM) methodology and Forest Service methodology were developed for assessing visual impacts to BLM lands and Forest Service lands, respectively. Although the BLM methodology can be a suitable methodology for non-BLM projects, it was determined that the Federal Highway Administration (FHWA) methodology was more appropriate for this project given the urban setting and linear nature of the proposal.

The assessment of impacts was generally based on methods described in the FHWA's *Guidelines for Visual Impact Assessment* (FHWA, 2015). FHWA guidelines do not specify thresholds for determining significant impacts, nor do state or local regulations. Therefore, significance was assigned based on criteria similar to those described in *The State Clean Energy Program Guide: A Visual Impact Assessment Process for Wind Energy Projects* (Vissering et al., 2011). The Phase 2 Draft EIS discloses that this Guide is generally not used for transmission lines, but it nonetheless provides guidance because wind turbines can be similar in height and scale to utility poles (Phase 2 Draft EIS, Section 3.2.3.4).

A review of policies and regulations applicable to the study area revealed that the existing regulatory framework was insufficient for determining significance because no clear written standards are included for aesthetic impacts in any of the Partner Cities. Thus, to develop a threshold for significance that reflects the policies of the Partner Cities, the EIS Consultant Team held a workshop in August 2016 with staff from the Partner Cities. The purpose of the workshop was to collaboratively define significance thresholds based on policies, past precedent, and practice within the Partner City jurisdictions. The development of significance criteria through a collaborative process is precisely what the 2015 FHWA Guidelines requires. *See, e.g., 2015 FHWA Guidelines, Sec. 3.2 (requiring the authors of the VIA to "determine if the community has any defined visual preferences" and develop an understanding of visual quality as a "relationship between viewers and their environment"), Sec. 3.2.1. ("Experts trained in landscape aesthetics. . . Cannot be assured that their aesthetic training will match the visual concerns and preferences of the public.")*. Information on the workshop process and how significance was identified is detailed in Appendix C of the Phase 2 Draft EIS.

I1141-A-5

PSE Energize Eastside  
DEIS Phase 2  
Page 4 of 12

There are three peer-reviewed, widely applied and conventionally accepted methodologies used in the United States<sup>7</sup> to assess the visual and aesthetic impacts (visual impact assessment or "VIA") of land-based projects and programs. These are (1) the U.S. Department of Interior Bureau of Land Management's *Visual Contrast Rating*, (2) the U.S. Department of Agriculture Forest Service Scenery Management System's *Landscape Character Goals and Scenic Integrity Objectives*, and (3) the Federal Highway Administration's ("FHWA") *Guidelines for Visual Impact Assessment*. Although the FHWA guidelines were developed for highways, they have proven to be highly appropriate for the evaluation of other linear infrastructure projects, including transmission lines.

Each agency's methodology uses its own series of variables. For each VIA, the variables are assessed through evaluation and application of defined criteria. In this way, each methodology yields consistency through a uniform set of variables and criteria salient to an agency's objectives. The three methodologies (including their respective variables and associated criteria) have been in use for decades, including the FHWA methodology first developed in the 1980s. Notably, the FHWA methodology is broadly used by the California Transportation System, or CALTRANS, whose VIA incorporates lessons learned during significant linear highway development in the 1970s and 1980s.

In the early 2010s, an effort was undertaken by a team of FHWA highway engineers to update the agency's VIA methodology. One of the team's first tasks was to rephrase the variable terminology within the methodology; the substance itself of the variables was untouched. The substance of the variables was never fully redefined, and the criteria historically used to calculate each variable were not revised before the core team departed the agency. Left with an incomplete product, the FHWA nonetheless published its 'new' methodology in 2015, which included no criteria whatsoever to guide the actual calculation of visual impact. Recognizing the absence of any operationalized criteria as a material gap, linear infrastructure agencies, including CALTRANS, have since set aside the incomplete FHWA methodology published in 2015, and instead continue to use the complete, peer-reviewed formula contained in the previously published methodology so as to continue yielding consistent results when the VIA is prepared.

In the Energize Eastside DEIS, the authors elected to use the incomplete 2015 FHWA VIA, applied criteria from a methodology that is admittedly not applied to linear infrastructure, then inexplicably sought non-linear VIA assessment professionals' opinions about what criteria should instead be used to determine significance. DEIS at

simpler review process." *The State Clean Energy Program Guide* at 3. Moreover, the nature of wind farm impacts is wholly distinct from transmission lines.

<sup>7</sup> Bureau of Land Management, *Visual Resources— Visual Impact Assessment Methodologies*, available at <http://blmwyomingvisual.anl.gov/assess-simulate/>.

The FHWA methodology was used to assess changes in visual quality and viewer sensitivity because it is used for linear projects in urban environments. The State Clean Energy Program Guide was used for determining significance due to its emphasis on consistency with local policy, which is consistent with SEPA guidance. The methodology is straightforward enough that it could be used again for similar projects in similar contexts. For more information, please see Appendix C of the Phase 2 Draft EIS. It details how the FHWA guidelines and the State Clean Energy Program Guide were consistently applied.

To clarify, local covenants are not given the effect of SEPA policy. The Somerset covenants restrict the height of houses and vegetation to protect views. This restriction over an entire neighborhood has resulted in a unique physical character that is the environmental baseline context for this project. Information on the text of the covenants is provided to show that the covenants are expected to continue to affect the character of the area into the future. As a result of the lower scale of the buildings and vegetation and this emphasis on view preservation, the increased height of the poles under the Willow 1 Option would be much more pronounced than at present. This increase in contrast was the primary reason for determining significance. While it was noted that these particular covenants are supported by City policies that protect distinctive neighborhood character, they are not characterized as adopted policy (see Section 3.2.5.9 of the Phase 2 Draft EIS, and clarifying discussion in Section 4.2 of the Final EIS).

When analyzing the environmental impacts of a proposal, lead agencies must compare proposals and alternatives to the environmental baseline. WAC 197-11-440(5),(6). Here, the environmental baseline should reflect the Somerset covenants that restrict the height of buildings and trees. Although the comment seems to assert that the covenants cannot be included in the environmental baseline because they are not formally recognized "SEPA" policies, nothing in the SEPA regulations limits the factors relevant to the context for the project to formally recognized "SEPA" policies. Consideration of the existing transmission line and the Somerset covenants is appropriate when making a significance determination.

Further, comparing the aesthetic impacts of the Energize Eastside Project to a baseline that includes "the presence of a transmission

I1141-A-5

PSE Energize Eastside  
DEIS Phase 2  
Page 5 of 12

3.2-25. This approach is not only scientifically flawed and void of peer review, its *ad hoc* application here cannot be applied consistently in the future to other liner visual impact assessments in Bellevue. This is likely to lead to inconsistent VIA's in Bellevue over time and, consequently, disjointed development throughout the City. The EIS should be revised to correctly apply the criteria historically and consistently applied, through today, in other jurisdictions that are conducting VIA's using the FHWA methodology, and should further reflect the elimination of criteria that are not, by the authors' own admission, used in the visual impact assessments of high voltage transmission lines. This would produce a more transparent analysis focused on the change between the existing visual conditions and those that would exist following construction of the project.

The DEIS's aesthetic impact analysis erroneously applies SEPA. Under SEPA, "[s]ignificant" means "a reasonable likelihood of more than a moderate adverse impact on environmental quality." WAC 197-11-794(1). "Significance involves context and intensity." WAC 197-11-794(2). The DEIS builds on the regulatory definition stating that there is a "significant impact" with respect to visual quality where "the degree of contrast between the project and the existing aesthetic environment would be substantial and viewer sensitivity is high." DEIS at 3.2-26. The DEIS then points to the existence of private covenants in Somerset as a basis for making a finding of significance because those private agreements increase contrast with any transmission line. DEIS at 3.2-70. In defining the environmental context the DEIS not only erroneously gives private covenants the effect of a SEPA policy, it fails to give effect to the land use decision made when the utility corridor was originally established.

This conclusion is confirmed by Washington case law. In *Plum Creek Timber Co., L.P. v. Washington State Forest Practices Appeals Bd.*, the court upheld the Forest Practices Appeal Board's conclusion that a road and timber harvest would not have significant aesthetic impacts where the "parcel is designated for timber harvests" and the harvest would not negatively impact the intensity of adjacent uses (in that case recreation). 99 Wn. App. 579, 595, 993 P.2d 287, 295 (2000). The court further held that because the parcel was dedicated for harvest, the applicant was "not obligated to prevent the impacts of its forest practices on aesthetics." *Id.*

As in *Plum Creek*, the Willow 1 route proposes to site the Project in parcels previously identified for the use—a transmission line corridor. The facts here are even more compelling as the parcels were designated for electrical facility use in the 1920s and 1930s, predating many adjacent uses, and *already houses transmission lines*. Further, the DEIS did not conclude that the presence of the transmission lines in the Willow 1 route would change the intensity of adjacent uses or result in significant economic impacts to residential uses. See DEIS, Chapter 3.1 (Land Use and Housing); DEIS, Chapter 3.10 (Economics).

Because Willow 1 proposes upgrading existing transmission lines in an almost 100-year-old utility corridor, the context or environmental baseline appropriately includes the presence of a transmission line taller than surrounding uses in Somerset. See, e.g.,

line taller than surrounding uses in Somerset" would effectively compare Energize Eastside to a theoretical use, rather than an existing use. The existing transmission line has a known height and existing environmental impacts, and this is the baseline against which the project must be compared. The SEPA regulations and the cases cited by the comment letter do not support the contention that the environmental baseline for the project must be based on the zoning of the existing site. The existing transmission line and the Somerset covenants reflect the actual conditions that should be considered.

Whether or not siting the transmission line within the existing corridor would be in accordance with existing plans and policies was evaluated in the Land Use section (see Section 3.1 of the Phase 2 Draft EIS). This includes any height restriction, etc. imposed based on land use. As mentioned above, the assessment of impacts does take into account the presence of the existing line, its height, and its form. However, the fact that there is a transmission line at present does not mean that the impacts of a new, larger, higher capacity transmission line cannot or should not be addressed under SEPA. By increasing voltage and pole heights, the project is intensifying its existing use and potentially the impact on the aesthetic environment in areas where there is an existing transmission line (e.g., Somerset).

The 2015 FHWA methodology was developed after a study conducted by the National Cooperative Highway Research Program (NCHRP) of the Transportation Research Board, evaluated the 1981 FHWA VIA guidelines and other VIA methods to arrive at a set of best practices for conducting VIAs. The study included a survey of all 50 states, an extensive review of the literature, and the examination of several domestic and foreign case studies. It concluded that there was a need to develop a more scientifically rigorous, administratively practical, and universally accepted VIA process. See the *NCHRP Report 741: Evaluation of Methodologies for Visual Impact Assessment* (NCHRP Report 741). FHWA began the process of updating the 1981 VIA field guide in 2012 and augmented the findings of the NCHRP report with an additional survey of state DOTs and additional research. The purpose of the guidelines was to provide a "rigorous scientific method that is practical in its application and readily understood by agencies, regulators, and the public" (FHWA, 2015).

The scope of work for the updated guidelines was critiqued by members of other federal offices and distributed as a request-for-

PSE Energize Eastside  
DEIS Phase 2  
Page 6 of 12

*Chuckanut Conservancy v. Washington State Dep't of Nat. Res.*, 156 Wn. App. 274, 292–93, 232 P.3d 1154, 1163 (2010) (“Blanchard Forest is trust land and has been logged on a sustainable basis for decades. It is against this existing use that the Strategies’ environmental impacts must be evaluated.”). Surrounding residences already have transmission lines in their yards and viewsheds and, as the electrical facility use is established, the values and placement of those houses should already reflect proximity to the managed utility corridor. See generally, *id.* at 285 (citing *ASARCO, Inc. v. Air Quality Coalition*, 92 Wash.2d 685, 706, 601 P.2d 501 (1979) (emphasis omitted) (“Where a proposal ‘change[s] neither the actual current uses to which the land was put nor the impact of continued use on the surrounding environment,’ that action is not a major action significantly affecting the environment and an EIS is not required.”).

Moreover, the Energize Eastside Project can only be conditioned or denied based upon formally designated agency SEPA policies in place when the DEIS is issued. RCW 43.21C.060; WAC 197-11-660(1)(a) (“Mitigation measures or denials shall be based on policies, plans, rules, or regulations formally designated by the agency (or appropriate legislative body, in the case of local government) as a basis for the exercise of substantive authority and in effect when the DNS or DEIS is issued.”). As relayed in the DEIS, “[t]he Partner Cities do not have SEPA policies that provide authority to recognize private covenants,” DEIS at 3.2-25, such as those that exist in Somerset and there are “no clear written standards... for aesthetic impacts in any of the Partner Cities.” DEIS at 3.2-3. As such, it is erroneous for the DEIS to base its significance determination in large part on the effect of the private covenants in Somerset on the viewshed.<sup>8</sup> The methodology is particularly flawed where the analysis fails to give full effect to established land use decisions, including the siting of the existing utility corridor.

**C. Alternative mitigation beyond the DEIS is possible to ensure that aesthetic impacts in Somerset are less than significant.**

PSE continues to work diligently to mitigate any perceived impact to the Somerset viewshed. For example, the DEIS assessed aesthetic impacts by assuming that all poles would be a rust/brown color. Alternative pole colors, however, can be a powerful and effective tool in reducing contrast with the horizon. This is illustrated in the attached visual simulations, which show a marked decrease in the contrast with the horizon in the Somerset viewshed when the transmission line poles are either galvanized or powder coated with a light blue or light grey paint. See Attachment B (containing

<sup>8</sup> See generally, *W. Homes v. City of Issaquah*, 90 Wn. App. 1029 (1998); see generally, *Pierce v. Northeast Lake Washington Sewer & Water Dist.*, 123 Wash.2d 550, 559–60, 870 P.2d 305 (1994) (inverse condemnation case, absent affirmative right no to a view); *Collinson v. John L. Scott, Inc.*, 55 Wash.App. 481, 778 P.2d 534 (1989) (absent view easement or restrictive covenant, landowner has no right to unobstructed view over adjoining property).

proposal to specialists in the field. The guidelines incorporated information gained from surveys of VIA specialists from FHWA, state DOTs, and consultants regarding their use of the then-current FHWA VIA guidelines. Although the guidelines themselves were not put through a formal peer-review process, development of the guidelines was a collaborative effort that considered input from outside parties (Larson, 2017).

The 2015 FHWA guidelines expressly supersede all prior guidance on VIA, and there is no indication in the text of the guidelines that the FHWA considered the framework incomplete. The guidelines have been adopted at the state level, including Washington State (i.e., the Washington State Department of Transportation). While the comment correctly notes that Caltrans is currently reviewing and has not adopted the new guidelines, their adoption of these guidelines is not relevant to this project, nor have they published any critique of the guidelines that would support the statements made in the comments about the inadequacy or inappropriateness of their use. As discussed in the Energize Eastside EIS, following FHWA guidelines is not required in any of the Partner Cities’ adopted policies, and the FHWA guidelines were developed for roadways, not transmission lines. The basic framework they provide is useful, however, and was adapted for this analysis, applying professional judgment for how they should be used.

A finding of significant impacts does not mean the project cannot be allowed. It is not within the scope of visual impact assessments to determine which land use came first and what are the inherent property rights. The purpose of the visual assessment is to determine whether the visual change between existing and proposed conditions would result in a significant adverse visual effect. Therefore, changes in the intensity of adjacent uses or economic impacts to residential uses as a result of this project were not considered for the Phase 2 EIS.

The mitigation section explains that certain mitigation would be required by code or other regulations, while other mitigation measures would be at the discretion of the applicant to adopt or an agency to impose as part of the permitting process (see Section 3.2.6 of the Phase 2 Draft EIS). Color is identified as a potential mitigation measure that can be applied prior to construction. See bullet 7: “Design overhead transmission lines in a manner that is aesthetically compatible with surrounding land uses (City of Newcastle Plan Policy UT-P10). This could include design measures such as changes to pole

I1141-A-5

simulations of grey and brown color alternatives). The DEIS should include pole color as a mitigation tool.

I1141-A-5

PSE has also undertaken additional design work to refine pole placement, decrease pole height and use more streamlined pole designs. Based on this recent work, PSE has determined that pole height in the Somerset area for the Willow 1 option can be reduced from the 85 feet analyzed in the DEIS to an average of 75 feet in the area where the DEIS found a significant adverse impact. See Attachment B. This means that the poles installed under Willow 1 would be only around 10 feet taller as those analyzed under the Willow 2 Option, which was found not to cause a significant aesthetic impact.

PSE is also considering the use of a delta conductor configuration that uses less hardware rather than the arguably more impactful rectilinear design assessed in the DEIS. Compare DEIS at 3.2-72 with Attachment B. By limiting the area of visual impact and mirroring other natural elements, PSE can effectively mitigate aesthetic impacts.

PSE requests that the Partner Cities consider these additional mitigation options, including pole color, height and configuration, and conclude that aesthetic impacts in Somerset are now less than significant.

**D. Undergrounding a transmission line is not SEPA mitigation and requires public funding.**

Under SEPA, the Partner Cities may require that PSE undertake mitigation responsive to significant adverse impacts resulting from the construction of transmission lines. RCW 43.21C.060; WAC 197-11-660(1), (6) (mitigation must “mitigate specific adverse environmental impacts... [and] shall be reasonable and capable of being accomplished.”). To avoid a taking under the state and federal constitutions, mandatory mitigation must be tied to a specific impact and be proportionate to that impact. See, e.g., *Isla Verde Int'l Holdings, Inc. v. City of Camas*, 146 Wn. 2d 740, 761, 49 P.3d 867, 879 (2002); RCW 82.02.020; 82.02.050(3)(b) (applying to impact fees). “Responsibility for implementing mitigation measures may be imposed upon an applicant only to the extent attributable to the identified adverse impacts of its proposal.” WAC 197-11-660(1)(d) (emphasis added).

I1141-A-6

To the extent that the Partner Cities continue to find an adverse aesthetic impact to Somerset and Newcastle, the DEIS’s suggestion that the undergrounding of the transmission line is appropriate mitigation is erroneous. Requiring the undergrounding of a transmission line is not reasonable, feasible or proportionate.

The undergrounding of a segment of the Energize Eastside Project based solely on limited aesthetic considerations is *not reasonable in light of the other environmental impacts caused by undergrounding*. See Attachment C (PSE’s FAQ on Undergrounding). The undergrounding of the entire Energize Eastside Project was removed from

height, spacing, location, or color.” A reduced pole height in the Somerset area for Willow 1 would reduce the potential for adverse impacts. Updated simulations that show the new pole heights and configurations are presented and analyzed in the Final EIS. The impacts, while reduced compared to the design for the Willow 1 Option in the Phase 2 Draft EIS, are still considered significant.

I1141-A -6

The Phase 2 Draft EIS identifies potential significant impacts to visual resources; therefore, SEPA provides authority to require mitigation. The Phase 2 Draft EIS also identifies potential mitigation measures as required under SEPA. Undergrounding was one of several mitigation options proposed in the Phase 2 Draft EIS (see Section 3.2.6). Significant adverse impacts resulting from the Newcastle Segment could also be mitigated through the use of shorter poles that are placed more centrally within the easement, for example, but would require City of Newcastle variance approval. Significant adverse impacts resulting from the Willow 1 Option could also be reduced through the use of shorter poles, vegetation screening, or alternate pole design. Adverse impacts associated with undergrounding a 230 kV transmission line were evaluated programmatically in the Phase 1 Draft EIS. The Phase 2 Draft EIS did not limit the potential mitigation measures based on financial, scheduling, environmental, or permitting challenges that could accompany them. Each jurisdiction would need to address these issues in determining whether to impose mitigation using SEPA or other permitting authority. A description of the technical challenges and potential impacts associated with these mitigation measures has been added to Section 4.2.6 and Appendix M of the Final EIS, including a suggested approach that would avoid delaying the project.

PSE Energize Eastside  
DEIS Phase 2  
Page 8 of 12

consideration following Phase I of the DEIS; however, the specific impacts of undergrounding the Somerset and Newcastle segments would be analogous.

Undergrounding a high voltage transmission line is not the singular action of placing the line out of sight. It also entails the *permanent* removal of all vegetation and structures in the right-of-way. Undergrounding would also require obtaining new easements and the relocation of existing utilities (e.g., natural gas, sewer, water, and communication lines). Further, when undergrounding a high voltage transmission line, the conduit does not simply disappear and reappear. To move the conduit from an overhead configuration into underground vaults and back overhead, a transition station is required. A transition station would be required at each end of the undergrounded segment.

The DEIS offers up undergrounding as mitigation without considering whether the mitigation eliminates the impact or simply trades it out for a different but equal, if not more significant, impact. Undergrounding would also cause significantly higher construction impacts, including impacts to traffic. When considered in balance with the significant delay of designing and permitting an underground facility, such mitigation is not reasonable. *Id.*

Undergrounding is not feasible because underground construction of a 230 kV transmission line triggers Schedule 80. This Washington Utilities and Transportation Commission-approved tariff requires that the requesting party (i.e., Partner Cities) pay, in full at the start of design, for the delta between the cost of constructing a transmission line as proposed and constructing an underground transmission line. See Attachment D (containing Schedule 80); Attachment E (containing PSE's memo on the application of Schedule 80 to the Energize Eastside Project). At no point in the development of the Energize Eastside Project has a Partner City expressed or implied a willingness to cover the significant additional costs of undergrounding.<sup>9</sup> Additionally, based on current estimates, it would take at least six years for PSE to design, negotiate easements,<sup>10</sup> permit, procure materials, and construct underground transmission lines. Such a schedule would mean PSE would have a long-term plan for rolling blackouts until the new underground transmission lines are built. Because undergrounding lacks a funding source and requires more time than is currently available, this design change is not feasible and is not appropriately considered SEPA mitigation. See also, Attachment C (PSE's FAQ on Undergrounding).

<sup>9</sup> Construction costs for an overhead 230 kilovolt (kV) transmission line are about \$3 million to \$4 million per mile, versus \$20 million to \$28 million per mile for undergrounding.

<sup>10</sup> Undergrounding likely cannot be accomplished in the existing corridor.

I1141-A-6

PSE Energize Eastside  
 DEIS Phase 2  
 Page 9 of 12

I1141-A-6

Finally, requiring undergrounding based on limited and subjective impacts is not proportionate. As explained in footnote nine, at best, the undergrounding of each mile of transmission line imposes an addition \$16 million dollars to project construction costs. This does not include the increased costs of maintaining an underground facility. Requiring this mitigation is wholly out of scale with the limited, subjective aesthetic impacts alleged in Somerset and Newcastle.

**E. Energize Eastside is consistent with the City of Newcastle’s Comprehensive Plan**

The DEIS erroneously concludes that “the project would be inconsistent with the Newcastle Comprehensive Plan.” DEIS at 3.2-78. First, it is premature to make a final determination of Energize Eastside’s consistency with the City of Newcastle’s Comprehensive Plan as PSE has not submitted a permit application containing a final design.

Moreover, the state’s Growth Management Act’s (“GMA’s”) consistency review process ensures that the Energize Eastside project is consistent with the City of Newcastle’s Comprehensive Plan. The GMA requires that a local government’s development regulations be consistent with its comprehensive plan. *See, e.g.*, RCW 36.70A.030(3). State regulations set forth the purpose of a project consistency rule:

I1141-A-7

... A basic principle of the Growth Management Act (GMA) and the Local Project Review Act is that land use decisions made in adopting a comprehensive plan and development regulations under chapter 36.70A RCW should not be revisited during project review. When review of a project indicates that it is consistent with earlier land use decisions, that project should not be reevaluated or scrutinized with respect to whether those decisions were appropriate.”

WAC 365-197-010.

In other words, a use allowed by a local government’s zoning code presumptively complies with the local government’s comprehensive plan. Here, Newcastle’s code specifically provides for the construction of regional utilities, including the Energize Eastside Project, through a conditional use permit process. *See* NMC 18.44.050-.052. Accordingly, the City of Newcastle has already decided that transmission lines are consistent with the Newcastle Comprehensive Plan because such facilities are allowed as a conditional use. This decision should not be revisited through the Partner Cities’ project level review process.

The Energize Eastside Project’s consistency is further bolstered by Newcastle’s Comprehensive Plan, which contains provisions encouraging that PSE provide reliable

I1141-A -7 See response to comment number LL1-A-3. While the project may be consistent with some or even most policies in the Comprehensive Plan, that does not preclude the possibility that it may be in tension with other policies. A final assessment of the project’s consistency with the Comprehensive Plan will be made during the conditional use permit review process.

PSE Energize Eastside  
DEIS Phase 2  
Page 10 of 12

electrical service and the co-location of utilities. Specifically, the Comprehensive Plan provisions encourage PSE and the City of Newcastle to ensure reliable power:

*ED-2.* Infrastructure and Capital Facilities Adequate roads, utilities, and telecommunication facilities are fundamental to Newcastle's ability to attract and retain businesses as well as the jobs that go with them. While the short-term and long-term needs for these facilities are addressed in other plan elements, it is important that the City make constant progress in maintaining and updating these facilities.

*UT-P18.* The City should work with utility providers to expand, develop, and retrofit systems to provide reliable service for the citizens of Newcastle.

*UT-P12.* The City should encourage the replacement of outdated equipment with technologically updated or advanced alternatives, providing that the cost of the updated equipment is fiscally reasonable.

I1141-A-7

Newcastle's Comprehensive Plan also directs the identification of utility corridors and *requires* that compatible utilities be collocated in such corridors:

*LU-G13.* The City *shall* identify lands useful for public purposes such as utility and transportation corridors, landfills, sewage treatment facilities, storm water management facilities, recreation, schools, and other public uses. (emphasis added).

*UT-P3.* The City *shall promote collocation* of major utility transmission facilities such as high voltage electrical transmission lines and water and natural gas trunk pipe lines within shared utility corridors, to minimize the amount of land allocated for this purpose and the tendency of such corridors to divide neighborhoods. (emphasis added).

Accordingly, the City of Newcastle's Comprehensive plan not only contemplates PSE's use of the existing public right-of-way for the Energize Eastside Project, it *requires* that the City of Newcastle promote this option, notwithstanding alternative route options. In sum, the DEIS's statements of inconsistency are erroneous.<sup>11</sup>

<sup>11</sup> For the reasons stated above, if the City of Newcastle interprets its code in a way that requires taller transmission line poles or PSE to obtain a variance to reduce pole height, such an outcome should also be deemed consistent with its comprehensive plan.

**F. The City’s Economic Impact Analysis appropriately estimates impacts.**

The DEIS uses a hypothetical cost sensitivity methodology and considers whether a \$10 million decrease in the assessed values of homes would significantly impact the City of Newcastle, which is the smallest jurisdiction and is most vulnerable to impacts to tax revenue. DEIS at 3.10-1 (“The City of Newcastle was selected for the worst-case scenario because it has the smallest population (and therefore fewest property taxpayers and/or rate payers).”).

I1141-A-8

The DEIS selected a highly conservative number (\$10 million) in order to evaluate the potential impacts associated with the project. A \$10 million decrease in the assessed value of affected properties in Newcastle amounts to an \$116,000 decrease per home, or a 22.8% decrease in the median home value. *See* DEIS at 3.10-8 (explaining that a \$10 million decrease in assessed value “would have to decline an average of approximately \$116,000 per residence); DEIS at 3.10-9 (listing Newcastle’s 2014 median home value as \$509,300). Despite the fact that a 22.8% decrease in value is highly unlikely where residential values already include proximity to a transmission line, the DEIS appropriately concluded that the overall economic impact is less-than-significant, and would not affect Newcastle’s ability to provide services.

**G. Operating both lines at 230 kV reduces interaction with the Olympic pipeline**

The Energize Eastside Project is comprised of two lines—a high capacity 115 kV and a 230 kV line. DEIS at 2-10. PSE initially proposed that, in the near term, one line would operate at 115 kV and the other would operate at 230 kV. *Id.* Over time, both lines would operate at 230 kV. *Id.*

I1141-A-9

An independent safety study undertaken by DNV-GL concluded that potential interaction between the Energize Eastside Project and the Olympic pipeline is reduced if both transmission lines are operated at 230 kV. *See, e.g.*, DEIS at 3.9-45 (“While the total magnitude of current for the 115 kV/230 kV transmission lines is less than both circuits operating at 230 kV, the electrical current imbalance between the two circuits can result in overall higher levels of interference on nearby pipelines.”). Although, as DNV-GL and the DEIS conclude, there are no significant health and safety impacts from operating in the 115/230 kV configuration, PSE is considering mitigating any impact by running both lines at 230 kV from the outset of Project operation. DEIS at 3.9-55 (recommending operational mitigation measures). This operational decision would further reduce health and safety concerns related to the co-location of the Energize Eastside Project with the Olympic pipeline. *Id.*

I1141-A-10

The DEIS contemplates and analyzes impacts associated with operating both transmission lines at 230 kV. Additional design analysis indicates that implementing this mitigation would require rebuilding the existing Rose Hill substation from a 115 kV to 12.5 kV substation to a 230 kV to 12.5 kV substation. All of the anticipated work would

- I1141-A -8 Comment noted.
- I1141-A -9 The Final EIS evaluates PSE's Proposed Alignment, which assumes both lines would be operated at 230 kV.
- I1141-A -10 Comment noted. Work at the Rose Hill substation has been included in the Final EIS, Chapter 2.

I1141-A

COMMENT

RESPONSE

PSE Energize Eastside  
DEIS Phase 2  
Page 12 of 12

occur within the existing fenced areas and would not generate new impacts. Significantly, there are no additional aesthetic impacts from running a transmission line at 230 kV as opposed to 115 kV.

I1141-A-10

PSE greatly appreciates this opportunity to comment on the Partner Cities' DEIS. We look forward to working with the cities in the coming months on the next phase of this important and necessary project.

Respectfully submitted,

*Brad Strauch for*

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Energize Eastside Infrastructure Program Manager  
PUGET SOUND ENERGY

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Energize Eastside Phase 2 DEIS  
Annotated Comments*

Comment #	Page	Section	Paragraph or Figure	Comment
<b>GENERAL</b>				
1	II		First	The DEIS should describe the risk of power outages and creation of "temporary outages to protect the regional grid" as a component of the operation of the existing system (which is discussed briefly on pages 1-5 and 2-57) in the description of the No Action Alternative in the Summary of Alternatives and Options. Leaving out this key aspect of the No Action Alternative in the summary (and in some impact discussions such as economics), leads the reader to believe that the existing service will continue under existing conditions. This is misleading. Statements similar to the one made on page 2-57 and made their own impact analysis associated with anticipated temporary outages in later sections.
2	IV			PSE will apply for applicable local city or county government permits and approvals based upon the final project location and design.
<b>CHAPTER 1: INTRODUCTION AND SUMMARY</b>				
3	1-9	1.8.1	Bullets	The No Action Alternative will also require the development and implementation of a future load shedding plan, which plans for the potential need for rolling blackouts. A bullet should be added to reflect this component of the No Action Alternative.
4	1-13	Land Use and Housing	Operational Impacts – Second Bullet	The DEIS inaccurately states that the acquisition of easements in publicly owned recreation sites is a significant impact. City of Bellevue policies do not prohibit the acquisition of easements in recreation areas for utility purposes. Although a public review process is required, the code contemplates and permits obtaining such easements. As the granting of such easements is permitted, it does not cause a significant impact.
5	1-15	Operational Impacts	3 <sup>rd</sup> Bullet	The DEIS's statement that residential viewers and recreation areas users have the highest viewer sensitivity is inaccurate. Where the Energize Eastside Project proposes the continued use of the existing corridor, residential and recreation users should already be accustomed to the presence of transmission lines. The corridor has been in place since the 1920s. Recreation facilities and informal uses have been built up through, along, and

II141-A -11 As stated on page 2-3 of the Phase 2 Draft EIS:  
"Implementation of the No Action Alternative would not meet PSE's objectives for the proposed project, which are to maintain a reliable electrical system and to address a deficiency in transmission capacity on the Eastside. Implementation of the No Action Alternative would increase the risk to the Eastside of power outages or system damage during peak power events." As stated on page 1-13 of the Phase 2 Draft EIS under the No Action Alternative: "Potential inconsistency with the Growth Management Act and Comprehensive Plan policies that require planning for utilities to accommodate anticipated growth." The scope of the economics chapter did not include an assessment of the potential impacts to the local economy as a result of the No Action Alternative. Additional analysis is provided in the Phase 1 Draft EIS, Section 16.7.2 (No Action Alternative), on page 16-29, which states: "Under the No Action Alternative, less reliable service could result in power disturbances and, without additional capacity in the near future, increase the likelihood of power outages during extreme temperature periods in both summer and winter. As a result, the No Action Alternative could result in significantly reduced reliability of electrical service to some areas..."

II141-A -12 Comment noted.

II141-A -13 Clarification has been added to Chapter 2 of the Final EIS.

II141-A -14 It is correct that City of Bellevue policies do permit the acquisition of easements in recreation areas for utility purposes. However, many recreational sites have been purchased with federal, state, or local grants, bonds, or other funding sources. The funding usually comes with provisions that protect the land for recreation in perpetuity. The conversion of recreation land purchased with restricted funds for non-recreation purposes would need to meet parcel-specific requirements. PSE's ability to acquire an easement or purchase a recreation site for non-recreation use would require an evaluation process that would be contingent upon approval from the property owner and grant agency or agencies. The City of Bellevue judged that the use of land purchased with funds exclusively for open space purposes for transmission line purposes could be a significant impact, given the potential scale of such use for Energize Eastside, along with other effects that such use could have on park enjoyment. Just because an activity may be allowed by permit does not preclude it from having significant impacts.

**Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments**

Comment #	Page	Section	Paragraph or Figure	Comment
II141-A-15				around the corridor. In many cases, the corridor is part of the recreation facilities or facilities the presence of the trail. The DEIS should be updated to more accurately reflected baseline conditions and to characterize impacts relative to the baseline.
II141-A-16	6	1-15	Mitigation Measures	5 <sup>th</sup> bullet Undergrounding of transmission lines can create ground-based changes to aesthetics when a corridor outside of developed areas, such as roadways, are used. Undergrounding can entail the <u>permanent</u> removal of all vegetation and structures in the entire right-of-way for safety reasons. Undergrounding would require obtaining new easements and the relocation of existing utilities (e.g., natural gas, sewer, water, and communication lines). Further, when undergrounding a high voltage transmission line, the conduit does not simply disappear and reappear.
II141-A-17	7	1-17	Water resources summary sheet	Streams and Rivers Clarify that only the Lower Kelsey Creek is in the shoreline environment.
II141-A-18	8	1-23	Unavoidable Impacts	As stated above, the acquisition of easements in publicly owned recreation sites is not a significant impact because the City of Bellevue's recreation plans and policies do not prohibit the acquisition of such easements. Although a public review process is required, because the code contemplates and permits it, obtaining an easement is not non-compliant with the cited policies and will not result in a significant adverse impact.
II141-A-19	9	1-29	Mitigation	This section should state that using a route with the fewest number of divergent points between the transmission lines and the pipeline(s) can reduce the level of AC interference between the two utilities (see page 31 of the DNV-GL report).
II141-A-20	10	1-31	No Action Alternative	Bullet 1 Development of a load shedding plan should be considered in the impact summary for the No Action Alternative.
<b>CHAPTER 2: PROJECT ALTERNATIVES</b>				
II141-A-21	11	2.3	2.1.1	1st "PSE would undertake to serve the project objectives without requiring the issuance of state or local permits (something PSE could build or undertake if the proposed project is not approved)." More often than not, maintenance of the PSE transmission lines involving pole or equipment replacement requires local, state, or federal permit approval;

II141-A -15 Viewer sensitivity was determined by examining *viewer exposure* and *viewer awareness*. Awareness considers viewer attention and focus, and whether affected views are protected by policy, regulation, or custom (such as local covenants relating to views or aesthetics). It was assumed that two groups were the most sensitive to changes in the aesthetic environment and scenic views: residents, and recreational users in parks and other recreational settings. These two groups would have the greatest exposure to the project of all of the viewers because they are often near the project and would frequently observe the project over longer durations (particularly residential viewers). In addition, they were more likely to be protected through Partner City comprehensive plans and policies. The fact that the project would be sited in an area that already has a transmission line was considered when determining the degree of contrast. Additional details on the methodology are presented in Section 3.2.3 and Appendix C of the Phase 2 Draft EIS.

II141-A -16 See responses to comments II141-A-41 and II141-A-90.

II141-A -17 Section 3.3.2.1 of the Phase 2 Draft EIS lists some of the mapped streams and rivers in the study area. Some of these streams also have associated floodplains, but it is not discussing their status as a shoreline of the state. Not all of Kelsey Creek is a Shoreline of the State; this is discussed in Section 3.3.5 of the Phase 2 Draft EIS, under the subheading Shoreline for each segment. PSE's Proposed Alignment would not be within the shoreline of Kelsey Creek. See Section 4.3 in the Final EIS.

II141-A -18 See response to comment II141-A-14.

II141-A -19 This information has been added to the Final EIS.

II141-A -20 Potential impacts from load shedding under the No Action Alternative are discussed in the Phase 1 Draft EIS and Phase 2 Draft EIS. Although not specifically discussed, it is assumed that PSE would develop a plan for doing so to minimize adverse effects on their customers to the extent possible.

II141-A -21 This has been addressed in Chapter 3, Errata, of the Final EIS.

*Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments*

Comment #	Page	Section	Paragraph or Figure	Comment
II141-A-21				particularly if there is work in or near a critical area. The DEIS should acknowledge that PSE's energy infrastructure will require maintenance and permitting even under the No Action Alternative.
II141-A-22	12	2-3	2.1.1	2nd Since under the No Action Alternative there would be a load shedding plan developed (creating temporary outages to protect the grid), the system would not necessarily be managed in the same manner.
II141-A-23	13	2-7	2.1.2.1	Figure 2.1-2 The proposed 115 kV Corridor should be labeled "Existing 115 kV Corridor".
II141-A-24	14	2-8	2.1.2.1	2nd It will be necessary to replace the existing culvert under the driveway adjacent to SE 30 <sup>th</sup> Street. The replacement culvert will be fish passable, serving as mitigation for potential wetland and stream impacts related to construction of the Richards Creek substation and associated transmission lines.
II141-A-25	15	2-9	2.1.2.1	5th "Landscaping is expected to be installed along the western substation boundary, with natural screening used along the north, east, and south boundaries." The western boundary is made up of critical areas that will be enhanced as part of the culvert replacement mitigation.
II141-A-26	16	2-11	2.1.2.2	2nd The DEIS states that some portion of the corridor is co-located with other transmission line poles and structures, and the line also crosses and/or runs parallel to other transmission line corridors (some contain lattice towers). The DEIS should consider how proposed reductions from four to two poles reduces visual clutter that is part of the environmental baseline.
II141-A-27	17	2-13	2.1.2.2	2nd In addition to lighting strikes, the shield wire protects against system faults.
II141-A-28	18	2-46	2.1.3.2	5th The DEIS should clarify that the existing driveway and access road are the same thing.
II141-A-29	19	2-49	2.1.3 Pole Installation	2nd Although use of vacuum trucks is just one of the tools used to install poles. When safe, a standard auger would likely be used.
II141-A-30	20	2-49	2.1.3 Pole Installation	2nd PSE is refining the transmission line design in an effort to reduce ground disturbance, including the number of poles that require engineered foundations. Engineered foundations are typically required at angle and dead-end poles, so they cannot be eliminated.
II141-A-31	21	2-53	2.2.2	5th As stated in Schedule 80 of the WUTC Tariff, the requesting agency is responsible for the delta in cost for undergrounding transmission lines. It is important to note that this cost

- II141-A -22 This has been clarified in Chapter 2 of the Final EIS.
- II141-A -23 The figure has been revised in the Final EIS with the correct label.
- II141-A -24 Additional information about the replacement culvert has been incorporated into the Final EIS in Section 4.4.5.2.
- II141-A -25 Natural screening would be used along all boundaries. Additional information has been incorporated into the Final EIS; see Section 4.4.
- II141-A -26 Reduction in visual clutter is evaluated, including the potential for the project to reduce visual clutter in the corridor by reducing the number of poles from existing conditions (see Section 3.2.5 of the Phase 2 Draft EIS).
- II141-A -27 This has been clarified in the Final EIS (see Section 2.1.2).
- II141-A -28 This has been clarified in the Final EIS (see Section 2.1.2).
- II141-A -29 This has been clarified in the Final EIS (see Section 2.1.3).
- II141-A -30 Construction details based on the refined design are included in the Final EIS; see Section 2.1.3.
- II141-A -31 Comment noted.

**Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments**

Comment #	Page	Section	Paragraph or Figure	Comment	
II141-A-31				sharing responsibility applies even when undergrounding is required as part of a permit condition.	
II141-A-32	22	2-53	2.2.2	Last	As set forth in detail in PSE DEIS Comment cover letter, the associated challenges with undergrounding segments are understated. Selection of a new corridor, ground disturbance, vegetation removal, financial responsibility to the requesting party, as well as material availability, all need to be considered.
<b>CHAPTER 3: LONG-TERM (OPERATIONAL) IMPACTS AND POTENTIAL MITIGATION</b>					
II141-A-33	23	3.1-1		1st	Example of long-term impacts for tree removal would only be realized if no tree replacements were planted. This impact can be fully mitigated through tree replacement.
II141-A-34	24	3.1-19	3.1.3.1	4th	The DEIS states that, "however, PSE would allow these transmitters to be replaced on the new poles, so no impacts are expected." This is subject to jurisdiction permit approval for the wireless facilities and the ability to meet carrier coverage objectives in the new location.
II141-A-35	25	3.1-21	3.1.5.2	3 <sup>rd</sup> , line 2	It should be noted that there will be no significant impacts to recreation (conversion of recreation properties in Bellevue can be approved through a public process).
II141-A-36	26	3.1-46	3.1.6.1	2 <sup>nd</sup> , 4 <sup>th</sup> bullet	All proposed corridors have existing aerial utilities (except SE 38 <sup>th</sup> Street); accordingly, the majority of the options are consistent with the various comprehensive plans. As set forth in detail in PSE's DEIS comment cover letter, undergrounding the transmission lines would not be appropriate mitigation.
II141-A-37	27	3.2-76	3.2.5.13	Table 3.2-6	Table is comparing impacts to Somerset only, not the entire route.
II141-A-38	28	3.2-77	3.2.5.14	1st	The proposed poles would not be closer to neighboring residences than the existing poles.
II141-A-39	29	3.2-82	3.2.5.15	4th	There is only one SCL crossing in the Renton segment, just south of the intersection of 126 <sup>th</sup> Ave SE with NE 25 <sup>th</sup> St. The approach used in the DEIS conservatively portrays impacts as further engineering is required to determine if the project would require raising the existing SCL towers.
II141-A-40	30	3.2-87	3.2.6.1	2nd	Bullet 3 – Clarify that sight screening requirement does not apply to transmission lines (as stated in the code).
II141-A-41	31	3.2-88	3.2.6.2	Bullet list	Undergrounding the transmission line is proposed as mitigation for visual impacts, however, the associated challenges with this approach are understated. Selection of a

- II141-A -32 See response to comment II141-A-6.
- II141-A -33 Comment noted.
- II141-A -34 Language clarifying the role of local jurisdictions regarding telecommunication facilities has been included in the Final EIS.
- II141-A -35 See response to comment II141-A-14.
- II141-A -36 See response to comment II141-A-6.
  
- II141-A -37 Table 3.2-6 summarizes the impact determinations described in Sections 3.2.5.9, 3.2.5.10, 3.2.5.11, and 3.2.5.12 (i.e., the Bellevue South Options). It does not only summarize impacts to Somerset; however, because there are significant aesthetic impacts in Somerset as a result of the Willow 1 Option, it means there is a higher potential for impacts under that alternative.
- II141-A -38 Comment noted; the text has been revised to clarify. See response to comment II141-A-91.
- II141-A -39 During the development of the Phase 2 Draft EIS, potential crossings of the proposed 230 kV transmission line and the SCL line were identified based on high-level GIS analysis. The statement that crossings would only occur at the intersection of 126th Ave SE with NE 25th St is a clarification that has been added to the Final EIS in Section 4.2.5.9.
- II141-A -40 BCC 20.20.255.A states that the "purpose of this section is to regulate proposals for new or expanding electrical utility facilities and to minimize impacts associated with such facilities on surrounding areas through siting, design, screening, and fencing requirements." Electrical utility facilities include transmission lines "of at least 115 kV that distribute electrical power to and from transmission switching and transmission stations to and from distribution substations, and which link generators to such stations." BCC 20.50.018. Pursuant to BCC 20.20.255.G, the City is authorized to "impose conditions relating to the location, development, design, use, or operation of an electrical utility facility to mitigate environmental, public safety, or other identifiable impacts." Only site landscaping and fencing are identified as design standards that are not appropriate for application to transmission lines. BCC 20.20.255.F.

**Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments**

Comment #	Page	Section	Paragraph or Figure	Comment
II141-A-41				new corridor, ground disturbance, vegetation removal, financial responsibility to the requesting party, as well as material availability all need to be considered.
II141-A-42	32	3.3-3	3.3.1	1-2 PSE will comply with applicable jurisdiction critical areas ordinances as they apply to the specific design and location of the project at the time of land use permit submittal and vesting.
II141-A-43	33	3.3-3	3.3.2.1	1 Reference to streams in the study area under the jurisdiction of King County contradicts opening paragraph under section 3.3.1 stating there are no water resources in the study area in unincorporated King County. No wetland or stream critical areas are present in the unincorporated King County study area corridor.
II141-A-44	34	3.3-4	3.3.2.1	Table 3.3-1 Stream types should be presented as "Type F", "Type N" etc. not "F-Type" or "N-Type".
II141-A-45	35	3.3-4	3.3.2.1	Table 3.3-1 Other streams are located on the Richards Creek Substation site (Streams A, B, and F) which are not presented in Table 3.3-1. These have been previously delineated and they are described and depicted in the Energize Eastside Delineation Report as well as the 2014 Delineation Report for PSE Lakeside Substation. See Attachment F (containing the Richards Creek Substation Delineation Study).
II141-A-46	36	3.3-7	3.3.2.2	Table 3.3-2 Footnote incorrectly states that wetland ratings are per the 2014 Rating System. They are rated using the 2004 Rating System.
II141-A-47	37	3.3-7	3.3.2.2	Table 3.3-2 There are other wetlands located on the Richards Creek Substation site which are not included in the table. Wetland E (the small wetland in the northeast portion of the site) which is proposed to be filled, and a small portion of Wetland A (near northeast property line) are not presented in the table or figure. These are delineated, described and depicted in the 2014 Delineation Report for the PSE Lakeside Substation. A comprehensive updated delineation of the Richards Substation parcel is attached as Attachment F (containing the Richards Creek Substation Delineation Study).
II141-A-48	38	3.3-12	3.3.4	
II141-A-49	39	3.3-12	3.3.5.1	P2, line 2 No poles will be located in streams.
II141-A-50	40	3.3-14	3.3.5.2	All, including The discussion does not include the fill proposed to Wetland E. Wetland E is also not shown on the figure. Stream/wetland buffer line on figure should also change to include

II141-A -41 Section 2.2.2 of the Phase 2 Draft EIS notes that underground transmission lines involve several technical challenges that would necessitate acquiring a new or expanded right-of-way, including greater restrictions on surface vegetation and uses than are present in PSE’s existing 115 kV right-of-way. It also states that underground lines require larger conductors, and are more costly to construct, repair, and maintain. Financial responsibility being placed on the requesting party is described in Section 3.10 of the Phase 2 Draft EIS. Although this option was not considered reasonable as an alternative for the entire corridor, it is considered as an option for mitigation in limited areas, should one or more jurisdictions determine that it was necessary to avoid significant impacts. Impacts generally associated with the undergrounding of the transmission lines are addressed in the Phase 1 Draft EIS (in the analysis of Option C). For impacts associated with acquiring a new corridor, see Chapter 10. For impacts associated with ground disturbance, see Chapter 3; for impacts associated with vegetation removal, see Chapter 6. For visual impacts, see Chapter 11. Also see response to comment II6-A-1.

II141-A -42 Comment noted.

II141-A -43 There are no known wetlands or streams within the unincorporated King County portion of the study area; however, PSE is required to comply with King County regulations. The text has been clarified in the Final EIS.

II141-A -44 Comment noted, and the designations have been revised in the Final EIS.

II141-A -45 This information was not available during the development of the Phase 2 Draft EIS. The Final EIS has been updated with the new information provided in the Richards Creek Substation Delineation Report from the Watershed Company (June 2017).

II141-A -46 The footnote has been revised in Table 4.3-2 of the Final EIS to be more clear.

- II141-A -47 The Phase 2 Draft EIS was based on information provided by PSE. The text of the 2016 Critical Areas Delineation Report from the Watershed Company does not include Wetlands A and E at the Richards Creek substation site (see pages 45 and 46 of that report). The 2016 report states that the data from the 2014 Lakeside delineation were integrated into it. The June 2017 report that was provided after the publication of the Phase 2 Draft EIS includes Wetland A and E, but they have been renamed (Wetland A is now Wetland C and Wetland E is now Wetland B). Table 4.3-2 and Section 4.3.5.2 in the Final EIS have been updated with the latest information about wetlands at the Richards Creek substation site.
- II141-A -48 This has been addressed in the Final EIS (see Section 2.1.1).
- II141-A -49 The text in the Phase 2 Draft EIS states that the preliminary design indicated that some poles would be located in streams, but PSE would move poles to avoid impacts to streams. See Section 4.3 in the Final EIS, which indicates that no poles would be located in streams.
- II141-A -50 See response to comment II141-A-47.

*Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments*

	Comment #	Page	Section	Paragraph or Figure	Comment
I1141-A-50				figure with no label	Wetland E. This change would need to be applied throughout the document. See Attachment F (containing the Richards Creek Substation Delineation Study).
I1141-A-51	41	3.3-14	3.3.5.2	1	PSE is looking at adjustments to the proposed design to avoid pole wetland impact to the greatest extent feasible.
I1141-A-52	42	3.3-14	3.3.5.2	1	Stream C – in addition to realignment of the roadway and the new culvert, new conduits (3-4-inch diameter) will be installed in the roadway for fiber and secondary distribution into the substation. These conduits will need to be installed under the existing and/or new culverts (dependent upon construction sequencing). Most likely, the conduit will be directionally drilled under the culvert(s) within a casing (approximately 12-inches).
I1141-A-53	43	3.3-16	3.3.5.3		The DEIS's description of the Redmond Segment does not appear to account for the Willows Creek project. Puget Sound Energy (PSE) proposes to reestablish a Willows Creek stream channel to improve site drainage and riparian habitat in an active utility corridor south of the Sammamish substation. Over time, sedimentation has altered the stream flow path across the site and the channel is generally no longer defined. Due to sedimentation, portions of the flow are diverted away from the former alignment and enter a tributary stream at the southern boundary of the site. The tributary does not have capacity for additional flow, resulting in flooding of adjacent properties.  The overall project goal is to reduce flooding and enhance habitat by reestablishing the stream channel, while preserving PSE's ability to maintain and use the site as an active transmission corridor. The project will provide a riparian buffer and floodplain, enhance in-stream habitat conditions, enhance flood conveyance and material transport, reduce sedimentation and increase fish habitat. The project also proposes to replace an existing culvert with a fish passable conveyance, dependent upon agreement by all property owners at the culvert location.
I1141-A-54	44	3.4-1	3.4	Bullet 9	Unclear which websites and datasets this is referring to. Please clarify source(s).
I1141-A-55	45	3.4-6	3.4.1.3	2 <sup>nd</sup>	The DEIS needs to be updated to reflect the current PSE Standard, which allows taller species where terrain conditions allow. Vegetation within the wire zone (the area

- I1141-A -51 Comment noted; see Section 4.3 of the Final EIS.
- I1141-A -52 Measures to avoid or mitigate impacts to Stream C have been included in the Final EIS, Section 4.3, as appropriate.
- I1141-A -53 The Phase 2 Draft EIS was based on information provided by PSE on PSE's projects. The Final EIS includes new information provided since the Phase 2 Draft EIS, including information on the Willows Creek restoration project; see Table 4.3-1 of the Final EIS.
- I1141-A -54 More detailed citations and references have been included in the Final EIS; see Section 4.4.
- I1141-A -55 This updated information has been included in the Final EIS, Section 4.4.1.1.

II141-A -56 This updated information has been included in the Final EIS, Section 4.4.1.1.  
 II141-A -57 The text has been clarified in the Final EIS, Section 4.4.  
 II141-A -58 See response to comment II141-A-47.

*Puget Sound Energy, Inc.  
 Energize Eastside Phase 2 DEIS  
 Annotated Comments*

Comment #	Page	Section	Paragraph or Figure	Comment
II141-A-55				underneath transmission conductors extending out approximately 10 feet past the footprint of the conductors) with a mature height greater than 15 feet will be removed, unless terrain conditions allow at least 20 feet of clearance between the conductor and the mature height of the vegetation under all Rated Electrical Operating Conditions.  Vegetation in the border zone (the area between the wire zone and the edge of the defined ROW) will be pruned to maintain 16' of clearance at all times (11.5' of blowout + 4.3' MVCD). In the event that the MVCD for any given span is located outside the defined ROW, vegetation will be pruned to the edge of the defined ROW.
II141-A-56	46	3.4-7	3.4.1.3	Fig. 3.4-3 The DEIS needs to be updated to reflect the current PSE Standard, which allows taller species where terrain conditions allow. Vegetation within the wire zone (the area underneath transmission conductors extending out approximately 10 feet past the footprint of the conductors) with a mature height greater than 15 feet will be removed, unless terrain conditions allow at least 20 feet of clearance between the conductor and the mature height of the vegetation under all Rated Electrical Operating Conditions.  Vegetation in the border zone (the area between the wire zone and the edge of the defined ROW) will be pruned to maintain 16' of clearance at all times (11.5' of blowout + 4.3' MVCD). In the event that the MVCD for any given span is located outside the defined ROW, vegetation will be pruned to the edge of the defined ROW.
II141-A-57	47	3.4-10	3.4.2.2	3 <sup>rd</sup> starting with "several large avian species..." This is not true. Although there are no eagle, heron, osprey, or peregrine falcon nests shown in the project corridor in the WDFW PHS database, this data is not kept up-to-date and all of these species are known to occur in the area and increasingly in developed/urban areas. They do not require open field foraging areas or open water for nesting habitat. (red-tailed hawks, although protected, are not a species of concern so their nests are not well-documented).
II141-A-58	48	3.4-19	3.4.5.2	Whole Section Same comment as above for section 3.3.5.2 – Map does not look like it includes all surveyed wetlands. Wetland E is missing, which is proposed to be filled. Buffer line needs

*Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments*

Comment #	Page	Section	Paragraph or Figure	Comment	
II141-A-58				to be adjusted accordingly as well. See Attachment F (containing the Richards Creek Substation Delineation Study).	
II141-A-59	49	3.4-19	3.4.5.3	<p>Third bullet – stream habitat will be enhanced with Willows Creek project. PSE proposes to reestablish a Willows Creek stream channel to improve site drainage and riparian habitat in an active utility corridor south of the Sammamish substation. Over time, sedimentation has altered the stream flow path across the site and the channel is generally no longer defined. Due to sedimentation, portions of the flow are diverted away from the former alignment and enter a tributary stream at the southern boundary of the site. The tributary does not have capacity for additional flow, resulting in flooding of adjacent properties.</p> <p>The overall project goal is to reduce flooding and enhance habitat by reestablishing the stream channel, while preserving PSE’s ability to maintain and use the site as an active transmission corridor. The project will provide a riparian buffer and floodplain, enhance in-stream habitat conditions, enhance flood conveyance and material transport, reduce sedimentation and increase fish habitat. The project also proposes to replace an existing culvert with a fish passable conveyance, dependent upon agreement by all property owners at the culvert location.</p>	
II141-A-60	50	3.6-1	3.6.1	2nd	The last two sentences are contradictory to one another. They state that cities discourage use of recreation sites for non-recreational uses, but at the same time state that the use of non-recreational sites such as utility corridors are encouraged for recreational users; therefore, making these corridor recreational sites.
II141-A-61	51	3-6.10	3.6.5.1	3, last sentence	None of the policies in listed in Appendix F for the City of Bellevue prohibit acquisition of easement for another use. Many policies emphasize protecting and retaining vegetation and avoiding when reasonable locating overhead line in greenbelts and open spaces, but it doesn’t outright prohibit use (a public review process is available for proposed conversions). And, two of the policies listed encourage the City of Bellevue to use utility corridors for recreation purposes. The acquisition of easements in publicly owned recreation sites would not be in noncompliance with the Bellevue recreation plans and policies. As such, it would not be significant. This needs to be fixed in the following

II141-A -59 This information has been included in the Final EIS (see Section 4.3).

II141-A -60 This paragraph discusses two types of land use policies. The first two sentences are discussing policy for greenbelts or open spaces that are recreation sites, and the use of these recreation sites for utilities. The last sentence applies to lands that are already utility corridors, and the use of these utility corridors for recreation.

II141-A -61 See response to comment II141-A-14.

**Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments**

Comment #	Page	Section	Paragraph or Figure	Comment
II141-A-61				sections of this chapter: 3.6.5.6; 3.6.5.7; 3.6.5.8; 3.6.5.9; 3.6.5.10; 3.6.5.12.
II141-A-62	52	3.8-1	3.8.1	Footnote 1 The DEIS states that "...magnetic fields are not coupled or interrelated in the same way they are at higher frequencies." Remove "or interrelated".
II141-A-63	53	3.8-10	3.8.2	1 <sup>st</sup> paragraph, last sentence The statement "(1) portions of the segment have three conductors within the corridor, while other segments only have two conductors..." is incorrect. The FEIS should state: (1) portions of the segment have three structures within the corridor, while other segments only have two structures...
II141-A-64	54	3.8-20	3.8.5.1	2 <sup>nd</sup> paragraph, last sentence To clarify, magnetic fields are significantly less than the reference guidelines as opposed to low enough to avoid known health effects.
II141-A-65	55	3.8-20	3.8.5.1	2 <sup>nd</sup> and 3 <sup>rd</sup> paragraph Since ICNIRP is included in the reference guidelines it is not "industry" guidelines. The term "reference" guidelines should have been used in place of "industry" guidelines.  It should be noted that the highest EMF level is 200 mG, which is more than ten times less than the reference standard of 1,800 mG.
II141-A-66	56	3.8-34	3.8.6	PSE will employ and optimize the geometry of the phase conductors wherever possible.
II141-A-67	57	3.9-48	3.9.6	The DEIS should acknowledge that potential impacts caused by a pipeline explosion or fire can be independent of the fact there is a transmission line present.
II141-A-68	58	3.9-53	3.9.7.1	2nd Recommendations provided by DNV-GL to minimize AC interaction with the pipeline include the following engineering aspects: initially operate both lines at 230 kV rather than 230/115 kV; minimize points of pipeline and transmission line divergents along the corridor; use a delta conductor configuration; and locate pole grounds away from the pipeline(s).
II141-A-69	59	3.9-54	3.9.7.2	10 <sup>th</sup> bullet To clarify, any pipeline monitoring systems would need to be designed and installed by OPL, as they determine necessary.
II141-A-70	60	3.9-54	3.9.7.2	12 <sup>th</sup> bullet This recommendation would be accomplished through installing the pole grounds at appropriate distance from the pipeline based on engineering analysis.
II141-A-71	61	3.9-55	3.9.7.2	1 <sup>st</sup> bullet on To clarify, PSE can provide modeling and engineering information to OPL; however, the

- II141-A -62 Comment noted, and the information has been added to Chapter 3, Errata, of the Final EIS.
- II141-A -63 Comment noted, and the information has been added to Chapter 3, Errata, of the Final EIS.
- II141-A -64 The comment refers to the following statement in the Phase 2 Draft EIS: "Although no mitigation measures are identified to reduce magnetic field strengths for portions of the project along new corridors, the calculated magnetic field levels would be sufficiently low enough to avoid known health effects, and therefore considered consistent with Bellevue and Redmond policies." It is correct that the magnetic fields are substantially lower than reference guidelines; therefore, we have clarified this statement in the Final EIS (see Section 4.8.5).
- II141-A -65 It is correct that reference guidelines should be used in place of industry guidelines. This has been clarified in the Final EIS (see Chapter 3, Errata, and Section 4.8, operational Impacts). Additional discussion on how much lower the anticipated magnetic field levels are compared to referenced guidelines has been added to the Final EIS (Section 4.8.5, Operational Impacts).
- II141-A -66 Comment noted.
- II141-A -67 As the commenter notes, there are risks associated with pipelines that are independent of the presence of transmission lines. This has been clarified in the Final EIS; see Section 4.9 of the Final EIS.
- II141-A -68 PSE's Proposed Alignment presented in the Final EIS now incorporates the DNV-GL recommendations. PSE's Proposed Alignment would operate both lines at 230 kV, and the transmission line would remain in the same position relative to the pipelines as the existing transmission line, thereby not increasing the number of points of divergence with the pipelines. PSE's Proposed Alignment would use a delta conductor configuration for most pole types. Based on the DNV GL recommendations, PSE revised the design from that presented in the Phase 2 Draft EIS to ensure that all poles would be at least 13 feet from the pipelines, because this was the maximum calculated arc distance necessary to prevent arcing between the poles and the pipelines, based on soil conditions in the corridor. If the modeled conditions are correct, there would be no risk of arcing damage. In addition, actual arc distances for steady state fault conditions will be confirmed at each pole once the poles are installed. Where necessary, pole grounds would be installed to provide adequate separation from the pipelines. An additional mitigation measure, requiring modeling prior to installation, would ensure that pole grounding meets NACE standards. See Final EIS Section 4.9.8, *Mitigation Measures*.

*Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments*

Comment #	Page	Section	Paragraph or Figure	Comment
I1141-A-71			page	monitoring and subsequent mitigation (if warranted) would be the responsibility of OPL. PSE can provide a plan that outlines the information that can be shared with OPL that could assist with monitoring and/or mitigation.
I1141-A-72	62	3.9-55	3.9.7.2 Start-up 1 <sup>st</sup> bullet	It has not been determined that an AC mitigation system will be required. AC monitoring and installation of any AC mitigation would be the responsibility of OPL.
I1141-A-73	63	3.9-55	3.9.7.2 Start-up 3 <sup>rd</sup> bullet	Site surveys to assess AC interference risks would be the responsibility of OPL.
I1141-A-74	64	3.9-55	3.9.7.2 Operation 2 <sup>nd</sup> bullet	PSE does not and cannot control OPLs monitoring or mitigation efforts.
I1141-A-75	65	3.9-55	3.9.7.2 Operation 3 <sup>rd</sup> bullet	PSE can inform OPL when peak loading is expected. PSE does not and cannot control OPLs monitoring or mitigation efforts.
<b>CHAPTER 4: SHORT-TERM (CONSTRUCTION) IMPACTS AND POTENTIAL MITIGATION</b>				
I1141-A-76	66	4.1-1	Intro	"Under the No Action Alternative, no construction would occur." The DEIS should acknowledge that maintenance of existing lines includes pole replacement and access disturbance.
I1141-A-77	67	4.3-1	4.3.2.1	2 The first sentence is incorrect. There is wetland fill proposed for the substation (Wetland E, missing from figures in EIS). See Attachment F (containing the Richards Creek Substation Delineation Study).
I1141-A-78	68	4.3-1	4.3.2.1	Whole section No discussion of impacts related to culvert replacement. See Attachment F (containing the Richards Creek Substation Delineation Study).
I1141-A-79	69	4.3-4	4.3.2.3	Table 4.3-1 Does not address wetland fill for substation or culvert replacement. See Attachment F (containing the Richards Creek Substation Delineation Study).
I1141-A-80	70	4.3-10	4.3.3	1 The first sentences states, "The following construction-specific mitigation measures would be required or could be imposed to reduce construction impacts to water resources." The third sentences states there are no potential mitigation measures proposed to reduced construction related impacts to water resources. This paragraph should be written more clearly to state that mitigation measures are not required because existing regulations and standard construction BMPs would alleviate any potential impacts.
I1141-A-81	71	4.4-4	4.4.2.2	Discussion Wetland impacts will occur through the filling of Wetland B for the substation

- I1141-A -69 This clarification has been made in the Final EIS; see Section 4.9.8.
- I1141-A -70 This clarification has been made in the Final EIS; see Section 4.9.8.
- I1141-A -71 This clarification has been made in the Final EIS; see Section 4.9.8.
- I1141-A -72 This clarification has been made in the Final EIS; see Section 4.9.8.
- I1141-A -73 This clarification has been made in the Final EIS; see Section 4.9.8.
- I1141-A -74 Based on this, and other comments by PSE and representatives of Olympic, these roles and responsibilities have been further clarified in the Final EIS; see Section 4.9.8.
- I1141-A -76 For the purposes of the Phase 2 Draft EIS, impacts associated with routine maintenance of the existing transmission lines (e.g., occasional replacement or repair of poles, wires, and related equipment or any disturbance caused when conducting these activities) are assessed as part of Chapter 3, Long-Term (Operation) Impacts and Potential Mitigation. Clarifying text has been added to the Final EIS.
- I1141-A -77 See response to comment I1141-A-47.
- I1141-A -78 The Phase 2 Draft EIS was based on information provided by PSE on PSE's projects. The Final EIS includes new information provided since the Phase 2 Draft EIS, including information on the culvert replacement (see Section 2.1.2.1 and 2.1.3.2 of the Final EIS).
- I1141-A -79 See responses to comments I1141-A-78 and I1141-A-47.
- I1141-A -80 See Section 5.3.3 in the Final EIS, which includes additional information on the mitigation approach.
- I1141-A -81 See responses to comments I1141-A-78 and I1141-A-47.

*Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments*

Comment #	Page	Section	Paragraph or Figure and Table	Comment	
II141-A-81			4.4-1	development and a portion of Wetland A for the culvert replacement project. Wetland B is isolated and less than 2,500 square feet in size and provides marginal habitat value.	
II141-A-82	72	4.4-4	Table 4.4-1	Culvert replacement project will enhance habitat. PSE is planning to replace and upgrade the culvert carrying a small, perennial stream beneath the access road to the Richards Creek substation site located at the end of SE 30 <sup>th</sup> Street. A pair of aging and undersized culverts (two side-by-side, 18-inch corrugated metal pipe culverts) have proven inadequate to carry the combined flow and sediment loading along the stream. The scope of the proposed project includes a new culvert crossing and restoring and enhancing affected adjoining habitat areas. These include affected wetlands and the realigned and enhanced stream sections extending upstream and downstream of the crossing.  Construction associated with the proposed culvert replacement and stream realignment will result in temporary disturbance to the stream, wetlands, and their associated buffers, but will result in net habitat benefits following project implementation. The proposed culvert replacement and stream realignment will increase stream streamflow conveyance capacity, improve sediment transport, facilitate sediment removal from the system, replace undersized culverts, reduce flooding that now occurs on the adjoining property to the west, improve fish passage, and improve in-stream and riparian habitat conditions.	
II141-A-83	73	4.6-1	4.6.2.1	1st	Work has recently occurred at the Lakeside substation, which adjacent to the Chestnut Hill Academy, with no disruption to school activities.
II141-A-84	74	4.6-2	4.6.2.2	1st	PSE will try to keep recreation areas open to the extent possible; however, during certain construction activities (movement of construction equipment), safety is paramount and may require temporary closure of some areas.
II141-A-85	75	4.9-8	4.9.4.1		The DEIS cannot require PSE to add pipeline location and depth to project plans and drawings and submit to Olympic for evaluation. This information is only available at the discretion of OPL based on their policies and regulations.
II141-A-86	<b>CHAPTER 5: CUMULATIVE IMPACTS</b>				
	76	5-1	5.1	1st	No discussion of impacts to Land Use and Housing under the No Action Alternative. The

- II141-A -82 See responses to comments II141-A-78 and II141-A-47.
- II141-A -83 Comment noted.
- II141-A -84 Comment noted.
- II141-A -85 This clarification has been made in the Final EIS; see Section 5.9.4.
- II141-A -86 The potential land use impacts of the No Action Alternative are discussed in Section 10.7.2 of the Phase 1 Draft EIS. It would be speculative to state that all future development could not be accommodated, but the EIS does acknowledge that reduced electrical reliability may reduce developers' willingness to invest in development within the Eastside. As the sole electrical provider for the Eastside, if PSE were to demonstrate that transmission capacity is not adequate to serve a proposed project, the project may not meet the requirements for approval under the City's permit review criteria.

**Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments**

Comment #	Page	Section	Paragraph or Figure	Comment	
II141-A-86				DEIS should acknowledge that if the Energize Eastside Project is not built, future development could not be accommodated, which could result in significant impacts to regional growth targets and long-range planning policies.	
II141-A-87	77	5-3	5.8	The term "reference" guidelines should have been used rather than "industry" guidelines.	
<b>CHAPTER 6: SIGNIFICANT UNAVOIDABLE IMPACTS</b>					
II141-A-88	78	6-2	6.2	3rd	The level of aesthetic significance is overstated as the pole heights that form the basis of the options through the areas are dependent upon the location of a small number of viewers.
II141-A-89	79	6-2	6.2	4th	The transmission line corridor was established prior to the majority of the residential development in the City of Newcastle. The statement that the project would not be consistent with the Newcastle Comprehensive Plan appears to be taken out of context and is not accurate. Utility Policy UT-P3 promotes the collocation of major utility transmission facilities. Additionally, UT-P14 states the utility provides should minimize visual impacts through siting and design. The intent of UT-P3, appears to take UT-P14 into account. The primary land use in Newcastle is residential and there are not contiguous corridors that link commercial properties together; therefore, use of the existing corridor provides the most consistency with the Comprehensive Plan.
II141-A-90	80	6-2	6.2	4th	This section fails to acknowledge the full range of impacts caused by undergrounding. Undergrounding of transmission lines can create ground-based changes to aesthetics when a corridor outside of developed areas, such as roadways, are used. Undergrounding entails the permanent removal of all vegetation, structures and uses in, and the fencing off of, the entire right-of-way for safety reasons. Undergrounding would require obtaining new easements and the relocation of existing utilities (e.g., natural gas, sewer, water, and communication lines). Further, when undergrounding a high voltage transmission line, the conduit does not simply disappear and reappear. To move the conduit from an overhead configuration into underground vaults and back overhead, a transition station is required. A transition station is visually akin to a substation that contains structures to hold high-tension conductors, a control house, conduit protective equipment, infrastructure to connect the overhead conductors to the underground conduit, and security fencing. This is

- II141-A -87 Comment noted.
- II141-A -88 Significant aesthetic impacts result when the degree of contrast between the project and the existing aesthetic environment would be substantial and viewer sensitivity is high. These significance criteria were developed collaboratively with the Partner Cities and were based on policies, past precedent, and practice within the Partner City jurisdictions. Information on the workshop process and how significance was identified is detailed in Appendix C of the Phase 2 Draft EIS. The determination of significance along the Newcastle Segment north of the May Creek ravine was based on the poles being almost double in height (to approximately 100 feet); close to neighboring residences and residential streets; and placement on the ridge, making the new transmission line a defining feature that would contrast strongly with the existing built environment. Viewer sensitivity was determined to be high because the project would be on a ridge and would be visible by much of the Newcastle population. The highest density of residential viewers in the study area along the Newcastle Segment is in the north portion of Newcastle, between Newcastle Way and SE 80th Way (see Appendix C of the Phase 2 Draft EIS). Although viewer sensitivity is lower within the existing corridor than elsewhere in Newcastle, overall viewer sensitivity is high, based on the extent of affected viewers and the recently adopted policies regarding aesthetic impacts from transmission lines. For more information, see Section 3.2.5.14 of the Phase 2 Draft EIS.
- II141-A -89 Inconsistency with the Newcastle Comprehensive Plan was verified by City of Newcastle staff. The Newcastle Segment could be altered to be more consistent with the comprehensive plan through the use of shorter poles and placement of the poles more centrally within the transmission corridor. Additional mitigation measures, such as the use of landscape screening, have been incorporated into Section 4.2.6.2 and Appendix M of the Final EIS.
- II141-A -90 Visual impacts associated with permanent clear zones are described in Section 11.6.3.7.1 of the Phase 1 Draft EIS, and the addition of aboveground structures is described in Section 11.6.3.7.3. Visual impacts associated with transition stations are described under the discussion of the underwater alternative (Alternative 1, Option D) (see Section 11.6.3.8.1 of the Phase 1 Draft EIS). Discussion of aesthetic impacts associated with undergrounding as a mitigation strategy is provided in Section 4.2.6 and Appendix M of the Final EIS.

**Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments**

Comment #	Page	Section	Paragraph or Figure	Comment
II141-A-90				part and parcel at each end of the undergrounded segment.
II141-A-91	81	6-2	6.2	5th Poles will not be closer to homes than the existing. Statement that impacts would be significant because the new transmission would change the neighborhood character does not acknowledge this is a transmission line replacement project. Should note reconfiguring poles will require variance approval.
II141-A-92	82	6-3	6.6	Entire Discussion The Bellevue Code requires a public review process for the conversion of park lands to a non-recreational use. The fact that there is a review process means that there is a potential (when necessary) to convert public land to a non-residential use. The good part about the Code/Policy requirements is that it requires that the project proponent keep the public park resources whole; meaning there would be conversion of another land for equal open space/recreational use. As such, the impact would be mitigated and not be significant.
II141-A-93	83	6-4	6.10	3rd "Undergrounding a portion of the transmission line could result in significant economic impacts..." It should be noted that PSE likely cannot underground in the existing corridor due to space limitations. Undergrounding would require obtaining new easements and the relocation of existing utilities (e.g., natural gas, sewer, water, and communication lines).
<b>APPENDIX A: GENERAL CONSTRUCTION AND ACCESS DESCRIPTION</b>				
II141-A-94	84	A-5	Pole Installation	1 <sup>st</sup> paragraph, 1 <sup>st</sup> sentence The DEIS states that each pole will be directly embedded or placed on a drilled pier. Based on design and construction limitations other foundation types may be utilized.
II141-A-95	85	A-5	Pole Installation	2 <sup>nd</sup> paragraph, last sentence The depth of the hole will be 10 percent of the pole height plus 4 feet, not 10 percent of the pole height plus 2 feet.
II141-A-96	86	A-12	Preliminary Access - Renton	The line routing shown in the map connects to the substation in the wrong location. The map shows the 230 kV entering Talbot Hill substation on the 115 kV side of the substation instead of the 230 kV side.

II141-A -91 Text has been clarified in the Final EIS in Chapter 3, Errata, regarding Section 3.2.5.14 and Chapter 6 of the Phase 2 Draft EIS to clarify that the poles would be in similar location to existing poles, which are in close proximity to houses, and that to reduce aesthetic impacts the poles could be placed more centrally within the corridor. In Section 3.1.6 of the Phase 2 Draft EIS, it is stated that: "In Newcastle, PSE could apply for a variance from the setback requirement, which could enable the use of shorter poles in that segment, as discussed in Section 3.2, *Scenic Views and the Aesthetic Environment.*"

II141-A -92 It is correct that City of Bellevue policy (PA-37) requires a public review process for the conversion of park lands to a non-recreational use. However, in addition, many recreational sites have been purchased with federal, state, or local grants, bonds, or other funding sources. The funding usually comes with provisions that protect the land for recreation in perpetuity. The conversion of recreation land purchased with restricted funds for non-recreation purposes would need to meet parcel-specific requirements. PSE's ability to acquire an easement or purchase a recreation site for non-recreation use would require an evaluation process that would be contingent upon approval from the property owner and grant agency or agencies. The City of Bellevue judged that the use of land purchased with funds exclusively for open space purposes for transmission line purposes could be a significant impact, given the potential scale of such use for the Energize Eastside project, along with other effects that such use could have on park enjoyment. Just because an activity may be allowed by permit does not preclude it from having significant impacts.

II141-A -93 Section 2.2.2 of the Phase 2 Draft EIS describes the limitations associated with undergrounding. Additional mitigation associated with undergrounding is identified in Section 4.2.6 of the Final EIS.

II141-A -94 The Final EIS has been revised to clarify and include additional information on foundation types. See Section 2.1.3.

II141-A -95 This has been addressed in Appendix A of the Final EIS, as well as noted in Chapter 3, Errata.

II141-A -96 The map on Page A-12 of Appendix A in the Phase 2 Draft EIS has been corrected and included in Appendix A of the Final EIS, as well as other relevant maps in the Final EIS showing this location.

*Puget Sound Energy, Inc.  
Energize Eastside Phase 2 DEIS  
Annotated Comments*

Comment #	Page	Section	Paragraph or Figure	Comment
<b>APPENDIX C: SCENIC VIEWS AND AESTHETIC ENVIRONMENT METHODOLOGY</b>				
II141-A-97	87	C-17	7.1	Table C-8 The pole heights for GIS analysis are more conservative than the pole heights in the photo simulations.
<b>APPENDIX I: SUPPLEMENTAL INFORMATION – PIPELINE SAFETY</b>				
II141-A-98	88	52	5.6.3	1 To clarify, as stated in the DNV-GL report, the low profile poles have a higher level of pipeline interaction due to the conductor configuration, as well as the conductors' closer proximity to the ground.
II141-A-99	89	57	5.6.3	1 The third sentence references 10 A/m <sup>3</sup> rather than the correct 20 A/m <sup>3</sup> low corrosion threshold.
II141-A-100	90	58	5.7.3	1 To address the coating stress voltage for the pipelines, OPL and PSE worked together to take actual field readings and know electrical system loads to validate that the model used appropriate coating values.
II141-A-101	91	89	9.3.7	2 Potential impact radius is generally 25-feet for each structure but based on topography or access the radius could increase.

II141-A -97 The heights shown in the simulations are less than the heights used for the scenic views GIS analysis with one minor exception: KVP 6 is slightly (5 feet) more than what was used for the scenic view GIS analysis because of design refinements made during the analysis. See Appendix C of the Phase 2 Draft EIS for a description of the heights used in the GIS analysis.

II141-A -98 Comment noted.

II141-A -99 This correction has been made in the Final EIS; see Chapter 3, *Errata*.

II141-A -100 Comment noted.

II141-A -101 Comment noted.

6/14/2017

Weebly Email Service Mail - Energize Eastside DEIS 2 Public Comment



Energize Eastside EIS <info@energizeeastsideeis.org>

**Energize Eastside DEIS 2 Public Comment**

1 message

**Kristi Tripple** <kristit@rowleyproperties.com> Tue, Jun 13, 2017 at 4:35 PM  
To: "info@EnergizeEastsideEIS.org" <info@energizeeastsideeis.org>  
Cc: "council@bellevuewa.gov" <council@bellevuewa.gov>

Heidi – Please accept the enclosed letter as Rowley Properties’ public comment on the Energize Eastside project and it’s DEIS 2. In short, we feel a no action alternative is simply not an option and want to underscore the importance of providing PSE with reliability and flexibility within use of an existing corridor.

Thank you again for the opportunity to comment. If you have any questions or would like further information, please do not hesitate to ask.

Respectfully,



**Kristi Tripple**  
VP for Community Development  
Office | 425.392.6407  
Direct | 425.395.9583



www.rowleyproperties.com

*Please consider the environment before printing this email*

*The information contained in this email and any attachment may be confidential and/or legally privileged and has been sent for the sole use of the intended recipient. If you are not an intended recipient, you are not authorized to review, use, disclose or copy any of its contents. If you have received this email in error, please reply to the sender and destroy all copies of the message.*

**Energize Eastside DEIS 2-Comment.docx.pdf**  
69K

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d39e4da2&view=pt&search=inbox&th=15ca3d050061bc5d&siml=15ca3d050061bc5d

1/1



June 13, 2016

Heidi Bedwell, Energize Eastside EIS Program Manager  
 City of Bellevue  
 Development Services Department  
 450 110th Ave NE  
 Bellevue, WA 98004

Dear Heidi:

**RE: Energize Eastside DEIS Phase 2 Comment**

Thank you for the opportunity to review and publicly comment on the Energize Eastside Project. Given the significance of this project's contribution to the economic vitality and continued health of the Eastside community by way of improving the delivery and reliability of power to the Eastside, we wish to reiterate our support of the Energize Eastside Project and its process (both study and construction) moving forward quickly, without delay. We understand that without this project, the consequence of power failure is simply unacceptable.

From our perspective, PSE's preferred alternative as outlined in the DEIS 2 continues to make the most sense for implementation given it provides PSE with reliability and flexibility within use of an existing corridor. Efficient use of utility systems already in place will help limit impact on several fronts and hopefully, expedite the project's permitting, construction and completion.

A safe, reliable electricity infrastructure for the long term (beyond 2024) is imperative to not only Issaquah, but our region as a whole. Solutions that are proven for a reliable infrastructure must be used.

We are very concerned about a pending critical failure in the system and hope the project will be continued to be treated with a sense of urgency. Thank you for your continued diligence and the study conducted in the DEIS 2.

Respectfully,

Kari Magill, CEO

Skip Rowley, Chairman of the Board

1595 NW Gilman Blvd., Ste. 1, Issaquah WA 98027  
[www.rowleyproperties.com](http://www.rowleyproperties.com)

I1143-A -1 Comment noted.

I1143-A-1

7/12/2017 Weebly Email Service Mail - 2nd submission by Todd Andersen/J. S. to the public comment record of PSE Phase 2 Draft EE EIS & WUTC requ...



Energize Eastside EIS <info@energizeeastsideeis.org>

## 2nd submission by Todd Andersen/J. S. to the public comment record of PSE Phase 2 Draft EE EIS & WUTC request for answers

1 message

**todd@matadortech.com** <todd@matadortech.com> Thu, Jul 6, 2017 at 10:57 PM  
 To: info@energizeeastsideeis.org, consumer@utc.wa.gov, Bellevue Council <council@bellevuewa.gov>, rkouchi@utc.wa.gov  
 Cc: rkouchi@utc.wa.gov, Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, Lindan@ci.newcastle.wa.us, Johnd@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Sue Stronk <SSBuds@comcast.net>, Brian <Br98799@comcast.net>, Lynne Prevetie <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>, Carrie Rodriguez <crodriguez@bellevuereporter.com>, mmurray@soundpublishing.com, Janis Medley <jpmedley@mac.com>, sdfour@aol.com, Larry Johnson <larry.ede@gmail.com>, todd@matadortech.com

To: EnergizeEastside EIS staff

To: WUTC staff/consumer affairs (please help in getting PSE to answer detailed "need" questions in the attachments . We are more than 3 years into this process and PSE refuses to answer & attempts to hide behind CEII for "Need" questions)

**Subject:** 2nd submission by Todd Andersen/Jennifer Steinman to the public comment record of PSE Phase 2 Draft EE EIS & WUTC request for answers

### Attachments

1. **Questions&Commentsfor June25-2014rev0.9w.o.TrackChg.doc**
2. Email trail of PSE trying to get questioners to sign CEII paperwork (critical energy infrastructure information) and NDA for all need related questions. In reality PSE might have been trying to hide the massive amount of CEII rules they broke not to mention hiding the massive increase overall critical energy infrastructure vulnerabilities. **email 2 fullPSE responses CEII CV 8 14 2014, CEII deception.pdf**
3. **email3 Kostek, Leann, 03 12 PM 8 13 2014, RE Need response to PSE invite RE PSE CEII Tariff Language,.pdf**
4. **Additional\_questions\_to\_PSE\_via\_WUTC\_2014-8-14-Toddrev4.doc**

Please include this email and the attachments as submission to the public comment record regarding the Phase 2 Draft EIS.

I1144-A-1

The attached questions, **June25-2014rev0.9w.o.TrackChg.doc**, were submitted to PSE with regard to its Energize Eastside project over three years ago and have never been answered by PSE. The questions are mine with significant review by CV Chung a senior transmission engineer with 35 yrs of experience all of it at Tacoma Power and Seattle City Lights; and Dr Dr. Philip Malte, Professor of Engineering University of Washington. It should be noted at the time we were the technical committee of CENSE with technical backgrounds but are no longer associated with CENSE, contrary to what the 3 year old doc says.

I1144-A-2

Also attached is PSE CEII deception to avoid publicly answering "Need" questions. **email 2 fullPSE responses CEII CV 8 14 2014, CEII deception.pdf** This attachment also has key questions for PSE/ EE EIS.

Relating to this attachment is **email3 Kostek, Leann, 03 12 PM 8 13 2014, RE Need response to PSE invite RE PSE CEII Tariff Language,.pdf** a odd but key email from the most senior PSE project manager, Leann Kostek, to myself and CV Chung regarding CEII/Need of EE. Seems she miss fired the email and it simply says "Todd -" What is very telling is Leann copies PSE's senior legal council Gretchen Aliabadi, not a low level lawyer or paralegal at PSE.

I1144-A-3

I am also attaching my markup of questions CV Chung previously submitted both to PSE and City of Bellevue. **Additional\_questions\_to\_PSE\_via\_WUTC\_2014-8-14-Toddrev4.doc.**

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=iuFS2U4Cs3s.en.&view=pt&search=inbox&th=15d1b9ff52825e9&siml=15d1b9ff52825e9 1/2

I1144-A -1

The attachment includes a set of questions about PSE's Needs Assessment, and will be included with the EIS documents for the record. Comments submitted directly to PSE are not part of the EIS process and therefore responses may not be reflected in the EIS. Responses are not provided to comments that were not specifically related to this EIS; therefore, a comment letter written before the EIS was published will not be responded to in this EIS. Comments were collected and incorporated into the project documents at multiple stages of the EIS process.

I1144-A -2

See response to comment I1144-A-1.

I1144-A -3

The attachment includes a set of questions about PSE's equipment, terms PSE used in various documents, and requests for various studies related to the electrical grid in the region. This attachment will be included with the EIS documents for the record. Comments submitted directly to PSE are not part of the EIS process and therefore responses may not be reflected in the EIS. Responses are not provided to comments that were not specifically related to this EIS; therefore, a comment letter written before the EIS was published will not be responded to in this EIS.

COMMENT

RESPONSE

7/12/2017 Weebly Email Service Mail - 2nd submission by Todd Andersen/J. S. to the public comment record of PSE Phase 2 Draft EE EIS & WUTC requ...

I1144-A-3 It should be stated for the record that the City of Bellevue and EIS process is a complete sham with senior EIS manager and lawyer Carol Helland caught on film slapping video gear out of the hands of residents at a public meeting event! It is on film and you will be hearing more about it. The CoB sham is even worse than the sham the PSE CAG process was.

I1144-A -4 See response to comment I17-A-1.

I1144-A -5 Comment noted.

I1144-A-4 The Energized Eastside project if allowed to go through vastly increases the Eastside's vulnerability to Earthquake/simple \$2000 terrorist attack which could easily completely shut down if not burn down the entire eastside economically. That is assuming the stress/other corrosion of the Olympic pipeline from PSE doesn't do it first.

I1144-A-5 These comments are offered in support of the "No Action" alternative. They are also submitted to support contentions that the draft EIS in its current state is inadequate, incomplete and defective.

And thanks in advance to any help WA UTC can provide getting the convicted criminal organization of Puget Sound Energy to answer questions! (falsifying pipeline safety records for four years, info added for the newbies at the Bellevue Reporter)

Sincerely,  
Todd Andersen and Jennifer Steinman  
4419 138th Ave SE Bellevue WA 98006  
H 425-449-8889

4 attachments

 **Questions&Commentsfor June25-2014rev0.9w.o.TrackChg.doc**  
1803K

 **email 2 fullPSE responses CEII CV 8 14 2014, CEII deception.pdf**  
82K

 **Additional\_questions\_to\_PSE\_via\_WUTC\_2014-8-14-Toddrev4.doc**  
47K

 **email3 Kostek, Leann, 03 12 PM 8 13 2014, RE Need response to PSE invite RE PSE CEII Tariff Language,.pdf**  
14K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=iufSU4Cs3s.en.&view=pt&search=inbox&th=15d1b9ffd52825e9&siml=15d1b9ffd52825e9> 2/2

7/12/2017 Weebly Email Service Mail - RE: Todd Andersen/Jenn Steinman submission to the public comment record regarding the Phase 2 Draft EIS for E...



Energize Eastside EIS <info@energizeeastsideeis.org>

**RE: Todd Andersen/Jenn Steinman submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside**

1 message

**todd@matadortech.com** <todd@matadortech.com> Wed, Jun 21, 2017 at 9:15 PM

To: info@energizeeastsideeis.org, Larry Johnson <larry.ede@gmail.com>  
 Cc: Rich Crispo <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindan@ci.newcastle.wa.us, JohnD@ci.newcastle.wa.us, Carol Simpson <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, Rob Wyman <RobW@ci.newcastle.wa.us>, Kirkland Council <citycouncil@kirklandwa.gov>, Bellevue Council <ccouncil@bellevuewa.gov>, Renton City Attorney Larry Warren <lwarren@rentonwa.gov>, Don Marsh <don.m.marsh@hotmail.com>, Richard <lauckjr@hotmail.com>, Russell Borgmann <rborgmann@hotmail.com>, Loretta Lopez <llopez@mstarlabs.com>, David Schwartz <davids58@gmail.com>, Brian <Br98799@comcast.net>, Lynne Prevetie <lynnepre@comcast.net>, Christina Aron-Sycz <aronsycz@gmail.com>, CENSE Board <board@cense.org>, Cense EC <ec@cense.org>, Sue Stronk <SSBuds@comcast.net>, Bellevue Needs <bellevuespecialneeds@gmail.com>

Please add this attachment to our previous email on the EE EIS. This attachment was taken off to make the 25MB of the city government systems for Bellevue Kirkland and Newcastle. I reference this paper from the Toyko Gas Co, many times in my EE EIS comments.

I1145-A-1 Turns out the Japanese haww their act together understanding corrosion and countering, including not over protecting pipelines. A bit technical for most, it has an easy to read history countering corrosion in pipes near high power electrical lines, or not with very deadly results in populated areas. Very unfortunate we in the USA, with our highly corrupt fossil fuels industry and related for-profit utility industry, are learning these lessons the hard way.

Sincerely,  
 Todd Andersen/Jennifer Steinman/Ryan Andersen

4419 138th Ave SE  
 Bellevue Wa 98006  
 tel.: 425 449-8889  
 email: todd@matadortech.com

----- Original Message -----

Subject: Todd Andersen/Jenn Steinman submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside  
 From: <todd@MATADORTECH.COM>  
 Date: Wed, June 21, 2017 4:56 pm  
 To: info@energizeeastsideeis.org, "Larry Johnson" <larry.ede@gmail.com>  
 Cc: "Rich Crispo" <Richc@ci.newcastle.wa.us>, JohnDr@ci.newcastle.wa.us, lindan@ci.newcastle.wa.us, JohnD@ci.newcastle.wa.us, "Carol Simpson" <carols@ci.newcastle.wa.us>, GordonB@ci.newcastle.wa.us, allend@ci.newcastle.wa.us, "Rob Wyman" <RobW@ci.newcastle.wa.us>, "Kirkland Council" <citycouncil@kirklandwa.gov>, "Bellevue Council" <ccouncil@bellevuewa.gov>, "Renton City Attorney Larry Warren" <lwarren@rentonwa.gov>, "Don Marsh" <don.m.marsh@hotmail.com>, "Richard" <lauckjr@hotmail.com>, "Russell Borgmann" <rborgmann@hotmail.com>, "Loretta Lopez" <llopez@mstarlabs.com>, "David Schwartz" <davids58@gmail.com>, "Brian" <Br98799@comcast.net>, "Lynne Prevetie" <lynnepre@comcast.net>, "Christina Aron-Sycz" <aronsycz@gmail.com>, "CENSE Board" <board@cense.org>, "Cense EC" <ec@cense.org>, "Sue Stronk" <SSBuds@comcast.net>, "Bellevue Needs" <bellevuespecialneeds@gmail.com>

To: EnergizeEastside EIS staff

I1145-A-2 Please include this email and the attached comment and other attachment regarding the Phase 2 Draft EIS for the PSE Energize Eastside project

It further adds to the lack of Integrity and credibility of the EIS process to date itself as previously submitted and documented by Larry Johnson.

https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=iuFS2U4Cs3s.en.&view=pt&search=inbox&th=15cce038e5c01081&siml=15cce038e5c01... 1/2

I1145-A -1 Comment noted; the EIS Consultant Team has reviewed the referenced Tokyo Gas Co. report in conjunction with the comments relating to it. Specific comments referencing this report are addressed individually.  
 I1145-A -2 This letter is included in the EIS as requested.



7/12/2017 Weebly Email Service Mail - RE: Todd Andersen/Jenn Steinman submission to the public comment record regarding the Phase 2 Draft EIS for E...

I1145-A-2

Sorry my document is not fully polished and very rough in some areas as there are so many massive technical errors/fraud/incompetence in the EE EIS and related documents particularly the PSE hired DNV-GL pipeline safety report it is shocking and not enough time to research & address in the short comment period.

Also please include my next email per Carol Helland stating the EE EIS will answer the 36 pgs of questions from 2014 yet to be answered on need. PSE has yet refused to answer save emails verbal invites if we sign NDAs.

Sincerely,

Todd Andersen/Jennifer Steinman/Ryan Andersen

4419 138th Ave SE  
Bellevue Wa 98006  
tel.: 425 449-8889  
email: [todd@matadortech.com](mailto:todd@matadortech.com)

----- Original Message -----

Subject: Additional CSEE submission to the public comment record regarding the Phase 2 Draft EIS for Energize Eastside

From: Larry Johnson <[larry.ede@gmail.com](mailto:larry.ede@gmail.com)>

Date: Tue, May 23, 2017 4:06 pm

To: [info@energizeeastsideeis.org](mailto:info@energizeeastsideeis.org)

Cc: Rich Crispo <[Richc@ci.newcastle.wa.us](mailto:Richc@ci.newcastle.wa.us)>, JohnDr@ci.newcastle.wa.us, [lindan@ci.newcastle.wa.us](mailto:lindan@ci.newcastle.wa.us), [Johnd@ci.newcastle.wa.us](mailto:Johnd@ci.newcastle.wa.us), Carol Simpson <[carols@ci.newcastle.wa.us](mailto:carols@ci.newcastle.wa.us)>, [GordonB@ci.newcastle.wa.us](mailto:GordonB@ci.newcastle.wa.us), [allend@ci.newcastle.wa.us](mailto:allend@ci.newcastle.wa.us), Rob Wyman <[RobW@ci.newcastle.wa.us](mailto:RobW@ci.newcastle.wa.us)>, Kirkland Council <[citycouncil@kirklandwa.gov](mailto:citycouncil@kirklandwa.gov)>, Bellevue Council <[council@bellevuewa.gov](mailto:council@bellevuewa.gov)>, Renton City Attorney Larry Warren <[lwarren@rentonwa.gov](mailto:lwarren@rentonwa.gov)>, Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>, Richard <[lauckjr@hotmail.com](mailto:lauckjr@hotmail.com)>, Russell Borgmann <[rborgmann@hotmail.com](mailto:rborgmann@hotmail.com)>, Loretta Lopez <[llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)>, David Schwartz <[davids58@gmail.com](mailto:davids58@gmail.com)>, Sue Stronk <[SSBuds@comcast.net](mailto:SSBuds@comcast.net)>, Brian <[Br98799@comcast.net](mailto:Br98799@comcast.net)>, Lynne Prevette <[lynnepre@comcast.net](mailto:lynnepre@comcast.net)>, Christina Aron-Sycz <[aronstycz@gmail.com](mailto:aronstycz@gmail.com)>, CENSE Board <[board@cense.org](mailto:board@cense.org)>, Cense EC <[ec@cense.org](mailto:ec@cense.org)>

To: EnergizeEastside EIS staff

Please include this email and the attached additional comment regarding the Phase 2 Draft EIS for the PSE Energize Eastside project, and regarding as well the lack of integrity and credibility of the EIS process to date itself.

This submission is supplemental to the two documents I submitted yesterday.

Sincerely,

Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE); [www.sane-eastside-energy.org](http://www.sane-eastside-energy.org) <<http://www.sane-eastside-energy.org/>>  
8505 129th Ave SE  
Newcastle, WA 98056  
tel.: 425 227-3352  
email: [larry.ede@gmail.com](mailto:larry.ede@gmail.com) <<mailto:larry.ede@gmail.com>>

 Japanese paperP2-43\_Fumio Kajiyama.pdf  
1505K

<https://mail.google.com/mail/u/0/?ui=2&ik=8b5d9e4da2&jsver=1ufS2U4Cs3s.en.&view=pt&search=inbox&th=15cce038e5c01081&siml=15cce038e5c01...> 2/2

From: Todd Andersen & Jennifer Steinman & Ryan Andersen residents and homeowners at 4419 138<sup>th</sup> Ave SE Bellevue WA 98006.  
 Questions/comments on EE EIS and Pipeline Safety Reports and related for Phase 2 2017 EE EIS  
 Submitted June 21, 2017

Attachments:

1. *Energize Eastside and seismic risks in South Bellevue.pdf* paper by James Sweet, PE (Professional Engineer) is a retired engineer who moved to South Bellevue with his family in 1960.
2. *P2-43\_Fumio 20Kajiyama.pdf* A Japanese AC induced corrosion paper.
3. *PipelineTechJournal(foundlooking\$.EN15280)ptj-1-2015.pdf*

First let me thank City Staff and associated contractors for continuing the massive fraud and incompetence (IMO) that PSE started with Energize Eastside and the former are continuing with this is draft Phase 2 EIS. It can only lead to a wholesale reform of Bellevue City government and a significant reorganization of City of Bellevue government and our energy infrastructure, for which I will be eternally grateful.

I1145-A-3

We request immediate halt to EE EIS for massive incompetence and blockage of information flow and request at restart of EE EIS with new personnel at City of Bellevue and new competent contractors. The CoB has not followed its electrical reliability reports from Exponent that the City hire a skilled technical utility electric power engineer to help guide its hiring of qualified resources. Hire competent staff from sources that do not have a economic interest in continuing the massive fraud of fossil fuels industry. Good sources include Pacific Northwest Laboratories, National Institute of Standards and Technology, scientist and engineers at US Navy Laboratories.

**The reason for the restart demand for EE EIS is as follows (Items 1.xx which also include comment and question for the EE EIS)**

I1145-A-4

1. The incompetence of the overall Energize Eastside (EE) and its review including this Phase 2 Energize Eastside EIS is so high that I request that the process be restarted with new City management skilled at hiring the necessary resources to review the safety impact of doubling the voltage over two highly volatile jet fuel, aviation gas and auto gasoline pipelines. And to included assessing the impacts of increased energy/communication infrastructure concentration as dozen of papers by US Congress, Congressional Research Service and etc warn of include Puget Sound Energy's infrastructure. PSE & idiocy such as EE was specifically targeted by recent Dept of Energy Clear Path IV exercise for a Pacific NW slip fault and the follow on FEMA Cascadia Rising exercise which gave PSE and all Puget Sound entities a grade of F. See [www.fema.gov/cascadia-rising-2016](http://www.fema.gov/cascadia-rising-2016) and the massive amount of documentation. Clear Path IV included representation from 10 Federal agencies, seven states, five local governments, 15 oil and natural gas companies, 18 electric utilities, six trade associations, and four state associations with more than 175 participants. Portland Oregon alone is expecting 700 breaks in its ~300psi

- I1145-A -3 Comment noted. The comment does not provide enough specific information regarding allegations of incompetence or "blockage of information flow" to allow a response.
- I1145-A -4 See response to comment I17-A-1 for information on the pipeline safety risk assessment completed for the Phase 2 Draft EIS. It is correct that PSE participated in the Clear Path IV exercise; however, it is not correct that the exercise specifically targeted the Energize Eastside project as stated in the comment.

The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study prepared by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used in the analysis is consistent with industry practice. The cited Japanese paper discusses the risk of stress corrosion cracking due to over-protection related to cathodic protection. Over-protection can also result in accelerated AC corrosion and should be avoided. AC interference and AC corrosion do not cause stress corrosion cracking.

Regarding comments on PSE's economic interests, under SEPA, an EIS is required to focus on the environmental impacts of a proposal and its alternatives. SEPA does not require an EIS to analyze the economic or social policy impacts of an action or discuss economic competition or profits (WAC 197-11-448(3)).

I1145-A-4

water main from Mt Hood. The Eastside's aged 45 yr old and 52 year old BP Olympic Pipelines operating at 300 to 500 psi and improperly inspected and improperly maintained; directly under PSE AND SCL high power lines will receive much greater stress corrosion and increased AC induced corrosion from a doubling of the overhead voltage from 115kV to 230kV. Why shouldn't PSE committee fraud? The economic case of \$3 million maximum penalties by federal law even for outright fraud resulting in multiples death is trivial when the interest & profits on the \$280 million un-need power lines will total well over \$1 billion dollars. Just yesterday June 19 2017 we have another example of PSE's fraud with the settlement of Greenlake area of Seattle natural gas explosions. Fine was \$1.5 million, ½ the maximum allowable no matter how much fraud and how many deaths. 40,000 uninspected natural gas lines.

What are the risks given PSE has no economic incentive to do the right thing and Macquarie has lost mass amounts on it investment in PSE that PSE will just pay the fine? What is the resulting damage PSE could cause under this very real world case?

I1145-A-5

Alternatively see what DOE scientists/Engineers and NY ConEd (a former giant of fossil fuel industry corruption, see the 1940 Spencer Tracy film Edison the Man particularly the NY City Council scenes, now good guy as Goldman Sach etc demands it) and Southern Cal Edison see as the solution as grid storage. And here is one commercially fielded example the DOE calls out from Mukilteo, WA Uni Energy Technologies with 100MW storage already sold, all to Germany. This does not include the dozen of others including PSE's owner Macquarie investing \$200 million in a grid storage company the far cheaper and deconcentration of energy infrastructure solution vs the more expensive and more concentration solution represented by PSE's EE. [www.greentechmedia.com/articles/read/Advanced-Microgrid-Solutions-Gets-200M-From-Macquarie-to-Finance-Aggregate](http://www.greentechmedia.com/articles/read/Advanced-Microgrid-Solutions-Gets-200M-From-Macquarie-to-Finance-Aggregate) [www.energy.gov/oe/articles/unienergy-technologies-and-pnnl-recognized-advancing-energy-storage-national-level](http://www.energy.gov/oe/articles/unienergy-technologies-and-pnnl-recognized-advancing-energy-storage-national-level) [www.energy.gov/oe/articles/oe-announces-investment-new-research-improve-grid-reliability-and-resilience-through](http://www.energy.gov/oe/articles/oe-announces-investment-new-research-improve-grid-reliability-and-resilience-through)

Here is PSE's owner Macquarie company Advanced-Microgrid-Solutions bidding NY CodEd solution. [www.greentechmedia.com/articles/read/New-Yorks-ConEd-Is-Building-a-Virtual-Power-Plant-From-Sunverge-Energy-Sto](http://www.greentechmedia.com/articles/read/New-Yorks-ConEd-Is-Building-a-Virtual-Power-Plant-From-Sunverge-Energy-Sto) A competitor to Advanced-Microgrid-Solutions is Stem .... "*Stem is already participating in an 85-megawatt project with Southern California Edison to provide local and system-wide capacity for the utility.*" Macquarie is desperate not to be left behind but more than will to shove EE shit down PSE rate payers throats,= see Edison Instutue ref later in this write up.

I1145-A-6

1a. The City of Bellevue staff and contractors as well as PSE and contractors have repeatedly and actively inferred with open meeting process including EE EIS slapping the camera out of citizens hands and/or blocking who where attempting to document the fraudulent and/or false and or misleading information that City of Bellevue EIS staff/contractors and PSE/PSE contractors are verbally putting out.

1b. The person responsible for slapping the camera out of my hand directly is Carol Helland the City of Bellevue lead manager for the EE EIS process and responsible authority for its impartial conduction. This is all on video. Carol,

I1145-A -5

See response to comment I1120-A-1.

I1145-A -6

Comment noted. The comment does not refer to anything in the EIS, including any specific "fraudulent and/or false and or misleading information" therefore no further response is provided.

I1145-A-6

unbelievably, is an attorney and further adding to the proof that the EE EIS is not being fairly and honestly being conducted.

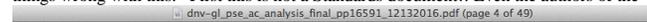
1c. The quality of the EE EIS is so incompetent on numerous fronts that it is clear it is just a white wash and completely lacking in real facts to the safety and need and real life alternatives. The simple fact of the EIS review is that experts not catching the issues with PSE's fraudulent pipeline safety report by DNV-GL using natural gas pipeline engineering recommendations (the 2015 INGAA report "Criteria for Pipelines Co-Existing with Electric Power Lines,") as there are no government standards yet in effect for liquid pipeline for corrosion including stress corrosion. The DNV never detail the corrosion risk and even get the personnel safety risk wrong.

The DNV-GL pipeline safety report is a warmed over copy of a similar EIS of the State of Minnesota, likely why the EE version has so many errors.  
<https://mn.gov/commerce/energyfacilities/documents/34079/Public%20Comments%20S2%20to%20W.pdf>

Nor did the City of Bellevue experts catch that the wrong "standards", actually not standards at all as the authors themselves state that the DNV-GL pipeline safety report is using recommendations from a report (the INGAA report ) written by the same highly inexperienced and technically deficient engineers that wrote the DNV report. And if that is not enough DNV-GL does even follow the INGAA recommendations (pg58of66) "there are no established criteria for AC corrosion control provided in SP0177-2014. Further, this standard states that the subject of AC corrosion is "not quite fully understood, nor is there an industry consensus on this subject. " True and BS what is what? The City of Bellevue EE EIS also called "experts" even stated on video that PSE's DNV-GL pipeline safety study uses Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations when in fact it does not contain one word of Pipeline and Hazardous Materials Safety Administration (PHMSA) or regulations relating to it.

I1145-A-7

PSE or DNV-GL chose the NACE Report 35110, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements" see screen shot below. Many things wrong with this. First this is not a Standards document!! Even the authors of the



> Determine if steady state conditions are conducive to AC corrosion, thus potentially compromising the pipeline integrity and necessitating mitigation using the following threshold ranges from **NACE Report 35110, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements"**:

- o Low likelihood: likelihood of accelerated AC corrosion is low at current densities between 0 – 20 amps/m<sup>2</sup>
- o Unpredictable: accelerated AC corrosion may or may not occur as it cannot be accurately predicted when the current density is between 20 and 100 amps/m<sup>2</sup>; therefore, after the transmission lines are energized field monitoring and/or mitigation by the pipeline operator may be required.
- o High likelihood: likelihood of accelerated AC corrosion is high when the current density is greater than 100 amps/m<sup>2</sup>

I1145-A -7

Regarding DNV GL's AC Interference Study (2016), at the request of the EIS Consultant Team, Stantec Consulting Services, Inc. (Stantec) completed a technical review of the study. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used to achieve an optimal transmission line route and powerline configuration to minimize the AC interference risks on the Olympic Pipeline system is consistent with industry practice. Stantec recommended that additional analysis be performed in the detailed design stage of the project in order to verify other mitigation needs for the project prior to transmission line energization (Stantec, 2017). These measures were incorporated into the EIS (see Section 4.9.8 of the Final EIS).

Regarding the INGAA report, the report was prepared by DNV GL and summarizes some of the research and industry practices related to AC corrosion, as there is no absolute industry criteria in North American standards. NACE has a draft standard that is in the approval process as described in response to comment I1145-A-30. Stantec has reviewed this and other comments requesting consideration of ISO and European standards, and has informed the EIS Consultant Team that DNV GL (2016) is consistent with these standards.

PHMSA regulations are described in Section 3.9 and Appendix I-5 (Pipeline Safety Technical Report) of the Phase 2 Draft EIS. The DNV GL AC Interference Study followed applicable industry standards relevant to AC interference studies between pipelines and powerlines. PHMSA regulations are the governing federal safety requirements for pipeline safety and do not provide direction on specific methods to control AC interference and AC corrosion.

There are other topics raised in this comment where specific deficiencies of the EIS analysis were not cited to allow a response.

- dmv-gl\_pse\_ac\_analysis\_final\_pp16591\_12132016.pdf (page 45 of 49)
- PRC International, 1999. [Are you aware NACE website says the TG 327 is inactive? Why?]
  - 5. NACE TG 327, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements", NACE Report 35110, 2010 [The IEEE says American National Standards Institute (ANSI) has not approved nor has Dept of Defense adopted]
  - 6. R. Gummow, S. Sewall. "AC Interference Guidelines." CPFA 2014. [Have you read this report? Who is CPFA 2014? Why is this not publically available?]
  - 7. S. Finneran, B. Krebs. "Criteria for Pipelines Co-Existing with Electric Power Lines." The INGAAC Foundation 2015-04 [pg 58/66 of Ref 7(INGAAC) While not a Standard Practice document, NACE published "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements"1 in 2010, providing guidance for evaluating AC current density, and providing recommended limits as discussed in Section 3.3.1.1.]

the DNV report authors says so in a natural gas pipeline report that they reference, the 2015 INGAAC report screen shot below see first yellow high lighting. What is particularly concerning is that the they and NACE readily admits that the AC corrosion is not well understood (by them but not other including the US Navy) , see red underline below for the authors of the DNV report which also wrote the below INGAAC report. The "protected level" is the DNV authors quote from this 2006 report EN15280, "Evaluation of AC Corrosion Likelihood of Buried Pipelines Applicable to Cathodically Protected Pipelines,"

INGAACCriteriaforPipelinesCo-ExistingwithElectricPowerLinesFINAL.pdf (page 58 of 66)

Regarding AC corrosion, there are no established criteria for AC corrosion control provided in SP0177-2014. Further, this standard states that the subject of AC corrosion is "not quite fully understood, nor is there an industry consensus on this subject." There are reported incidents of AC corrosion on buried pipelines under specific conditions, and there are also many case histories of pipelines operating under the influence of induced AC for many years without any reports of AC corrosion."

While not a Standard Practice document, NACE published "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements" in 2010, providing guidance for evaluating AC current density, and providing recommended limits as discussed in Section 3.3.1.1.

The State-of-the-Art report also cites European Standard CEN/TS 15280:2006<sup>15</sup>, which previously offered the following guidelines related to the likelihood of AC corrosion:

*"The pipeline is considered protected from AC corrosion if the root mean square (RMS) AC density is lower than 30 A/m<sup>2</sup> (2.8 A/ft<sup>2</sup>).*

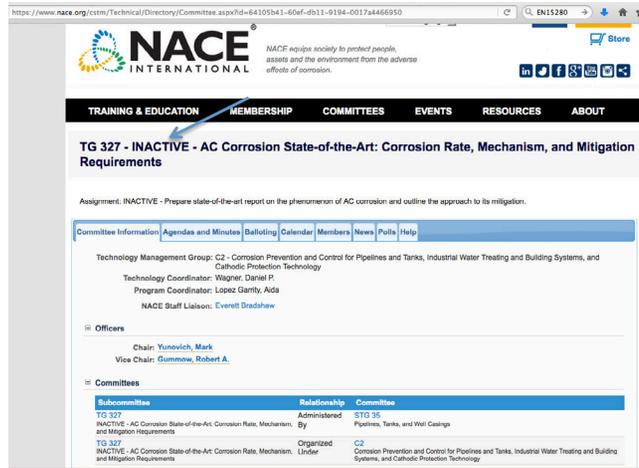
is for protection against AC corrosion (nothing could be further from the truth but let get with it) at according to the British Standard which the author mistakenly call the European Standard "European Standard CEN/TS 15280:2006". It a British Standard. Please have EE EIS clarify what is the USA Federal Standard and WA state standard for Evaluation of AC Corrosion Likelihood of Buried Pipelines Applicable to Cathodically Protected Pipelines. What are the rule/regulations?

First this EN15280 standard is contradicted by the real Eurpean Standard the ISO standard per see paper which quotes the European Standard as 3 A/m<sup>2</sup> is at high risk of corrosion. CP means catholic protection which OPL are using.

Japanese paperP2-43\_Fumio Kajiyama.pdf (page 7 of 21)

ISO 15589-1 prescribes for the AC corrosion risk and CP as follows: If the a.c.current density on a 100 mm<sup>2</sup> bare surface (e.g. an external test probe) is higher than 3 A/m<sup>2</sup> (or less, in certain conditions), there is a high risk of corrosion. Risk of corrosion is mainly related to the level of a.c.current density compared to the level of CP current density. If the a.c.current density is too high, the a.c. corrosion cannot be prevented by CP.

Please have / what is the "protection" level for all standards bodies USA British, EU, Japan?  
 Why on Pg4/49 the DNV-GL pipeline safety report reference a NACE group that has been inactive for 7 years and why has the DOD and ANSI have not adopted nor approved its use? See below screen shots. IS it because NACE is the laughing stock of the corrosion world?, at least in the US Navy, minus non technical DOD managers desperate for a job function.  
 NACE Report 35110, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements"<sup>5</sup>: 5 = NACE TG 327, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements", NACE Report 35110, 2010.  
 This below gives father below.  
[www.nace.org/cstm/Technical/Directory/Committee.aspx?id=64105b41-60ef-db11-9194-0017a4466950](http://www.nace.org/cstm/Technical/Directory/Committee.aspx?id=64105b41-60ef-db11-9194-0017a4466950)



and here is what IEEE says

I1145-A-7

standards.globalspec.com/std/1243051/nace-35110

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**Standard: NACE 35110**  
**AC CORROSION STATE-OF-THE-ART: CORROSION RATE, MECHANISM, AND MITIGATION REQUIREMENTS**

This standard is available for individual purchase. [Price and Buy this Standard](#)

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**Scope: Introduction**

The phenomenon of AC corrosion has been considered by many authors since the early 1900s. However, the mechanisms of AC corrosion are still not completely understood. The body of recent (post-1980) literature indicates that AC corrosion or AC-enhanced corrosion (ACEC) is a *bona fide* effect (reported corrosion rates up to 20 mpy [0.5 mm/y], with pitting rate considerably higher); there appears to be a tacit agreement that at prevailing commercial current frequencies (such as 50 or 60 Hz) corrosion is possible, even on cathodically protected pipelines.

AC corrosion on cathodically protected pipelines is not well understood, despite discussion about it dating back to the late 19<sup>th</sup> century. For many years, corrosion experts did not consider corrosion attributed to alternating currents on metallic structures very important. In 1891, Mengarini<sup>1</sup> concluded that corrosion ("chemical decomposition") by AC (1) is less than that caused by the equivalent direct current (DC), (2) is proportional to the AC, (3) there exists a threshold AC density below which no "decomposition of electrolyte" occurs, and (4) the extent of corrosion decreases with increased AC frequency.

In 1916, McCollum, et al.<sup>2</sup> published a research paper that concluded iron does not suffer from attack when a limiting frequency of the current (somewhere between 15 and 60 Hz) is reached. AC corrosion was not well understood for two reasons: (1) the electrochemical phenomenon of corrosion is normally attributed to DC, and (2) the instruments normally used to measure the electric parameters in direct currents cannot correctly detect the presence of AC with frequencies between 50 and 100 Hz.<sup>3</sup> Recently, concern for AC corrosion mitigation has been increasing because AC interference has been shown to affect cathodically protected underground structures and increase safety concerns (i.e., high AC step-and-touch potentials). Factors that contribute to AC interference on pipelines include (1) the growing number of high-voltage power lines, (2) AC operated high-speed traction systems, (3) high isolation resistance of modern pipeline coatings, and (4) coating integrity.<sup>3</sup>

(1) American Gas Association (AGA), 400 N. Capitol St. NW, Washington, DC 20001.

(2) CECCOR, c/o CIBE, rue aux Iainees, 70, B-1000 Brussels, Belgium.

<b>Organization:</b> NACE International	<b>DOD Adopted:</b> NO
<b>Document Number:</b> nace 35110	<b>ANSI Approved:</b> NO
<b>Publish Date:</b> 2010-01-01	<b>Most Recent Revision:</b> YES
<b>Page Count:</b> 60	<b>Current Version:</b> YES
<b>Available Languages:</b> EN	<b>Status:</b> Active

[This Standard References](#)

I1145-A-7

Please detail why the DOD refuses to use the incomplete and insufficient NACE Report 35110, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements"<sup>5</sup>

What governing body said to use NACE, a for profit corrosion company which can't even keep it plaque for work at the Statue of Liberty from corroding? See screen shot below.

Why is this the non standard "standard" per the authors of the DVN report used by the same authors for the EE DVN\_GL pipeline safety report? pg 58/66(INGAA) While not a Standard Practice document, NACE published "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements" in 2010, providing guidance for evaluating AC current density, and providing recommended limits as discussed in Section 3.3.1.1.

Table E1. Conclusion Summary: Optimized Willow 1 and 2 Results

Route (Optimized Configuration)	Load Scenario	Maximum Induced AC Potential (V)		Maximum Theoretical AC Current Density (Amps/m <sup>2</sup> )	
		OPL16	OPL20	OPL16	OPL20
Willow 1	230/230 Winter Peak	D	D	L	L
Willow 1	230/115 Winter Peak	E	D	U	L
Willow 2	230/230 Winter Peak	D	E	U	U
Willow 2	230/115 Winter Peak	E	E	U	U

Induced AC Potential: D – Does not exceed 15V NACE safety limit, E – Exceed 15V NACE safety limits.  
 Current Density: L – Low risk range, U – Unpredictable risk range.  
 Yellow: Requires additional post-construction monitoring and/or mitigation by the pipeline operator to verify that safety standards and/or thresholds are met.

What governing body said to use NACE, a forprofit corrosion company which can't even keep it plaque for work at the Statue of Liberty from corroding?

DNV GL - Report No. OAPUS312DKEMP (P116591)-1, Rev. 0 - www.dnvgl.com Page v December 13, 2016

The above are just safety limits so pipeline personnel are not electrocuted!! WHAT DOES TABLE E1 LOOK LIKE FOR CORROSION including stress corrosion?

1d. During with extremely short period of time to review the City held back experts at the third and final EE EIS Phase 2 open house so that citizens could not fully record the lack of technical expertise and engineering knowledge of the EE EIS and supporting documents and the Federal standards and the lack of governing regulations and the feasibility of safety parallel collocating high power electrical transmission line and highly volatile gasoline pipelines for 18 miles not to mention natural gas pipelines. None of the experts at the second EE EIS meeting in Bellevue May 29, 2017 were present at the third in Kirkland on June 3 2017 as citizens were starting to piece together how little the so called experts knew. Surprisingly the little amount videoed of EE EIS "experts" at the May 29<sup>th</sup> Bellevue EE EIS shows a shocking level of understanding of the pipeline safety issues for which PSE

II145-A -8 The City of Bellevue sent out emails to the Energize Eastside distribution list with information on the public meetings/open houses, including information on which technical consultant staff would be available at which meeting to answer questions. The email (dated May 8, 2017) stated that consultant staff from Stantec, EDM Services and Enertech Consultants would be available to answer questions on pipeline safety and electric and magnetic fields during the open house at the May 25 meeting (in Bellevue). The emails were sent out to the Energize Eastside distribution list, which includes all individuals that have previously commented on the project or expressed interest in receiving information on the project.

II145-A-7

II145-A-8

II145-A-8 commissioned the DNV-GL a safety report. Why were the experts held back and not present for the Kirland meeting?

1e. The 9% increase in risk is so fraudulently determined that it alone disqualifies the contractors producing, contractors reviewing and City of Bellevue staff from further work on the EE EIS and a full restart of the process. One such example is only a claimed 9% increased risk going from 230kV lines from 115kV. This 9% number is highly fraudulent from dozens of factors let us just review the top ones. First ESA (the contactor) just selectively chose the pipeline incidents that are not representative of EE. Ones representative are pipelines the parallel collocation of pipelines with high voltage power lines for decades. Including pipelines without the high power voltage lines 115kV or greater is so statistically invalid that it is fraud or highly incompetent as it massively suppresses the increase in risk by many orders of magnitude. Second I believe I have the City's "experts" on video saying that they could not get any information on jet fuel/aviation gas/car gasoline pipeline lines parallel collocated with 115 KV or any high power transmissions lines. And thus claims he has to use statistically irreverent non AC inducted pipeline data. If so picking incidents from non located pipelines is equally invalid as picking incidents from children drinking with paper soda straws. Third the EE EIS "experts" claim that new and unreleased safety rules and inspection criteria from PHMSA make it statistical validation to exclude incidents pre 2010 for pipelines that are decades old. Please detail exactly what new pipeline updates to regulations and inspections are in place and were used for the EE-EIS pipeline safety study and how the lack of little no enforcement make this a valid assumption? Once again demonstrated by PSE being criminally fined for lack of inspecting 40,000 natural gas pipe lines on June 19, 2017. What allows for pipeline issues prior to 2010 to be ignored? vastly suppressing the safety issues. place inspection criteria?

II145-A-9 Why is the most sophisticated pipeline Risk Criteria by Jurisdiction of the European Union left out and only cherry pick ones left pg 434/574. Please detail the City references for each of the listed Risk Criteria by Jurisdiction. Trusting a demonstrably incompetent and likely fraudulent fossil fuel service company like EDM Services is unacceptable

II145-A-10 1f. unbelievably incompetent use of basic documentation procedures followed to allow citizens to timely and cost effectively uncover the vast amount of fraud the EE EIS and related report contain. Only a mass listing of references with no tied back to the 574 pages of information/garbage/fraud. Please correct and reissue the document and expand citizens review time. Zero documentation of references to claims/assertion/or simple reference provided. One of thousands of examples is example see ref 3 of 9% pg 438 of 574. Search for any "ref 3" or like and zero result to see the math or statistical procedure (non math) provided for this 9% increase determination. Please detail the math or other fraud to get the 9% number. The "Source: EDM Services, 2017. Figure 3.9-11. Change in Incident Frequency" on pg 437 of 574 are just assertions. Please detail how the numbers are arrived at. One could just as easy assert 100% increase risk in disaster based on evidence EDM and/or ESA/ other contractor have provided.

II145-A-11 1g. Figure 3.9-8. Pg xxof574 contains no internal corrosion only external consideration which can in fact be the dominate issue. The fluids flowing through the pipe in fact contain lead, water vapor and other material in minuscule quantities

II145-A -9 See response to comment II47-C-2 regarding historical pipeline incident data.

Regarding the commenter's question about European Union risk criteria, this question was posed to EDM Services, the firm that prepared the pipeline safety risk assessment. To their knowledge, there is not a unified risk criterion that is used throughout the European Union. Some member countries (e.g., United Kingdom, The Netherlands) have individual risk criteria, which are presented in the Pipeline Safety Technical Report (Appendix I-5 of the Phase 2 Draft EIS).

II145-A -10 The Phase 2 Draft EIS summarized the results of the Pipeline Safety Technical Report (Appendix I-5). The report includes more detailed discussions on the determination of baseline data, methods used for analysis, and risk calculation.

As the commenter refers to, Section 3.9.5.2 of the Phase 2 Draft EIS found that the pipeline safety risk assessment estimates that there would be an approximately 9 percent increase in individual risk during operation of Alternative 1 (before any mitigation is applied). The calculation for this percentage was provided in a footnote and is based on information presented in Section 9.3.6 of the Pipeline Safety Technical Report (Appendix I-5 of the Phase 2 Draft EIS).

In the Pipeline Safety Technical Report, individual risk maximum annual probability of fatality from operation of the 230 kV lines within the corridor was estimated at  $2.21 \times 10^{-7}$  (1 in 4.5 million). This risk considers all potential causes of pipeline incidents, related to, or unrelated to operation of the transmission line in the corridor. The maximum estimated increase in individual risk (over that posed by the existing 115 kV lines) was estimated at  $1.95 \times 10^{-8}$  (1 in 51 million). See Figure 3.9-13 of the Phase 2 Draft EIS for a graphical representation of how the 9 percent figure was derived.

II145-A -11 Stantec has reviewed this and similar comments provided by the commenter on internal corrosion. Stantec is not aware of any situation where AC interference has resulted in or increased internal corrosion inside of a pipeline.

I1145-A-11 | that can be dominate corrosion factors. What are the corrosion and other impacts of this?

I1145-A-12 | AAA. Please detail the maximum federal penalty if convicted fraud and other crimes committed for profit utilities and the effects, impact. What is increased risk borne by the Eastside for the maximum federal penalty for fraud of \$3 million no matter the deaths or damage? Please detail PSE's and Macquarie criminal and civil penalty history. What is its impact on risk factors and repeat offender vs new and those risks factors on safe construction and operation of EE and possible negative impacts of repeat of fraud? Please denote the 10 worse possible case safety of fraud PSE could commit as well as BP given they are both repeat offenders. It critical that PSE and owners past history be taken into account on safety risks.

I1145-A-13 | BBB1 pg 418 and on/574 "The inspection reports on UTC's website for Olympic's facilities in Washington State are only available for the years 2012 through 2016." This unacceptable and insane these pipes are +45-55 yrs old with massive amount of accumulated wear and corrosion. Are these reports are available by going to the WA UTC? Why are they not available farther back? By statute? Where is the Newcastle Olympic pipeline fire from a test pipe that ignited solely from the corona discharge energy same as the massive fire which will result from a 20"/16" main pipeline breakage.

I1145-A-14 | BBB1.2 EDM Services assumption of a spill reaching **372,162 gallons** is ball park correct. All other are complete and utter nonsense. EDM Services is simply pulling crap out of their orifices. As a form US Dept of Navy Survivability technical manager and fuel air explosive (FAE weapons) engineer a 10,000 gallon jet fuel spill will easily have flames hundreds of feet high if not over a 1000 feet high vertically. Horizontally the heat driven wind vortexes will drive the fuel thousands of feet from the spill on a flat surface within a minutes if not seconds. Limiting our Navy testing to just 40 gallons of jet fuel we could easily get peak fire heights of 100 feet. Please include details of actual fuel fire not just made up crap. Also detail the toxic plumes for the burning of homes/business and electronic equipment. The recent massive fire in a Canadian petroleum town (2015 or 16) prevented the return of hundreds of home owners not burned down for months due to the toxics from the plume from the electronics from the homes that did burn. Who the hell is the reference *CDE, 2007*? Really California Department of Education (CDE 2007 and CDE 2005). February 2007. Guidance Protocol for School Site Pipeline Risk Analysis. and is used to spew all kind of bullshit in the EE EIS report. Was the CDE report done by Exponent or other fake science for hire like DNV-GL. Exponent hired by the fossil fuel industry to provide fake science to California legislators to say MTBE is perfectly safe well within societal risk factors

Exponent is as corrupt/criminal science for hire as DNV-GL (PSE/BP Olymic pipeline safety report which is unbelievably fraudulent). Exponent was the "independent experts" paid for by the oil industry for telling the California Legislature that MTBE was a safe fuel additive for auto gasoline only to have it pulled years later for its toxicity.

I1145-A -12 | Under SEPA, an EIS is required to focus on the environmental impacts of the proposal and its alternatives. The topics raised by the commenter are outside the scope of a SEPA EIS.

I1145-A -13 | See response to comment I130-A-2 for information on UTC inspection reports for Olympic's facilities.

After review of UTC inspection reports and consultation with Olympic, the EIS Consultant Team has been unable to verify the referenced incident in Newcastle.

I1145-A -14 | See response to comment I1130-A-3 for information on the estimated spill volume used in the risk assessment. See response to comment I130-A-4 for information on the pool fire scenario used in the risk assessment. It is recognized that if the low probability/high consequence event of a pipeline incident occurring as a result of proximity to transmission lines were to occur, the impacts would be significant. Because the Energize Eastside project does not affect pipeline pressure and flow rates, or other operating parameters of the pipelines, the potential characteristics of a spill or fire would be the same regardless if it occurred under the No Action Alternative or Alternative 1. Mitigation measures can limit but cannot eliminate the risk of a catastrophic release and fire on the pipelines, which is possible under both the No Action Alternative and Alternative 1. Some of the risk of pipeline release is attributable to proximity to transmission lines, both existing and proposed, as noted in Section 3.9.5 of the Phase 2 Draft EIS.

The California Department of Education (CDE) report cited in the EIS (and referred to by the commenter), was prepared by URS Corporation and intended to provide a consistent, professional basis for determining if a pipeline poses a safety hazard for proposed school sites and projects in the state of California. Its sole purpose as a cited reference in the EIS was to place the evaluation of societal risk for PSE's proposal, in context with criteria, guidance, and regulations in place in other communities.

The commenter also asked about requests made to BP/Olympic. As described in Section 3.9.5.1 of the Phase 2 Draft EIS, the EIS Consultant Team requested information from Olympic on the Olympic Pipeline system in the study area to supplement the national data (information requested and received is identified in Appendix I-5 of the Phase 2 Draft EIS).

See response to comment I1114-A-5 for information on potential effects on public services, including emergency response.

Exponent, like DVN-GL, starts with the answer the customers wants and generates spin and irrelevant science to support leaving out the real facts.

For 1/10th of the MTBE story google (Exponent MTBE and "Doubt is Their Product: How Industry's Assault on Science Threatens Your Health") The other 9/10th of the story is oil industry wanted to get MTBE got into autos to reverse it being banned by the aircraft manufactures. The piston driven aircraft industry banned MTBE as a replacement to lead just 8 hrs after first testing its use in 1992. Why? Because of its toxicity. Aviation fuel was getting 10 year waivers (from themselves as they control the astm petroleum committees with user having only 20% of votes) of to continue use of toxic lead since lead was banned in car fuel in 1978. The aircraft industry wanted ETBE as it far safer/better/cheaper. If that happened the oil industry lost at least 1/3 of its aviation fuel business (piston not jet) to ETBE which was made via agriculture/distilling vs MTBE which was made from fossil fuels. The oil industry was desperate to get MTBE out in the market as the "non toxic alternative" and thus the fake science. By the way piston aircraft still use leaded fuel, toxic to kids at any level and way health issue 2 miles around all airports are significantly higher including lead levels....

Really you are going to use a California Department of Education report to say it is ok not to get real pipeline safety information? (pg 432/574) "In the risk assessment field, it is not uncommon for certain pipeline information to be unavailable from the pipeline operator due to proprietary or security reasons (CDE, 2007). (CDE, 2007)=bullshit. It is not ok for the EE EIS not to use actual pipeline condition and remaining lifetime facts which under a 230kV stress could result in a massive leak in just few years if not months. What requests were made to BP in writing and BP responses?



**Explosions**

Gasoline, jet fuel, and diesel fuel generally do not explode, unless the vapor cloud is confined in some manner, called a *vapor cloud explosion*. For the most recent PHMSA incident database (2010 – 2015), there were no reported explosions for refined petroleum product pipelines. Impacts for vapor cloud explosions are expressed in terms of a shock wave measured as overpressure (pounds per square inch) above atmospheric pressure. EDM Services modeled the potential releases from each of the refined petroleum products transported by the Olympic Pipelines within the project corridor. The resulting peak overpressure level was 0.38 pounds per square inch due to the relatively open environment (medium fuel reactivity and low obstacle density). This overpressure level is not high enough to pose potential explosion risks. As a result, explosions are not described any further in this EIS chapter. For additional information on explosions, see the *Pipeline Safety Technical Report* (Appendix I).

**Vapor Cloud Explosion**

Occurs when there is a sudden release of flammable vapor, it mixes with air, and then is ignited by an outside source. Note: The Bellingham incident of June 10, 1999 was technically a **pool fire**, and not an explosion. The pipeline release flowed into a creek and ignited approximately 1.5 hours after the pipeline rupture.

The explosion impacts from the Olympic Pipeline system was modeled using refined petroleum products, medium fuel reactivity, and low obstacle density, as described in the Pipeline Safety Technical Report (Appendix I-5 of the Phase 2 Draft EIS). The resulting peak overpressure was 0.38 psi, as referenced by the commenter. Although this is sufficient to result in window breakage, it is not high enough to pose potentially fatal risks to the public. If an explosion occurs in a confined area (e.g., a pipe), this would result in much higher overpressure levels. These type of conditions are not anticipated as a result of the interaction of the Olympic Pipeline system with PSE's proposal.

II145-A-14

BBB1.3 The wetter the day the bigger the fire max width, they are never a circle. Complete BULLSHIT even for a 500 gallon fire!!! See screen shot below. Drawing assumes a flat terrain which is less than 1% of the 18 miles. **Please correct with real data of fuel fires that are running there will never be stationery "pool fire" in the terrain under review.** How are how fuel fires are fought in detail and how useful is water with fuel fires? Please detail the numerous area where the leaks could run, ie paved streets, storm drains (please detail the impact of the resulting days if not weeks of ullage explosionS which will occur in the storm drains (particularly in hilly terrain= elevation delta of 10 feet or greater) and the cost to replace fractures in light weight concrete pipes used for storm drain pipes, this could total in miles of storm drain pipe for each fuel spill with just 10,000 gallons. An earthquake could see dozens of breaks in storm drain and stream beds. Please denote all crossing of the above with major highway 1405 190 520 and amount of fuel to take down a interstate. Answer around 500 gallons. Atlanta had a simple PVC pipe (empty pipe) fire take down and interstate just in the last year. Even CARANY's BS 0.38 psi overpressure would send 200 pound manhole covers flying.

II145-A-15

BBB1.4 Please compare the recent Space-X rocket explosion on the pad with a fuel release under 680 psig, What are the head pressures and height of spray and ability to blow off 3 feet of soil cover, amount of radiant heat released per unit of time and the rate needed to melt the power lines and catch trees houses on fire? Please see the video shown on every TV station of the fuel load deflagration on the Space-X rocket that vaporized the paint and primer on the adjacent towers in less than 4 seconds (see top of adjacent tower and smoke coming off [www.youtube.com/watch?v=UKUz5ZUPqM8](http://www.youtube.com/watch?v=UKUz5ZUPqM8)). And what the structural damage to those towers was from radiant heat and compare for the EE EIS what an arc fault rupture of the Olympic pipeline from a fallen power lines both 115kV and proposed 230kV and resulting jet fuel release rates we have actually seen in real life scenarios?

II145-A-16

Please detail how many high power line drops have occurred historically in the PSE/BP pipeline right away and how long power to the line remained on in each incident. Please include the history of other pipeline/HVAC line drop incident and impacts.  
What the Olympic pipeline yellow pipeline patrol aircraft purpose and if it has infrared gear for leak detection for those not yet ignited?

II145-A-17

Please Detail how well OPL's leak detection system worked for the Bellingham WA fire. Aand did it reach the 8% requirement and what was the penalty for not? "Leak detection systems must be capable of detecting an eight percent (8%) of maximum flow leak within fifteen (15) minutes or less." ? How was Bellingham WA leak detected? Also please detail the effectiveness leak detection system for the ~2300 liquid pipeline spills and include that in to your societal risk factor analysis. Please detail the Colonial pipeline fire/spill and did the detection system there meet the 8% criteria for leak detection for that 957,600 US gallons spill.

II145-A -15 Under SEPA, an EIS is required to focus on the environmental impacts of the proposal and its alternatives. The topic raised by the commenter is outside the scope of this EIS because the project does not involve rockets or rocket ignition systems. The Phase 2 Draft EIS assessed the probability of a release from the Olympic Pipeline system, taking into account several potential mechanisms that could be related to the Energize Eastside project, and describes the possible consequences of a fire resulting from such a release.

II145-A -16 PSE transmission line incidents were requested. PSE did not have records of incidents of line falls that had damaged the pipeline, and indicated that this could be because PSE responds to the line fall and makes a record of that, but does not necessarily know about damage to the pipeline. Records of incidents were requested from Olympic but were not provided.

II145-A -17 The Energize Eastside project is proposed by PSE and not by Olympic. Questions about pipeline inspections and leak detection should be directed to Olympic or the WUTC. In response to questions about pipeline safety, the Phase 2 Draft EIS includes a probabilistic risk assessment that took into account a reasonable "worst-case" or maximum release volume based on actual reported releases from petroleum pipelines in the U.S. Hazardous Liquid Pipeline Release database (normalized to the diameter of the Olympic pipelines). See response to comment II130-A-3 for more information.

The Colonial Pipeline spill referred to in the comment occurred in 1996 (based on the volume referenced in the comment). This was prior to the study period for the probabilistic risk assessment. Please see Section 3.9.3.1 of the Phase 2 Draft EIS for a description of the reasons the study period was selected.

1.1.3 OPL Leak Detection System

Olympic Pipe Line Company's (OPL's) Pipeline Leak Detection System (PLDS) has been in service in the OPL control center since the early 1990's. PLDS is a real-time pipeline simulation that detects and locates leaks by comparing the volume in and the volume out, with volume adjustments based on pressure (compression of the pipe contents) and predicted pressures within a defined pipeline section. When the difference exceeds a defined loss threshold, the software provides a warning to the operator. If the condition persists, an alarm is provided. Alarms are communicated through the SCADA alarm and event system. OPL's enterprise SCADA System covers 60 sites over its roughly 400 miles of main and lateral pipeline segments, including the pipe segments under consideration. PLDS is a separate software package but is integrated with the SCADA software.

OPL's PLDS meets or exceeds State and Federal requirements for pipeline leak detection including WAC 480-75-300<sup>57</sup>.

<sup>5</sup> Since initial construction, there have been some relatively short pipe replacements (re-routes) which may have an increased wall thickness and/or higher grade pipe.

<sup>6</sup> Leak detection systems must be capable of detecting an eight percent (8%) of maximum flow leak within fifteen (15) minutes or less.

<sup>7</sup> OPL pipeline, leak detection system, and emergency response data were provided by OPL in their July 25, 2016 response to our data request.

Please include in societal risk assessment numbers the risk of not having details on various pieces of information which the draft EE EIS denote in dozens of places. The Space Shuttle had a 1:1,000,000 ~calculated risk. Actual facts 135 total launches 2 failures actual risk 1:62.5

What are the societal risks for PSE going bankrupt because if EE is approve and massive amount of people leave the grid and PSE prices increase further pushing more people off the grid. See *Disruptive Challenges: Financial Implications and Strategic Responses to a Changing Retail Electric Business*.

<http://www.eei.org/ourissues/finance/documents/disruptivechallenges.pdf> PSE owner Maquaire wrote the dam report see Exhibit 2 pg 16/26. Why leave the grid? Per Morgan Stanley and Deutsche Bank, WA is the last state to be in the money for solar PV which it does in 2017, meaning cheaper to go off grid than stay. Why? because solar PV and storage it is cheaper and essentially become a 10to15% percent yielding bond. What are the societal risks to this happening?

What are the risks for release rate vs age of pipe from stress corrosion pipeline breaks for pipes with HVAC corrosion and those without?

What are the reasons why sections of the pipelines line have been replaced and expected remain lifetime of the old section of pipes?

<sup>5</sup> Since initial construction, there have been some relatively short pipe replacements (re-routes) which may have an increased wall thickness and/or higher grade pipe.

II145-A -18 Under SEPA, an EIS is required to focus on the environmental impacts of the proposal and its alternatives. The topic raised by the commenter is outside the scope of this SEPA EIS.

II145-A -19 It is not clear from this comment what the concern is related to the EIS. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the maintenance or ongoing operation of the Olympic Pipeline system. Olympic's pipeline integrity program, which will continue to exist under either the No Action Alternative or the action alternatives, is designed to ensure that all of its pipeline meets or exceeds applicable pipeline safety requirements. With appropriate steps taken to maintain pipeline integrity, including but not limited to an effective cathodic protection program, the age of a given section of pipeline is not necessarily predictive of an increased risk of damage from AC corrosion; therefore, the age of the pipeline is not considered in the EIS analysis. Regarding stress corrosion concerns, see response to comment II145-A-4.

II145-A-19

Also what is the comparison of the stress corrosions knowledge history in non fraudulent industries particularly the US Navy with that of the criminal and fraudulent fossil fuels industry? Where the federal regulator of the massive William pipe line explosion in WA in 2003 had the !@#\$\$% balls to call stress corrosion a "new phenomenon". Pencil lead on aluminum aircraft metal is not a new effect when it brittles the metal and causes a 10 hour old aircraft to have a wing rip off from low fatigue life and neither is stress corrosion. The fact that it took 4 decade before graphite pencils are banned in all aluminum manufacturing floors in the USA is not "new phenomenon" just age old ignorance of humans. Please refer to Williams pipeline explosion elsewhere in this document.

II145-A-20

What is the further energy infrastructure concentration where Seattle City Light lines and PSE cross and the very low level of fuel fire need to weaken the SCL towers to collapse and the impact of losing both PSE and SCL lines and the ramifications of having the Olympic pipeline shut off values out of commission along with both lines down? Also is a 370,000 gallon spill is enough make to the creek bed near by and when it has water how far for fuel to travel to shut down I405 highway? Also detail the escape time to the elementary school 500 meters away at the crossing of SCL and PSE line (around Renton New Castle boarder).

Also what are escape times for Tyee Middle School and Puesta del sol elementary school which is right on the a fault line and Tyee which is 50 feet from the Olympic pipeline , see attach seismic impacts paper attached with this document by James Sweet PE. When does the creek bed by Tyee middle school has water in it as well as the dozen of other creek beds crossing this EE concentrate energy infrastructure for 18 miles allowing very fast fire spread as in Bellingham? What is the ullage explosion potential of the creek bed piping and tunneling and air flow dynamic for repeated explosions in same pipe or tunnel. Same for storm drains particularly on long slopes?

II145-A-21

What are the increased risks including societal risk numbers from the information in attached James Sweet details in his 2015 paper which was previously submitted to the EE EIS and City of Bellevue but have received no response nor included analysis in the EE EIS. Why is the Energize Eastside (EE) EIS ignoring the risk. What are the as increased AC induced corrosion which is very hard to detect particularly stress corrosion? Please detail the further risk and impacts to the Eastside to PSE's EE and its further energy and communication infrastructure concentration including page 10 of 10 Tyee Middle and Puesta del Sol elementary school. Both schools on a creek bed which is often running with water which allow a fast fuel leak spread. EE is just solving the fraudulent problem if two 500kV BPA powerlines go down during a freak 23F winter and 80-95% of 1.2 GW of peaking plant generation is off line and thus the need for more concentrated energy infrastructure which greatly increase societal risk. What is the increase societal risk given EE increase AC corrosion and Stress corrosion and increase risk of terrorist attack on infrastructure shutting down both SEATAC and Portland airport? What is the societal risk shutting of auto and diesel gas deliveries to southern half of WA and Oregon? What is the increase risk of while the BP pipeline are down and fuel shipment go to I5 and I405 and risks of accident/ terrorist opportunities? What are the risks of this

II145-A -20

It is acknowledged that there are infinite variations of circumstances in which a release could occur. Further discussion has been included in the Final EIS to help illustrate the range of possibilities for such a release, but does not evaluate every circumstance, including those noted by the commenter. There is one location in Renton where the SCL line crosses over the PSE and Olympic Pipeline corridor, in the Sierra Heights neighborhood. The project would not change the fact that there is this convergence of energy infrastructure. This location is approximately 1,200 feet from the nearest school, approximately 1,600 feet from the nearest stream, and approximately 1.2 miles from I-405. Like other locations, the probability of a release at this location is very low, but the consequences could be significant.

II145-A -21

This comment generally focuses on societal risks related to the presence of the pipelines in the Energize Eastside corridor. Societal risk is considered in Section 3.9.5.2 of the Phase 2 Draft EIS and Section 4.9.5 of the Final EIS.

General information on emergency evacuation procedures is provided in Section 3.9.2.2 of the Phase 2 Draft EIS and Section 4.9.2.2 of the Final EIS. Assessing 'escape times' from specific locations is outside of the scope of the SEPA EIS. The societal risk analysis used population density and did not assume that anyone would have time to retreat from the immediate pool fire and heat flux areas, as described in Section 3.9.4 of the Phase 2 Draft EIS.

See response to comment II30-A-4 for information on the pool fire scenario used in the pipeline safety risk assessment.

The commenter discusses 'stress corrosion,' which is discussed in response to comment II145-A-4.

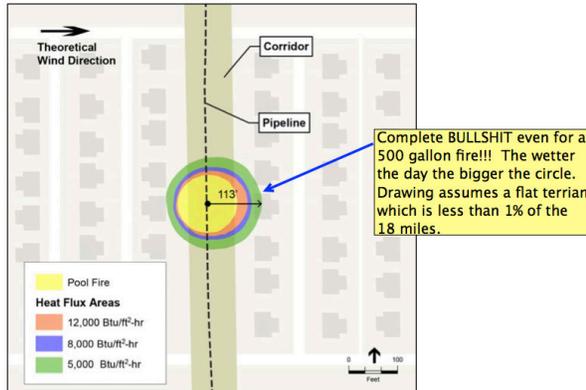
To address the commenter's questions related to explosion potential in creek bed, pipes, or tunnels, if refined petroleum product were to flow into a storm drain or other pipe where the atmosphere was confined, then an explosion could result due to the confinement. A deeply incised creek bed might be sufficient to provide adequate confinement to pose some explosion risk to humans. Further discussion has been included in Section 4.9.5 in the Final EIS to illustrate the range of possibilities for a pipeline release, including a release that enters a creek. It should be noted that PSE's proposal will not change the potential consequences of these situations.

II145-A-21

the societal risk in feet of spacing from pipeline/powerline and schools as security by obscurity? Security by obscurity never works just makes the attackers more successful, what is the increase zero-day risk of EE's 230kV lines? How is it two 500kV lines have to go down before the current EE 115kV lines which never overheat just the transformers do? How massively over built the current system is? How poorly designed is it given FERC didn't force SCL PSE and BPA to form Columbia grid until 2006, which this project was never run through Columbia Grid organization for approval?

Please expand and inform the societal risk section of the EE EIS with pipeline and power line location rules relative to schools for Texas to those in WA. Texas the seat of the criminal fossil fuel industry, has a quite more restrictive take. What does Texas do and what are its societal risk analysis numbers?

energize\_eastside\_phase\_2\_draft\_eis\_volume\_1.pdf (page 427 of 574)



Complete BULLSHIT even for a 500 gallon fire!!! The wetter the day the bigger the circle. Drawing assumes a flat terrain which is less than 1% of the 18 miles.

Note: This diagram is meant to be a simplistic representation of where released pipe contents would spread (or pool) and result in a fire (if an ignition source is present), and does not show site-specific conditions. See Sections 7.1 and 8.3 of the EDM Services report in Appendix I for more information on assumptions and data inputs used to develop this diagram.  
Source: EDM Services, 2017.

Figure 3.9-7. Typical Pool Fire and Heat Flux Areas Diagram

II145-A-23

BBB1.3 The resulting peak over pressure 0.38 psi is also complete bullshit. Why? The below is total bullshit, any of these can be made to denote (flame front faster than the speed of sound in the medium) or deflagrate (flame front slower than

See response to comment II20-A-1 for information on how seismic risks was considered in the Phase 2 Draft EIS and Final EIS. For further information on how societal risk was estimated, see Section 10.0 of the Pipeline Safety Technical Report (Appendix I-5 of the Phase 2 Draft EIS).

See response to comment II122A-41 regarding intentional destructive acts.

The commenter poses a hypothetical scenario regarding the need for the project that involves BPA transmission lines being out of operation; this EIS does not discuss any such scenario.

The commenter requests a number of societal risk probabilities that were not further evaluated because they are incalculable, due to the number of variables. The risks mentioned, such as the need to truck fuel, mechanisms for the spread of fire, and the populations at risk are all described qualitatively in the Phase 2 Draft EIS, Section 3.9. The Phase 2 Draft EIS does not address impacts that are speculative and not probable, consistent with SEPA.

It is not clear in the comments regarding ColumbiaGrid, what specific issue regarding the EIS that the comments are intended to address. The EIS is not intended to determine the need for the project.

II145-A -22 After completing additional research, we were unable to identify any relevant societal risk criteria in use by Texas.

II145-A -23 The commenter is requesting CANARY results for propylene oxide. The pipelines transport refined petroleum products; therefore, such analysis would not be relevant. Other aspects of this comment were not specific enough in citing specific deficiencies in the EIS to be addressed.

II145-A-23

Parameter	Model Input
Fuel Reactivity	Medium - Most hydrocarbons have medium reactivity, as defined by the Baker-Strehlow method. Low reactivity fluids include methane, natural gas (98+% methane), and carbon monoxide. High reactivity fluids include hydrogen, acetylene, ethylene oxide, and propylene oxide.

the speed of sound in the medium) under the right open air conditions. Those conditions likelihood greatly expand for deflagrations which have enough overpressure to kill. Particular with the massive available corona discharge energy of power lines as a multiple ignition source greatly boosting overpressure. All can easily generate over pressure great enough to kill. Even a deflagration far less than the speed of sound can kill via over pressure alone, all depends. The scenario is a light wind pushed fuel vapor horizontal to ground away enough from corona discharge such that a tail possible thousand of feet long form. The winds stop of a moment to allow a fuel vapor to hit enough corona discharge energy and bang, a thousand foot deflagration, much larger and stronger with a 230 kV corona and bigger to higher poles. Please do some CANARY runs for propylene oxide at Zero degrees F and appropriate humidity at such temperature and tell us the over pressure as a sanity check including the various ignition sources tried? I bet I can even dig up video of real world results. Hope your model matches the real world facts.

As a fun factoid the world largest weapons lab China Lake CA with hundreds of possible fueling operations shut down ALL operations at a corona discharge level of 2000 volts per meter.

The below are too limited and cherry picked values to cover actual conditions during, need to run a range 23F (PSE design temp) to say 100F, 5% to 70% humidity for open air, storm drains will completely different. What are the corona discharge energy of powerlines which will the dominate ignition source even at 70% humidity, as the previous New Castle BP OPL fire as demonstrated.

energize_eastside_phase_2_draft_eis_volume_2_appendices.pdf (page 230 of 274)	
Relative Humidity	70%
Air and Surface Temperature	70 degrees F
Spill Surface	Soil

Too limited and cherry picked values, need to run a range 23F (PSE design temp) to say 100F, 5% to 70% humidity for open air, storm drains will completely different, Please model the corona discharge energy of powerlines which will the dominate ignition source.

BBB.2 "pg 422/574 "Note: this data set excludes incidents that were limited to pipeline facilities (e.g., tank farm, station equipment, pump station, appurtenance piping, and valve station)" This is malpractice and invalid to exclude. Please add back in. There are several value stations and appurtenance piping under the PSE EE power lines with corrosion effects from inducted AC and/or electrochemical corrosion which could result in massive leak. The appurtenance piping (test pipe is just one of many

II145-A -24 The environmental parameters used in the CANARY analyses included in Appendix I-5 of the Phase 2 Draft EIS (Pipeline Safety Technical Report) are those commonly used for analysis and represent average conditions. EDM Services re-ran the pool fire models using 30% relative humidity. For small pool fires, the change was negligible. For the largest pool fire, the maximum downwind distance increased from 2% at 12,000 Btu/ft2-hr and 7% at Btu/ft2-hr. It should be noted that PSE's proposal will not change the potential consequences of a release from the existing pipelines.

The frequency of incidents was developed by analyzing all of the releases that occurred along the pipeline right-of-way and all of those which occurred on pipeline operator controlled property and extended beyond the parcel boundary. The historic releases that occurred on pipeline operator property and were entirely contained on the pipeline operator's property were not included since these generally pose no public safety threat. The objective of the risk assessment was to estimate the public safety risks. As a result, it is appropriate to exclude these releases in determining the frequency of releases.

II145-A-24

II145-A-24

connected to the Olympic pipeline) was involved in the Olympic pipeline fire in Newcastle.

II145-A-25

BBB.3 pg 423/574 "Throughout the study area, the Olympic Pipelines are externally coated and cathodically protected, primarily with overlapping impressed current systems (West, pers. comm., 2016). These systems consist of an array of metallic anodes buried in the ground along the pipeline with a connection to a source of electric **direct current (DC)** [see BBB5] to drive the protective electrochemical reaction." DC protection for AC driver of the PSE EE lines is a disaster waiting to happen. Please explain and detail pipeline lifespan of this so called "protective" DC system in term of years of pipeline left with the 115kV current lines and the EE 230kV lines.

II145-A-26

BBB.4 The colossal lack of competent analysis of pipeline safety is also revealed by this report. PipelineTechJoure(foundlooking\$.EN15280)ptj-1-2015.pdf "Evaluation of AC Corrosion Likelihood of Buried Pipelines Applicable to Cathodically Protected Pipelines," 2013 [www.pipeline-journal.net/pdf/ptj-1-2015.pdf](http://www.pipeline-journal.net/pdf/ptj-1-2015.pdf)  
The EE EIS nor the fraudulent PSE (DNV-GL) pipeline safety report analyze the two parallel pipe corrosion issues, please do so. Given the EE DNV-GL pipeline safety report is so incompetent; missing even the basics of stress corrosion and the acceleration of further corrosion from electrochemical reaction induced by EE 115kV and proposed 230kV lines it is not surprising the children hired by the City of Bellevue missed a bachelor of science level effect as shown below. See Japanese paper.

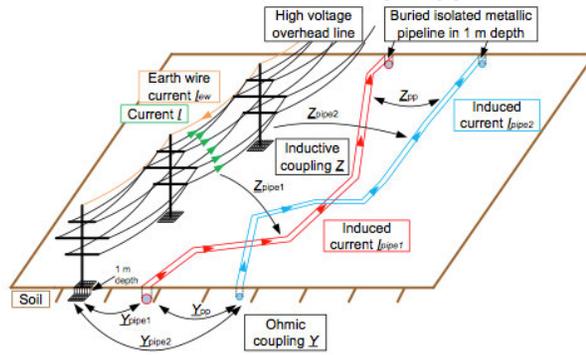


Figure 5: The complex interference and reduction situation between high voltage power line and two pipeline systems

II145-A -25

Cathodic protection and electrical interference (including a discussion of AC current density and AC-induced corrosion) are addressed in Sections 3.9.3.3 and 3.9.5 of the Phase 2 Draft EIS and Sections 4.9.4 and 4.9.5 of the Final EIS. Mitigation measures to support Olympic's determination of cathodic protection requirements for their pipelines are included in Section 4.9.8 of the Final EIS. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipeline; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipeline from corrosion lies with Olympic. The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's Energize Eastside project, not the ongoing operation of the Olympic Pipeline system. The probability of a pipeline incident under the action alternatives could be slightly higher in some locations when compared with the No Action Alternative. In these areas, testing, monitoring, engineering analysis, and implementation of mitigation measures would lower these risks such that there would be no substantial change in risk when compared to existing conditions.

II145-A -26

The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study prepared by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used in the analysis is consistent with industry practice. The cited Japanese paper discusses the risk of stress corrosion cracking due to over-protection related to cathodic protection. Over-protection can also result in accelerated AC corrosion and should be avoided. AC interference and AC corrosion do not cause stress corrosion cracking.

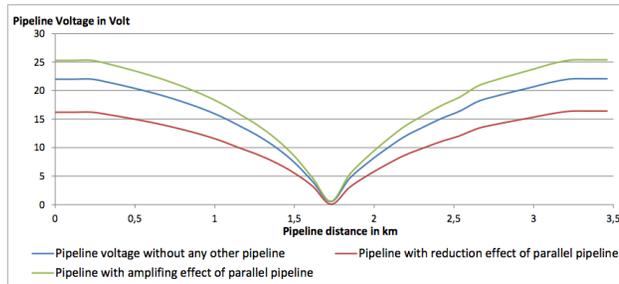


Figure 6: PIV with a second parallel pipeline

II145-A-27

Also include the analysis of natural gas pipelines both transmission and local distribution lines. The local distribution lines, even if plastic and not metal pipes, will have the dominant impact. For the technically illiterate contractors hired by the City as well as City of Bellevue staff plastic pipes have tracing metal wires. "An electrically continuous corrosion-resistant tracer wire (minimum AWG 14)" is required per all city codes and has only a minor less electric-chemical corrosion effect than a 16" or 20" metal pipe lines or Sound Transit light rail effect.

Please add this very relevant and significant analysis into the redo to the EE EIS. And do not forget to add the analysis figure 3 below. The electrical coupling of water pipes, metal fences, metal siding, roofing etc. Please note the author assumption of "In these cases, pipeline and GeS are more or less parallel metallic conductors due to their similar conductive material." Is likely not accurate it could easily be perpendicular driven in many spot cases.

II145-A -27 As described in Section 16 of the Phase 1 Draft EIS, PSE would be required to coordinate with other utility providers to design new transmission lines according to industry best practices, which includes proper positioning and grounding relative to other utilities, including natural gas transmission and local distribution lines. Because of particular safety concerns related to the Olympic Pipeline system, additional analysis focusing on the pipelines was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers construction risks, and electrical interference risks related to corrosion, fault conditions, arcing.

Several aspects of this comment are outside of the scope of the SEPA EIS process, which is focused on evaluating the impacts of PSE's proposal to construct and operate new 230 kV transmission lines. Under SEPA, an EIS is not required to document all of the possible effects and considerations of a decision (WAC 197-11-448), but should focus on elements of the environment that may be significantly affected by a proposal and alternatives. See response to comment II145-A-4 for information related to stress corrosion.

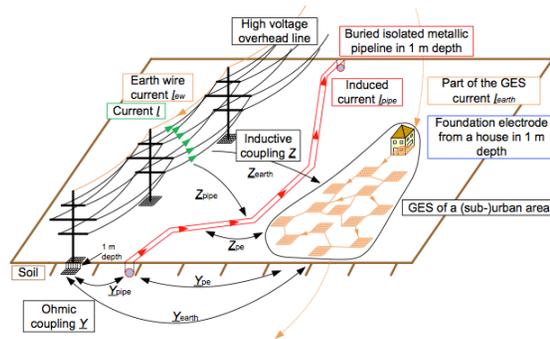


Figure 3: The complex interference and reduction situation between high voltage power line, GES and pipeline system

For the technically illiterate that produced the EE EIS and the DNV-GI Olympic pipeline safety report) and the so called “technical experts” reviewing please include the risk from the coupling and resulting corrosion you will see from new Sound Transit lines (regardless DC or AC) in areas around PSE EE. In case your technically illiterate nature wants to dismiss it, accept for direct crossings, let me provide you with the following figure below. PIV= Pipeline induced voltages. Notice the induced voltage vs pipeline distance, normally one would not have to call this out but given the staggering technical illiteracy of the EE EIS contractors and City of Bellevue Staff, I feel compelled too do so. The Israelis only do it out to 500m but they have very dry soil so AC induced corrosion issues drop off significantly.

I1145-A-27

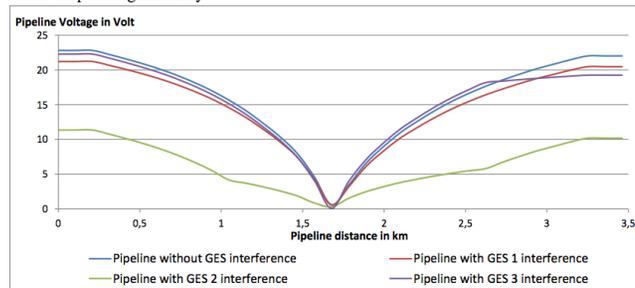


Figure 4: PIV reduction effect from differently sized GESs

II145-A-27

BBB.5 See 2011 Japanese paper "STRATEGY FOR ELIMINATING RISKS OF CORROSION AND OVERPROTECTION FOR BURIED MODERN PIPELINES" attached as P2-43\_Fumio 20Kajiyama.pdf  
[http://members.igu.org/old/IGU%20Events/igrc/igrc2011/igrc-2011-proceedings-and-presentations/poster-papers-session-2/P2-43\\_Fumio%20Kajiyama.pdf](http://members.igu.org/old/IGU%20Events/igrc/igrc2011/igrc-2011-proceedings-and-presentations/poster-papers-session-2/P2-43_Fumio%20Kajiyama.pdf)  
 pg 2/21 "It has been definitely shown by the occurrence of AC corrosion on a cathodically protected pipeline that AC corrosion cannot be prevented by CP in the presence of very high AC voltage of a pipeline." and pg 4/21 "4.1 UNDERSTANDING OF AC CORROSION AC corrosion was not well understood for two reasons: (1) the interaction of AC and DC currents affecting the electrochemical phenomenon of corrosion is very complicated, and (2) the instrumentations used to measure the electric parameters in DC and AC with frequencies between 50 and 100 Hz were not available."  
 Please detail the results of this highly technical approach for liquid distillates (Jet fuel, aviation gas and auto gasoline) which have higher dissolved water than the levels seen in natural gas resulting in higher corrosion and the expected lifespan reduction to the Olympic pipeline from the analysis approach. Please include the much higher electrochemical induction corrosion results for the lead additive in aviation gas. This could be seen in the PIG dat if only one pipe was limited to just aviation gas transport for a significant portion of the time

CCC.1 Map & compare the stress corrosion from actual measured PIG results on the Olympic pipeline over time with any seismic activity that has occurred on or near or could be felt on the Olympic pipeline or could cause shifting across crack boundaries.

II145-A-28

See seismic  
 Only 6 fluffy mentions of earthquake in the main 574pg EE EIS, given this is such a likely and critical event how is this justified? Ignorance? Earthquake risk going to 230kV from 115kV has to at least double the risk from solely from the arc fault puncturing the 20" or 16 inch gasoline pipeline under 800psi. I know the EE EIS staff wants to be like Edward Bernays and his student from afar, Joseph Goebbels, (the Army found every paper and all 11 books at the time of Bernays's in Goebbels' office after the war) but I must insist on this one decency from the EE EIS staff.

II145-A-29

000. 2. Is there anybody here from DNV-GL who wrote the Pipeline safety report here to explain? Ask Carol Helland for sure on video.  
 00. Do you feel you were given the right amount of time/funding **and data** to do a honest accurate and reliable job doing the actual work or reviewing the work done by others on EnergizeEastside powerline upgrade to 230kV the EIS?

II145-A-30

0.b If Pipeline and Hazardous Materials Safety Administration (PHMSA) regulation where not used for the DNV pipeline safety study what would you say to that?

II145-A -28 See response to comment II20-A-1 for information on seismic risks.

Arc fault is a function of the fault current entering the ground at a specific structure, and the associated voltage rise of that structure. Installation of a shield wire on the 230 kV lines would significantly reduce the current flowing into the soil from the faulted structure by distributing the current to multiple structures. This would also reduce the arcing distance. It is likely that the arcing distance and risk would be reduced over the current (115 kV) condition.

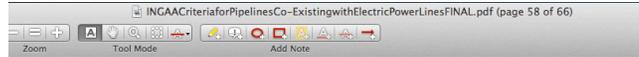
II145-A -29 The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study prepared by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used in the analysis is consistent with industry practice.

II145-A -30 See response to comment II145-A-7 regarding PHMSA regulations.

The standards and references cited in the DNV-GL report are those used in the industry. The 30 A/m2 limit is the standard practice in Europe and the direction North America is also moving to in the new NACE AC Corrosion Criteria Draft standard (not yet approved). Several recent studies have assessed the AC corrosion rates in relation to AC and DC current density (e.g., PRCI EC-6-2). The general consensus is that AC corrosion on cathodically protected pipelines is due to elevated AC current density (i.e., over 30 A/m2) in combination with over-protection (i.e., DC current densities in excess of 1 A/m2).

Based on Stantec's technical review of DNV GL (2016), the report is consistent with the ISO and European standards.

0.c Why are the engineering standards not clearly explained in the DNV-GL pipeline safety report? None are used. Instead DNV mostly uses conclusions from a 1986 German investigation or other deadend or madeup "standard practice" !!! Are there far better standards available?



Regarding AC corrosion, there are no established criteria for AC corrosion control provided in SP0177-2014. Further, this standard states that the subject of AC corrosion is "not quite fully understood, nor is there an industry consensus on this subject." There are reported incidents of AC corrosion on buried pipelines under specific conditions, and there are also many case histories of pipelines operating under the influence of induced AC for many years without any reports of AC corrosion."

While not a Standard Practice document, NACE published "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements" in 2010, providing guidance for evaluating AC current density, and providing recommended limits as discussed in Section 3.3.1.1.

The State-of-the-Art report also cites European Standard CEN/TS 15280:2006<sup>15</sup>, which previously offered the following guidelines related to the likelihood of AC corrosion:

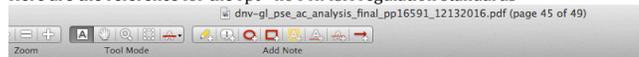
*"The pipeline is considered protected from AC corrosion if the root mean square (RMS) AC density is lower than 30 A/m<sup>2</sup> (2.8 A/ft<sup>2</sup>).*

58

0.d What country has the best liquid pipeline safety standards? Why are USA liquid distillate standards not being used or quoted, only natural gas pipeline safety standards?

Regulations §49 CFR Part 195 Subpart H Corrosion Control (195.551 – 195.589)<sup>26</sup> and §49 CFR Part 192 Subpart I Requirements for Corrosion Control (192.451 – 192.491)<sup>27</sup>?

Here are the reference for the rpt= no PHMSA regulation standards



#### 11 REFERENCES

1. IEEE Std 80-2000 "Guide for Safety in AC Substation Grounding," 2000
2. NACE SP0177-2014 "Mitigation of Alternating Current and Lightning Effects on Metallic Structures and Corrosion Control Systems," 2014
3. NACE SP0188-2006 "Discontinuity (Holiday) Testing of New Protective Coatings"
4. "AC Predictive and Mitigation Techniques – Final Report", for Corrosion Supervisory Committee PRC International, 1999.   
 [Are you aware NACE website says the TG 327 is inactive? Why?]
5. NACE TG 327, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements", NACE Report 35110, 2010   
 [The IEEE says American National Standards Institute (ANSI) has not approved nor has Dept of Defense adopted]
6. R. Gummow, S. Sezall, "AC Interference Guidelines," CEPA 2014.   
 [Have you read this report? Who is CEPA 2014? Why is this not publically available?]
7. S. Finneran, B. Krebs, "Criteria for Pipelines Co-Existing with Electric Power Lines," The INGAA Foundation 2015-04

How do European standards compare?

Pg 20 of 58

Why are the European standards not clearly labeled in the DNV and refer rpts??  
 Why are the EU standards not being used? Not a single reference to ISO standards.  
 Q. Who has the newest for safety pipeline and corrosion standards? The EU, USA, Japan other?

INGAACriteriaforPipelinesCo-ExistingwithElectricPowerLinesFINAL.pdf (page 58 of 66)

Regarding AC corrosion, there are no established criteria for AC corrosion control provided in SP0177-2014. Further, this standard states that the subject of AC corrosion is "not quite fully understood, nor is there an industry consensus on this subject." There are reported incidents of AC corrosion on buried pipelines under specific conditions, and there are also many case histories of pipelines operating under the influence of induced AC for many years without any reports of AC corrosion.

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Q is this so called guidance foolish and dangerous or the "State of the Art"?

dnv-gl\_pse\_ac\_analysis\_final\_pp16591\_12132016.pdf (page 19 of 49)

"In 1986, a corrosion failure on a high-pressure gas pipeline in Germany was attributed to AC corrosion. This failure initiated field and laboratory investigations that indicated induced AC-enhanced corrosion can occur on coated steel pipelines, even when protection criteria are met. In addition, the investigations ascertained that above a minimum AC density, typically accepted levels of cathodic protection would not control AC-enhanced corrosion. The German AC corrosion investigators' conclusions can be summarized as follows: see charts using 20 A/m<sup>2</sup> (1.9 A/ft<sup>2</sup>) as safety standard

- AC-induced corrosion does not occur at AC densities less than 20 A/m<sup>2</sup> (1.9 A/ft<sup>2</sup>).
- AC corrosion may or may not occur (is unpredictable) for AC densities between 20 to 100 A/m<sup>2</sup> (1.9 to 9.3 A/ft<sup>2</sup>).
- AC corrosion occurs at current densities greater than 100 A/m<sup>2</sup> (9.3 A/ft<sup>2</sup>).

The AC current density is related to the soil resistivity, the induced voltage and the size of a holiday in the coating. Additionally, research has indicated the highest corrosion rates occur at holidays with

DNV GL - Report No. OAPUS312DKEMP (PP116591)-1, Rev. 0 www.dnvgl.com Page 10  
 December 13, 2016

Japanese paper uses the ISO standard ISO 15589-1 prescribes for the AC corrosion risk and CP as follows: If the a.c. current density on a 100 mm<sup>2</sup> bare surface (e.g. an external test probe) is higher than 3 A/m<sup>2</sup> (or less, in certain conditions), there is a high risk of corrosion.

Japanese paper P2-43\_Fumio Kajiyama.pdf (page 7 of 21)

ISO 15589-1 prescribes for the AC corrosion risk and CP as follows: If the a.c. current density on a 100 mm<sup>2</sup> bare surface (e.g. an external test probe) is higher than 3 A/m<sup>2</sup> (or less, in certain conditions), there is a high risk of corrosion. Risk of corrosion is mainly related to the level of a.c. current density compared to the level of CP current density. If the a.c. current density is too high, the a.c. corrosion cannot be prevented by CP.

Pg402/574 "Due to concerns surrounding pipeline ruptures in 2010 (in Marshall, Michigan, and San Bruno, California), Congress passed the Pipeline Safety, Regulatory Certainty, and Jobs Creation Act of 2011. This law mandated a variety of new safety measures, and directed the Pipeline and Hazardous Materials Safety Administration (PHMSA) to evaluate concerns surrounding the pipeline ruptures and to submit a report to Congress. Based on those findings, PHMSA is developing rule changes to 49 CFR Part 195, Hazardous Liquid Pipeline Safety Regulations.

Are those rule changes done? When will they be done? Why are they not quoted? Why is this critical information (the rule changes) left out of the DNV Safety report AND references?????

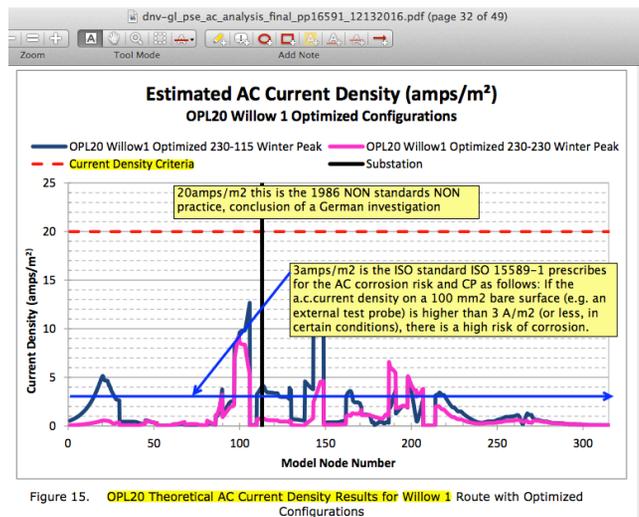


Figure 15. OPL20 Theoretical AC Current Density Results for Willow 1 Route with Optimized Configurations

1. (Question for the 574 pg authors as they wrote it and split it up On pg 402/574 there are new rule coming from Pipeline and Hazardous Materials Safety Administration (PHMSA) How long have they been working on the proposed rules??

When will the rules be finalized??? It has only been 18 yrs. Why was the history started in 2010 pipeline accidents and the 2002 accident resulting in more rules pushed down? Appendix I-pg151/27477: "The two pipeline incidents that led to the passage of the 2002 Pipeline Safety Improvement Act of 2002 and the current pipeline integrity management rules are as follows: Bellingham, Washington, June 16, 1996; Carlsbad, New Mexico, August 19, 2000. Per the National Transportation Safety Board accident report.

Do you find there is a lack of regulatory standard and regulatory dysfunction with regard to pipeline safety for the USA? For EU? The is Act was 2002 here we are 18 years later and still have no liquid distillate pipeline safety standards????!!!!!!

I1145-A -31 Information on the proposed rule making related to the Pipeline Safety, Regulatory Certainty, and Jobs Creation Act of 2011 are included in Section 2.2.2 of the Pipeline Safety Technical Report (Appendix I-5 of the Phase 2 Draft EIS). If enacted as published, the Olympic Pipeline system would be subject to these new requirements, as applicable.

See response to comment I155-A-4 regarding how population density was taken into account in the risk assessment.

Other topics raised by the commenter are outside the scope of a SEPA EIS or did not provide sufficient detail to provide a response.

I1145-A-31

I know why. Same reason we still have lead in aviation gas 40 years after it should have been taken out.



PHMSA!!!!!!!!!!!!

Appendix I=pg151/274. 2002 Pipeline Safety Improvement Act of 2002 and the current pipeline integrity management rules are as follows:

Due to concerns surrounding pipeline ruptures in 2010 (in Marshall, Michigan, and San Bruno, California), Congress passed the Pipeline Safety, Regulatory Certainty, and Jobs Creation Act of 2011. This law mandated a variety of new safety measures, and directed the Pipeline and Hazardous Materials Safety Administration (PHMSA) to evaluate concerns surrounding the pipeline ruptures and to submit a report to Congress. Based on those findings, PHMSA is developing rule changes to 49 CFR Part 195, Hazardous Liquid Pipeline Safety Regulations.

The Protecting Our Infrastructure of Pipelines and Enhancing Safety Act of 2016 reauthorized the Pipeline Safety, Regulatory Certainty, and Jobs Creation Act of 2011, and directed PHMSA to accomplish the mandates of the 2011 act. It also created new mandates in response to the 2015 gas leak in Aliso Canyon, California.

**Pipeline Integrity Management**

Pipeline integrity management, which "provides for continual evaluation of pipeline condition; assessment of risks to the pipeline; inspection or testing; data analysis; and follow-up repair, as well as preventive or mitigative actions," has been a part of PHMSA requirements for the pipeline industry since 1997 (CRS, 2010). In 2002, Congress passed the Pipeline Safety Improvement Act to strengthen pipeline safety laws following two major pipeline incidents (see Appendix I for descriptions of these incidents, which occurred in Bellingham, Washington and

**Proposed Rule Changes to Hazardous Liquid Pipeline Regulations are to:**

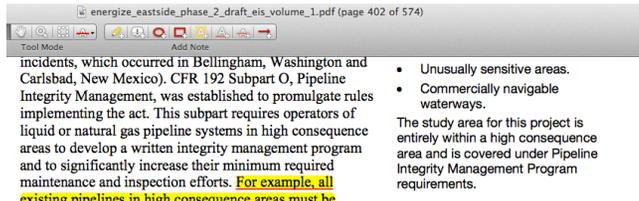
(1) extend reporting requirements; (2) require inspections of pipelines in areas affected by extreme weather and natural disasters; (3) require periodic inline integrity assessments for lines that are outside of high consequence areas; (4) require the use of leak detection systems in all locations; (5) modify pipeline repair provisions; and (6) expand requirements for accommodating use of inline inspection tools. If enacted as published in the Federal Register, the existing Olympic Pipelines would be subject to these new requirements.

**High Consequence Areas** are defined under the Pipeline Integrity Management Program as either:

- High population areas, defined by the Census Bureau as urbanized areas.
- Other populated areas, defined by the Census Bureau as places that contain a concentrated population.

I1145-A-31

I1145-A-31



**Pipeline Offsets**

Requirements for minimum offsets (or clearance) between any underground structures and hazardous liquid pipelines are 12 inches (49 CFR 195.250). Olympic Pipe Line's practice is to require a minimum of 24 inches of clearance between underground structures and the pipeline, and 10 feet of clearance aboveground, to facilitate access to the pipeline for maintenance purposes. Alternative



- Q. How many of the below incidences were in highly populated areas?
- Q. What are the expect fatalities with the incidents in unpopulated area had happened in densely population areas.
- Q. Why does the EE EIS on show liquid incidents when in fact the DNV-GL pipeline safety study only uses natural gas standard which in themselves are out of date not even 10% applied. Please detail those that occurred in populated areas. Please detail the age of the pipelines at failed to those that did not fail, a dot plot similar to a bathtub curve will work = x axis is age of pipe y axis time since last inspection and the size of the dot is the size of spill.

II145-A-31



**Table 3.9-2. Reported U.S. Hazardous Liquid Pipeline Unintentional Release Leaks and Fatalities, 2010–2015<sup>1</sup>**

Reported Incidents	General Public Fatalities	Total Fatalities <sup>2</sup>	Total Pipeline Mileage
<b>Hazardous Liquid Pipelines (total)</b>			
2,362	4	7	1,143,831 <sup>3</sup>
<b>Refined Petroleum Products (only)</b>			
805	0	0	379,086 <sup>4</sup>

<sup>1</sup> Because pipeline safety is expected to improve with each successive change in federal safety rules, PHMSA reports data based on the period reflecting the most recent rule changes to ensure consistent data (see further explanation above).

<sup>2</sup> Includes pipeline operator employees, contractor employees, and the general public.

<sup>3</sup> This is a sum of the individual pipeline mileages for each year, from 2010 through 2015.

<sup>4</sup> This is a sum of the individual pipeline mileages for each year, from 2010 through 2015.

Source: PHMSA, 2016b.

2. There was never anybody from DNV-GL to explain the Pipeline safety report at any of the EE EIS open houses. The replacement for other companies was clear on video tape they had not read the DNV-GL EE EIS Pipeline safety report. Why does DNV hide its own report internally when they are public record? Because there is massive collusion and fraud in the fossil fuels industry and supporting service companies including all the contractors the City of Bellevue has hire to conduct and review the EE EIS.

2a.  Limited distribution within DNV GL after 3 years

VERY odd given this is a public report Why would DNV limit expect to hide things??

2b. Zero stress corrosion cracking discussed in the DNV-GL the Pipeline safety report for EE. Why is that? See pg 64/72 Pipeline Tech]. This is simple malpractice and/or fraud for the prepares of the EE EIS. Please include detailed stress corrosion analysis? Why? The EE soil conditions and movement are ideal for creating stress corrosion. There multiple examples!! please detail all known going back 20 years. EE EIS contract EMA lame claims about PSHMA sp? new up grades has changed and the utility industry are magically inspected by vastly underfunded watch dogs and the "new standards" have caught all issue since 2010. I actually have the EMAXXX orifice saying this on video. PSE latest June 19 2017 pipeline safety settlement sows this BS assertion utterly false and fraudulent.

Here is one example stress corrosion. "On December 13, 2003 the Williams 26-inch line ruptured near Toledo Washington. The pipeline company that supplies most of Washington's natural gas was ordered on 19 December 2003 to all but shut down its trunk line from Canada to Oregon after federal safety inspectors determined frailties in the 268-mile pipe would 'likely result in serious harm to life, property and the environment.'

II145-A -32 This comment generally refers to the assumptions made about pipeline safety regulations. Comments and quotes from industry articles included in the comment did not include sufficient detail to provide a response.

See response to comment II145-A-8 for information on how the public was notified of technical expert presence at the Energize Eastside open houses/public meetings.

The comment about "limited distribution" (labeled 2a in the letter) does not provide sufficient information to understand the issue being raised.

See response to comment II145-A-4 for information on stress corrosion. The example given of the explosion on a natural gas pipeline near Lake Tapps was in 2003 and before the current federal pipeline safety rules were put in place. Comments related to fraud and corruption in developing and implementing stress corrosion regulations for pipelines are outside of the scope of the SEPA EIS process, which is focused on evaluating the environmental impacts of PSE's proposal to construct and operate new 230 kV transmission lines. The EIS makes clear what assumptions were made regarding compliance with federal regulations for pipeline safety.

II145-A-32



I1145-A-32

After the 46-year-old line ruptured twice in six months, the federal Office of Pipeline Safety told Williams Northwest Pipeline it must replace every section of line it hopes to use, or prove it is resistant to stress corrosion cracking. The company's natural-gas artery burst with a roar on May 1 2003 near Lake Tapps, sparking evacuations at a school, a supermarket and about 40 homes. While such eruptions are typically caused by land movement or other outside forces, **inspectors later identified the cause as stress corrosion cracking. The line had passed inspection within the previous year.** See <http://corrosion-doctors.org/Pipeline/Williams-explosion.htm>

2b2. Please detail what the current US federal and WA state stress corrosion regulations for liquid fossil fuel pipe lines before and 14 years after the above 2003 WA fossil fuel pipeline explosion. See the below comment in bold of the federal regulator in 2004 acting like they just discovered gravity and it is a new. Please detail the differences for various countries (USA, UK EU, Norway, Japan, Saudia Arbia) in pipeline stress corrosion regulations. Please contrast this with design knowledge and standards of the US Navy Army and Air Force military fuel depots and refueling ships and aircraft for stress corrosion and well as the same in other countries.

From 2004 ref above: "The same type of cracking caused another section of the Williams line to leak in 1999 and fail during tests in 1992. In 1994, a lateral line on the same system near Oregon City, Ore., failed 22 times during tests. After repairs were made to the line near Lake Tapps in May, inspectors ordered the company to reduce the line's gas pressure 20 percent to 632 pounds per square inch. Following a similar break on an oil pipeline in Tucson, Arizona that sprayed 30,000 gallons of diesel fuel onto homes, federal inspectors issued a formal alert to pipeline operators about stress corrosion cracking.

Pg 26 of 58

Inspectors typically examine lines by running water through them at high pressure. But such hydrostatic testing doesn't guarantee there's no problem there and can't reveal stress corrosion cracks. Until recently, companies weren't required to do the complex in-line inspections that **might catch** the problem.

"We have no actual regulation saying that you need to address (stress corrosion cracking) in your pipelines," said Hill, with the federal safety office. "**Basically, it's a new phenomenon**, and we're studying it." **[THIS comment in bold is either fraud or**

**purposeful incompetence, the US Navy has been dealing with stress corrosion for over 100 years particularly in piping. Yet another example for the massive fraud which is the US fossil fuels industry and its corruption of the government regulators. For the EE EIS please detail the results of that "studying" has been 13 years later!!!!!!! And the inspection tools to "might catch" the problem]**

Even today, state and federal regulators acknowledge stress corrosion cracking must be considered when evaluating a line's integrity, but in-line testing is required only where pipelines run through populated areas. Companies can get around even those tests, some said.

"The problem, particularly in the gas industry, is they aren't built for this kind of testing, so the law gives them an out," said Kim West, senior pipeline-safety engineer for the state. **[!@#\$\$%^& unbelievable fraud in our state & federal regulations, not civil service fault criminal fossil fuels industry and criminal politicians]**

Please detail the level of maturity of Federal and State regulations for this industry and the level of change those regulations have seen after 80 years say circa 1995 and the "massive" or lack there of, level of changes since then, every ten years say 2005, 2015 and those pending. Compare and contract as you did with societal risk but for these Fed and state regulation please include Texas in the analysis. And detail what laws are in effect to give the utilities

Pg 27 of 58

II145-A-32

industries a “legal out” as the WA UTC pipeline safety engineer denoted.

What are the lack of funding and impact of June 19 2017 PSE for the real societal risk calculated in the EE EIS? *“As for that settlement money, none of it goes to any of the victims affected by the blast. **Instead, it will go into a fund to promote pipeline regulation and safety projects.**”* What is the current risk impact of “lack of funds to promote pipeline safety” in WA effect PSE’s EE project?



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56

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A complaint alleged five violations related to improper deactivation of a pipeline and failure to perform periodic gas leak surveys and corrosion tests as required by pipeline safety regulations. In the settlement, PSE did not contest the five violations.

As for that settlement money, none of it goes to any of the victims affected by the blast. Instead, it will go into a fund to promote pipeline regulation and safety projects.

II145-A-33

II145-A-34

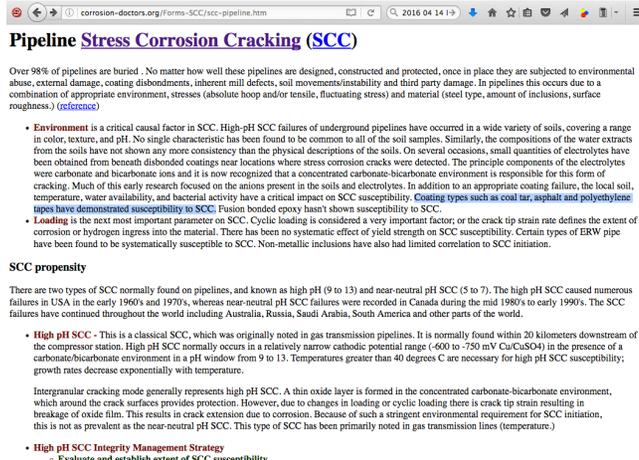
What are the details of the coal tar coating used on the OPLs in term of stress corrosion susceptibility. Also what are the AC induced deterioration of the coal tar coatings and other deterioration including microbial. What is the expect lifetime left in the coal tar coating?

II145-A -33 This comment is outside of the scope of the SEPA EIS process, which is focused on evaluating the environmental impacts of PSE's proposal to construct and operate new 230 kV transmission lines. Under SEPA, an EIS is required to focus on the environmental impacts of a proposal and its alternatives. SEPA does not require an EIS to analyze the economic or social policy impacts of an action (WAC 197-11-448(3)).

II145-A -34 As project applicant, PSE does not have the ability to require Olympic to publicly release information on their system. Validating Olympic’s system operation is outside of the scope of the EIS for the Energize Eastside project. Olympic, as the pipeline operator, is responsible for operating and maintaining their pipelines in accordance with federal standards. Regarding coal tar coating and AC interference, refer to response to comment II122-A-30.

Regarding stress corrosion, the EIS Consultant Team could not find information to suggest a direct relationship between topography (e.g., hilly or flat land) or fault conditions and stress corrosion cracking occurrences on pipelines. Stress corrosion cracking is a form of corrosion that occasionally occurs as a result of the combined influence of pipeline stress due to its pressurized contents and a corrosive medium. Due to the higher pipeline temperatures, pipeline incidents attributed to stress corrosion cracking are more common on natural gas pipelines than on hazardous liquid pipelines (for additional information, see U.S. Department of Transportation's 'Fact Sheet: Stress Corrosion Cracking' at <https://primis.phmsa.dot.gov/comm/FactSheets/FSStressCorrosion.htmRefer>).

The presence of the transmission line does not affect the freeze/thaw cycles. PSE assumed a maximum lateral force on the pipeline of 1.3 ksf. This lateral force value is conservative (i.e., reflects a worst-case scenario) because it assumes placement of the largest foundation as close to the pipeline as the proposed route gets. As described in Section 4.9.8 of the Final EIS, PSE will provide steel pole designs and locations to Olympic for their review and ensure that lateral force does not exceed 1.3 ksf.



I1145-A-34

2c. What buried coupon testing is for pipeline corrosion get done for Olympic pipeline. Please detail including that done for stress corrosion.

2d. CoFB please force the criminally convicted BP to release ALL Olympic pipeline inspection records and include in the EE EIS and for the EE EIS to access remaining pipeline lifetime left with current 115 kV lines and detailed analysis showing pipeline(S) reduction with the 230kV. How does stress corrosion different in hilly pipeline area vs flatland vs known or suspected fault lines, particularly those the PSE EE 18 miles of pipeline in densely populated areas? Please note significant AC coupling as far away as 2km.

Given the complete lack of competent contractors working on EE EIS [given CoB ignored its own electrical reliability report, to hire technical staff to help hire outside staff,] here is what a fact based and almost complete good engineering approach looks like below the picture of what happen when you do not. The Exponent report is a surprising amount of honesty from the expert at Exponent well known for it fake science and is like duely to the fact he was well into retirement want to atone for his sins or just a partime guy who didn't get the memo to lie. [www.corrosionclinic.com/corrosion\\_courses/External%20Pipeline%20Integrity%20Assessment%20and%20Composite%20Repairs.htm](http://www.corrosionclinic.com/corrosion_courses/External%20Pipeline%20Integrity%20Assessment%20and%20Composite%20Repairs.htm)

II145-A-34

**External Pipeline Integrity Assessment and Composite Repairs**

Course Outline | Who Should Attend | Registration | In-House | On-Demand | Online Courses | PPT Slides+Testbank | Course List

**Course Overview**

Pipelines play an extremely important role throughout the world as a means of transporting gases and liquids over long distances from their sources to the ultimate consumers. Given the implications of pipeline failures and the role that external corrosion plays in these failures, it is apparent that proper corrosion control can have a major impact on the safety, environmental preservation, and the economics of pipeline operation. This 5-day course covers various forms of external pipeline corrosion, external corrosion direct assessment methods, and pipeline composite repairs.



This course is available for in-house training, online and distance learning worldwide. It can also be customized to meet the specific needs of your organization.

Course Outline | Who Should Attend | Registration | In-House | On-Demand | Online Courses | PPT Slides+Testbank | Course List

**Course Outline**

**1.1 External corrosion of oil and natural gas pipelines**

- 1.1.1 Introduction to Pipeline Integrity
- 1.1.2 The threats and impacts of external corrosion of oil and natural gas pipelines

I1145-A-34

[www.corrosionclinic.com/corrosion\\_courses/External\\_Pipeline\\_Integrity\\_Assessment\\_and\\_Composite\\_Repairs.htm](http://www.corrosionclinic.com/corrosion_courses/External_Pipeline_Integrity_Assessment_and_Composite_Repairs.htm)

- 1.5.2 Concentration cell corrosion
- 1.5.3 Differential aeration cell corrosion
- 1.5.4 Galvanic corrosion
- 1.5.5 Active-passive cell corrosion
- 1.5.6 Cathode to anode area effect
- 1.5.7 Exercise/practical
- 2.1 Microbiologically Influenced Corrosion**
  - 2.1.1 Magnitude of MIC on external corrosion of pipelines
  - 2.1.2 Classification of bacteria in underground environment
  - 2.1.3 aerobic bacteria
  - 2.1.4 anaerobic bacteria
  - 2.1.5 obligate aerobic bacteria
  - 2.1.6 Mechanisms of MIC
- 2.2 MIC Inspection and testing**
  - 2.2.1 Field testing of MIC
  - 2.2.2 Lab testing of MIC
- 2.3 Stray current corrosion**
  - 2.3.1 Definition
  - 2.3.2 Sources of stray current that affects pipeline corrosion
  - 2.3.3 AC corrosion
- 2.4 Exercise/practical session**
- 3.1 Stress corrosion cracking of pipeline steels**
  - 3.1.1 Definition
  - 3.1.2 High pH SCC
  - 3.1.3 neutral pH SCC
  - 3.1.4 Stages of SCC
- 3.2 Underground environments that cause SCC of pipeline steels**
- 3.3 Groundwater containing CO2**
- 3.4 Effect of CP and coatings on SCC of pipeline steels**
- 3.5 Effect of soil property on SCC**
- 3.6 Effect of welding methods on the susceptibility of line pipe steels to SCC**
- 3.7 Effect of tensile stress on SCC of gas transmission pipeline**
- 4.1 Prevention and Mitigation of Corrosion and SCC**

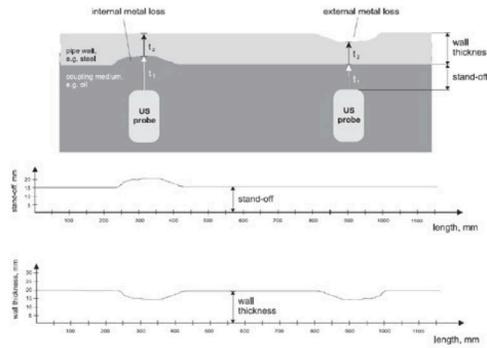


Figure 6: The principle of ultrasonic technique measurements.

regular outside pipe surface corrosion and inside surface of pipe corrosion chemically or electrically induced is above in figure 6. Below is internal pipe corrosion resulting from stress corrosion. See pg xx of Pipeline Tech Journal.

I1145-A-34

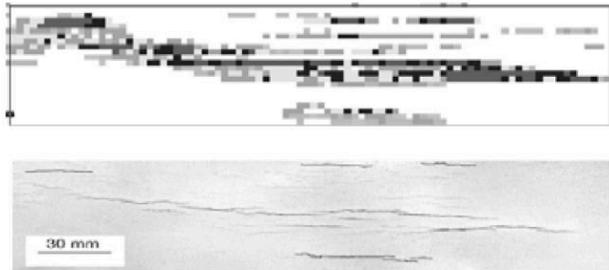
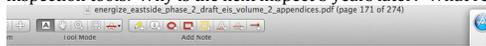


Figure 7: Stress-corrosion cracks (SCC) detected by angled-beam ultrasonic tool.

Please detail the resolution of BP's " high resolution deformation and high resolution magnetic flux leakage tool in April 2014." And compare to state of the art of PIG inspection tools. Why is the next inspect 5 years later? What regulation drive that?



- This pipeline was internally inspected using a high resolution deformation and high resolution magnetic flux leakage tool in April 2014. **The next planned internal inspection is early 2019.**

Is that regulation(s) current or under review, How does it compare to UK and ISO standards?

Please do the risk analysis of the proposed 230kV power line and the increased risk resulting from stress corrosion combining with AC inducted currents. To do this risk the CoB will need to require the PIG inspection data from the Olympic pipeline Company. Also include soil pH and resistivity at the pipe depth not just the average pipe depth in both SCC (stress corrosion cracking) What are details the number of pipe holidays ( nice way for the industry to sugar coat & hide facts) holidays are breaks/hole in the pipes exterior coating which for the Olympic pipeline is coal tar.

dnv-gl\_pse\_ac\_analysis\_final\_pp16591\_12132016.pdf (page 15 of 49)  
 or other aboveground appurtenance of the pipeline. During steady state normal transmission line operation, **AC current density at a coating holiday (flaw)** above a certain threshold may cause accelerated external corrosion damage to the pipeline. In addition, damage to the pipeline or its coating can occur if the voltage between the pipeline and surrounding soil becomes excessive during a fault condition.

dnv-gl\_pse\_ac\_analysis\_final\_pp16591\_12132016.pdf (page 17 of 49)

Table 1. Pipeline Model Summary

Pipeline Name	Outer Diameter (in.)	Burial Depth (ft.)	Coating Type	Average Coating Resistance (kohm-ft <sup>2</sup> )	Approximate Coating Thickness (mils)
OPL16	16	4	Coal Tar	22.5	75
OPL20	20	4	Coal Tar	22.5	75

2d.(continued) Here is what trained technical experts say about coal tar and stress corrosion. *“• In addition to an appropriate coating failure, the local soil, temperature, water availability, and bacterial activity have a critical impact on SCC susceptibility. Coating types such as coal tar, asphalt and polyethylene tapes have demonstrated susceptibility to SCC. Fusion bonded epoxy hasn't shown susceptibility to SCC.*

*• Loading is the next most important parameter on SCC. Cyclic loading is considered a very important factor: or the crack tip strain rate defines the extent of corrosion or hydrogen ingress into the material. There has been no systematic effect of yield strength on SCC susceptibility. Certain types of ERW pipe have been found to be systematically susceptible to SCC. Non-metallic inclusions have also had limited correlation to SCC initiation.”*

Here, the above non EE EIS authors are correct that cyclical loading is a very important fact, but long term static stress from different ground shifting is enough such a pipe crossing as earth quake fault line or hillside slippage or alluvial fan movement including those up slope or down slope from the pipeline. What are the current static mechanical stress on the pipes and how will new towers effect that stress. How is will the changes in freeze/thaw cycles due to the new towers effect pipe stress/stress corrosion? New towers will be as close as 13 feet to the pipes.

Q4.2.4 pg 35/66(INGAA) How does Coating Resistance break down voltage change with time and degradation? What is the increase arc fault and arc fault puncture of the pipe with 230kV lines vs 115kV.

II145-A -36 Coating breakdown voltage potentially occurs only under a fault condition with very short durations. Stantec has reviewed this comment and has not identified a need to change criteria used in the DNV GL report based on degradation.

In terms of the arc fault risk difference between a 230 kV and an 115 kV line, the MVA (Mega Volt Amp, or 'apparent power') for a short circuit depends on generation on the system at the time of the fault and the impedance in the system to the point where the fault occurs. If the 115 kV lines are replaced by 230 kV lines, the short-circuit MVA is not substantially affected since the generation does not change. There may be a small change in impedance with the new line. However, since the voltage is doubled, the fault current would be expected to be reduced. However, these are complex conditions involving a number of variables related to fault sources on the system, and any future changes in load and generating capacity. As more load and generating capacity are added to the system, the short-circuit MVA would continue to rise. Therefore, in the future, the fault currents on the 230 kV line may be more than what is seen on the 115 kV system at present.

To address arc fault risk, PSE proposes the inclusion of shield wires on the new transmission lines. This additional safety equipment provides a low resistance path to carry the majority of the system fault current along the line to ground at several locations. The new steel poles with shield wires will provide better grounding than currently exists with the 115 kV lines. This will reduce the voltage risk in the ground around the pole area when there is a fault. Mitigation measures included in Section 4.9.8. of the Final EIS will also mitigate any potential increased arc fault risk from the new transmission lines. Also see response to comment II29-B-3.

II145-A-36

dnv-gl\_pse\_ac\_analysis\_final\_pp16591\_12132016.pdf (page 4 of 49)  
 > Under fault conditions, determine if personnel safety and/or the pipeline integrity could be compromised (coating damage could occur if fault voltage exceeds the approximate **coating breakdown** voltage of **10,825 volts**).

II145-A-37

Earthquake or \$20 terrorist attack. What is the arc fault risk of the 230 kV lines to some who pound a 6 foot ½ inch steel metal agriculture rod to say support a tree nearby or a terrorist doing so right on the pipeline.

II145-A-38

2e. What is the level of over protection currently of BP Olympic pipeline's DC catholic protection system verses the AC inducted currents from the 115kV power lines currently and those of the proposed 230kV lines? See part b of figure 1 below. How will this overprotect change with 230kV lines and it impact on the corrosion and lifetime of the pipe and predictability of failure of the pipe?

II145-A -37

Public safety risks associated with intentional destructive acts are discussed in the Phase 1 Draft EIS as an unlikely, but possible worst-case scenario. However, the project is not expected to increase the risk of terrorist or other malicious attacks. While public awareness of this transmission line has increased because of the EIS process, there is no reason that the transmission lines or the pipeline system would become a more likely target of such action because of the Energize Eastside project.

II145-A -38

Cathodic protection and electrical interference (including a discussion of AC current density and AC-induced corrosion) are addressed in Sections 3.9.3.3 and 3.9.5 of the Phase 2 Draft EIS and Sections 4.9.4 and 4.9.5 of the Final EIS. Section 4.9.8 of the Final EIS includes mitigation measures to support Olympic's determination of cathodic protection requirements for their pipelines. Per federal law, Olympic is responsible for the maintenance and safe operation of the pipeline; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipeline from corrosion lies with Olympic. Olympic has not identified any specific areas where overprotection is currently an issue or would be in the future with the Energize Eastside project.

"Overprotection" of pipelines using cathodic protection systems is a known issue and the subject of continuing research, including research PHMSA is supporting. PHMSA's objective of the research is to develop a set of guidelines for the pipeline operators, which would enable users to determine the limiting cathodic protection potentials for a given steel metallurgy and coating type and thickness to mitigate possible hydrogen-induced damage and coating disbondment and /or blistering. As industry guidelines are developed, Olympic, as pipeline operator, is expected to incorporate these guidelines into their pipeline integrity program.

Also see response to comment OO1-A-4, with regard to the approach PSE has taken to minimize the potential for AC induced corrosion on the pipeline.

Japanese paperP2-43\_Fumio Kajiyama.pdf (page 5 of 21)

Probable simultaneous reactions for the positive part of AC wave form:  
 $Fe^{2+} \rightarrow Fe^{3+} + e^-$   
 $1/2H_2O \rightarrow 1/4O_2 + H^+ + e^-$   
 $1/2H_2 \rightarrow H^+ + e^-$   
 Principal anodic reaction is thought to be the dissolution of steel. Consequently, the dark shading on the AC wave form in Figure 1 refers to a strong likelihood of AC corrosion.

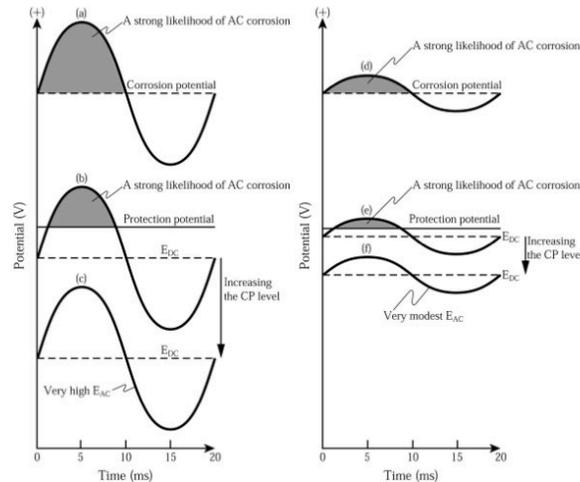


Figure 1 AC corrosion and its control by increasing the cathodic protection (CP) level.

3. Why is there zero mention of Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) in the DNV-GL pipeline safety report? No one word of either

Nor 49 CFR Part 195

Nor PHMSA is developing rule changes to 49 CFR Part 195.

In fact, contrary to what I have the CoB contractors on video tape saying that the DNV-GL pipeline safety report uses PHMSA regulations when in fact does not! In fact PHMSA are still not finalized! If so please denote In fact the DNV-GL pipeline safety report only uses reference material as standards that the authors of the DNV-GL pipeline safety report themselves wrote, the 2015 INGAA report "Criteria for Pipelines Co-Existing with Electric Power Lines

II145-A -39 See response to comment II145-A-7 regarding PHMSA regulations.

The INGAA report was prepared by DNV GL and summarizes some of the research and industry practices related to AC corrosion, as there is no absolute industry criterion in North American standards. NACE has a draft standard that is in the approval process, as described in response to comment II145-A-30.

Regarding the question on "Case 1 or 2" in the DNV-GL report, the question is not understood. The entire powerline corridor was modeled.

Regarding the question about "crossing angle criteria," the question is not understood. Unless there is a substantial length parallel between the pipelines and the powerlines, there will be very minimal effect at any crossings. If the question is related to the two new powerlines, then it has been taken into account in the DNV-GL model.

There are other topics raised in this comment where there was not sufficient detail, or specific deficiencies of the EIS analysis were not cited, to allow a response.

II145-A-39

4. The only reference to criteria/recommendation corrosion is a 2015 INGAA report "Criteria for Pipelines Co-Existing with Electric Power Lines," The INGAA Foundation 2015-04 (zero standards from the PHMSA in force) Please detail fossil fuel industry obstruction of regulation and limiting to fines including service industries such as DNV-GL and the current contractor firm working on this report.

5. What are the top five oldest jet fuel pipelines paralleling high power AC lines for more than 10 miles. Is there a reason the Case 1 or 2 in DNV report just went 0.95 miles (5000ft) the EE/pipeline goes 400 miles (~62,000 ft in EE study area) under high voltage/current.

\* from <http://www.ingaa.org/about.aspx>

The Interstate Natural Gas Association of America (INGAA) is a trade organization that advocates regulatory and legislative positions of importance to the natural gas pipeline industry in North America.

- Is it appropriate to quote natural gas corrosion criteria for liquid distillate criteria? pg17/66(INGAA) "In 1986, a corrosion failure on a high-pressure gas pipeline in Germany was attributed to AC corrosion.

AC-induced corrosion does not occur at AC densities less than 20 A/m<sup>2</sup> (1.9 A/ft<sup>2</sup>).

\* pg 58/66(INGAA) While not a Standard Practice document, NACE published "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements"<sup>1</sup> in 2010, providing guidance for evaluating AC current density, and providing recommended limits as discussed in Section 3.3.1.1., ref 15=

The DNV auther reference this INGAA report which they themselves also wrote. Why did they reference it? Why does the DN-GL safety report not fully detail the crossing angle criteria? What exactly are the AC inducted effects for a zero cross angle? The DN-GL safety report only mentions it twice in entire report See 2<sup>nd</sup> yellow highlighting.

[dnv-gl\\_pse\\_ac\\_analysis\\_final\\_pp16591\\_12132016.pdf \(page 17 of 49\)](#)  
Pugot Sound Energy  
AC Interference Analysis - 230 kV Transmission Line Collocated with Olympic Pipelines OPL16 & OPL20

It should be noted that the steady state 15 VAC threshold (in the standards listed above) was established with personnel safety in mind and not with consideration of corrosion influences. Recent research and experience has shown that AC accelerated corrosion can occur in low resistivity soils at AC voltages well below this threshold. The effects of the power transmission line on an adjacent pipeline are a function of geometry, soil resistivity, coating resistance, and the transmission line operating parameters. The geometry characteristics include separation, depth of cover (DOC), pipe diameter, angle between pipeline and transmission line, pole footing design, and phase conductor spacing and average distance above the ground. These remain constant over the life of the installation. The critical resistance comes from system ground resistance and soil resistivity.

Below is the referenced work of the DNV-GL authors which they also wrote—the INGAAC report of 2015. Why are there not references and who validated this criteria?

INGAACriteriaforPipelinesCo-ExistingwithElectricPowerLinesFINAL.pdf (page 48 of 66)

### 6.1.5 Collocation / Crossing Angle

The angle of collocation or crossing of the pipeline and power line limits the influence of induction. The following generalized rankings have been determined through **parametric studies, and historical experience.**

Collocation/Crossing Angle - $\theta$ (°)	Relative Severity
$0 < \theta < 30$	High
$30 < \theta < 60$	Med
$\theta > 60$	Low

Why no references?!?!?!

Who validated DNV-GL model? How accurate is it? And if it is not Also what are the corrosion effects

Why are the last 0 to 15 degrees crossing angles left off that is the case the EE EIS is analyzing? Would you leave off the last 15 degrees. How to charts like this compare to other governing regulation and to other bodies of work? Who says NACE's 15V criterion is the what to use? The authors themselves admit 15VAC is not to be used for corrosion only personal safety, that is getting their butts electrocuted. The PSE/OPL crossing angle is zero in most cases how could DNV-PL analysis be valid for even the

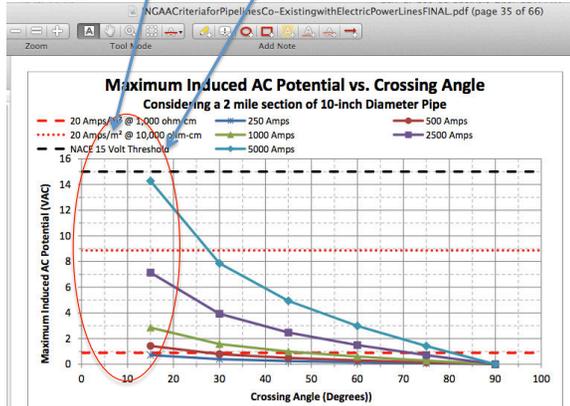


Figure 14. Maximum calculated induced voltage at various HVAC line crossing angles

Who is the governing body that bless the 20Amp/m2 criterion the DNV authors use? Here is that 31 year old (1986) German investigator 20Amp/m2 when the EU standard is ISO standard ISO 15589-1 is 3 A/m2 or less "prescribes for the AC corrosion risk and CP as follows: If the a.c.current density on a 100 mm2 bare

I1145-A-39

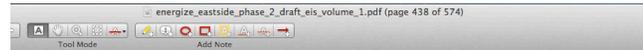
surface (e.g. an external test probe) is higher than 3 A/m<sup>2</sup> (or less, in certain conditions), there is a high risk of corrosion.”



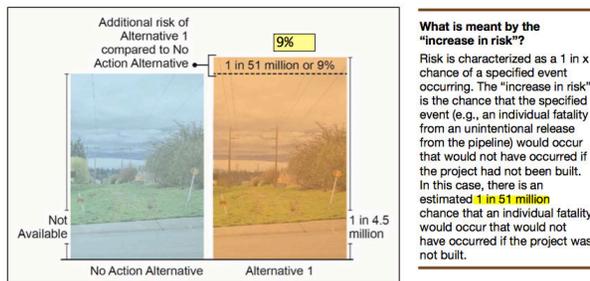
despite high level of cathodic protection.

**9. AC CORROSION PROTECTION CRITERION**

After the first corrosion perforation on a polyethylene coated gas pipeline in Germany, attributed to AC corrosion despite satisfying the protection potential criterion, in 1986, the AC corrosion protection criterion DIN 50 925 as described as below was established, in 1992.

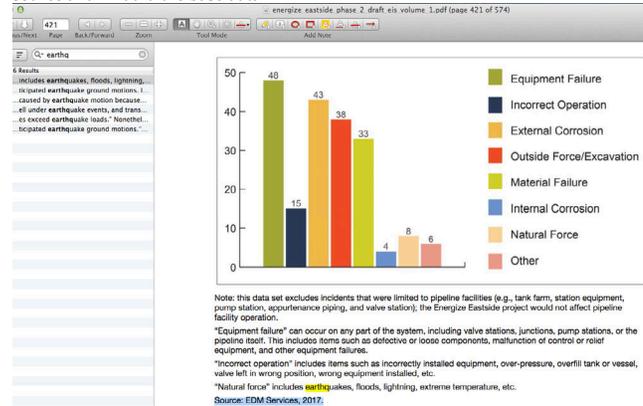


Using the incident frequency results in Figure 3.9-12, the individual risk results for Alternative 1 are presented in Figure 3.9-13.



Source: EDM Services, 2017.

Why no earthquake risks analyzed just mention the word 6 times all fluffy. Why is EDM Services is the reference why not DOT or PHMSA? How is EDM Service anymore relevant reference than quoting Donald Duck? What is the base data source and what id the base data?



This is same DNV before being repurposed for INGAA=DNV/Puget Sound Energy for

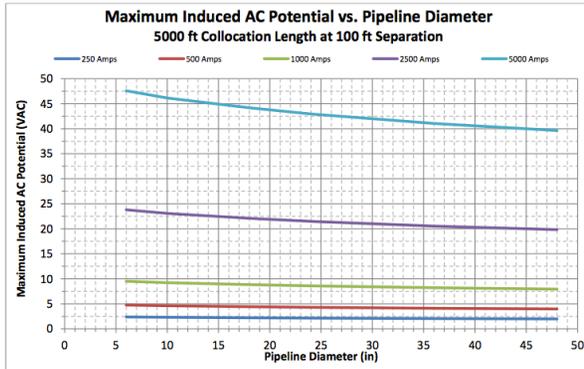


Figure 15. Maximum Induced AC Potential as a Function of Pipeline Diameter

I1145-A -40 See response to comment I120-A-1 for information on how seismic risks were considered in the pipeline safety risk assessment.

I1145-A -41 The comment does not provide sufficient detail to allow a response.

I1145-A-41

dnv-gl\_pse\_ac\_analysis\_final\_pp16591\_12132016.pdf (page 45 of 49)

**11 REFERENCES** ZERO!!!! of these references are tied to the pgs of propaganda above

1. IEEE Std 80-2000 "Guide for Safety in AC Substation Grounding," 2000
2. NACE SPO177-2014 "Mitigation of Alternating Current and Lightning Effects on Metallic Structures and Corrosion Control Systems," 2014
3. NACE SPO188-2006 "Discontinuity (Holiday) Testing of New Protective Coatings"
4. "AC Predictive and Mitigation Techniques – Final Report", for Corrosion Supervisory Committee PRC International, 1999. The NACE website says the TG 327 is inactive for 7 yrs? Why?
5. NACE TG 327, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements", NACE Report 35110, 2010 The IEEE says American National Standards Institute (ANSI) has not approved nor has Dept of Defense adopted.
6. R. Gummow, S. Sewall, "AC Interference Guidelines," CEPA 2014. Have you read this report? Who is CEPA 2014? Why is this not publically available?
7. S. Finneran, B. Krebs, "Criteria for Pipelines Co-Existing with Electric Power Lines," The INGAA Foundation 2015-04. pg 58/60 of Ref 7(INGAA) While not a Standard Practice document, NACE published "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements" in 2010, providing guidance for evaluating AC current density, and providing recommended limits as discussed in Section 3.3.1.1.

ZERO!!!! PHMSA in this report

ZERO!!!! soil Ph in this report. Zero! wet dry soil resistivity

ZERO!!!! buried coupon testing

ZERO!!!! mention of pipe depth changes and the soil resistivity at the pipeline depth

ZERO!!!! comparison of measure corrosion data of the pipes

ZERO!!!! mention of what liquid distillate pipeline corrosion standards this report uses if any

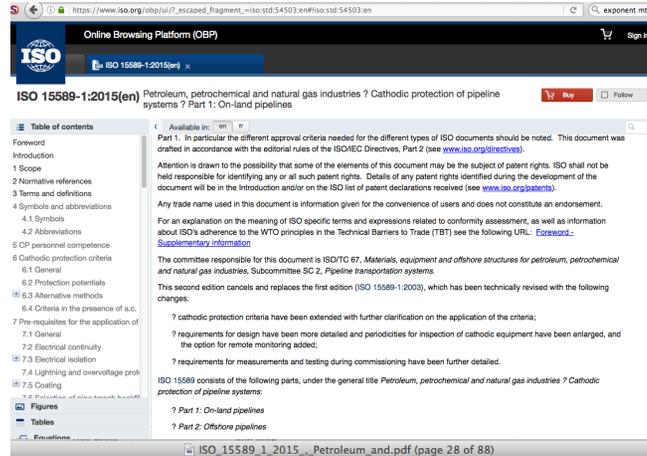
ZERO!!!! only one mention of "crossing" pg12 and only 2 for angle pg 17,23

**ZERO!!!! stress corrosion in this report**

ZERO!!!! burst pressure reduction to 3000psi mentioned in this report

pg402/574 Due to concerns surrounding pipeline ruptures in 2010 (in Marshall, Michigan, and San Bruno, California), Congress passed the Pipeline Safety, Regulatory Certainty, and Jobs Creation Act of 2011. This law mandated a variety of new safety measures, and directed the Pipeline and Hazardous Materials Safety Administration (PHMSA) to evaluate concerns surrounding the pipeline ruptures and to submit a report to Congress. Based on those findings, PHMSA is developing rule changes to 49 CFR Part 195, Hazardous Liquid Pipeline Safety Regulations.

ISO standard ISO 15589-1(2003=Old current is 2015) is 3 A/m<sup>2</sup> or less "prescribes for the AC corrosion risk



**8.4 Cathodic protection current demand**

**8.4.1 Calculation of the theoretical total current demand**

The evaluation of the current demand necessary for the cathodic protection shall be carried out from the design input data explained in 8.4.2 and 8.4.3.



For new pipelines, the total current demand  $I_{tot}$  is determined using Formula (3):

$$I_{tot} = \pi D \times L \times k \times j \times f_i \tag{3}$$

where  $k$  is a contingency factor due to possible non-uniform current distribution along the pipeline, attenuation, and shielding.

NOTE Because of attenuation phenomena, the current demand along a long pipeline can be much higher.  $k$  values higher than 1,25 are normally used.

Calculation of coating breakdown factors may be done from values given in Table 2. The selection of coating breakdown factors for other types of pipeline coatings shall be justified and documented.

Typical design current densities for bare steel or cast iron pipelines should be in the range of 100 mA/m<sup>2</sup> to 1 A/m<sup>2</sup>, mainly depending on the oxygen diffusion rate at the metal surface and electrolyte resistivity to achieve the cathodic protection criteria.

The current demand of a coated pipeline increases with time as the coating deteriorates. Enough cathodic protection capacity should be provided to maintain protection as the coating deteriorates.

ISO\_15589\_1\_2015\_Petroleum\_and.pdf (page 31 of 88)

**Table 3 — Typical design current density values for coated pipeline**

Type of coating	Current density for optimized design mA/m <sup>2</sup>	Current density for conservative design mA/m <sup>2</sup>
3LPE or 3LPP	0,001 to 0,02	0,05 to 0,2
FBE	0,02 to 0,2	0,4 to 0,7
Coal tar or bituminous coating	0,2 to 0,3	0,3 to 0,8

NOTE These values are given for pipelines built with respect to standards mentioned in 7.5.2 and 7.5.3.

ISO15589-1(2003)standard2917.pdf (page 15 of 48)

**Table 1 — Design current densities for coated pipe, ( $J_{FC}$ ) in Equation (1), for steel in soils with various pipeline coatings to be used in the design of CP systems for operating temperatures  $\leq 30$  °C**

Pipeline coating	Design current density mA/m <sup>2</sup>		
	10-year design life	20-year design life	30-year design life
Asphalt/coal-tar enamel Cold-applied tape	0,4	0,6	0,8
Fusion-bonded epoxy Liquid epoxy	0,4	0,6	0,9
3-layer epoxy-polyethylene 3-layer epoxy-polypropylene	0,08	0,1	0,4

For a design life of more than 30 years, correspondingly greater factors should be used.  
It is assumed that pipeline construction and operation is carried out in such a manner that coating damage is minimized.  
For pipelines operating at elevated temperatures, the current density values shall be increased by 25 % for each 10 °C rise in operating temperature above 30 °C.  
Alternative design current values may be used if reliable and properly documented.  
Current density requirements also depend upon the oxygen content and resistivity of the soil.

The CP system can be designed so that the increasing current demand due to progressive coating deterioration is catered for by a phased installation of additional CP facilities. Pipeline attenuation calculations can be carried out to define the spacing between drain points and anodes.

ISO 15589-1:2015\_Petroleum\_and.pdf (page 86 of 88)

A value for the insulation resistance,  $R_0$ , should be selected based upon practical experience and should consider the following factors:

- type of coating;
- exposure conditions such as seawater or seabed sediments.

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ISO 15589-1:2015(E)

— design life of the pipeline, and the anticipated progressive reduction in coating resistance over the design life;

— pipeline installation method and the projected extent of coating damage.

$R_0$ , the linear electrical resistance of the section of the pipeline, can be calculated from Formula (E.5):

$$R = 4 - \frac{\rho}{\lambda} \quad (E.5)$$

ISO 15589-1:2015\_Petroleum\_and.pdf (page 17 of 88)

Table 1 — Free corrosion potentials, protection potentials, and limiting critical potentials of common metallic materials in soils and waters (except seawater) measured against CSE

Metals or alloys	Environmental conditions	Free corrosion potential range (indicative values) $E_{cor}$ V	Protection potential (IR-free) $E_p$ V	Limiting critical potential (IR-free) $E_l$ V
Carbon steels, low alloyed steels and cast iron	Soils and waters in all conditions except those hereunder described	-0,65 to -0,40	-0,85	a
	Soils and waters at 40 °C < T < 60 °C	—	b	a
	Soils and waters at T > 60 °C	-0,80 to -0,50	-0,95	a
	Soils and waters in aerobic conditions at T < 40 °C with 100 < p < 1 000 Ω·m	-0,50 to -0,30	-0,75	a
	Soils and waters in aerobic conditions at T < 40 °C with p > 1 000 Ω·m	-0,40 to -0,20	-0,65	a
	Soils and waters in anaerobic conditions and with corrosion risks caused by Sulfate Reducing Bacteria activity	-0,80 to -0,65	-0,95	a
Austenitic stainless steels with PREN < 40	Neutral and alkaline soils and waters at ambient temperatures	-0,10 to + 0,20	-0,50	d
Austenitic stainless steels with PREN > 40		-0,10 to + 0,20	-0,30	-
Martensitic or austenite-ferritic (duplex) stainless steels		-0,10 to + 0,20	-0,50	e
All stainless steels	Acidic soils and waters at ambient temperatures	-0,10 to + 0,20	e	e
Copper	Soils and waters at ambient temperatures	-0,20 to 0,00	-0,20	-
Galvanized steel		-1,10 to -0,90	-1,20	-

NOTE 1 All potentials are IR free and refer to a copper/saturated copper sulfate reference electrode, ECA = EH - 0,32 V

NOTE 2 During the lifetime of the pipeline, any possible changes of resistivity of the medium around the pipeline are to be taken into account.

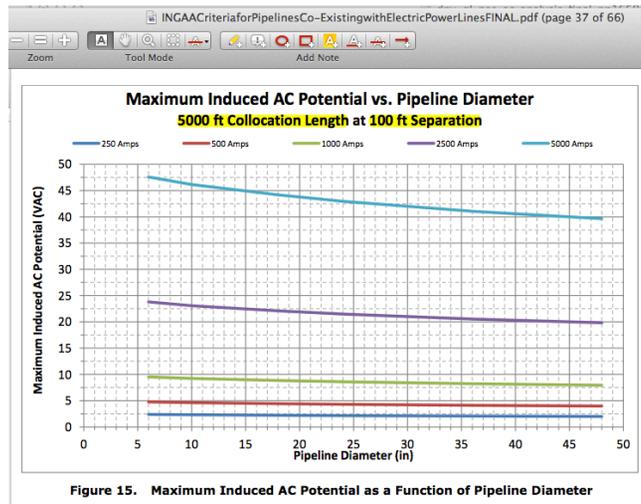
a To prevent hydrogen embrittlement on high strength non alloyed and low alloyed steels with designed yield strength exceeding 550 N/mm<sup>2</sup>, the critical limit potential shall be documented or determined experimentally.

b For temperatures 40 °C < T < 60 °C, the protection potential may be interpolated linearly between the potential value

I1145-A -42 Sections 4.9.8 and 5.9.4 of the Final EIS include mitigation measures for the Partner Cities to consider during their permit review. As described in Section 4.9.8, an AC interference study would be re-performed that incorporates the final powerline route, configuration, and operating parameters, which would include the final horizontal distance. Mitigation measures included in Section 4.9.8 would further require PSE to reassess the safe separation distance to minimize arcing risk and to ensure that the separation distance between the pipelines and the powerline structures exceeds the safe distance required to avoid electrical arcing by installing pole grounds at appropriate distance from the pipelines based on engineering analysis. DNV GL (2016) measured soil resistivities along the corridor, which were factored into the preliminary assessment used to determine AC corrosion risk and would be factored into the re-assessment during final design.

I1145-A-42

Q= pg 35/66(INGAA) EE does not have 100ft horizontal separation we have zero to 25 feet Nor do we go just 1 mile (5000ft) we go hundreds of miles. pg 35/66(INGAA) DNV GL created a computer model simulating a single pipeline, parallel to a single circuit vertical transmission line for 5,000 feet at a horizontal separation distance of 100 feet. " The model used a uniform soil resistivity of 10,000 ohms-cm." Se below



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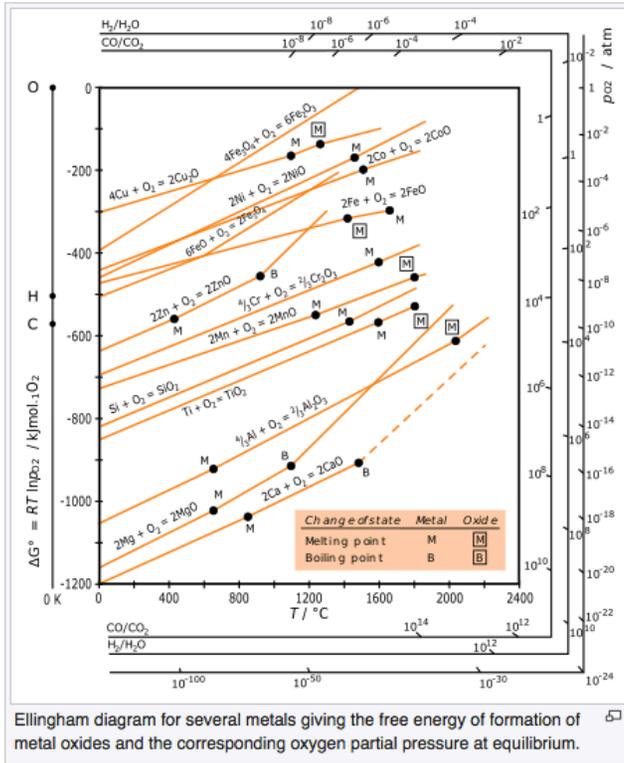
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or



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- [Latimer diagram](#)
- [Frost diagram](#)
- [Ionic partition diagram](#)
- [Bjerrum plot](#)

Book for NACE Report 35110, "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements"

AC CORROSION RISK ASSESSMENT AND MANAGEMENT 381

**FIGURE 26.24** AC corrosion criteria based on AC voltage and DC ON potentials with corrosion rates measured simultaneously [9].

has been present for a long time and no corrosion incident has ever occurred. The monitoring strategy could be based on the electrical fingerprints as allowed in the EN 15280 standard, or it could be based on the corrosion rate measurements strategy as illustrated previously. If, for instance, the monitoring strategy involves measuring the AC/DC current on coupons and it shows that it is impossible to mitigate AC to below acceptable limits (unsafe condition), then the monitoring strategy could be changed to the corrosion rate strategy for the demonstration of a safe condition. A direct way to the demonstration of a safe operation would imply application of the corrosion rate strategy—which is operational and fully allowed according to the new standard.



Oil and Gas Pipelines: Integrity and Safety Handbook  
By R. Winston Revie  
2015 book

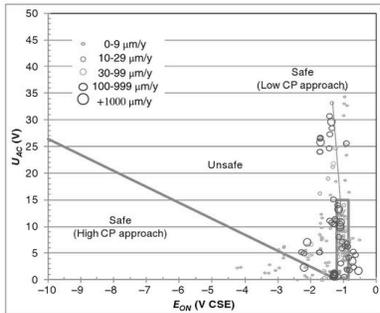


FIGURE 26.24 AC corrosion criteria based on AC voltage and DC ON potentials with corrosion rates measured simultaneously [9].

Puget Sound Energy  
AC Interference Analysis – 230 kV Transmission Line Collocated with Olympic Pipelines OPL16 & OPL20

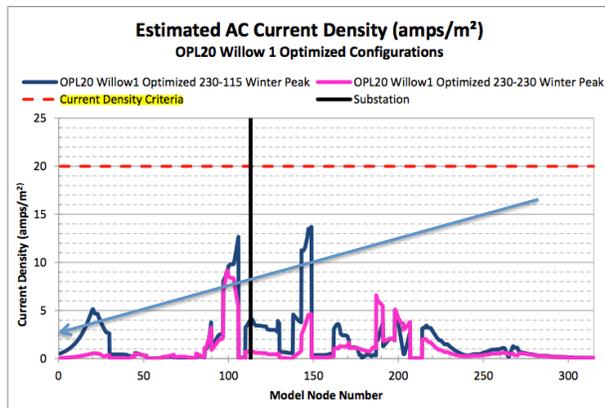


Figure 15. OPL20 Theoretical AC Current Density Results for Willow 1 Route with Optimized Configurations

I1145-A-42

What is Model Node number?  
Why is the 1986 German (not a standard) investigation conclusion number of 20Amp/m<sup>2</sup> used not at PHMSA standard or a ISO standard?

Pg 48 of 58

II145-A-42



Graphic expressions of the new CP criterion (I and II) established by the authors together with DIN 50 925 and ISO 15589-1 are illustrated by Figure 5. The criterion eliminated all corrosion risks such as AC corrosion, DC stray current corrosion, microbologically influenced corrosion etc. and overprotection risk.

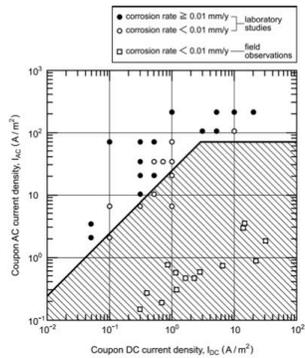
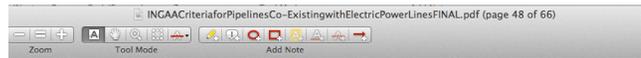


Figure 4 The data on DC and AC current densities on test specimens and coupons in consideration of corrosion rate obtained from laboratory studies and field observations.



6.1.4 Collocation Length

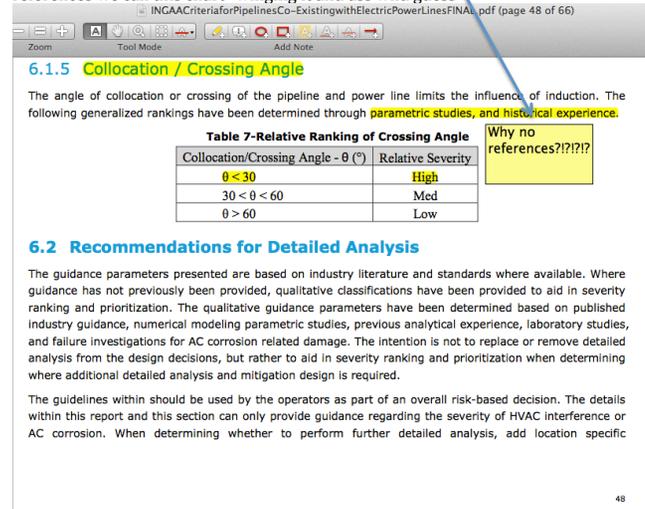
The collocation length of the pipeline and transmission line affects the magnitude of induced AC potential accumulating on the pipeline as it defines the length of the pipeline exposed to the LEF of the phase wires. The following generalized rankings have been determined through parametric studies, and historical experience.

Table 6-Relative Ranking of Collocation Length

Collocation Length: L (feet)	Relative Severity
L > 5,000	High
1,000 < L < 5,000	Medium
L < 1,000	Low

6.1.5 Collocation / Crossing Angle

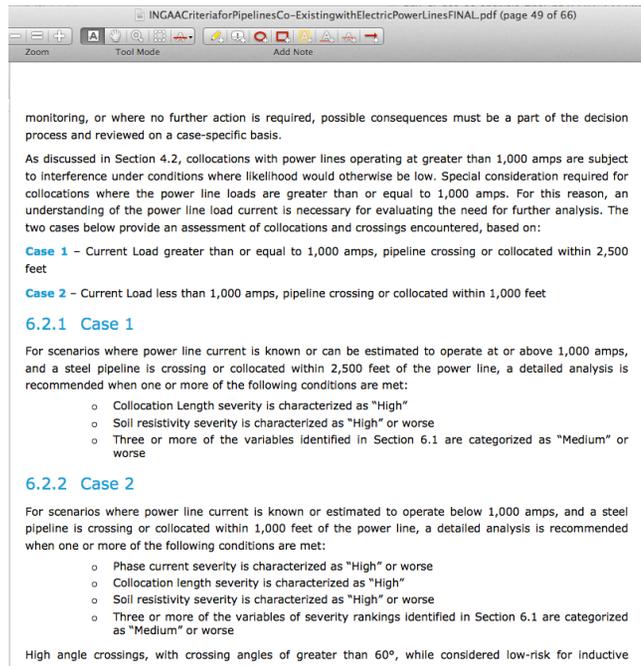
pg 48/66(INGAA) In the Defense Department when we make charts like this with no references we call this chart "winging it and ass wild guess"



I1145-A-42

Do either of the below case match what EE EIS situation 18 miles of collocated? See scrn capture below

I1145-A-42



I1145-A-45

Why do the authors of the DVN report which they reference say in their INGAAC report that it is a requirement to take soil resistivity readings at multiple depths see below scree shot. Yet in their DNV report at the average pipe depth but not at the pipe depth at the 32 locations taken.

I1145-A -45 Stantec Consulting Services, Inc. (Stantec) provided input to this comment. Soil resistivity affects the AC current density calculation. It is the AC current density that is used to determine AC corrosion risk (along with DC current density). As such, the soil resistivity is already factored into the assessment.

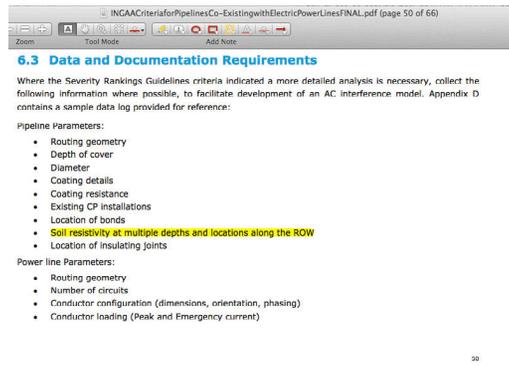
Soil resistivity was performed at multiple depths. When using the Wenner 4-pin method, the spacing is equivalent to the depth. Testing was performed to 2.5', 5', 7.5' and 10' depths (pin spacings).

DNV GL measured soil resistivities at 31 locations along the route. With 12 miles of powerline, that equates to approximately one measurement every 2000 feet (approximately 600 m). There is no requirement in any standards for a spacing between resistivity readings or to take a certain number of them. This type of spacing between measurements is typical in the industry.

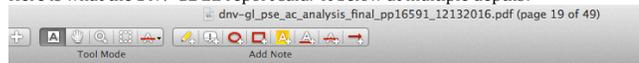
When modeling is performed, the AC corrosion risk is assessed based on calculated AC current densities, which incorporate the soil resistivity. Soil resistivity alone does not correlate to an increased risk of AC corrosion, but it results in a lower resistance (called "spread" resistance) path for the current to flow from the holiday to ground. However, the soil is not a factor if there is little or no AC voltage induced on the pipe, as there would then be no or little AC current flow and no AC corrosion risk.

Regarding soil moisture conditions and how that affects soil resistivities, at the pipe depth, moisture levels are not expected to be affected by seasonal wet/dry cycles. As such, there is little change in soil resistivities.

Other elements of this comment do not cite any specific deficiencies in the EIS or did not include sufficient detail to provide a response.



Here is what the DNV-GL EE report said. It below at multiple depths?



Soil resistivity measurements were collected by DNV GL using the Wenner four-electrode method (ASTM G57) at selected locations along the right-of-way. This test measures the bulk electrical resistivity of the soil in half hemispheres at a depth equal to the pin spacing. Pin spacings of 2.5, 5, 7.5, and 10 feet were used. The average bulk resistivity to the pipeline depth is one of the controlling factors in the analysis of HVAC interference. However, the specific resistivity of the soil layer directly next to the pipe surface is the factor of concern in the corrosion activity (conventional galvanic and AC assisted). Table 4 below shows the range of the bulk soil resistivity values taken at 32 locations along the collocation at the average pipe depth. The complete set of soil resistivity measurements is tabulated and provided in Appendix B.

Table 4. Bulk Soil Resistivity Data Summary

Pipeline Name	Minimum Resistivity (ohm-cm)	Maximum Resistivity (ohm-cm)	Average Resistivity (ohm-cm)	Average Pipe Burial Depth (ft.)	Bulk Resistivity Depth (ft.)
OPL16	6,607	402,174	101,251	4	5
OPL20	6,607	402,174	100,564	4	5

**6 THEORETICAL AC CURRENT DENSITY**

In January of 2010, NACE International prepared and published a report entitled "AC Corrosion State-of-the-Art: Corrosion Rate, Mechanism, and Mitigation Requirements", which provides the following insight on AC corrosion current density.

"In 1986, a corrosion failure on a high-pressure gas pipeline in Germany was attributed to AC corrosion. This failure initiated field and laboratory investigations that indicated induced AC-enhanced

The Israeli pipeline safety methodology requires "Perform a soil resistivity test every 500m along the pipeline route. Where a change of more than 10Q/m is identified between two measurements, the distance between test locations should be reduced until sufficient resolution is provided to determine the exact extent of the low resistivity area. The depth for which the

measurements are taken shall be the same depth as the pipeline."  
<http://energy.gov.il/Subjects/NG/Documents/Directive/34537-ACInducedCorrosionDirectiveRev.pdf> See screen shot below. Given the low soil resistivity is the critical safety parameter why is not carefully handled?



**Step 1: Establish Soil Resistivity Along Route.**

Perform a soil resistivity test every 500m along the pipeline route. Where a change of more than 10Ω/m is identified between two measurements, the distance between test locations should be reduced until sufficient resolution is provided to determine the exact extent of the low resistivity area.  
The depth for which the measurements are taken shall be the same depth as the pipeline.

Compare to the pg 48/66(INGAA) report and that to same slightly less washed out table A1. There they write Soil Resistivity -  $\rho$  (ohm-cm)  $\rho < 2,500$  the is **VERY HIGH** Relative Severity of HVAC Corrosion, see Table 5 below.

[INGAACriteriaforPipelinesCo-ExistingwithElectricPowerLinesFINAL.pdf \(page 48 of 66\)](#)

**Table 5-Relative Ranking of Soil Resistivity**

Soil Resistivity - $\rho$ (ohm-cm)	Relative Severity of HVAC Corrosion
$\rho < 2,500$	Very High
$2,500 < \rho < 10,000$	High
$10,000 < \rho < 30,000$	Medium
$\rho > 30,000$	Low

Compare this to above to table 5 above to table A1 below. There are multiple readings below 2,500 ohm-cm mean very high HVAC Corrosion dozens below 10,000. Why are the readings not denoted if the are wet or dry soil? Why is the Israeli method not used to determined the full extent of the low resistivity? Israeli method = "Where a change of more than 10Ω/m is identified between two measurements, the distance between test locations should be reduced until sufficient resolution is provided to determine the exact extent of the low resistivity area"

The Israeli regulation are designed to get the low areas of soil resistivity fully identified and they are in a very dry soil conditions and they were concerned. Why are these rules not followed give corrosion risk is much higher? Are DVN paid to looked the other way by PSE? IS the CofB's technical contractors paid to look the other way or incompetent?

II145-A-45

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Puget Sound Energy  
AC Interference Analysis – 230 kV Transmission Line Collocated with Olympic Pipelines OPL16 & OPL30

See pg 19= Mislabeled as Appendix B

Table A1. Soil Resistivity Data

ID #	Latitude	Longitude	Northing	Easting	Bulk Resistivity (Ω-cm)				Barnes Layer Resistivity (Ω-cm)			
					2.5' SR	5' SR	7.5' SR	10' SR	0-2.5ft	2.5-5ft	5-7.5ft	7.5-10ft
1	47.689982	-122.158787	5281520.034	563132.765	22,024	25,854	25,854	24,896	22,024	31,207	25,854	22,407
2	47.678368	-122.158656	5280896.299	563149.373	49,314	37,345	33,036	38,302	49,314	30,051	26,842	74,113
3	47.671523	-122.158160	5280135.871	563194.865	292,055	220,238	143,634	112,992	292,055	176,770	84,707	68,897
4	47.664768	-122.158404	5279384.933	563184.702	62,241	67,029	71,817	59,369	62,241	72,615	83,786	39,058
5	47.656433	-122.158344	5278458.646	563199.265	148,421	248,965	330,357	402,174	148,421	771,791	954,366	1,156,251
6	47.652902	-122.158612	5277843.723	563185.814	119,695	181,936	201,087	248,965	119,695	379,033	254,710	871,377
7	47.643848	-122.158780	5277059.619	563181.704	129,270	134,058	143,634	1,378,883	129,270	139,214	167,573	-
8	47.637067	-122.158959	5276305.848	563176.435	306,418	354,296	402,174	268,116	306,418	419,907	551,128	134,058
9	47.630028	-122.159100	5275523.435	563174.327	306,418	402,174	430,801	497,930	306,418	584,981	502,718	933,619
10	47.622973	-122.159034	5274739.414	563187.788	44,048	49,793	57,453	61,284	44,048	57,262	82,988	76,605
11	47.616958	-122.159205	5274070.783	563182.187	15,800	9,384	6,464	5,362	15,800	6,674	3,984	3,549
12	47.609960	-122.159045	5273293.175	563202.642	16,757	20,109	17,236	18,385	16,757	25,136	13,406	22,981
13	47.602400	-122.158712	5272453.250	563236.781	20,109	11,491	9,623	8,618	20,109	8,043	7,263	6,561
14	47.594124	-122.158553	5271533.610	563258.707	52,666	101,501	149,843	157,039	52,666	1,395,640	1,742,435	192,560
15	47.589045	-122.158323	5270999.334	563282.121	52,666	47,878	35,908	26,812	52,666	43,888	23,939	15,234
15a	47.584699	-122.158223	5270486.415	563294.879	17,236	22,024	22,981	26,812	17,236	30,495	25,170	53,623
16	47.582174	-122.157924	5270206.039	563320.406	47,399	38,302	33,036	24,896	47,399	32,135	25,910	14,315
17	47.574487	-122.157421	5269352.143	563367.504	244,177	325,570	258,541	229,814	244,177	488,354	183,133	172,360
18	47.568057	-122.157877	5268637.163	563340.964	11,969	6,607	3,447	2,873	11,969	4,563	1,782	1,915
19	47.561888	-122.161718	5267948.435	563059.465	10,533	7,660	7,900	6,703	10,533	6,019	8,427	4,608
20	47.555240	-122.165852	5267206.250	562756.427	47,878	48,835	37,345	28,727	47,878	49,832	25,994	16,975
21	47.548630	-122.169677	5266468.555	562476.514	157,997	105,331	87,617	74,689	157,997	78,998	65,563	51,773
22	47.541416	-122.169851	5265666.680	562471.993	35,430	18,194	9,623	4,979	35,430	12,239	4,955	2,034

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ID #	Latitude	Longitude	Northing	Easting	Bulk Resistivity (Ω-cm)				Barnes Layer Resistivity (Ω-cm)			
					2.5' SR	5' SR	7.5' SR	10' SR	0-2.5ft	2.5-5ft	5-7.5ft	7.5-10ft
23	47.536463	-122.169402	5265116.585	562511.669	52,666	43,090	33,036	22,981	52,666	36,461	22,524	12,013
24	47.529893	-122.169165	5264386.614	562537.317	10,054	11,491	12,783	10,533	10,054	13,406	16,495	6,893
25	47.522802	-122.169186	5263598.535	562544.165	37,345	22,981	18,672	14,938	37,345	16,598	13,580	9,336
26	47.517809	-122.169061	5263043.736	562559.511	95,756	181,936	215,450	229,814	95,756	1,819,359	341,130	287,267
27	47.511271	-122.173335	5262313.698	562245.465	119,695	90,968	83,307	57,453	119,695	73,361	71,299	29,753
28	47.505172	-122.168860	5270130.266	562498.789	210,663	172,360	122,089	80,435	210,663	145,843	77,109	39,750
29	47.574156	-122.169784	5269305.333	562438.125	21,545	19,151	20,109	19,151	21,545	17,236	22,343	16,757
30	47.567900	-122.169122	5268610.597	562495.354	28,727	9,576	5,171	2,681	28,727	9,745	2,693	1,097
31	47.560610	-122.169414	5267800.178	562482.060	143,634	181,936	186,724	65,114	143,634	248,094	197,097	22,044

Why are there no USA standards for pipeline safety levels for soil resistivity, soil pH...long list of other parameters?? It is not because the USA Oil industry has prevented those standards from being created?  
The EN 15280:2013, is a British Standard. See scrn shot a bit below

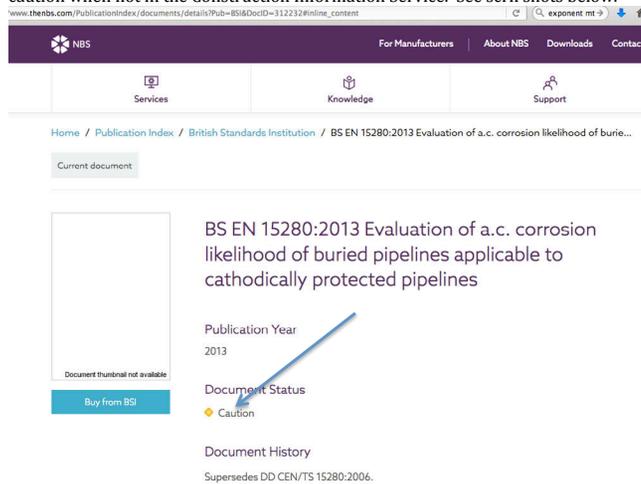
Did the DNV authors forget that for their low reading was 66 Why do the above table mismatch for minimum values with this on pg 39 /49 of the same DNV doc "the local soil resistivity ranged from 66 ohm-m to 3,256 ohm-m. Considering the local soil resistivity along the collocation, the resulting arcing distances range from 4 ft to 13 ft at these pole locations."

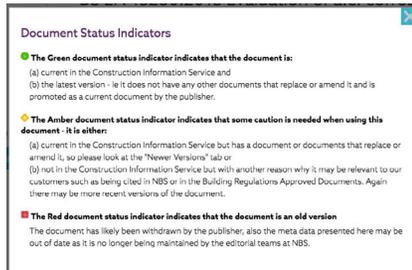


will include a shield wire using OPGW on the pole structures. The initial screening for the arcing distance was based upon the maximum soil resistivity for the collocation, which would result in the maximum arcing distance. Considering the poles within the maximum arcing distance of 13 feet (considering a fault current of 25 kA and an OPGW shield wire) the local soil resistivity ranged from 66 ohm-m to 3,256 ohm-m. Considering the local soil resistivity along the collocation, the resulting arcing distances range from 4 ft to 13 ft at these pole locations. Due to variation in soil resistivity, and lack of precision related to the pipeline location relative to the proposed transmission line poles, in those areas where the transmission poles are proposed within 13 feet of the pipeline, the following is

By this gage the risk is only high if soil is wet?? Really please detail corrosion risks for dry soil and those for wet.

As for EN 15280 the National Building Specification (owned by the Royal Institute of British Architects) says to use with caution. Please detail exactly the nature of the caution when not in the Construction Information Service. See scrn shots below.





6.1.3 Soil Resistivity

Soil resistivity affects both the magnitude of induced AC and the susceptibility to AC corrosion. The AC corrosion process, as presented in Section 3.3.1 is a function of the AC current density at a coating holiday, which in turn is dependent on the level of AC voltage on the pipeline and the local spread resistance. The bulk soil resistivity is a primary factor controlling overall level of induction, while the local soil resistivity near a holiday is a primary factor in the corrosion activity, as discussed in Section 4.2.2. The following generalized severity rankings have been determined based on industry experience and guidance provided in EN 15280:2013, with respect to AC corrosion.<sup>49</sup>

47

Table 5-Relative Ranking of Soil Resistivity

Soil Resistivity - $\rho$ (ohm-cm)	Relative Severity of HVAC Corrosion
$\rho < 2,500$	Very High
$2,500 < \rho < 10,000$	High
$10,000 < \rho < 30,000$	Medium
$\rho > 30,000$	Low

Wow actual measurements not the averaged so risk is very high. Please provide pipeline inspection measurements for this low areas. What is the lifetime left in the pipe for these areas and that expect when increased to 230kV.

dmv-gl\_pse\_ac\_analysis\_final\_pp16591\_12132016.pdf (page 47 of 49)

Puget Sound Energy  
AC Interference Analysis - 230 kV Transmission Line Collocated with Olympic Pipelines OPL16 & OPL20  
See pg19- Mislabeled as Appendix B

Table A1. Soil Resistivity Data

ID #	Latitude	Longitude	Northing	Easting	Bulk Resistivity (Ω-cm)				Barnes Layer Resistivity (Ω-cm)				
					2.5' SR	5' SR	7.5' SR	10' SR	0-2.5ft	2.5-5ft	5-7.5ft	7.5-10ft	
1	47.688982	-122.158787	5281520.034	563132.764	22,024	25,854	24,896	22,024	31,297	25,854	22,407		
2	47.678368	-122.158656	5280896.209	563149.373	49,314	37,345	33,036	38,302	49,314	30,051	26,842	78,413	
3	47.675123	-122.158160	5280335.871	563194.865	292,055	220,238	143,634	112,992	292,055	176,770	84,707	68,897	
4	47.664768	-122.158404	5279384.933	563184.702	62,241	67,029	71,817	59,369	62,241	72,615	83,786	39,058	
5	47.656433	-122.158344	5278458.646	563199.265	148,421	248,965	330,357	402,174	148,421	771,791	954,366	1,156,251	
6	47.650902	-122.158612	5277843.723	563185.814	119,695	181,936	201,087	248,965	119,695	379,033	254,710	871,377	
7	47.643848	-122.158780	5277059.619	563181.704	129,270	134,058	143,634	1,378,883	129,270	139,214	167,573	-	
8	47.637067	-122.158959	5276305.848	563176.435	306,418	354,296	402,174	268,116	306,418	419,907	551,128	134,058	
9	47.630028	-122.159100	5275523.435	563174.327	306,418	402,174	430,901	497,930	306,418	584,961	502,718	935,619	
10	47.622979	-122.159024	5274739.414	563187.769	44,068	49,783	57,451	61,284	44,048	57,252	62,988	76,805	
11	47.616958	-122.159025	5274070.783	563182.187	15,800	9,384	6,264	5,362	15,800	6,674	3,964	3,549	
12	47.609960	-122.159045	5273293.175	563202.642	16,757	20,109	17,236	18,385	16,757	25,136	13,406	22,981	
13	47.602400	-122.158712	5272453.250	563236.781	20,109	11,491	5,623	8,618	20,109	8,043	7,263	6,561	
14	47.594124	-122.158553	5271533.610	563258.707	52,666	101,501	147,943	157,039	52,666	1,395,640	1,742,435	192,560	
15	47.588045	-122.158323	5270969.334	563282.121	52,666	47,878	35,908	26,812	52,666	43,888	23,939	15,234	
15a	47.584699	-122.158223	5270486.415	563294.879	17,236	22,024	22,981	26,812	17,236	30,495	25,170	53,623	
16	47.582174	-122.157924	5270206.039	563320.406	47,399	38,302	33,036	24,896	47,399	32,135	25,910	14,315	
17	47.574487	-122.157421	5269352.143	563397.504	344,377	325,570	258,541	229,814	244,177	486,354	135,133	172,369	
18	47.568057	-122.157877	5268637.163	563300.964	11,969	6,007	3,447	2,873	11,969	4,889	8,262	1,915	
19	47.561888	-122.161718	5267948.435	563059.465	10,533	7,660	7,900	6,703	10,533	6,019	8,427	4,608	
20	47.555240	-122.165852	5267206.250	562756.427	47,878	48,835	37,345	28,727	47,878	49,832	25,394	16,975	
21	47.548630	-122.169677	5266468.555	562476.514	157,997	105,331	87,617	74,689	157,997	78,998	65,563	51,773	
22	47.541416	-122.169851	5265666.680	562471.993	35,430	18,194	9,623	4,979	35,430	12,239	4,955	2,034	

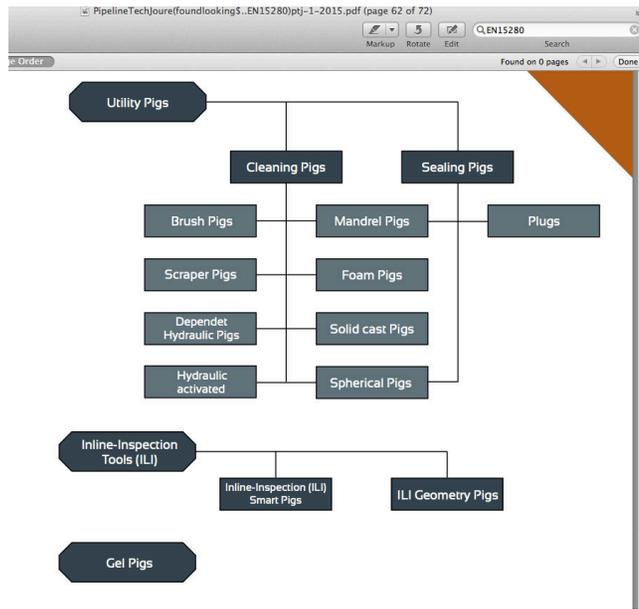
dmv-gl\_pse\_ac\_analysis\_final\_pp16591\_12132016.pdf (page 48 of 49)

Puget Sound Energy  
AC Interference Analysis - 230 kV Transmission Line Collocated with Olympic Pipelines OPL16 & OPL20

ID #	Latitude	Longitude	Northing	Easting	Bulk Resistivity (Ω-cm)				Barnes Layer Resistivity (Ω-cm)				
					2.5' SR	5' SR	7.5' SR	10' SR	0-2.5ft	2.5-5ft	5-7.5ft	7.5-10ft	
23	47.536463	-122.169402	5265116.585	562511.669	52,666	43,090	33,036	22,981	52,666	36,461	22,524	12,013	
24	47.529893	-122.169165	5264386.614	562537.317	10,054	11,491	12,783	10,533	10,054	13,406	16,495	6,893	
25	47.522802	-122.169186	5263598.535	562544.165	37,345	22,981	18,672	14,938	37,345	16,598	13,580	9,336	
26	47.517809	-122.169061	5263043.736	562559.511	95,756	181,936	215,450	229,814	95,756	1,819,359	341,130	287,267	
27	47.511271	-122.173335	5262313.698	562245.465	119,695	90,968	83,307	57,453	119,695	73,361	71,299	29,753	
28	47.505172	-122.168860	5270130.266	562498.789	210,663	172,360	122,089	80,435	210,663	145,843	77,109	39,750	
29	47.574156	-122.169784	5269305.333	562438.125	21,545	19,151	20,109	19,151	21,545	17,236	22,343	16,757	
30	47.567900	-122.169122	5268810.597	562495.354	28,727	9,576	5,673	2,681	28,727	5,745	2,693	1,097	
31	47.560610	-122.169414	5267800.178	562482.060	143,634	181,936	186,724	65,114	143,634	248,094	197,097	22,044	

I1145-A-45

II145-A-45



Pg 58 of 58

The Boeing Company  
P.O. Box 3707  
Seattle, WA 98124-2207

June 21,2017

Heidi Bedwell  
Environmental Planning Manager  
City of Bellevue Development Services Department  
Box 90012  
Bellevue, WA 98009-9012



RE: Energize Eastside Phase 2 Draft EIS Comments

Dear Ms. Bedwell:

On behalf of The Boeing Company, I thank you for the opportunity to review and comment on the Energize Eastside Phase 2 Draft EIS.

As I have mentioned in our previous letters, Boeing has been an integral part of the region's growth and economy since our founding in 1916. We have thousands of employees working in Renton and Bellevue. At our 1.1 million square feet factory in Renton we assemble 737 commercial airplanes. We currently assemble 42 planes per month and we anticipate ramping up to 52 per month before the end of the decade. In order to design, assemble and deliver superior airplanes to our customers, we must have reliable power.

The power lines serving our Renton and Bellevue campuses were installed back when we were installing our first 727 airplanes. Since then the Eastside and Renton's population, both business and residents, have grown significantly.

As a company we actively work to conserve energy but we rely on the dependable delivery of a substantial amount of power. The existing power lines need to be upgraded to address the growth the Eastside, Bellevue and Renton have experienced as well as the continued growth expected in the future.

The Energize Eastside Phase 2 DEIS addresses both a no action alternative as well as the consequences of delay, as discussed in the following sections:

Chapter 2: Project Alternatives

- The disadvantages of delaying the project are that the risks of power outages (described in Chapter 1 of the Phase 1 Draft EIS) that would be associated with the No Action Alternative could develop over time.
- It is also possible that the awareness of the risk of outages could discourage development within the Eastside that would place the Partner Cities at an economic disadvantage to other jurisdictions in the region.

I1147-A-1

I1147-A-2

I1147-A -1 Comment noted.  
I1147-A -2 Comment noted.

II147-A-3



Chapter 6 : Significant Unavoidable Adverse Impacts

- The No Action Alternative would not be consistent with city comprehensive plan policies, as discussed in the Phase 1 Draft EIS. The No Action Alternative could lead to unavoidable significant adverse land use impacts in the long term if unreliable power supply were to outweigh the regional factors amenable to growth and development, leading to development inconsistent with regional growth plans and targets.

Our company, and the aerospace industry on the Eastside, need certainty – we must have reliable power. A no action or delay scenario leading to potential rolling blackouts is not acceptable to us. Delivery timelines and production schedules would be at risk, not to mention the effects to our suppliers and the surrounding communities. To delay and/or do nothing is not an option.

We urge the EIS team to finalize its work and proceed without delay so that this critical infrastructure project can be built and built on time. We need a technically feasible solution that will provide reliable power for all of us for the future.

Thank you again for the opportunity to provide comments.

Sincerely,

Keith Warner  
Boeing Utilities Senior Manager  
[Keith.C.Warner@boeing.com](mailto:Keith.C.Warner@boeing.com)  
425-269-6351

II147-A -3 Comment noted.

ENERGIZE EASTSIDE  
PHASE 2 DRAFT ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING/PUBLIC TESTIMONY

6:00 p.m.  
Tuesday, May 23, 2017

Oliver Hazen High  
1101 Hoquiam Avenue Northeast  
Renton, Washington

KIMBERLY MIFFLIN, CCR, CSR  
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Phase II Draft EIS Hearing - May 23, 2017

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PANEL MEMBERS

CAROL HELLAND - SEPA Responsible Official, City of Bellevue  
HEIDI BEDWELL - EIS program Manager  
JENNIFER HENNING - City of Renton Project Contact  
THARA JOHNSON - City of Newcastle Project Contact

MEETING FACILITATOR

CASEY BRADFIELD

PUBLIC SPEAKERS

DON MARSH and JAN MEDLEY  
LARRY JOHNSON  
BRIAN ELWORTH  
JULIAN VON WILL  
RICH CRISPO  
SUE STRONK  
SANGEETHA RAJENDRA  
JEANNE DEMUND  
RICHARD KANER  
LORI ELWORTH  
STEVE O'DONNELL  
CURTIS ALLRED  
LORETTA LOPEZ  
WARREN HALVERSON  
RICARDO GARMENDIA

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3

1 MR. MARSH: Good evening. My name is Don  
 2 Marsh, and I am president of CENSE, the Coalition of  
 3 Eastside Neighborhoods for Sensible Energy, an  
 4 all-volunteer organization.

5 MS. MEDLEY: I'm Jan Medley. I'm a CENSE  
 6 board member.

7 MR. MARSH: For the past three years we have  
 8 been shedding light on PSE's Energize Eastside  
 9 project, engaging multiple industry experts to help us  
 10 understand all aspects of this proposal. We have  
 11 identified seven issues that need to be corrected in  
 12 the Phase 2 Draft EIS.

13 One, the Phase 1 Draft EIS stated that the EIS  
 14 would be divided into two phases. Quote, the Phase 1  
 15 Draft EIS broadly evaluates the general impacts and  
 16 implications associated with feasible and reasonable  
 17 options. The Phase 2 Draft EIS will be a project  
 18 level evaluation describing impacts at a site specific  
 19 and project specific level, end quote. From this  
 20 description, we expected to see specific proposals for  
 21 pole locations and a list of the specific trees that  
 22 would be removed. Without these specifics, how can  
 23 the public evaluate or comment on the environmental  
 24 impacts of this project. We request the cities to  
 25 publish a supplemental EIS when a final route is

OO1-G-1

OO1-G-1 See response to OO1-A-1



Phase II Draft EIS Hearing - May 23, 2017

4

OO1-G-1

1 chosen and the specific information regarding poles  
2 and trees is known.

OO1-G-2

3 Two, the EIS states it is important to understand  
4 the need for the project to enable a thorough  
5 understanding of the project's objectives. However,  
6 the EIS doesn't include any data or charts to  
7 substantiate the need. It only says that PSE  
8 determined there was a need and it cites two outdated  
9 documents that are collectively known as the Eastside  
10 Needs Assessment. Eastside demand for electricity has  
11 not increased in the way these documents assumed. We  
12 request that the EIS present 10 years of historical  
13 data for Eastside demand and an updated forecast so  
14 the public can observe the trends over time and  
15 develop a thorough understanding of the project's  
16 objectives.

OO1-G-3

17 Three, the EIS states that Energize Eastside will  
18 improve electrical reliability. The public  
19 understands this to mean there would be fewer or  
20 shorter power outages after the project is built.  
21 However, PSE has stated that Energize Eastside will  
22 not improve reliability metrics for any neighborhood  
23 in Bellevue. We request that the EIS quantify the  
24 projected improvement and reliability using an  
25 industry standard metric such as the average reduction

OO1-G-2 See response to OO1-A-2

OO1-G-3 See response to OO1-A-3

Phase II Draft EIS Hearing - May 23, 2017

5

OO1-G-3

1 in outage duration per customer per year. Using this  
2 metric, stakeholders can compare the cost  
3 effectiveness of PSE's preferred solution with other  
4 alternatives.

OO1-G-4

5 Four, the EIS references a report on pipeline  
6 safety produced by the safety consultants DNV GL.  
7 However, the EIS does not highlight the two top  
8 findings of the report: first, that PSE's preferred  
9 route known as Willow 2 violates safety standards and  
10 has an unpredictable risk range. Second, that PSE's  
11 alternate route, Willow 1, would not be safe without  
12 significant design changes. These are important  
13 factors in the choice of routes and the safety of  
14 nearby homes and schools. We request that the EIS  
15 specifically describe how DNV GL's recommendations  
16 will be incorporated into the project's design.

OO1-G-5

17 Five, the EIS states that seismic hazards are  
18 less than significant and do not require further  
19 study. The public still has unanswered questions.  
20 What might happen if the Seattle fault, which roughly  
21 parallels the I-90 freeway, were to slip up to 10 feet  
22 during a major earthquake. Would the Olympic  
23 pipelines running perpendicular to the fault be  
24 ruptured? Would higher voltage levels and bigger  
25 poles made of conductive steel pose any greater risk

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OO1-G-4 See response to OO1-A-4

OO1-G-5 See response to OO1-A-5

Phase II Draft EIS Hearing - May 23, 2017

6

OO1-G-5

1 of igniting a catastrophic fire? A manmade  
 2 catastrophe might follow a natural disaster, requiring  
 3 the attention of emergency responders at the same time  
 4 they are needed elsewhere. We request that the EIS  
 5 quantify how much Energize Eastside might increase  
 6 risk in these circumstances.

OO1-G-6

7 Six, the EIS states that the Eastside will face  
 8 rolling blackouts in the summer of 2018. Even though  
 9 we disagree with that prediction, the only solution  
 10 that could be built fast enough to meet that timeline  
 11 is a grid battery. PSE says its Richards Creek  
 12 substation would take 18 months to build. Even if  
 13 construction began today, the substation would not be  
 14 operational by next summer. PSE's solution does not  
 15 meet the company's required timeline and must be  
 16 eliminated as a viable alternative to address the  
 17 stated need. We request that the EIS re-evaluate the  
 18 potential of batteries using current data from grid  
 19 battery installations such as the one Tesla built in  
 20 Southern California to protect customers from rolling  
 21 blackouts. That battery started operation just three  
 22 months after the contract was signed.

OO1-G-7

23 Seven, last week the Bonneville Power  
 24 Administration canceled a \$1.2 billion transmission  
 25 line in southwestern Washington that would have

OO1-G-6 See response to OO1-A-6

OO1-G-7 See response to OO1-A-7

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7

OO1-G-7

1 carried increased electricity to California. Changing  
2 demand forecasts reduced the need for that line.  
3 Instead, the agency found it could save customers  
4 hundreds of millions of dollars by employing modern  
5 technology such as flow control devices and grid  
6 batteries. We request that the EIS examine how BPA's  
7 reasoning applies to PSE's proposal.

8 Thank you for considering these changes. We look  
9 forward to these answers in the final EIS or  
10 supplemental EIS. Thank you very much.

11 MR. JOHNSON: I'm Larry Johnson. I'm the  
12 president of Citizens for Sane Eastside Energy. And I  
13 understand that that entitles me to five minutes. You  
14 look out here and there's hardly anybody here tonight.  
15 But I remember when we had a thing like this not too long  
16 ago at the elementary school and it was packed. And it  
17 was a nice weather day then as it is now. And there's  
18 almost as many of you up here as there are of us out  
19 there.

OO5-B-1

20 I want to talk about how I feel the entire process  
21 and not just the report is inadequate, because that's the  
22 question you want to get answered tonight. And I've  
23 provided three documents that have already been filed  
24 electronically and I'll give them to you in hard copy  
25 when I'm done.

OO5-B -1 Comment noted.

Phase II Draft EIS Hearing - May 23, 2017

8

1 I think people aren't here because they don't think  
 2 you're listening. I think people are not here because  
 3 you're not doing a good job. People are not here because  
 4 they think you're in the pocket of PSE. And you know  
 5 what? I've gotten now 39 installments of e-mail from  
 6 public records requests from very good people in Bellevue  
 7 who did a great job, and I can't tell you how many  
 8 e-mails I've seen where there's just this cozy acceptance  
 9 of everything PSE tells you. I mean, I've even seen  
 10 documents and drafts of things you send to PSE. They  
 11 make all of these changes to make the language look more  
 12 favorable to them and you adopt them. How many times --  
 13 have you ever asked Richard Lauckhart, our expert, to  
 14 explain his flow studies? How many times have you called  
 15 him to say we'd like to talk to you about your views on  
 16 this process. He lives in California, but you can get  
 17 him on the phone at any time, and he'll come up at any  
 18 time, but you have never done that.

19 Now, I, as I said, have got many e-mails that I've  
 20 looked through that together show an all too cozy  
 21 relationship with PSE. I don't know, maybe because it's  
 22 work for you and this is fun or maybe you're going to get  
 23 a job with PSE someday, or maybe there are other  
 24 incentives. But I notice, for example, in an attachment  
 25 that I have to one of my letters where Nicholas Matts

O05-B-2

O05-B-3

- O05-B -2 PSE has been consulted on some matters in preparing the EIS, including the project description and details about their existing and proposed system. PSE is not consulted on impact analysis or conclusions of the EIS.
- O05-B -3 Mr. Lauckhart's comments on the Energize Eastside EIS have been addressed. See response to his numerous comment letters.



Phase II Draft EIS Hearing - May 23, 2017

9

1 says to Chris -- I can't pronounce the last name -- it  
2 says on the agenda for the meeting of the council,  
3 Energize Eastside, tonight's objective is buy off  
4 unplanned. This is a May 2014 e-mail, three years old,  
5 and already they want to buy.

6 And look at how PSE has been presenting this case.  
7 It's a hard sell, it's not a dialog. And I've got a  
8 footnote from the last page 5 of a document sent to you  
9 yesterday, where Mark Williamson, a lawyer in Wisconsin,  
10 takes pride in the fact that he runs these campaigns like  
11 a political campaign. It's all about selling and  
12 winning, not about dialog.

13 So that's why people are not here. And I want to  
14 tell you, I listed four things that I just call the four  
15 big lies of Energize Eastside. The project is based on a  
16 field flow study given to the ColumbiaGrid in 2013. They  
17 had what they call an N111 event. In other words, far  
18 beyond what FERC requires for two major failures on a  
19 hypothetical cold winter day, an N11 event. Those  
20 criteria were used by PSE in its studies with Quanta,  
21 which they'll never actually show us, so we ask and ask  
22 and ask. And that's because they say now, in another  
23 e-mail that I've attached to this stuff, well, Lauckhart  
24 and Schiffman, they didn't use the minimum requirements.  
25 Well, what they say are the minimum requirements is this

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10

1 failed ColumbiaGrid study. I'm probably going to run out  
2 of time here soon.

005-B-4

3 Seattle City Light levels. You don't list it as an  
4 alternative, but you discuss it in the report. You go  
5 through all of these assumptions that PSE has fed you,  
6 saying, well, they can't use it, it's not feasible, this  
7 and that. And I've provided you with these documents in  
8 rebuttal of that.

9 As a matter of fact, I even got a letter from one of  
10 the top executives of Seattle City Light saying PSE never  
11 made a formal request. If you make a formal request 888,  
12 you have to cooperate. No utility anywhere can acquire  
13 its resources. I go into that in detail in this  
14 document, so I'll skip over to the next two things.

005-B-5

15 The other big lie is that somehow the Eastside is  
16 growing so fast that it's a supply and demand problem,  
17 it's not a reliability problem, which is really what this  
18 is all about. They say, oh, gees, we're growing 10 times  
19 faster than Seattle according to the Seattle City Light  
20 video that I pulled.

005-B-6

21 And then the final big lie is that we've never had  
22 an upgrade since the day of the Beatles in the 1960's.  
23 Look at this map that I put on this letter. There's been  
24 numerous petitions of I believe it's 150 kilowatt lines.  
25 It's a network, it's not a backbone. We've got more than

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- 005-B -4 The use of the SCL corridor was evaluated in the Phase 1 Draft EIS (see Section 2.3.2.3 for a description of this alternative). The SCL facility is not under PSE ownership, and SCL stated that it needs this line to serve its customers. This alternative was not brought forward for additional analysis in the Phase 2 Draft EIS because it did not meet PSE's project objectives.
- 005-B -5 See response to comment 005-A-4.
- 005-B -6 While portions of the grid have been replaced or upgraded, the Eastside transmission grid has not had a major capacity increase since the 1960s.

Phase II Draft EIS Hearing - May 23, 2017

11

1 enough transmission to meet the demands of whatever  
2 future needs there are, which have been wildly  
3 exaggerated and even put in a fairy tale by PSE.

4 So I just want to conclude by saying that I adopt  
5 all of the things that Don Marsh said and would like to  
6 have it incorporated in the record as our comments too.  
7 Thank you.

8 MR. ELWORTH: I've got about 18 pages, so I'm  
9 going to be cycling through a few times up here I expect.

10 My name is Brian Elworth. I live at 8605 129th  
11 Court Southeast, Newcastle. I represent the Olympus  
12 Homeowners' Association.

13 March 9, 2016 at 1:40 a.m., PSE single-handedly  
14 destroyed a large portion of a block in the Greenwood  
15 District, \$3 million in destruction, 12 businesses  
16 damaged or destroyed, livelihoods destroyed, nine  
17 firefighters injured. That time bomb existed for 12  
18 years. Undeniable gross incompetence by PSE, undeniable  
19 gross disregard for property and human safety by PSE.  
20 And that wasn't a rare oversight. WUTC discovered  
21 there's like 40,000 more of these similar ticking time  
22 bombs all over the place. So not only is it gross  
23 incompetence, it's systemic incompetence essentially  
24 rotted to the core.

25 PSE was fined \$1.5 million for 17 pipeline safety

OO4-A-1 Comment noted.

OO4-A-1

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12

OO4-A-1

1 regulation violations. For a company that size, \$9  
 2 million company, that's a small slap on the wrist. But  
 3 PSE called the finding disappointing and excessive and  
 4 reiterated that the pipe was damaged by people in a space  
 5 where they're not supposed to be. Quick to whine, quick  
 6 to play the blame game for their incompetence, which  
 7 clearly shows besides incompetence PSE has no moral  
 8 compass, no ethical standards.

OO4-A-3

9 So what does this have to do with Energize Eastside?  
 10 PSE's statement to Newcastle City Council and Planning  
 11 Commission meeting February 2, 2016, quote, First of all,  
 12 we should remember that there are significant federal  
 13 standards that guide us both on pipeline work and on high  
 14 voltage electric work. Those standards specify how  
 15 pipelines have to operate with great detail, including  
 16 their safety procedures, testing the pipes to make sure  
 17 they're safe, solid and secure for all of us, end quote.  
 18 Evidenced by Greenwood, PSE is good at lying and cheating  
 19 but not interested in following rules, not interested in  
 20 safety.

21 The danger of PSE's systemic technical incompetence  
 22 in the electrical engineering -- which I'll get to later  
 23 -- is compounded by their systemic incompetence in  
 24 pipeline safety. The destructive force unleashed by  
 25 PSE's incompetence is proven to be enormous by evidence

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OO4-A -3 Comment noted.

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13

OO4-A-3

1

of the Greenwood incident.

OO4-A-5

2

Magnified by PSE's incompetence, Energize Eastside

3

exposes our communities to unbounded risk. Co-location

4

of a high energy ignition source with a high energy

5

voltage source is reckless. Clearly the co-location of

6

the Energize Eastside project with a hazardous liquid

7

pipeline is a continuous and unmitigated danger to our

8

community.

OO4-A-6

9

Appendix I-5, Section 1.1.2, page 8, it indicates a

10

breach in the hazardous liquid pipeline induced by AC

11

current from Energize Eastside can continuously spill

12

over 26,000 gallons of toxic and flammable liquid per

13

hour while meeting federal leak detection standards. The

14

EIS fails to state how much toxic and flammable liquid

15

continues leaking after leak detection is triggered. The

16

EIS is defective because it ignores this impact.

OO4-A-7

17

Co-location of a high energy ignition source with a

18

high energy fuel source is reckless. Clearly the

19

co-location of the Energize Eastside project with a

20

hazardous liquid pipeline is a continuous and unmitigated

21

danger to our community.

OO4-A-8

22

Appendix I-5, Section 1.1.3, page 9 states, OPL did

23

not provide details regarding the precise type and

24

location of their mainline block valves and related

25

facilities within the study. OPL treats these data as

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OO4-A -5 See response to comment I18-A-1. Under SEPA, an EIS is required to focus on the environmental impacts of the proposal and its alternatives. The EIS acknowledges the existing risk of having a transmission line sharing the same corridor as a petroleum pipeline, and that the consequences of an electrical interference-related pipeline incident could be significant. PSE's Energize Eastside project would place higher voltage lines within the corridor, which (before the consideration of proposed mitigation measures) would incrementally increase the likelihood of electrical interference-related pipeline incidents. With the implementation of measures to mitigate potential risks described in Sections 3.9.7, these risks would be similar to those under existing conditions or the No Action Alternative.

OO4-A-6 See response to comment I177-A-24.

OO4-A -7 See response to comment OO4-B-2.

OO4-A -8 The City and the EIS Consultant Team contacted Olympic during the development of the Phase 1 Draft EIS, and made additional inquiries during the project-specific phase of the EIS. Certain information (such as valve locations and operation) was not available from Olympic for use in the Phase 2 Draft EIS for proprietary or security reasons. In addition, as project applicant, PSE does not have the ability to require Olympic to publicly release information. In the absence of Olympic-specific data, EDM Services relied on national data of similar pipeline systems and used reasonable worst-case assumptions consistent with industry practice.

Phase II Draft EIS Hearing - May 23, 2017

14

OO4-A-8

1 confidential information which is not available for  
2 public disclosure due to potential security risks. In  
3 other words, the risk is so high Bellevue cannot be  
4 trusted and is not allowed to access the information to  
5 assess it. So Bellevue cannot determine the sufficiency  
6 of pipeline control needed for safety of the Energize  
7 Eastside project.

OO4-A-9

8 The EIS is defective because it ignores the  
9 criticality of this impact. Co-location of a high energy  
10 ignition source with a high energy fuel source is  
11 reckless. Clearly the co-location of the Energize  
12 Eastside project with a hazardous liquid pipeline is a  
13 continuous and unmitigated danger to our community.

14 Appendix I-5, Section 1.1.4, page 9, states, OPL  
15 considers specific details regarding OPL's emergency  
16 response procedures as confidential information not  
17 available for public disclosure due to potential security  
18 risks.

19 MS. BRADFIELD: Brian, if you could wrap up  
20 your first five minutes.

21 MR. ELWORTH: I'll just start that chart over  
22 and then continue.

23 Thank you.

24 MR. VON WILL: Hi, I'm Julian. I'm at 2101  
25 Edmonds Avenue, Kenndale. First, I have a number of

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OO4-A-9 See response to OO4-A-7

Phase II Draft EIS Hearing - May 23, 2017

15

1 questions about the EIS. The first one is the tree  
2 question, the need of the project compared with 5,000  
3 trees, and I guess I'm agreeing with Don Marsh on this  
4 point about itemizing whether the big canopy trees are in  
5 this because they are very important for circulation of  
6 air quality and so on. And so that's not detailed at  
7 all. Five thousand trees is a big cut, and those trees  
8 are needed now especially with the influx of more people.

9 Secondly, yeah, I mean, I don't think PSE has made  
10 their case at all. I think they've been moving us  
11 through this process and they're a foreign-owned company.  
12 They're one of the few foreign-owned companies owned in  
13 America that can control our power, while in Europe,  
14 Germany is going completely with energy democracy, so  
15 that's a very, very critical point in this.

16 They are not allowing us to get these points across.  
17 There is serious problems and they haven't proved that we  
18 really need these power lines right now. So I think that  
19 really needs to be addressed here and, you know, I think  
20 they've been unethical about how they processed us in  
21 this.

22 Yeah, so a study needs to be done on these big  
23 canopy trees. That is very important, which is a new  
24 thing. Anyway, yes, and I think, you know, the pictures  
25 being offered tonight are very toned down of what those

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16

1 power lines are going to look like. It's going to look  
 2 like a Godzilla movie. You know, we're a very  
 3 sophisticated area here. We have Microsoft, we have  
 4 Boeing. We should be going after ground up power.  
 5 That's how they are doing it elsewhere. And we really  
 6 need to save those 5,000 trees. I mean, every tree now  
 7 we have to fight for around the world.

8 Thank you.

9 MR. CRISPO: Hi, my name is Rich Crispo, 14406  
 10 Southeast 89th Place in Newcastle. And I want to talk  
 11 about safety. I don't know about the need for the  
 12 project. I'm not qualified to talk about that. But I am  
 13 concerned about the safety.

14 We have a corridor. There's a liquid pipeline going  
 15 through there. We have an existing transmission source  
 16 right now. It's wooden poles. We're going to replace  
 17 that with metal poles. I'm concerned about the  
 18 construction techniques that are used, I'm concerned  
 19 about the ongoing maintenance of the system, lightning  
 20 strikes, those kinds of things.

21 Now, I've had an opportunity to talk to OPL  
 22 representatives, and I've talked to many PSE  
 23 representatives, and I've seen the report that says our  
 24 assessment is that this is safe to go do. Well, I'm an  
 25 engineer. When you read through that report, what you

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1134-A -1 See response to comment 117-A-1.

1134-A -2 The purpose of the pipeline safety risk assessment conducted for the Phase 2 Draft EIS was to identify, describe, and estimate the change in risk that would occur with PSE's proposal, in recognition of the potential hazards and with a focus on describing risk in terms of consequences (severity of a pipeline incident) and the likelihood of occurrence. The risk assessment used available information and reasonable worst-case assumptions to provide a reasonable estimate of this risk to help the public and decision-makers understand potential impacts. The analysis described the methods used to estimate the frequency of releases, spill size distribution, likelihood of fires following a release, and consequences (estimates of fatal injuries following a fire). See the Pipeline Safety Technical Report in Appendix I-5 of the Phase 2 Draft EIS for more information.

1134-A-1

1134-A-2

Phase II Draft EIS Hearing - May 23, 2017

17

1 see is a whole bunch of probable situations. Eighty  
 2 percent that this will occur, 60 percent that this will  
 3 occur, 50 percent that this will occur. If everything  
 4 goes positively, you have a safe condition.

II34-A-2

5 Well, if you know anything about mathematics, what  
 6 you do is you multiple the probabilities together, and  
 7 when you do that, you end up with something that says  
 8 you've got about a five percent safety situation if  
 9 everything works out, because that's the probability that  
 10 it will.

II34-A-3

11 Now, talking to OPL, they tell me the integrity of  
 12 the pipeline is verified by continual tests. They've  
 13 done what's called a pig through the line. They do,  
 14 based on electric discharges to verify the thickness of  
 15 the pipe and all of that. Well, I'm assuming that they  
 16 did that in the pipeline in the Bellingham area where  
 17 there had been an incident where an individual had hit  
 18 the pipeline with a piece of mechanical equipment and  
 19 caused a crease, a small crease that over five years it  
 20 corroded and eventually a spark hit it and they had an  
 21 explosion and you know the result of that explosion that  
 22 took place. Well, if that pig was running for five years  
 23 through there and verifying it was okay, how do we know  
 24 the condition of the pipeline that is running through  
 25 this particular segment that we're talking about today?

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II34-A -3 Regarding the Bellingham incident on June 10, 1999, the National Transportation Safety Board (NTSB) found that the adequacy of Olympic's inspections and interpretation of the inspection results were a major safety issue. It is important to note that as a result of the Bellingham and other pipeline incidents, the NTSB made a number of recommendations that resulted in new gas pipeline regulations requiring improvements in gas pipeline integrity management. See Section 3.9.1.2 of the Phase 2 Draft EIS for additional information. The proposed project will not affect Olympic's internal pipeline inspection program, nor their compliance with the federal regulation (49 CFR 195).

Phase II Draft EIS Hearing - May 23, 2017

18

1 Now, in our city we've got a couple of miles of this  
 2 pipeline. It's been checked out continuously, but I  
 3 wonder just how good is it. And if we're going to have  
 4 these construction techniques to put this in place, we're  
 5 going to have very large pieces of equipment, a lot of  
 6 weight, what's the likelihood a crease is going to  
 7 happen, and four or five years from now after it's all  
 8 put together, we're going to have the same kind of  
 9 condition as happened in Bellingham.

10 I don't think we know enough about the actual  
 11 physical conditions of what we're dealing with to declare  
 12 that it is safe to do it. Maybe we will with more  
 13 testing, but right now we don't.

14 Thank you.

15 MS. STRONK: I am Sue Stronk, a CENSE member  
 16 and a 30-year resident of Olympus and Newcastle  
 17 supporting the No Action Alternative. I submit tonight a  
 18 scaled drawing of a typical 230 kV project as described  
 19 in the EIS by AEP Ohio with a 120-foot to 150-foot  
 20 right-of-way, and I also show the Energize Eastside  
 21 solution using the existing 100-foot right-of-way where  
 22 the project cannot be centered because of the two Olympic  
 23 pipelines. Energize Eastside puts the 100-foot tall  
 24 poles within 20 feet of our homes following the Newcastle  
 25 code requirements. The EIS states PSE can apply for a

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II34-A -4 Olympic would perform pipe stress calculations for equipment crossings and surface loads, in coordination with PSE. Olympic has indicated that formal engineering assessments may be required depending on site-specific considerations. PSE will also develop construction and access plans in coordination with Olympic's Damage Prevention Team that outline the specific actions that PSE will take to protect the pipelines from vehicle and equipment surcharge loads, excavation, and other construction activities (this would include auguring). Also, see response to comment II61-A-7.

II36-A -1 Comment noted.

II36-A -2 See response to comment number II36-C-6 for a response regarding the right-of-way placement. Refined pole location data are presented in Chapter 2 and Appendix A of the Final EIS for PSE's Proposed Alignment, as well as on the project website ([www.energizeeastsideeis.org/](http://www.energizeeastsideeis.org/)), in the Library tab.

The Newcastle Segment alternative presented in the Phase 2 Draft EIS was designed to comply with the Newcastle setback and avoid the need for a variance. PSE's Proposed Alignment presented in this Final EIS includes a design that would require a variance from Newcastle. The City of Newcastle will determine whether the Energize Eastside project will be granted a variance from the setback requirements. The variance would allow for the use of shorter poles to minimize visual impacts in that portion of the project. Without the variance, the project would need to be constructed at least 5 feet outside of the Olympic Pipeline system easement, which typically extends 50 feet within the PSE easement area.

Phase II Draft EIS Hearing - May 23, 2017

19

II36-A-2 | 1 variance. As PSE admits, it may not be feasible to build  
 II36-A-3 | 2 it here. Or they could underground the lines, which  
 3 better not be at citizen's expense.

4 PSE replaced a wooden pole behind my house and  
 5 suggested I not be home that day. Each new pole requires  
 6 three to seven days for installation over a two-month  
 II36-A-4 | 7 time frame. What mitigation is there to homeowners who  
 8 should evacuate for safety during construction.

9 As you see, these poles are well within falling  
 10 distance of homes as well as the foundations that could  
 11 fracture the pipeline. How can PSE's paid consultants  
 II36-A-5 | 12 also be the authors of the EIS documents? Is that not a  
 13 conflict of interest?

14 PSE says we face rolling blackouts soon, yet one or  
 15 two of the five existing transmission lines can be shut  
 II36-A-6 | 16 down for 12 to 18 months during the construction of  
 17 Energize Eastside without any scary consequences? Photo  
 18 simulations are not updated showing the 100-foot tall  
 19 poles now proposed in Newcastle and many photos are not  
 20 accurately scaled in the EIS. Locations do not represent  
 II36-A-7 | 21 the true visual impacts of the project and do not show  
 22 the other two wires that will be on each pole, the  
 23 fiberoptic and the shield wires, a total of four or five  
 24 wires on each pole not just three.

II36-A-8 | 25 The consequence of a 10 percent home de-evaluation

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II36-A -3 As stated in Section 3.10.2 of the Phase 2 Draft EIS, while the cost of the new transmission line would be paid for by all of PSE's customers, PSE has stated that its position is that any cities and/or property owners requesting underground alignments would be required to pay for undergrounding the lines. PSE's position is based on their utility rate tariff rule, which they have interpreted to require the parties requesting the undergrounding, or the "requesting party," to pay for the marginal or additional cost above what it would have cost for overhead lines (PSE, 2016). Sections 3.1.6 and 3.2.6 of the Phase 2 Draft EIS, and Section 4.2.6.4 of the Final EIS identify undergrounding the line as a potential mitigation measure.

II36-A -4 Section 4.9 of the Phase 2 Draft EIS (and updated Section 5.9 of the Final EIS) describes potential pipeline safety risks related to construction activities. With PSE's awareness of the pipelines within the corridor, Washington State's Damage Prevention Law and "one-call" locator service, and Olympic's procedures to prevent third party damage described in Section 4.9.4 of the Phase 2 Draft EIS, the increased risk posed to the pipelines during construction is relatively low. Even with reasonable worst-case assumptions, the results of the risk assessment completed for the Phase 2 Draft EIS indicate that there would be a very small increase in total risk during construction. With the implementation of measures to mitigate potential construction risks described in Section 4.9.4, these risks would be even lower. As described in Section 5.9.4.2 of the Final EIS, the EIS Consultant Team has included a recommended mitigation measure that would require PSE to develop an adjacent use protection plan near sensitive land uses to identify appropriately sized construction zones to protect the general public, construction timing limits, and other mitigation measures that would effectively limit the exposure of the general public to potential pipeline incidents. According to PSE: In general, "PSE does not anticipate the need to evacuate homeowners during construction; however, at some locations, there may be a benefit to using cranes or helicopters to facilitate the construction by lifting pole sections over buildings. These activities would require building occupants to vacate the premises for a couple of hours at a time during daylight working hours." Additional information on helicopter use during construction is included in Sections 5.1 and 5.4 of the Final EIS, as well as Appendix A-4.

COMMENT

RESPONSE

- II36-A -5 The EIS is written by a team of consultants selected by the City of Bellevue as the lead agency for the project in cooperation with the Partner Cities. For all firms working on the EIS Consultant Team, disclosures were made to the City about any past work for PSE. The City determined that this past work did not constitute a conflict of interest for reviewing this project, and furthermore, none of the EIS Consultant Team members are currently under contract with PSE.
- II36-A -6 The existing transmission line would stay in operation until the project has been built, and then power will be switched to the new lines, which would not create any disruption to PSE customers. The project would also be built in phases, as described in the Final EIS, Chapter 2 (Section 2.1.3). The substation and south phase would be permitted and constructed first.
- II36-A -7 As noted on the simulations, simulated pole heights are site-specific and may differ from the typical pole heights described in Chapter 2 due to topography and other factors. At many of the locations along the Newcastle Segment as presented in the Phase 2 Draft EIS, 95-foot-tall poles would be installed, and this is shown in the Phase 2 Draft EIS. Simulations are accurately scaled in accordance with Power Engineer's methodology, detailed in Appendix C of the Phase 2 Draft EIS. Figure 3.2-22 shows an outdated pole configuration from a distance. This has been rectified in the Final EIS (see Chapter 3, Errata, in the Final EIS). However, the correct pole configuration was shown in Figure 3.2-21, as well as in Appendix C. The correct simulation was used for the analysis, and no changes have been made to the text.
- The top wire shown in the simulations is the shield wire. The fiber optic lines would be coaxial cable within the shield wire, referred to as Optical Ground Wire. The total number of lines visible on a double-circuit pole configuration would be seven, as shown in the simulations. For a single-circuit pole configuration, the total lines visible would be four.

Phase II Draft EIS Hearing - May 23, 2017

20

1 was a hypothetical study of Newcastle's 89 homes adjacent  
 2 to the project, resulting in a value decrease of \$116,000  
 3 per home and a \$20,000 tax deficit for our city. The EIS  
 4 says that this is less than significant because Newcastle  
 5 could easily raise \$5.27 annually from each Newcastle  
 6 home or the city could reduce budgets. Tell us again  
 7 that a \$100,000 loss in our home value is not significant  
 8 when PSE profits over a billion dollars at our expense  
 9 building this project.

10 Thank you.

11 MS. RAJENDRA: Thank you for coming here and  
 12 listening to us. My name is Sangeetha Rajendra. I live  
 13 at 8613 129th Court Southeast, Newcastle, Washington,  
 14 98056.

15 Firstly, I would like to say I feel a little  
 16 redundant bringing up issues that should have already  
 17 been addressed during Phase 1. And I have two topics to  
 18 discuss.

19 One of them is the specifics of the project. I  
 20 assumed that it would be addressed in Phase 2 because  
 21 this would be the last place to comment, so the next  
 22 would be the final. And then the next would be the need  
 23 for the project. We still don't understand why there is  
 24 a need.

25 So one of the primary issues is that this is

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II36-A-8

II14-B-1

II14-B-2

II36-A -8 As stated in Section 3.10.4.1 of the Phase 2 Draft EIS, the amount of any shift in value due to the project is difficult to predict. The EIS therefore does not predict what the effect would be. Because the homes adjacent to the proposed transmission line already have a transmission line adjacent to them, the effect on home values of this adjacency should already be factored in to the home value. The change in appearance with taller poles could affect property values, but the degree of effect of the new pole configurations would likely vary by property and was not evaluated on an individual property level. SEPA does not require this type of economic analysis.

To understand the possible effect this could have on property taxes, the EIS Consultant Team evaluated the effect of a \$10 million shift in assessed value. The choice of this level of change was selected for sensitivity analysis only, and does not represent an estimate of the effects, but allows an understanding of how a shift of this magnitude might affect taxes in a jurisdiction. The purpose of the study was not to identify actual reductions in assessed value as a result of the project. As an example, in Newcastle, there are 86 adjacent single-family residences along the existing corridor. For a cumulative decline of \$10 million in AV affecting these homes, property values would have to decline an average of approximately \$116,000 per residence. For more information about how property values were assessed for the Phase 1 Draft EIS, please see the comment summary included as Appendix J of the Final EIS, which includes responses to comments on the Phase 1 Draft EIS regarding depreciation of property values. For more information, see Topic Econ - Key Theme ECON-1.

II14-B -1 See response to comment II139-A-3 in regards to project specifics.

The purpose and need for the project are summarized in Section 1.3 of the Phase 1 and Phase 2 Draft EISs. Additionally, PSE prepared the Eastside Needs Assessment, which includes a more detailed explanation of the project need. The comment summary included as Appendix J of the Final EIS responds to comments on the Phase 1 Draft EIS, including questions regarding the purpose and need for the project (See Topic OBJ).

II14-B -2 See response to comment II43-B-2 in regards to the placement of the poles and the pipeline. See response to comment II139-A-3 for more details about pole placement and tree removal.

Phase II Draft EIS Hearing - May 23, 2017

21

1 supposed to be an environmental study, but how can an  
 2 environmental impact study be conducted without these  
 3 important details. One is the selection of the specific  
 4 route. Poor design. Where are they going to be, next to  
 5 the pipeline or between? The pole locations. Are the  
 6 list of trees that are being removed or claimed, we don't  
 7 have a list. You could expect the specific details to be  
 8 listed in at least Phase 2.

II14-B-2

9 There are no pole locations specified. Where are  
 10 they going to be placed? Is it in an existing spot or  
 11 somewhere farther or close to my house since I live just  
 12 on the edge of the power line. Without these basic  
 13 specific details, the validity and reliability of an  
 14 environmental impact study is highly questionable.  
 15 Without the pole design location and method to  
 16 accommodate the trees that are going to be cut or killed,  
 17 the EIS is just throwing out a number of trees that are  
 18 potentially going to be cut but nothing about the types  
 19 and the location of those trees. This can have a huge  
 20 effect on the aesthetic and layer of neighborhood and  
 21 home, especially our Olympus homes in Newcastle.

II14-B-3

II14-B-4

22 The lack of specifics and structure in the EIS Phase  
 23 2 makes it hard to analyze exactly what the environmental  
 24 impact is.

II14-B-5

25 My second concern is more stressing. This concern

II14-B-6

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II14-B -3 The specifics of the design and exact placement of poles would be determined during the local permitting process. The Phase 2 Draft EIS covers details of the project as it was known at the time of publication and reflects information based on the early stages of design. Project design has been refined for the Final EIS (presented as PSE's Proposed Alignment), with more site-specific information presented on the route, pole types, pole locations, and vegetation clearing requirements. The EIS Consultant Team believes the information provided is sufficient to allow for a reasonable evaluation of potential impacts under SEPA.

In addition, please refer to the Energize Eastside EIS website library, where the EIS team has provided an interactive map which shows approximate pole locations and trees that are proposed to be removed <http://www.energizeeastsideeis.org/library.html>. See also Section 4.4 of the Final EIS for details of impacts from PSE's Proposed Alignment. Vegetation Impact Analysis reports can be found on the website under Phase 2 Materials, PSE Background Documents.

II14-B -4 See response to comment II139-A-3.

II14-B -5 See response to comment II14-B-3.

II14-B -6 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

Phase II Draft EIS Hearing - May 23, 2017

22

II14-B-6

1 is that unbalance need versus the effect. PSE has  
 2 predicted that energy need will increase rapidly in the  
 3 next few years. However, in actuality they use it as an  
 4 argument. If this need for the electricity is as massive  
 5 as PSE claims it to be, present it with accurate data,  
 6 graphs. Everybody loves graphs.

II14-B-7

7 It bothers me that we are dealing with possible  
 8 explosions and fires that would result from this project.

II14-B-8

9 The need for this project does not outweigh its possible  
 10 consequences. That's all.

11 MS. DEMUND: Hi. Thank you for this  
 12 opportunity speak. My name is Jeanne Demund. My address  
 13 is 2811 Mountain View Avenue North in Renton, Washington.  
 14 Please note I do not live along one of the currently  
 15 proposed routes for Energize Eastside.

II30-A-1

16 I too am dismayed by the lack of participation  
 17 tonight, and I think one of the reasons for that might be  
 18 that it's a very short time since this extremely long,  
 19 extremely dense technical document was released, and the  
 20 average citizen who doesn't have the benefit of a lot of  
 21 spare time and colleagues to split up the reading would  
 22 have no way to get through it and comment effectively.

II30-A-2

23 In 2016 I pointed out that the Olympic Pipeline  
 24 Company was under a final order to fix deficiencies  
 25 related to corrosion resistance. OP didn't find those

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II14-B -7 See response to comment II8-A-1.

II14-B -8 Comment noted.

II30-A -1 The Energize Eastside EIS process followed the public commenting procedures required by SEPA. Additionally, the Phase 2 Draft EIS public comment period was extended to July 6, 2017, from the originally scheduled end date of June 21, 2017, to allow additional time for the public to review and comment on the Draft EIS.

II30-A -2 Regarding Olympic's past violations, additional information available on the Washington Utilities and Trade Commission (UTC) website was provided in the Phase 2 Draft EIS. In the inspection reports summarized in Table 3.9-4, several violations and areas of concern were noted, including the violation described by the commenter. UTC's inspections included a review of Olympic's records, operation and maintenance, emergency response, and field inspection of pipeline facilities. Violations included late reporting and defects at test sites. As described in Section 3.9.5.1 of the Phase 2 Draft EIS, to estimate the probability of pipeline failures, historical data on pipeline incidents/spills that have occurred on similar systems are most commonly used.

Per federal law, Olympic is responsible for the maintenance and safe operation of the pipelines; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipelines from corrosion lies with Olympic. While local governments cannot use this SEPA process to compel Olympic to protect their pipeline as required by federal law, the EIS notes that PSE can help mitigate risks by providing Olympic with information that would help them understand corrosion risks to the pipelines that could be caused by the transmission line. Section 4.9.8 of the Final EIS includes mitigation measures addressing coordination between PSE and Olympic.

Phase II Draft EIS Hearing - May 23, 2017

23

1 problems during any of their routine maintenance or  
 2 inspection activities, those same activities that we are  
 3 being asked to rely on for safety under Energize  
 4 Eastside. They were discovered by government inspectors  
 5 in August of 2014. Nearly three years later we still  
 6 don't know if these deficiencies have been corrected.  
 7 The matter is still open according to the federal Office  
 8 of Pipeline Safety.

II30-A-2

9 In the EIS PSE is very careful to state that they  
 10 have no recourse to compel any mitigation or safety  
 11 activities on the part of Olympic Pipeline. Can we trust  
 12 OP to carry out their safety and mitigation activities if  
 13 their record gives me pause.

II30-A-3

14 The second draft of the EIS also downplays the  
 15 consequences of a possible pipeline rupture or leak.  
 16 This little chart shows a tidy circle leading to a  
 17 statistical result of one possible fatality. It says  
 18 nothing about the fire that will spread in all directions  
 19 with this amount of heat. Where is the circle that shows  
 20 where the fire will be while a human body is being  
 21 vaporized? Wood will auto-ignite under these conditions  
 22 in a very short time according to the reading I've done  
 23 in the Pipeline Risk Management Manual, Ideas, Techniques  
 24 and Resources.

II30-A-4

25 This document the EIS does not lay out for public

II30-A-5

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II30-A -3 While local governments cannot use this SEPA process to compel Olympic to protect its pipelines as required by federal law, the EIS notes that PSE can help mitigate risks by providing Olympic with information that would help them understand corrosion risks to the pipelines that could be caused by the transmission lines. As described in Section 3.9 of the Phase 2 Draft EIS, Olympic has been working with PSE in connection with PSE's Energize Eastside project, sharing information and supporting requests for information about its facilities and operations. Olympic and PSE meet regularly to discuss, identify, and develop mitigation strategies for potential threats to pipeline integrity. Olympic has indicated it will identify specific measures, or a suite of measures, following their detailed engineering analysis of the final design and based on site-specific conditions and field measurements conducted at project start-up and during peak loading scenarios.

II30-A-4 See response to comment LL1-A-9.

Given that it is not practicable to specify every situation or condition along an 18-mile corridor, the analysis presents a reasonable approach to characterizing possible consequences of a pipeline incident in order to identify potential impacts of the project.

II30-A -5 See response to comment II9-A-3.

Phase II Draft EIS Hearing - May 23, 2017

24

II30-A-5

1 discussion the actual catastrophe that will occur if  
2 something does happen.

II30-A-6

3 My final comment tonight is, from the beginning of  
4 Energize Eastside, we rate payers, we citizens, we  
5 voters, we're not trusted with an honest discussion of  
6 the most fundamental issue. Is this project needed? The  
7 absolute denial of any discussion of need was a huge red  
8 flag for me. Anytime somebody or some organization  
9 figured they pats me on the head and says, Believe me, I  
10 get very skeptical.

II30-A-7

11 There are many flaws in PSE's needs assessment.  
12 Beyond that, the recent and continuing acceleration of  
13 technological advances in smart grid, battery, other  
14 technologies and the decreases in cost make it imperative  
15 to re-examine alternative solutions to any reliability  
16 and transmission issues that may actually exist before we  
17 spend a billion dollars.

18 PSE has refused to engage in an honest discussion of  
19 a need or alternatives. If they are so sure they are  
20 right, what are they afraid of?

II35-A-1

21 MR. KANER: I'm Dr. Richard Kaner. I'm at 6025  
22 Hazelwood Lane. I'm not on the corridor of the proposed  
23 routes, and I've been an Eastside resident since before  
24 the Beatles arrived.

25 So in reading the EIS, or at least a portion of it,

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II30-A -6 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see Topic OBJ).

It is the responsibility of the Washington Utilities and Transportation Commission (WUTC) to determine if the cost of electrical upgrades is appropriate for inclusion in PSE's rates. PSE has stated that because this project meets local needs, it is a local project and the cost should be borne by PSE customers.

II30-A -7 See response to comment II15-A-2.

Phase II Draft EIS Hearing - May 23, 2017

25

II35-A-1

1 for me the math doesn't add up in several places. The  
 2 new lines are stated to involve between 15 and 17 stream  
 3 crossings depending on which route and in central  
 4 Bellevue alone. If you look at all the segments, the  
 5 number is more than like 20 to 22 excluding unnamed  
 6 tributaries.

II35-A-2

7 The EIS states that there will be removal of more  
 8 than 5,400 trees. It says that 17 to 26 percent of the  
 9 trees will be removed per acre of area surveyed. But  
 10 they also say that they plan to retain 5,000 inventoried  
 11 trees. To me another way of looking at the math is if  
 12 inventoried trees include those that are going to be  
 13 removed and those that are going to be retained, then  
 14 that's a total of 10,400 inventoried trees, 52 percent of  
 15 which will be removed.

II35-A-3

16 There seems to be an even bigger discrepancy when  
 17 you look at the data through the land studies. Of the  
 18 5,400 trees 1,400 or 26 percent are stated to be in  
 19 critical areas or stream buffered areas. However, the  
 20 math doesn't match up with the data in subsequent  
 21 sections, that's 3.4.5.2 through 3.4.5.15.

22 If you look at the individual segments, about 6,000  
 23 trees out of 8,000 would be potentially removed, which is  
 24 75 percent. Just under 3,700 are considered significant  
 25 trees and 1,900 or just under 2,000 are located in

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II35-A -1 Bellevue is divided into three segments, Bellevue North, Bellevue Central, and Bellevue South. Section 3.3.5.8 in the Phase 2 Draft EIS is comparing between the options in the Bellevue Central Segment only (15-17 new streams). Table 3.3-4 in Section 3.3.5.13 compares options in the Bellevue South Segment and states that 1-5 new streams could be crossed. In the Bellevue North Segment, no new streams would be crossed. If you added up the maximum possible number (worst-case scenario) of stream crossings for all three segments, it would be approximately 20 to 22. Bypass Option 1 and Bypass Option 2 (Bellevue Central Segment) and Oak 1, Oak 2, and Willow 2 Options (Bellevue South Segment) are not carried forward for analysis in the Final EIS. For information on the streams crossed by PSE's Proposed Alignment based on the revised design, see Section 4.3 of the Final EIS.

II35-A -2 See response to comment II20-B-9. The Phase 2 Draft EIS, Section 3.4.5, includes information on vegetation clearing based on design details available at that time; the Final EIS includes additional information on tree clearing based on refined project design details, focused on PSE's Proposed Alignment (see Section 4.4).

II35-A -3 See response to comment II20-B-9 regarding tree removal by segment and option.

On page 3.4-16 in the Phase 2 Draft EIS it states that approximately 1,400 trees would be removed in critical areas or their buffers. In Sections 3.4.5.2 through 3.4.5.15 in the Phase 2 Draft EIS, if you add up the number of trees that could be removed from critical areas by segment, it is approximately 1,000 - 1,400 (depending on the combination of segment and options constructed). The maximum number removed in critical areas (1,400) would be associated with the following options: Richards Creek Substation + Redmond Segment + Bellevue North Segment + Bellevue Central Segment (Bypass Option 1) + Bellevue South Segment (Oak 2 Option or Willow 2 Option) + Newcastle Segment + Renton Segment. The minimum number potentially removed from critical areas (1,000) would be associated with the following options: Richards Creek Substation + Redmond Segment + Bellevue North Segment + Bellevue Central Segment (Existing Corridor Option) + Bellevue South Segment (Oak 1 Option) + Newcastle Segment + Renton Segment.

PSE's Proposed Alignment is most similar to the combination of options that would remove the least amount of trees in critical areas; see Section 4.4. in the Final EIS.

Phase II Draft EIS Hearing - May 23, 2017

26

1 critical wetlands or buffered areas. That's 550 more  
 2 trees removed in critical and buffered areas than stated  
 3 elsewhere in the EIS.

4 Either way, the loss of trees can be accompanied  
 5 with the loss of 327 acres of vegetation results in  
 6 reduced shading over the streams, changes the water  
 7 temperature and robs the fish of shade that they use for  
 8 cover and to avoid predators. This becomes important  
 9 when looking at the stream designations.

10 And I haven't looked at all of them, but I did look  
 11 at Coal Creek basin, which is core summer salmon habitat  
 12 and listed as extraordinary contact by the King County  
 13 Stream Report updated in November of 2016.

14 It's also given the additional assignment of  
 15 supplemental spawning and incubation protection, which  
 16 subjects any projects to the Endangered Species Act.

17 So I strongly disagree with the assessment stated in  
 18 3.3 and 3.4 of the less than significant impact on  
 19 waters, trees and fish. I think the loss of trees and  
 20 vegetation would have a highly significant impact on all  
 21 of those entities.

22 Thank you.

23 MS. ELWORTH: My name is Lori Elworth. I live  
 24 at 8605 129th Court Southeast, Newcastle. I have lived  
 25 in the Olympus neighborhood for the last 29 years. My

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II35-A -4 Impacts to streams, including fish-bearing streams, considers the removal of vegetation within buffers. Impacts from vegetation removal will be mitigated through compliance with applicable regulations. In the Phase 2 Draft EIS, refer to Section 3.3.5 for discussion of impacts to streams and Section 3.4.5 for impacts to stream buffers (critical areas). See Section 4.3.5 and Section 4.4.5 of the Final EIS for more discussion on the impact tree removal would have to stream shading.

II35-A -5 PSE's Proposed Alignment would not place poles within the ordinary high water mark of streams. There would be impacts to the buffer of Coal Creek, which would be mitigated per Bellevue's critical areas regulations. Refer to Section 4.3 of the Final EIS for further details.

II35-A -6 The criteria against which significance was determined are described in Sections 3.3.3 and 3.4.3 in the Phase 2 Draft EIS. Impacts are considered significant where project activities cannot be reduced through mitigation. Removal of trees and other vegetation within stream and/or wetland buffers would require mitigation through city critical areas regulations. As these impacts would be reduced to a level of no-net-loss, they would not be significant.

II35-A -7 Please refer to Section 3.4.3.1 of the Phase 2 Draft EIS, which defines the significance criteria; these criteria were approved by the Partner Cities.

Phase II Draft EIS Hearing - May 23, 2017

27

1 home is located right next to the PSE Olympic Pipeline  
2 corridor. One of the two pipelines is less than a foot  
3 from our backyard property line.

4 I have a copy of PSE's graph Eastside customer  
5 demand forecast. This graph has been distributed by PSE  
6 for the last three and a half years to demonstrate the  
7 need for the project. The graph shows us that the  
8 customer demand will surpass the current system capacity  
9 this year leading to an increased number of power outages  
10 in the area.

11 However, we have data from PSE showing that despite  
12 population growth of 7.3 percent from 2011 to 2015 power  
13 consumption is down 5.7 percent over that same period.  
14 That trend is being seen everywhere. Growth is being  
15 offset by greener technologies and higher efficiencies.

16 The only way to determine electrical need is by  
17 running a load flow study. PSE claims to have conducted  
18 one but refuses to share their data with anyone,  
19 including individuals with the appropriate clearance.  
20 Because of this CENSE conducted their own independent  
21 study but could not replicate PSE's conclusion.

22 It is the responsibility of the lead agency to  
23 define and understand the need. How can the City of  
24 Bellevue do this without an independent load flow study?

25 I am a member and supporter of CENSE, and I would

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II32-A -1 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ"). The Lead Agency has limited authority to question an applicant's motives and cannot use SEPA authority to alter the objectives of an applicant for purposes of review under SEPA.

II32-A-1

Phase II Draft EIS Hearing - May 23, 2017

28

1 like to leave my comments with you.

2 Thank you.

3 MR. O'DONNELL: Good evening. My name is Steve  
4 O'Donnell. I've been at Somerset in Bellevue since 1972  
5 at 13945 Southeast 47th Street. I have been on the board  
6 and president of the Somerset Community Association, also  
7 co-founder and past president of CENSE, the Coalition of  
8 Eastside Neighborhoods for Sensible Energy. I like to  
9 say this: The Coalition of Every Neighborhood for  
10 Sensible Energy.

II142-A-1

11 I want to share with you three things tonight. Of  
12 course, I'm a member of CENSE. I also concur with all of  
13 the comments of CENSE members that made comments this  
14 evening. I will be submitting comments online.

15 I do believe this EIS is deficient and inadequate in  
16 many, many areas, but I want to share with you -- Don  
17 Marsh had his top 10, and I have my five two's.

II142-A-2

18 This project is too out of scale with the need.  
19 This project creates or does too much environmental  
20 damage, 5,000 plus trees, that's preposterous. This  
21 project avoids too many viable alternatives that would  
22 provide reliable power for many decades to come.

II142-A-3

23 This proposal costs too much, \$2- to \$300 million of  
24 rate payer money to provide a return to this company of  
25 nearly 10 percent for 40 or more years is ridiculous,

II142-A -1 Comment noted. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Project Objectives Topic).

II142-A -2 Comment noted. Updated information on vegetation clearing based on refined project design for PSE's Proposed Alignment is included in the Final EIS (see Section 4.4).

II142-A -3 Comment noted. See response to comment II6-A-2.

Phase II Draft EIS Hearing - May 23, 2017

29

II142-A-3

1 just ridiculous. It would escalate to probably more than  
2 a billion dollars.

II142-A-4

3 Finally, this project is too unsafe and that's what  
4 I want to talk about. My company is in its 37th year,  
5 American Preparedness. We feel that we have some  
6 expertise in safety and in emergencies, natural and  
7 manmade disasters. I want to share with you some  
8 comments. Picture if you will, imagine that you just sat  
9 down for dinner at 6 o'clock on September the 9th, 2010,  
10 and you live in the Crestmore neighborhood, San Mateo,  
11 California, a few miles from the San Francisco airport,  
12 and you're not served by PSE, but you are served by three  
13 other initials, PG&E. Now, this is a natural gas  
14 pipeline that blew up at 6:11 p.m., not a high pressure  
15 gas high octane jet fuel pipeline carrying many millions  
16 of gallons per day that the four city's fire departments  
17 cannot extinguish.

18 The wall of flames were 1,000 feet high, could be  
19 seen for many, many miles. It registered a magnitude of  
20 1.1 on the Richter scale, an earthquake, the boom. The  
21 boom was almost a 200 foot by 50 foot crater that was 40  
22 feet deep. Many, many homes, dozens of homes were  
23 incinerated. The neighborhood was turned to ash. Eight  
24 people sadly lost their lives. Dozens were sent to the  
25 intensive care unit.

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II142-A -4 Comment noted. See response to comment II7-A-1 for information on the pipeline safety risk assessment completed for the Phase 2 Draft EIS. See response to comment II20-A-1 for information on how seismic risks were considered in the Phase 2 Draft EIS and Final EIS.

Phase II Draft EIS Hearing - May 23, 2017

30

1 PG&E just settled this month, seven years later, a  
2 \$90 million settlement with the families, and they paid  
3 \$1.6 billion -- 1,600 million dollar fine.

4 Now, we had a 9 plus Cascadia subduction zone  
5 earthquake 300 years ago on January 26, 1700. I am  
6 pretty old but I wasn't here then either. None of us  
7 were here. Just about everybody in the room has probably  
8 been to Yellowstone -- hold up their hands -- Yellowstone  
9 National Park and seen Old Faithful that goes off about  
10 every 35 or 40 minutes. Our geologists and our  
11 scientists have found that the core samples out of the  
12 ocean, about 50 to 80 miles off our coast -- I don't  
13 think you guys studied this -- sand, mud, sand, mud,  
14 sand, mud for 5- to 10,000 years about every 243 to 300  
15 years we have a major Cascadia subduction zone tectonic  
16 plate, 9.0 plus earthquake of mega proportions that  
17 shakes for four to six minutes. It destroys everything.  
18 Seventy-five percent is predicted of all roads, bridges  
19 and buildings in this region will be catastrophically  
20 destroyed. We have a chart tonight on a easel showing  
21 one of the fault lines that runs right across these two  
22 pipelines.

23 So I think that this EIS needs to go back to the  
24 drawing board and do some additional study because it's  
25 definitely, on this topic, definitely inadequate. Thank

11142-A-4

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Phase II Draft EIS Hearing - May 23, 2017

31

1 you very much.

2 MR. ALLRED: Hi, my name is Curt Allred, Curtis

3 Allred. I'm at 13609 Southeast 43rd Place in Bellevue.

4 I want to start by reading from the beginning of the EIS

5 what the purpose of the EIS is to -- it says, the EIS is

6 intended to identify reasonable alternatives that could

7 attain or approximate PSE's objectives at a lower

8 environmental cost.

9 So, what are PSE's objectives? The point of this

10 project is to address an extreme case, which is on the

11 coldest day of winter where six local power generation

12 sources are offline, 1500 megawatts of power is going to

13 Canada, and in addition, they assume unusually high

14 growth rate to justify this need for additional energy

15 resources, a higher rate than other utilities and city

16 planners are using.

17 So this is an extreme case and, you know, we stress

18 our current power systems, but there are plenty of modern

19 technologies to address this short-term issue, batteries,

20 for example. New batteries are coming online.

21 Alternative 2B, for example, mentioned also some

22 alternative technologies that could solve this short-term

23 problem.

24 But PSE dismisses modern solutions and says that

25 they must build this massive transmission line on top of

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- II29-A-1 Details on the project objectives, including PSE's electrical and non-electrical criteria, are described in detail in Chapters 1 and 2 of the Phase 1 Draft EIS. The growth rate within the Eastside has been and is expected to continue to be greater than the growth rate in PSE's overall service area. PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers.
- II29-A-2 See response to comment II15-A-2.

II29-A-1

II29-A-2



Phase II Draft EIS Hearing - May 23, 2017

32

- II29-A -4 Comment noted.
- II29-A -5 See response to comment II20-A-1.
- II29-A -6 See response to comment OO4-A-5.
- II29-A -7 Comment noted.

- II31-A -1 See response to comment II30-A-1.

II29-A-4 1 a petroleum pipeline. The transmission line quadruples  
 2 the energy capacity of the existing transmission line and  
 3 replaces the wooden poles with conductive metal poles.  
 4 And as Steve O'Donnell just pointed out, seismologists  
 5 say there is a 10 to 15 chance of a major earthquake in  
 6 the next 50 years, which is the lifetime of this project.  
 II29-A-5 7 A large earthquake would certainly rupture a  
 8 petroleum pipeline as well as bring down many of the  
 9 poles along this corridor.  
 10 So it seems to me we should be looking for ways to  
 II29-A-6 11 move the power lines out of that pipeline corridor rather  
 12 than amping them up.  
 13 So just to close, I want to emphasize the three  
 14 elephants in the room here, the high level of  
 15 environmental damage that this project causes, the high  
 16 risk of co-location with the pipeline and the lack of a  
 II29-A-7 17 clear need for this scale of a project. So given those  
 18 points, I would say the only sensible choice to attain  
 19 the lowest environmental cost is the no action  
 20 alternative. Thank you.  
 21 MS. LOPEZ: Loretta Lopez, 13419 Northeast 33rd  
 22 Lane, Bellevue, 98005. I'm vice president of Bridle  
 23 Trails Community Club.  
 II31-A-1 24 My first objection is to the amount of time that  
 25 citizens were given to comment on this gigantic document,

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Phase II Draft EIS Hearing - May 23, 2017

33

1 prepared by experts. Not acceptable that we as citizens  
 2 in the midst of everything else we're doing are expected  
 3 to review this that was issued on May 8 and comment  
 4 tonight.

II31-A-1

5 My further objections starting with page 1 -- and,  
 6 of course, I will not get through all 900 pages --  
 7 actually, this is the perfect statement. The purpose is  
 8 a projected deficiency. We request that the City of  
 9 Bellevue force PSE to set forth its analysis of  
 10 deficiency. We request that the City of Bellevue issue a  
 11 supplemental EIS to address all of the deficiencies that  
 12 have been set forth tonight and that will be set forth in  
 13 the comment period that ends on June 21.

II31-A-2

II31-A-3

14 Objection to the statement on page 1 that the route  
 15 options are included for some of the segments. We  
 16 request that there be specific detailed description of  
 17 the poles, the route and the exact trees that will be  
 18 trimmed and also destroyed.

II31-A-4

19 Page 1, Phase 2, the statement is that this is the  
 20 project level phase EIS. All along we were led to  
 21 believe that Phase 2 would include specific very detailed  
 22 analysis, and that has not been the case. We request  
 23 that the City of Bellevue provide specific detailed  
 24 analysis so that all citizens have the opportunity to  
 25 comment on its project and not just in a general way.

II31-A-5

- II31-A -1 See response to comment II30-A-1.
- II31-A -2 Comment noted.
- II31-A -3 See response to comment II31-A-6.
- II31-A -4 See response to comment II14-B-3.
- II31-A -5 See response to comment II14-B-3.



Phase II Draft EIS Hearing - May 23, 2017

34

II31-A-5

1 We've already been through that.

2 On page 1-1, the statement that the need for this  
3 project is due to population and employment growth. We  
4 request -- and further on page 1.5, the statement that

II31-A-6

5 this is due -- that this is based upon the internal  
6 forecasting conducted by PSE, we request that the City of  
7 Bellevue force PSE to set forth the exact details of what  
8 they based their calculations upon, their analysis upon.

II31-A-7

9 Where are the details about employment growth? Where are  
10 the details about population?

II31-A-8

11 I'll skip to 1.3. This is a citation to the WAC  
12 197-11-055. The statement is that this is the early  
13 stage and that the project details are approximate and  
14 subject to change and the big -- and the support for that  
15 statement is a citation to WAC 197. 197 sets forth that  
16 the information should be assessed early to avoid delays  
17 later in the process. But avoiding delays later in the  
18 process should not preclude notice and opportunity to the  
19 citizens so that they can comment on the adequacy and on  
20 the specific details of the project.

21 Do I have any more minutes left?

22 MS. BRADFIELD: Not at the moment. But as soon  
23 as we finish with the speakers, we're going to open it up  
24 for folks to come back to the podium.

25 MS. LOPEZ: So once again, we request a

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II31-A -6 It is not within the scope of SEPA to require PSE to disclose their modeling assumptions. It is up to PSE to determine to whom they will release their proprietary data. The planning model, however, was reviewed by the EIS consultant team and found that PSE had used standard planning practices and had not modified any regional transmission planning assumptions beyond those recommended by ColumbiaGrid.

II31-A -7 See response to comment II31-A-6.

II31-A -8 See response to comment II30-A-1.

Phase II Draft EIS Hearing - May 23, 2017

35

1 supplemental EIS. Thank you.

2 MR. HALVERSON: My name is Warren Halverson. I  
3 live at 13701 Northeast 32nd Place. I really don't have  
4 a comment that I want to make. I'd like to get a point  
5 of order. Maybe you can address this now or a little bit  
6 later. It was our understanding, I believe, or maybe I  
7 had a misunderstanding, that there would be a response to  
8 every person who testified. In other words, you'd put  
9 something in writing back to them for every person that  
10 testified in the EIS Phase 1. Is that true in EIS Phase  
11 2? You can respond later if you'd like.

II37-A-1

12 The second question I have is do I understand that  
13 you're going to completely rewrite, consolidate into one  
14 document the Phase 1 and Phase 2 EIS's?

II37-A-2

15 The third question I have is what is your tentative  
16 schedule to have that EIS done and how will it be  
17 presented to the stakeholders here and to everybody else.

II37-A-3

18 Thank you.

19 MR. ELWORTH: I got to page 6 of 18, so I'll be  
20 back. This is Brian Elworth again, still representing  
21 Olympus Homeowners' Association.

22 Appendix I-5, Section 1.1.4, page 9, states OPL  
23 considers specific details regarding OPL's emergency  
24 response procedures as confidential information not  
25 available for public disclosure due to potential security

OO4-B-1

II37-A -1 A general comment summary and response document was produced for the comments received on the Phase 1 Draft EIS. This document is available on the project website here: [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/phase\\_1\\_draft\\_eis\\_comment\\_summary\\_report\\_final.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/phase_1_draft_eis_comment_summary_report_final.pdf).

Additionally, a detailed comment summary and response document was prepared for the comments received on the Phase 1 Draft EIS and is included as Appendix J of the Final EIS.

Comments received on the Phase 2 Draft EIS are provided with individual responses.

II37-A -2 The Phase 1 Draft EIS and Phase 2 Draft EIS are final documents and will not be consolidated. The Final EIS includes errata items and any additional analysis needed to satisfy the requirements under SEPA. All three documents, together with appendices, are considered part of the EIS.

II37-A -3 This document is the Final EIS. It has been made available by the same means as each of the Draft EISs, online, in print at various libraries, and on CDs available from each of the Partner Cities.

OO4-B -1 See responses to comments II122-A-21, OO4-A-5, and OO4-A-8.

Phase II Draft EIS Hearing - May 23, 2017

OO4-B-1

1 risks. In other words, the risks are so high, Bellevue  
 2 cannot be trusted and is not allowed to access the  
 3 information to assess it. The EIS is defective, and it  
 4 ignores the criticality of this impact. Co-location of a  
 5 high energy ignition source with a high energy fuel  
 6 source is reckless. Clearly, the co-location of the  
 7 Energize Eastside project with the hazardous liquid  
 8 pipeline is a continuous and unmitigated danger to our  
 9 community.

OO4-B-2

10 Appendix I-5, Section 1.4, page 12, states, There  
 11 are a few significant pipeline incidents, five of these  
 12 incidents have resulted in changes and proposed changes  
 13 to the federal pipeline regulations which should further  
 14 improve pipeline safety. As is chronic of federal  
 15 policy, action is taken after disasters occur. There are  
 16 many pending changes being considered by PHMSA to address  
 17 the incomplete and deficient safety standards regarding  
 18 detection of defects in pipeline safety and repair  
 19 pipeline safety defects. This pushes the preemptive  
 20 safety mitigation down to the local level. We have to  
 21 put the protection in there because the federal laws are  
 22 not going to take place until after the disaster instead  
 23 of preempting the disaster.

OO4-B-3

24 Co-location of a high energy ignition source with a  
 25 high energy fuel source is reckless. Clearly, the

OO4-B -2 Section 3.9.1 of the Phase 2 Draft EIS describes laws and regulations addressing pipeline safety. As described in Section 2.0 of the Pipeline Safety Technical Report (included in Appendix I-5 of the Phase 2 Draft EIS), a number of laws and pipeline safety measures have been put into place since the initial pipeline laws and regulations were enacted. The commenter is correct that several of these changes were enacted as a result of several significant pipeline incidents (see Section 1.4). The purpose of the EIS is to evaluate the impacts associated with the construction and operation of PSE's project, not the ongoing operation of the Olympic Pipeline system. The SEPA process for the Energize Eastside project does not provide authority to regulate the pipeline system. The EIS lists mitigation that PSE is capable of providing. With the implementation of measures to mitigate potential risks described in Section 3.9.7 of the Phase 2 Draft EIS, these risks would be similar to those under existing conditions, the No Action Alternative, or any of the action alternatives.

OO4-B -3 See response to comment OO4-A-5.

Phase II Draft EIS Hearing - May 23, 2017

37

OO4-B-3

1 co-location of the Energize Eastside project with the  
2 hazardous liquid pipeline is a continuous and unmitigated  
3 danger to our community.

OO4-B-4

4 Chapter 8, references environmental health pipeline  
5 safety, page 8-12. The EIS cites DNV GL 2015 criteria  
6 for pipeline co-existing with electric power lines, final  
7 report 2015. But the EIS doesn't apply it per that  
8 reference. Severity ranking of HVAC interference high,  
9 HVAC being high voltage AC, interference high. Relative  
10 severity of HVAC interference, very high. Relative  
11 severity of HVAC corrosion, very high. Relative severity  
12 of HVAC co-location length, high. Relative severity of  
13 HVAC crossing angle, high.

14 The EIS is defective and it ignores the criticality  
15 of this impact. Co-location of a high energy ignition  
16 source with a high energy fuel source is reckless.  
17 Clearly the co-location of the Energize Eastside project  
18 with the hazardous liquid pipeline is a continuous and  
19 unmitigated danger to our community.

20 Article in "Newcastle News," January 6, 2017 titled,  
21 "Study: Energize Eastside Pipeline Can Safely Co-exist."  
22 Quote, a recent study shows the Energy Eastside project  
23 can safely co-exist in the same corridor that contains an  
24 Olympic Pipeline Company channel carrying fuel to Sea-Tac  
25 airport according to a Puget Sound Energy news release.

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OO4-B-4 The risk ranking referenced by this commenter attempts to assist with identifying susceptibility of a pipeline to AC interference based on several factors. Once identified as a potential risk, a detailed study including modeling is required to determine the actual AC interference levels that the pipeline would be exposed to, to quantify the actual risks, and to design required mitigation. The pipelines were identified as requiring a detailed study, which was completed by DNV GL as part of the AC Interference Study completed for the project.

Phase II Draft EIS Hearing - May 23, 2017

38

1 DNV GL described as a national pipeline safety consulting  
 2 firm completed the PSE-commissioned study. The study is  
 3 in the EIS.

4 Letter to the editor, "Newcastle News," February 3,  
 5 2017, titled "Puget Sound Energy's Report on Pipeline  
 6 Safety Has Holes." Quote, Puget Sound Energy bases its  
 7 weak hypothesis on report it cites from DNV GL. That  
 8 report only addresses the subset of the electromagnetic  
 9 safety issue regarding co-location of the proposed Energy  
 10 Eastside project with petroleum pipeline. Further,  
 11 electromagnetic-related safety issues are only a subset  
 12 of the whole spectrum of the safety issues raised during  
 13 the EIS process. The validity of the DNV GL report is  
 14 dependent on information that was not independently  
 15 verified and was provided by a very dubious source, PSE.  
 16 The DNV GL report essentially concludes the safety risks  
 17 cannot be completely assessed until the project is  
 18 complete and operating. By then it's much too late.

19 Continuing. To base their conclusion on so little  
 20 information on such a small part of the overall safety  
 21 risk created by the proposed Energize Eastside project  
 22 shows PSE's systemic ignorance of the magnitude of safety  
 23 of the project and the impact on the community. This  
 24 also points to a large gap in PSE's technical competence  
 25 in their inability to perform a valid and complete safety

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OO4-B-5 Other pipeline safety concerns raised by commenters, including construction risks and risks associated with natural forces, such as earthquakes, windstorms, and lightning (as well as other electrical-interference related risks), were considered as part of the risk assessment completed for the Phase 2 Draft EIS. See Section 4.9 for information on construction risks and Section 3.9 for information on risks during operation.

The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for more detailed engineering by PSE. The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study completed by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used to achieve an optimal transmission line route and powerline configuration to minimize the AC interference risks on the Olympic Pipeline system is consistent with industry practice. However, Stantec recommended that additional analysis be performed in the detailed design stage of the project in order to verify mitigation needs for the project prior to transmission line energization (Stantec, 2017). These measures were incorporated into Section 3.9.7.2 of the Phase 2 Draft EIS (and updated Section 4.9.8.2 of the Final EIS).

OO4-B-5

Phase II Draft EIS Hearing - May 23, 2017

39

1 risk assessment.

2 Safety is something that must be proven, not

3 assumed. Safety is something that must be analyzed and

4 designed in, not added on after something bad happens.

5 All safety risks must be mitigated with adequate margin.

6 PSE claims victory, but Energize Eastside isn't even at

7 square one yet on proof of safety.

8 "Newcastle News" was fundamental in drawing local

9 attention to the safety issues that resulted in the

10 Olympic Pipeline's disaster in Bellingham on June 10,

11 1999. It is unfortunate that the attention was gained

12 after lives were lost and after the damage was done.

13 Media and public pressure brought about many positive

14 changes. For Energize Eastside, we need to do the same,

15 but before the fact.

16 MS. BRADFIELD: Brian, that was another five

17 minutes. Are you close to end or would you like to come

18 back?

19 MR. ELWORTH: No, I've got another third done.

20 So another five minutes.

21 MR. JOHNSON: I appreciate the opportunity to

22 just kind of add a few things I wasn't able to touch on

23 last time. The safety issue which Councilman Crispo

24 pointed to, and I believe he's here speaking in his own

25 private capacity, is not a vacuum. This isn't just a

OO4-B-6

OO4-B -6 As the commenter notes, given that for portions of the corridor, construction of a 230 kV transmission line poses potential risks of interaction with or disruption to the Olympic Pipeline system, particular attention to these risks is necessary. To address these concerns, additional analysis focusing on pipeline safety was included in the Phase 2 Draft EIS (Sections 3.9 and 4.9), which includes a risk assessment that considers electrical interference risks related to corrosion, fault conditions, arcing, and construction risks. Measures to mitigate potential risks are described in Sections 3.9.7 and 4.9.4. As part of ongoing coordination between PSE and Olympic, additional mitigation measures may be identified during final design.

Phase II Draft EIS Hearing - May 23, 2017

40

1 theoretical thing.

2 What is extremely frustrating is, my perception

3 anyway -- what's frustrating to me is there are two

4 things that are so wildly obvious and yet it's like

5 business as usual. It reminds me of the Madoff movies

6 and the documentaries you see where he's getting away

7 with the \$65 billion Ponzi scheme over years, and during

8 that same period their financial experts screaming to the

9 SCC, look what he's doing. It has to be a Ponzi scheme.

10 None of this stuff adds up. Everybody said, well, you

11 know, that's -- he's a very highly respected guy and he's

12 founded NASDAQ. He couldn't possibly be doing what

13 you're saying. And now we know the truth.

14 I feel as if this is a surreal dream. You're

15 accepting PSE as a player that's working in good faith.

16 PSE is a bad actor. I don't know how well it's known,

17 but PSE besides the fine Brian just talked about, PSE

18 received the biggest fine ever at the time for a utility,

19 \$1.25 million for falsifying gas pipeline safety records

20 for four years. Now, if that's not bumping into a

21 pipeline and causing a fire. That was intentionally done

22 to save money.

23 And we've seen this now in this project. It's all

24 about the money. It's about making infrastructure

25 investments on behalf of these Australian and Canadian

005-C-1

005-C-1 The EIS is not required to evaluate who would profit from a project. PSE is a private equity utility provider. While PSE may be owned or controlled by a foreign company, it is regulated by the Washington UTC and is a member of regional utility planning organizations, such as ColumbiaGrid.

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Phase II Draft EIS Hearing - May 23, 2017

41

005-C-1

1 foreign investors. It's an investment. It's not a  
2 public utility. They're making big bucks. I don't blame  
3 them. Let them try. It's like Madoff got away with  
4 murder because people were supposed to be regulating him  
5 and not making that happen didn't do their job. And I'm  
6 saying that's the same for you folks. You're not doing  
7 your job.

8 Now, the Seattle City Light, that can still be done  
9 and you treat it sort of as an alternative and not an  
10 alternative. It doesn't make it on the slides yet you  
11 talk about it in the EIS. You give all of these standard  
12 talking points, and PSE says, well, we can't do it. It's  
13 not feasible and it costs more money. Please look at the  
14 two and a half pages that Richard Lauckhart gives in  
15 rebuttal to each one of those paragraphs saying, this  
16 isn't true, this is the truth, this isn't true, this is  
17 the truth.

18 And look at those two letters from Seattle City  
19 Light telling you the truth about the availability of  
20 that line as opposed to the lie that you've incorporated  
21 in the EIS from PSE.

22 Look at this corridor right here, and look at that  
23 corridor over there. This corridor you can walk through  
24 but there's a one percent chance you'll get killed. You  
25 go down that corridor over there, you go through. Which

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Phase II Draft EIS Hearing - May 23, 2017

42

1 one are you going to take? Hey, it's not that big of a  
 2 risk. Take this one. Why wouldn't you? Because that  
 3 one is safe. It parallels the same corridor as the  
 4 proposed one for PSE. It's exactly the same only a mile  
 5 away. And if you tie up the SCL line to the transformer  
 6 at Lakeside, you can even afford to underground all of  
 7 that and it will cost immensely less than this crazy  
 8 project.

9 So don't be the SCC to PSE's Bernie Madoff. Thank  
 10 you.

11 MR. MARSH: I'm just going to extemporaneously  
 12 try to explain something that's complicated enough that  
 13 even our members still don't quite get it, but I think  
 14 it's really a central question in this whole thing. If  
 15 you go back to the Eastside Needs Assessment, I think  
 16 it's No. 5 of the key assumptions that PSE lists as their  
 17 top assumptions, I think it's No. 5, says 1500 megawatts  
 18 is going to Canada.

19 Now, that's confusing because sometimes people think  
 20 1500 megawatts is going through our lines, and PSE has  
 21 clarified that it's 1500 megawatt transmitted done by BPA  
 22 on big 500 kV lines that are to the east of us. That's  
 23 where most of that energy is going, that electricity is  
 24 going to Canada, except that since it's a grid, the  
 25 electricity takes the path of least resistance and some

OO1-D -1 See response to comment I12-B-5.

OO1-D-1

Phase II Draft EIS Hearing - May 23, 2017

43

1 of that electricity gets onto our grid. And it's  
 2 actually enough to cause problems and the kind of crazy  
 3 scenario that PSE has put together.

OO1-D-1

4 So we asked Utility System Efficiencies, Bellevue's  
 5 independent analyst, what would happen if that flow cut  
 6 off. And they did a load flow study which we like and  
 7 they concluded that 80 percent of PSE's overloads  
 8 disappeared. There's only one overload on one  
 9 transformer left, and it's just a little tiny overload.  
 10 And they said, well, that proves that the project is  
 11 needed. But that's not what would happen if that  
 12 situation actually occurred that way.

OO1-D-3

13 So what would happen is we're on a very cold day,  
 14 we're using lot of electricity. BPA is shipping all of  
 15 that electricity to Canada, and all of a sudden we have a  
 16 couple of transformers go out in our area and then our  
 17 grid starts having a problem. PSE would call up BPA and  
 18 say, Hey, we're having a problem here. Can you cut that  
 19 flow to Canada, and BPA would say, absolutely, because  
 20 it's not required. Canada does not need that  
 21 electricity. It's more like a financial transaction than  
 22 need.

OO1-D-4

23 In fact, they passed a law, the Clean Energy Act of  
 24 2010, that said they have to be self-sufficient with  
 25 their own electrical resources. So this is just a

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OO1-D -3 PSE alone is responsible for delivering power within PSE's service area. Of the energy flowing over the Northern Intertie to Canada, only a small portion flows through the Eastside. Between 1 and 2 percent (15 and 30 MW) of the 1,500 MW flowing north over the Northern Intertie in the heavy winter model currently flows through the substations on the Eastside.

OO1-D -4 Comment noted.

Phase II Draft EIS Hearing - May 23, 2017

44

OO1-D-4

1 financial transaction. If you cut it off, no lights go  
 2 off in Canada. And how fast could they do that? Fifteen  
 3 minutes. So if we've having a problem, PSE calls them up  
 4 and they cut the flow in 15 minutes.

OO1-D-5

5 So if PSE still says, well, we still have one  
 6 transformer that is overloading, what would actually  
 7 happen is the electricity flow would reverse and Canada  
 8 would start sending electricity to us, and that would  
 9 stop the last transformer overload that PSE has.

OO1-D-6

10 Now, is that a realistic scenario? Well,  
 11 fortunately, BPA has a website where you can look at the  
 12 energy transfers going across the border on a 15-minute  
 13 granularity for the past 20 years. Guess who went  
 14 through all that data? It was a long night and early  
 15 morning, but I looked at every point at which we have  
 16 cold temperatures here, and never in 20 years has there  
 17 been 1500 megawatts going to Canada when we have those  
 18 cold temperatures here.

OO1-D-7

19 In fact, in the past three years, there has not been  
 20 a single megawatt that has gone to Canada during those  
 21 conditions. It's all come here. We actually need that  
 22 electricity when it's cold here. So Canada is sending  
 23 the electricity to us. And PSE's scenario is completely  
 24 bogus. But even if it wasn't bogus, in 15 minutes we  
 25 would have the solution.

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- OO1-D -5 Comment noted.
- OO1-D -6 BPA data show that the maximum flow exceeds 2,000 MW at times. The 1,500 MW value is considered reasonable by ColumbiaGrid in its Biennial Plan for planning for heavy winter conditions, which is PSE's justification for making this modification in the model.
- OO1-D -7 Comment noted.

Phase II Draft EIS Hearing - May 23, 2017

45

OO1-D-8

1 So I would love the EIS to explain to people,  
 2 because they really don't understand what's happening  
 3 here. And if there is any inaccuracies in what I just  
 4 said, it would be great for you guys to correct them and  
 5 tell us exactly what happens when 1500 megawatts is going  
 6 to Canada in the middle of our peak emergency scenario.  
 7 That would be great.

8 Thank you.

9 MR. O'DONNELL: I just had a couple of  
 10 comments. Steve O'Donnell, Bellevue, CENSE member. I  
 11 wanted to say that I do not live on the corridor, and  
 12 also I wanted to show -- I want to go back to safety for  
 13 a minute. We'll put this into the record, but I wanted  
 14 you to see one of the fault lines that wasn't known back  
 15 when these pipelines went in.

II142-B-1

16 In fact, Sandi Doughton, the Seattle Times science  
 17 editor for the Seattle Times in her book, "Full-Rip 9.0"  
 18 points out that some dozen, I think, or more major faults  
 19 have been discovered in the last 10 to 20 years. So I  
 20 think there is some things that need to be -- these black  
 21 lines, squiggly lines, are the fault line going across  
 22 I-90, and incidentally, they just happen to cross both  
 23 pipelines here. I don't know if the force of a major  
 24 quake is really fully understood.

25 The Nisqually quake was almost a 7, a 6.8. That's

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OO1-D -8 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

II142-B -1 See response to comment II20-A-1 for information on seismic risks. See response to comment II90-F-7 for response to questions on emergency response.

The incremental change to risks to human health, safety, and the environment as a result of the project's proximity to the Olympic Pipeline are described in Section 3.9 of the Phase 2 Draft EIS. For a buried pipeline transporting refined petroleum product, the greatest risk to the public is posed by pool fires. Such an event would be extremely hazardous for emergency personnel as well as civilians. For more information, see Section 3.9.4 and Appendix I-5 of the Phase 2 Draft EIS.

See response to comment II114-A-5.

Phase II Draft EIS Hearing - May 23, 2017

46

1 about 240,000 tons of TNT. A 9.0 earthquake is 900  
2 times. An 8 is 30 times more powerful than a 7, and a 9  
3 is 30 times more powerful than an 8. It's 900 times,  
4 480,000,000 tons of TNT. That's how powerful a 9 is.  
5 We're overdue for that. I hope it never happens. Hope  
6 for the best, prepare for the worst. And that's why this  
7 EIS, this project, it needs to be studied further to take  
8 these things into consideration.

9 Now, in Kobe, Japan, much of the city was leveled  
10 and many parts of it were incinerated because the  
11 infrastructure under the ground was completely destroyed.  
12 They didn't have any water. So, you know, we haven't put  
13 that technology underground yet. We should. We should  
14 start. It would probably take -- it's taken Kobe, it's a  
15 50-year project.

16 But water won't put -- if this baby blows and goes  
17 kaboom in Bridle Trails or Somerset or any one of 40  
18 neighborhoods along an 18-mile line, this will be  
19 hundreds of homes incinerated, hundreds. It will be one  
20 of the biggest catastrophes in the United States other  
21 than one of our wars.

22 So water -- water won't put this fire out. It's  
23 only a special foam that can put this fire out, and the  
24 City of Bellevue fire chief says that they cannot put it  
25 out. The foam is out at Sea-Tac. All our fire

II142-B-1

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Phase II Draft EIS Hearing - May 23, 2017

47

1 departments can do is come and help you evacuate, try to  
 2 evacuate the area and maybe take, you know, haul bodies  
 3 away or take people to hospitals. That's all they can  
 4 do. They can't put it out.

5 In San Bruno, California, the PG&E gas explosion I  
 6 talked about, it took 90 minutes to three hours to turn  
 7 off valves and shut off the fuel source for that fire.

8 So when we can't even fight the thing. I mean, one  
 9 of the mitigations, and it wasn't studied, I mean, we're  
 10 going to do this, this is going to happen, get a crew, I  
 11 mean, don't we need these fire suppressant foam stations  
 12 along the line so that our fire departments in Redmond  
 13 and Newcastle and Bellevue would be able to respond and  
 14 put the thing out and minimize the loss of life. Don't  
 15 we need that?

16 Thank you.

17 MS. BRADFIELD: Brian, would you like to finish  
 18 your comments.

19 MR. ELWORTH: Brian Elworth again. Last time I  
 20 left off talking about the validity of the DNV GL study.  
 21 It is predicated on a 75 mil coal tar pipe coating  
 22 thickness and integrity of that coating. Without that  
 23 integrity, without that coating, that study is invalid.

24 So how will PSE initially and periodically assess  
 25 the coating is intact and is no less than the stated

II142-B-1

OO4-C-1

OO4-C-1 Per federal law, Olympic is responsible for the maintenance and safe operation of the pipeline; therefore, beyond PSE employing reasonable measures in the design and construction of the transmission line and providing information to Olympic, the responsibility for protecting the pipeline from corrosion lies with Olympic. Also see response to comment OO4-B-5.

Phase II Draft EIS Hearing - May 23, 2017

48

OO4-C-1

1 thickness. What is the impact of the initial and  
 2 periodic assessment? The EIS is defective and it does  
 3 not address this critical safety issue.

OO4-C-2

4 The validity of the DNV GL study is predicated on a  
 5 peak current of 1,315 amps. How will this be  
 6 continuously and independently monitored and verified?  
 7 What is the impact of providing this monitoring? The EIS  
 8 is defective in that it does not address this critical  
 9 safety issue.

OO4-C-4

10 So would you advocate someone designing and building  
 11 a brand new school bus, loading it with children and  
 12 driving it down the freeway to see if the steering and  
 13 brakes work? Would you advocate someone designing and  
 14 building a brand new aircraft, loading it with passengers  
 15 and then going full throttle down the runway to see if it  
 16 would fly? If not, how can you possibly advocate  
 17 Energize Eastside given per DNV GL final mitigation  
 18 design if necessary should be based on field data  
 19 collected after this system is energized. That's way too  
 20 late. That's the school bus, that's the aircraft in  
 21 these scenarios.

22 Reliability. Per DNV GL, quote, PSE should notify  
 23 the pipeline operator when there is planned outages on  
 24 the individual circuits as the AC induction effects on  
 25 the pipeline may be magnified when only one circuit of

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OO4-C-2 PSE installs supervisory control and data acquisition (SCADA) systems to monitor loads on all of the transmission lines in real time (every 4 second samples). As the commenter noted, the simulation studies for Energize Eastside show that these lines could carry a maximum current of 1,315 amps under peak winter operating conditions. If necessary, the Partner Cities could request this information through the permit approval process, and has been identified as a potential mitigation measure in the Final EIS.

OO4-C-4 Mitigation measures in Section 3.9.7.2 of the Phase 2 Draft EIS identify additional analysis to be performed in the detailed design stage of the proposed PSE project in order to verify mitigation needs for the project prior to transmission line energization. These recommendations were identified by Stantec, part of the EIS Consultant Team, who performed independent, technical review of the AC Interference Study completed by DNV GL (Stantec, 2017).

Phase II Draft EIS Hearing - May 23, 2017

49

1 the double-circuit transmission line is energized. This  
 2 is a slippery way of saying it's dangerous to operate one  
 3 circuit when the other one is not operating. So what  
 4 that means is one failure cascades into two. Therefore,  
 5 an N minus one failure is an N minus two failure.

6 Phase 1, EIS, Section 2.2.1, electrical criteria  
 7 indicates this is a big no no. Energize Eastside creates  
 8 this cascading failure mode and fails to meet PSE's own  
 9 reliability requirements. Now, I couldn't find 2.2.1  
 10 anywhere. Was that eliminated because PSE no longer met  
 11 their own initial baseline requirements? It kind of  
 12 looks that way.

OO4-C-5

13 What are the other safety issues? How are they  
 14 being addressed? What is the impact of mitigation of  
 15 those? What about the curtain of death caused by those  
 16 power lines and conductive smoke. When there is a fire  
 17 there, that smoke is conductive. You can see BPA reports  
 18 of wildfires where there is lightning coming down through  
 19 those lines through that smoke. The exact same thing  
 20 would happen, only to a greater degree, in a pipeline  
 21 fire situation.

OO4-C-6

22 By the way, the foam they use that you can't get, a  
 23 lot of it, a lot of it is conductive. You couldn't even  
 24 use it in a fire like that because you've got these steel  
 25 poles conducting down from the three-phase power the

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OO4-C-5 This comment mischaracterizes the recommendations of the DNV-GL report it refers to. Please refer to the report. The recommendation was made to allow Olympic the opportunity to see if there is any additional protection that Olympic needs to do to protect its pipe during such events. These are not necessarily N-2 events.

The comment also mischaracterizes the criteria PSE provided for the objectives of the project, which are included in the Phase 1 Draft EIS and are still applicable. The project is not intended to eliminate the possibility of N-2 events, but rather to provide sufficient capacity to be able to accommodate such events, as required by NERC regulations. Verification of anticipated design outcomes is also recommended mitigation after the line is energized.

OO4-C-6 Both the existing and proposed transmission lines would have similar vulnerability to smoke causing faults. No smoke-related faults have been reported on the existing lines, and there is nothing to suggest that smoke is more likely to cause faults with the proposed line. To the extent that the comment is referring only to smoke from a fire resulting from the pipelines, the potential effect of a fire to include damage to the power lines is discussed in the Phase 2 Draft EIS, Section 3.9. As such, this issue is not further evaluated in the Final EIS.

Phase II Draft EIS Hearing - May 23, 2017

50

1 lines are supporting.

2 So where is the Homeland Security risk mitigation

3 impact assessment? I didn't see that. Simple example.

4 A terrorist decides to remotely control a drone to drop a

5 conductor across the phases and short it to the

6 conductive tower to send a high voltage, high current

7 surge into the ground adjacent to the hazardous liquid

8 pipeline. Simple scenario, but a guy could do it right

9 now. Where is your assessment of that?

10 What is Bellevue doing to assess the impact to the

11 mitigation of the huge risk of safety risks? Bellevue,

12 as a lead agency, is obligated to conduct a complete

13 assessment of all safety-related failure modes, including

14 mechanical failures, unintentional actions and

15 intentional destructive actions. Safety risks associated

16 with those failure modes, risk mitigation for the

17 safety-related failures, impact of safety risk

18 mitigation, and a quantification of the elements of

19 assessment. The EIS will continue to be defective until

20 that is complete.

21 By virtue of the extreme dangerous route being

22 advocated for Energize Eastside, this will very likely be

23 a long and expensive process. You need to hire experts.

24 A good expert is probably going to cost you a quarter of

25 a million dollars maybe. You need probably a half a

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- OO4-C-7 The project is not expected to increase the risk of terrorist attacks on the pipeline or the transmission line, because the colocation of the two facilities already exists. The pipeline safety analysis provided in the EIS describes the potential adverse effect of a large release from the pipeline.
  - OO4-C-8 The project is not expected to increase the risk of mechanical failure, unintentional actions, or intentional destructive actions. Electrical interference-related risks and construction risks are addressed in Sections 3.9 and 4.9 of the Phase 2 Draft EIS.
  - OO4-C-9 The Partner Cities acknowledge that public safety is of paramount concern. The City of Bellevue and the EIS Consultant Team contacted Olympic during the development of the Phase 1 Draft EIS, and made additional inquiries during the project-specific phase of the EIS. The discussion, analysis, and characterization of public safety were refined in the Phase 2 Draft EIS, with greater focus on project-level details, including the preparation of a probabilistic pipeline risk assessment (risk assessment) that evaluated the probability of a pipeline rupture occurring as a result of the construction and operation of overhead transmission lines. EDM Services, a company specializing in pipeline safety risk assessments, conducted the assessment.
- As described in Section 3.9.1.4 of the Phase 2 Draft EIS, PSE retained DNV GL (the author of the report "Criteria for Pipelines Co-Existing with Electric Power Lines") to develop a detailed analysis of risks and recommendations for the Energize Eastside project. This study ("A Detailed Approach to Assess AC Interference Levels Between the Energize Eastside Transmission Line Project and the Existing Olympic Pipelines, OLP16 & OPL20"), referred to in the EIS as the AC Interference Study, was used in preparing the analysis for the Phase 2 Draft EIS. The study included recommendations related to the design of pole locations, layout, and configuration to mitigate potential electrical interference-related impacts on the pipelines (see Section 3.9.7.2). The EIS Consultant Team retained Stantec Consulting Services Inc. (Stantec) to perform an independent, technical review of the AC Interference Study completed by DNV GL. Based on Stantec's experience and industry standards, it is their opinion that the technical approach used to achieve an optimal transmission line route and powerline configuration to minimize the AC interference risks on the Olympic Pipeline system is consistent with industry practice. The project is not expected to alter the likelihood of an attack on either the pipeline or the transmission system. Therefore, there has been no coordination with Homeland Security for this EIS.

Phase II Draft EIS Hearing - May 23, 2017

51

004-C-9

1 dozen of them. This is going to be like a two-year  
 2 process to go and analyze, flush out all of those safety  
 3 risks and do the complete analysis. Have you got those  
 4 people on board? Have they gotten their clearances to  
 5 talk to Homeland Security, to talk to OPL, to talk to all  
 6 of these sources of information that won't just hand it  
 7 over to the general public.

8 Thank you.

9 MR. GARMENDIA: My name is Ricardo Garmendia,  
 10 G-A-R-M-E-N-D-I-A, Garmendia. My address is 10205 126th  
 11 Avenue Southeast. My house is right behind -- I mean,  
 12 you guy's line is right behind my house and my bedroom is  
 13 less than 40 feet, the head of my bed probably 50 feet at  
 14 the most, from the new power line. I'm not happy about  
 15 what you guys are going to do over there. So I'm asking  
 16 for you guys to reconsider putting the power line near my  
 17 house and near my bed. I don't think that this is  
 18 something that is conducive to our neighborhood.

1133-A-1

19 I think I started to read all the things that are  
 20 out there regarding the effects of power being so close,  
 21 especially my bed where I will be spending at least eight  
 22 hours a night so close to that line I think is not going  
 23 to be a good thing for me or my family.

1133-A-2

24 I don't know if you guys consider any kind of  
 25 compensation in terms of moving me out of there, that

1133-A -1 Comment noted.

1133-A -2 No residential property acquisitions are anticipated for the Energize Eastside project, therefore no one will be required to move. Compensation for voluntary moves by adjacent residents has not been considered.

Phase II Draft EIS Hearing - May 23, 2017

52

II33-A-2

1 power line being so close, or any other type of  
2 accommodation that will facilitate for me if I have to  
3 leave my own house that I owned for the last 10 years.

4 That's all I have. Thanks.

5 MR. JOHNSON: I just want to supplement  
6 something that Steve said. Larry Johnson. I'm with  
7 Citizens for Sane Eastside Energy. My address is 8505  
8 120th Avenue Southeast, Newcastle.

9 Just a quick supplemental thing to what Steve said  
10 about foam and fighting a fire like this. If you go to  
11 YouTube and just put in there the search term San  
12 Bernardino gas pipeline explosion, there are several  
13 videos taken by helicopters and news organizations  
14 showing the fire as it's in progress. And there's two  
15 things that really stand out when you look at that video,  
16 and of course, there's news commentary to supplement.

OO5-D-1

17 It's not just an explosion and a fire. The gas kept  
18 coming through and feeding the fire, so it just kept  
19 building and building and it just builds higher and  
20 higher because it keeps getting fuel. As somebody  
21 pointed out, this isn't highly flammable jet fuel under  
22 pressure. Several thousands of gallons an hour come out  
23 of a ruptured pipeline. This wasn't the case in San  
24 Bernardino.

25 But the point I want to supplement to what Steve

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OO5-D -1 See response to comment II130-A-3 regarding spill size. The normal flow rates and operating pressures of the 16-inch and 20-inch pipelines were obtained from the Olympic Pipe Line Company and used in the release modeling conducted by EDM Services.

Phase II Draft EIS Hearing - May 23, 2017

53

1 said is in those videos you see all these fire trucks and  
2 ambulances six, seven, eight, 10 blocks away from the  
3 fire. Why weren't they there putting out the fire? Why  
4 weren't they there rescuing people? Because the fire was  
5 too hot. They could not get closer. The foam won't  
6 help. Turning it on and off is a problem if you can't  
7 get to the switch. That's all I have to say.

8 Thanks.

9 (Public comments concluded at 8:16 p.m.)  
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ENERGIZE EASTSIDE  
PHASE 2 DRAFT ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING/PUBLIC TESTIMONY

6:00 p.m.  
Thursday, May 25, 2017

Bellevue City Hall  
450 110th Avenue Northeast  
Bellevue, Washington

KIMBERLY MIFFLIN, CCR, CSR  
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Phase II Draft EIS Hearing - May 25, 2017

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PANEL MEMBERS

CAROL HELLAND - SEPA Responsible Official, City of Bellevue  
HEIDI BEDWELL - EIS program Manager  
MARK JOHNSON

MEETING FACILITATOR

CASEY BRADFIELD

PUBLIC SPEAKERS

BRIAN ELWORTH  
WARREN HALVERSON  
NORM HANSEN  
DON MARSH  
TODD ANDERSEN  
ERIC BIDSTRUP  
WAYNE RECTOR  
MIKE ABEL  
SUE STRONK  
JANIS MEDLEY  
MARYANNE HALVERSON  
JEANNE DEMUND  
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Phase II Draft EIS Hearing - May 25, 2017

3

1 MR. ELWORTH: My name is Brian Elworth. I  
2 live at 8605 129th Court Southeast in Newcastle. I  
3 represent the Olympus Homeowners' Association. Since  
4 I didn't really have time to really prepare more  
5 material, I mean this is a document rich with  
6 opportunities, and I found that sometimes I need to  
7 repeat myself, I'm going to sort of condense down what  
8 I said last time and go through that rather quickly.

9 Article in "Newcastle News" January 6, 2017,  
10 Study, Energize Eastside Pipeline Can Safely Coexist.  
11 Quote, A recent study shows the Energize Eastside  
12 project can safely coexist in the same corridor that  
13 contains an Olympic Pipeline Company channel carrying  
14 fuel to the Sea-Tac airport according to a Puget Sound  
15 Energy news release. DNV GL described as a national  
16 pipeline safety consulting firm completed the  
17 PSE-commissioned study. That study is in the EIS.

18 Letter to the editor, "Newcastle News," February  
19 3, 2017, Puget Sound Energy's Report on Pipeline  
20 Safety has Holes. Quote, Puget Sound Energy bases its  
21 weak hypothesis on a report it cites from DNV GL.  
22 That report only addressed the subset of the  
23 electromagnetic safety issues regarding co-location of  
24 the proposed Eastside Energy project with the  
25 petroleum pipeline.

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Phase II Draft EIS Hearing - May 25, 2017

4

1 Further, electromagnetic-related safety issues  
2 are only a subset of the full spectrum of safety  
3 issues raised during the EIS process. The validity of  
4 the DNV GL report is dependent on information that is  
5 not independently verified and was provided by a very  
6 dubious source, PSE. The DNV GL report essentially  
7 concludes safety risk cannot be completely assessed  
8 until the project is complete and operating. By then  
9 it is much too late.

10 Co-location of a high energy ignition source with  
11 a high energy fuel source is reckless. Clearly, the  
12 co-location of the Energize Eastside project with the  
13 hazardous liquid pipeline is a continuous and  
14 unmitigated danger to our community.

15 So would you advocate someone designing and  
16 building a brand new school bus, loading it with  
17 children, driving down the freeway to see if the  
18 steering and brakes would work? Would you advocate  
19 someone designing and building a brand new aircraft,  
20 loading it with passengers and then going full  
21 throttle down the runway to see if it flies? If not,  
22 how can you possibly advocate Energize Eastside given  
23 per DNV GL final mitigation design, if necessary,  
24 should be based on field data collected after the  
25 system is energized. Too late.

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Phase II Draft EIS Hearing - May 25, 2017

5

1 Reliability. Per that same study, PSE should  
 2 notify the pipeline operator when there is a planned  
 3 outage of the individual circuits as the AC induction  
 4 effects on the pipeline may be magnified when only one  
 5 circuit of the double circuit transmission line is  
 6 energized. That is a slipperier way of saying it is  
 7 dangerous to operate one circuit when the other is not  
 8 operating. Therefore, one failure cascades into two.

9 It is less reliable than what you have right now.  
 10 It reduces reliability, it's going the wrong  
 11 direction. It's contrary to Phase 1 EIS Section  
 12 2.2.1, electrical criteria that says that's a big no  
 13 no.

14 So what are all the other safety issues? How are  
 15 they being addressed? What is the impact of  
 16 mitigation? You haven't addressed Homeland Security  
 17 at all yet. You have got two high value targets  
 18 co-located. You haven't addressed that security issue  
 19 yet. I suggest that you look up the term FMEA,  
 20 Failure Mode Effects Analysis and study it and learn  
 21 it because by the time you're done you're going to be  
 22 professional at it.

23 You also need to look at risk management. I  
 24 think you absolutely have to have training in risk  
 25 management, particularly safety in risk management.

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- OO4-D -1 The DNV GL recommendation for notification of one transmission line being out of use is related to pipeline corrosion effects, not electrical system reliability. The purpose of the recommended notification is so that when a shutdown of one transmission line is planned, Olympic could examine the effects on its pipeline to determine if any adjustments are needed to its cathodic protection system. The suggestion that this would reduce electrical reliability is incorrect. Establishing a 230 kV transmission line between the Richards Creek substation and the Sammamish substation, and a second 230 kV transmission between the Richards Creek substation and the Talbot Hill substation would provide greater transmission capacity and add redundancy to the transmission system.
- OO4-D -2 The EIS addresses a range of safety issues related to its proximity to the Olympic Pipeline system. The FMEA process cited relates to engineering used in manufacturing, which is outside of the scope of this EIS.
- OO4-D -3 The Phase 2 Draft EIS does look at probabilistic risk with regard to pipeline safety, in reliance on analysis by experts in pipeline risk analysis. As discussed in the previous comment, this project is not expected increase the risk of terrorist attack.

OO4-D-1

OO4-D-2

OO4-D-3



Phase II Draft EIS Hearing - May 25, 2017

6

OO4-D-4

1 At the current rate, it will take years for you to  
 2 complete the EIS given the rate you are addressing the  
 3 safety issues. You can't just reach in the honey do  
 4 jar, pick up a topic and say, oh, huh, shut-off  
 5 values. Well, I'm not allowed that. Put it back in  
 6 the jar. Pick up another one. Oh, response, disaster  
 7 response. Oh, I can't see that data. Put it back in  
 8 the jar, pick up another one. It has to be rigorous.  
 9 It can't just pick and choose topics and throw them  
 10 into the EIS.

OO4-D-5

11 So as Bellevue is the lead agency it is obligated  
 12 to conduct the lead assessment. All safety-related  
 13 failure modes, including mechanical failures,  
 14 unintentional actions and intentional destructive  
 15 actions, safety risks associated with failure modes,  
 16 risk mitigation of safety-related failures, impact of  
 17 safety risk mitigation and the quantification of those  
 18 elements. The EIS will essentially be defective until  
 19 you've got all that information in there, complete and  
 20 concise and top to bottom, complete assessment of the  
 21 safety risks and mitigation for those. Thank you.

22 MR. HALVERSON: Good evening. My name is  
 23 Warren Halverson. I live at 13701 Northeast 32nd  
 24 Place. My wife and I have lived in Bridle Trails for  
 25 over 40 years, and I am here as president of the

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- OO4-D -4 The comment makes reference to the unavailability of specific information regarding the location of shutoff valves on the Olympic Pipeline, which is reported in the Phase 2 Draft EIS. The partner Cities do not have the authority to compel Olympic to identify the locations of its shutoff valves for this EIS. In instances where such information is unavailable, the approach taken in the EIS is to make conservatively high assumptions about the potential impact, consistent with the rules for SEPA analysis.
- OO4-D -5 The EIS is not charged with evaluating how the pipeline is operated, but rather what are the possible ways in which the transmission line could affect pipeline safety. The analysis takes into account statistical likelihood that the pipeline could have a release, which is based on a national database of failures on pipelines, the best available data for such evaluation. The EIS also identifies methods for limiting risk suggested by three different consulting firms with experience in pipeline risk management.

Phase II Draft EIS Hearing - May 25, 2017

7

1 Canter Green Homeowners' Association. I too am a  
2 member of CENSE and fully support the remarks of Don  
3 Marsh that he will be making.

4 As I begin my remarks, I think it is important to  
5 acknowledge the fact that there are significant  
6 changes occurring in the electrical industry and  
7 marketplace. Today continuous technology advances and  
8 customer awareness of the need for conservation are  
9 significantly, significantly impacting demand and  
10 provisioning electricity. It's an exciting place to  
11 be. But it has become a declining growth industry.

12 Illustrative of this is a recent announcement by  
13 the BPA canceling an 80-mile long 500 kV transmission  
14 line project in Oregon, a project first announced in  
15 2009, canceled after studies, community involvement  
16 and environmental impact statements were complete.  
17 I've attached this article to my remarks. It's a true  
18 case study.

OO7-A-1

19 As to Phase 2 of the EIS, I am deeply concerned  
20 that the need for this project has not been proven,  
21 and I am deeply concerned that the purpose of Phase 2  
22 of the EIS has not been met.

OO7-A-2

23 Firstly, Phase 2 of the EIS states that there is  
24 a need for Energize Eastside to address a projected  
25 deficiency in transmission capacity resulting from

OO7-A -1 Comment noted.

OO7-A -2 See response to comment OO5-A-4.

Phase II Draft EIS Hearing - May 25, 2017

8

OO7-A-2

1 growth in the electricity demand which could affect  
2 the grid future reliability of the electrical service  
3 to the Eastside. The EIS shows PSE forecast of 2.4  
4 percent growth rate with a shortfall of 74 megawatts  
5 over the next 10 years. However, there are many  
6 unanswered questions about these projections and  
7 underlining assumptions. Because of this magnitude of  
8 a project, we request a load forecast for Eastside  
9 transmission transformers showing the deficiencies  
10 and projected improvements. We too request the EIS  
11 team substantiate growth forecast with a current  
12 Eastside customer demand forecast showing assumptions,  
13 actual numbers for the past five years and actual  
14 numbers for the next 10 years. This will validate  
15 need with current facts.

16 This may sound like a lot of work, but it really  
17 isn't. Currently, PSE is developing their integrated  
18 resources plan. They are three-quarters of the way  
19 through it for 2017, so the data is available. Please  
20 recall, we're only looking for 74 megawatts of power  
21 based upon a highly questionable 2.4 percent forecast.

22 Energize Eastside is a mammoth and for the  
23 Macquarie Company, a very lucrative project. The  
24 impact on neighborhoods would be for decades. The  
25 portrayal that any delay will potentially cause the

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Phase II Draft EIS Hearing - May 25, 2017

9

1 lights to go out or rolling blackouts as portrayed is  
 2 not true. The facts simply do not support this PR  
 3 spin and hyperbole. Let's get this right. Let's get  
 4 this right for ourselves and future generations. I'll  
 5 attach the charts that I think need to be updated.

6 Next Phase 2 of the EIS, the purpose again. The  
 7 purpose of Phase 2 of the EIS is to provide  
 8 project-level alternatives based upon more defined  
 9 geographic locations in a more detailed analysis of  
 10 potential environmental impacts. And as required by  
 11 SEPA, the No Action Alternative must be evaluated as a  
 12 baseline against which the actions alternatives can be  
 13 evaluated.

14 I question this process, that the process has  
 15 evaluated alternatives and elements. Throughout both  
 16 Phase 1 and Phase 2, alternatives have never been  
 17 adequately defined, including no action. Further, the  
 18 no action alternative was never used as a baseline for  
 19 comparison. The EIS team has then gone on to define  
 20 and limit determinations to either significant or less  
 21 than significant.

22 By defining the measurement system and  
 23 interpreting it, the EIS team concludes that there are  
 24 no significant unavoidable adverse impacts for all 10  
 25 elements in Energize Eastside. Really. Frankly, does

007-A-3

007-A-4

007-A -3 The comment does not identify specific deficiencies in the definition of the alternatives. The No Action Alternative was used as the baseline to compare impacts to throughout the EIS. The No Action Alternative and action alternatives are defined in Section 1.8 of the Phase 2 Draft EIS. Additionally, SEPA requires that the EIS identify all probable significant impacts therefore all impacts are identified as either "significant" or "less than significant." The impacts are also described and, where appropriate, quantified.

007-A -4 The comment is incorrect. Potential significant impacts are identified and described in several sections of the Phase 2 Draft EIS, and summarized in Chapter 6 (Significant Unavoidable Adverse Impacts); the "Summary Sheets" at the end of Chapter 1 also summarize impacts by element of the environment.

Phase II Draft EIS Hearing - May 25, 2017

10

OO7-A-4

1 this not provide for a serious thoughtful analysis?  
2 No significant impacts.

OO7-A-5

3 We request Phase 2 be rewritten to meet the  
4 stated objective of comparing EE with No Action  
5 Alternative with a complete rewrite of determination  
6 of significance. The public has spent thousands of  
7 hours and invested thousands of dollars to help the  
8 EIS process, yet it is impossible to fully understand  
9 their contribution.

OO7-A-6

10 Another suggestion is we request you provide an  
11 executive summary chapter of public comments,  
12 including a three- to five-page summary of number of  
13 comments by chapter, changes made in the EIS and the  
14 impact of those changes in terms of degree of  
15 significance.

OO7-A-7

16 I know I'm going to run out of time. I want to  
17 honor everybody else's time, so I'd like to move along  
18 real quickly. I'd like to talk about trees quite a  
19 bit. Here's the comment that I'd like to make.

OO7-A-8

20 This problematic EIS cannot meet standard without  
21 a complete list of all trees being removed. We  
22 strongly support this request. The EIS needs to be  
23 clarified also on what you mean by the vegetation  
24 management program, the difference between a 115 kV  
25 line and a 230 kV line. This is a whole new subject.

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- OO7-A -5 The Phase 2 Draft EIS adheres to the standards of SEPA and uses the No Action Alternative as the baseline for comparison of alternatives.
- OO7-A -6 A summary of responses to comments received on the Phase 1 Draft EIS is included in the Final EIS, Appendix J. Responses to comments received on the Phase 2 Draft EIS are included in the Final EIS, Appendix K. Comments are not quantified, but are organized by topic. Where there has been a change to analysis, it is noted in the comment responses.
- OO7-A -7 See response to comment II139-A-3.
- OO7-A -8 In the Phase 2 Draft EIS, PSE's Vegetation Management Program is explained in Section 3.4.1.3, and further details are in Appendix E. PSE will also work with property owners on a one-on-one basis to refine vegetation removal and replacement within the parameters of this plan and city permit requirements. See also Section 4.4 In the Final EIS.

Phase II Draft EIS Hearing - May 25, 2017

11

007-A-8

1 This should not be left up to the homeowner to decide  
2 and work out with PSE. So I'd like some more  
3 definition on that.

007-A-9

4 As to economics, we appreciate you adding this,  
5 but it's troublesome that property value, ecosystem  
6 and other costs continue to be incomplete. But most  
7 troubling, quoting 2015, PSE has concluded that the  
8 most effective and cost efficient solution to meet its  
9 objectives is Energize Eastside. This may sound good  
10 to the hearing examiner or the Washington Utilities  
11 and Transportation Commission, but there is no  
12 analysis to support this conclusion. We therefore  
13 request the EIS team to provide the cost data for  
14 alternatives in Phase 1 and Phase 2 to support these  
15 conclusions.

007-A-10

16 In conclusion then without many, many serious and  
17 significant modifications to this EIS, we cannot  
18 accept this document as Bellevue's environmental  
19 review for Energize Eastside. Nobody can.

20 Because I still have a couple of more seconds --  
21 I still have four more pages -- but I would like to  
22 also say --

23 MS. BRADFIELD: Warren, you're actually out  
24 of time. Could you wrap up.

25 MR. HALVERSON: I'd like to talk about

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007-A -9 This is outside of the scope of SEPA.  
007-A -10 The Partner Cities believe that the Draft EIS contains a  
reasonably thorough analysis of the potential environmental  
impacts of the project, as required by SEPA.

Phase II Draft EIS Hearing - May 25, 2017

12

1 industrial corridors which is what's happened here.

2 MR. HANSEN: My wife says I don't hear very  
3 well. Maybe that's true. Norm Hansen, 3851 136th Avenue  
4 Northeast, Bellevue. I live in the Bridle Trails area  
5 and I'm representing the Bridle Trails Community Club as  
6 a board member and I'm also a member of CENSE.

7 And in reading the EIS, I was lucky enough I guess  
8 or unlucky enough to get a paper copy. And I found out,  
9 though, that this book is probably one of the most  
10 expensive books around. This was two and a half million  
11 dollars, I believe, just about, and we're not done yet.

12 In reading it, I was a little bit concerned because  
13 I can't find out the location, the exact location of the  
14 poles. And in order to really assess the scenic and the  
15 visual aspects of this sometimes one foot can make a  
16 difference, two feet. And I can't find that in there, so  
17 I'd like to request that information and we'd like to get  
18 it in a timely manner because we know that the last day  
19 of comment will be June 21 and we'll need some time to do  
20 that.

OO6-A-1

21 The same thing applies on the trees, which trees  
22 will be cut. We've got some very special trees in Bridle  
23 Trails, and maybe they're on the edge of the easement,  
24 maybe they're not, and so we really need to know to  
25 assess the impact of that and what the economic impact

OO6-A-2

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OO6-A -1 Exact pole placement has not be decided and would not be final until the permitting stage. For the Phase 2 Draft EIS, while specific pole locations were provided by PSE, they were still making adjustments in those locations in response to property owner requests, wetland and stream buffer locations, and other information. For this reason, the assumptions used likely overstate the impacts of the project since PSE is working to reduce impacts as the design is refined. This is typical of the design process for a large project going through an EIS process. Potential pole locations used for the Phase 2 Draft EIS are shown in Appendix A of the Phase 2 Draft EIS. Refined location data are presented in Chapter 2 and Appendix A of the Final EIS for PSE's Proposed Alignment, as well as on the project website ([www.energizeeastsideeis.org/](http://www.energizeeastsideeis.org/), in the Library tab).

OO6-A -2 See response to comment II139-A-3. Also see Section 3.10.3, Tree Cover Along Transmission Line Corridor, in the Phase 2 Draft EIS for the discussion of the monetary value of lost ecosystem services due to reduced tree cover. Information on potential vegetation clearing associated with PSE's Proposed Alignment is presented in Section 4.4 of the Final EIS, based on refined design data.

Phase II Draft EIS Hearing - May 25, 2017

13

OO6-A-2 |

1

would be on that.

2

I was also -- I couldn't find any detailed

OO6-A-3 |

3

information on the economics of undergrounding these

4

lines, and they speak of undergrounding, one sentence

5

here, one sentence there. But there's no detailed

6

analysis. And for those of you that may not know,

7

undergrounding dual circuits, 230 lines are very much the

8

best practice today.

9

And as a matter of fact, San Diego Gas and Electric

10

is undergrounding to this day 11 and a half miles, and it

11

takes about a year and a half to do that. There's a

12

three-foot wide trench six feet deep. It's amazing they

13

can do this. And they're running it along the roadway.

OO6-A-4 |

14

And we need to know subsurface plans, we need to

15

know those costs. I think they can get very direct costs

16

from them. I think also New Jersey Public Power, they're

17

doing 18 miles of 230 underground.

18

And I think for Bellevue, you know, we're a real

19

high tech area and we're looking at a 20-year horizon.

20

And if we ever do need this line, I think we ought to be

21

looking at the best practice. You may be surprised that,

22

yes, it's going to cost more. My phone costs more too.

23

You know, I didn't pay \$600 20 years ago, you know, it

24

was a lot less.

25

So those are my comments, and so I would appreciate

OO6-A -3 See response to comment II6-A-1.

OO6-A -4 There are no current plans to underground any part of the transmission line. PSE's consultant Power Engineers prepared an initial estimate for placing the line underground prior to the Phase 1 Draft EIS, and is available on the [www.energizeeastsideeis.org](http://www.energizeeastsideeis.org) website Library under PSE documents.

Phase II Draft EIS Hearing - May 25, 2017

14

1 this information, especially on the trees and the poles  
2 and very timely. If we could get it early next week, I  
3 think that would be very good. Thanks.

4 MR. MARSH: My name is Don Marsh, and I am  
5 president of CENSE, the Coalition of Eastside  
6 Neighborhoods for Sensible Energy, an all-volunteer  
7 organization. For the past three years we have been  
8 shedding light on PSE's Energize Eastside project,  
9 engaging multiple industry experts to help us understand  
10 all aspects of this proposal.

11 One. The Phase 1 Draft EIS stated that the EIS  
12 would be divided into two phases. The Phase 1 Draft EIS  
13 broadly evaluates the general impacts and implications  
14 associated with feasible and reasonable options. The  
15 Phase 2 Draft EIS will be a project-level evaluation,  
16 describing impacts at a site-specific and  
17 project-specific level, end quote. From this  
18 description, we expected to see specific proposals for  
19 pole locations, pole designs and a list of the specific  
20 trees that would be removed. Without these specifics,  
21 how can the public evaluate or comment on the  
22 environmental impacts of this project?

23 We request the cities to publish a Supplemental EIS  
24 when a final route is chosen and the specific information  
25 regarding poles and trees is known.

OO1-A-1 See response to comment II14-B-3.

OO1-A-1

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Phase II Draft EIS Hearing - May 25, 2017

15

1 Two. The EIS states it is important to understand  
 2 the need for the project, to enable a thorough  
 3 understanding of the project's objectives. However, the  
 4 EIS doesn't include any data or charts to substantiate  
 5 the need. It only says that PSE determined there was a  
 6 need, and it cites two outdated documents that are  
 7 collectively known as the Eastside Needs Assessment.  
 8 Eastside demand for electricity has not increased in the  
 9 way these documents assumed.

OO1-A-2

10 We request that the EIS present 10 years of  
 11 historical data for Eastside demand and an updated  
 12 forecast so the public can observe the trends over time  
 13 and develop a thorough understanding of the project's  
 14 objectives.

15 Three. The EIS states that Energize Eastside will  
 16 improve electrical reliability. The public understands  
 17 this to mean there will be fewer or shorter power outages  
 18 after the project is built. However, PSE has stated that  
 19 Energize Eastside will not improve reliability metrics  
 20 for any neighborhood in Bellevue.

OO1-A-3

21 We request that the EIS quantify the projected  
 22 improvements in reliability using an industry standard  
 23 metric such as the average reduction in outage duration  
 24 per customer per year. Using this metric, stakeholders  
 25 can compare the cost effectiveness of PSE's preferred

OO1-A -2 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

OO1-A -3 See response to comment OO1-C-3.

Phase II Draft EIS Hearing - May 25, 2017

16

OO1-A-3

1

solution with other alternatives.

2

Four. The EIS references a report on pipeline

3

safety produced by the safety consultant DNV GL.

4

However, the EIS does not highlight the top two findings

5

of the report: First, that PSE's preferred route known

6

as Willow 2 violates safety standards and has an

7

unpredictable risk range; second, that PSE's alternate

OO1-A-4

8

route known as Willow 1 would not be safe without

9

significant design changes. These are important factors

10

in the choice of routes and the safety of nearby homes

11

and schools.

12

We request that the EIS specifically describe how

13

DNV GL's recommendations will be incorporated into the

14

project's design.

15

Five. The EIS states that seismic hazards are less

16

than significant and do not require further study. The

17

public still has unanswered questions. What might happen

18

if the Seattle fault, which roughly parallels the I-90

19

freeway, were to slip up to 10 feet during a major

OO1-A-5

20

earthquake? Would the Olympic pipelines, running

21

perpendicular to the fault, be ruptured? Would higher

22

voltage levels and bigger poles made of conductive steel

23

pose any greater risk of igniting a catastrophic fire? A

24

man-made catastrophe might follow a natural disaster,

25

requiring the attention of emergency responders at the

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OO1-A -4

The DNV GL analysis examined two routes: the existing transmission line corridor (Willow 1) and a route that combines parts of the existing corridor with the Newport Way area (Willow 2). For Willow 1, the analysis found that with optimized conductor geometry and with both lines operating at 230 kV, the induced AC potentials and theoretical AC current densities satisfied accepted industry levels. For Willow 2, and for either route operating at 230 kV/115 kV, the analysis predicted that AC corrosion potential would be in the "unpredictable" range, and field monitoring and/or mitigation would be required to confirm that current densities remain within acceptable levels. Willow 2 was not carried forward for additional analysis in the Final EIS. PSE's Proposed Alignment in the Final EIS follows the same route as Willow 1 and includes operating both lines at 230 kV at the outset.

The DNV GL analysis provided PSE with a detailed assessment of the design available at the time of their report, considering the many specific variables of this particular co-located pipeline/transmission line segment. The results, conclusions, and recommendations of the report are intended to be used as the basis for a more detailed engineering design by PSE. The Phase 2 Draft EIS analysis went a step further and developed additional recommendations for analysis of the potential for AC interference once final pole locations are developed and again after the project is constructed and operational (Stantec, 2017).

OO1-A -5

See response to comment I120-A-3.

Phase II Draft EIS Hearing - May 25, 2017

17

1 same time they are needed elsewhere.

OO1-A-5

2 We request that the EIS quantify how much Energize  
3 Eastside might increase risk in these circumstances.

4 Six. The EIS states that the Eastside will face  
5 rolling blackouts in the summer of 2018. Even though we  
6 disagree with that prediction, the only solution that  
7 could be built fast enough to meet that timeline is a  
8 grid battery. PSE says its Richards Creek substation  
9 would take 18 months to build. Even if construction  
10 began today, the substation would not be operational by  
11 next summer. PSE's solution does not meet the company's  
12 required timeline and must be eliminated as a viable  
13 alternative to address the stated need.

OO1-A-6

14 We request that the EIS re-evaluate the potential of  
15 batteries using current data from grid battery  
16 installations such as the one Tesla built in Southern  
17 California to protect customers from rolling blackouts.  
18 That battery started just three months after the contract  
19 was signed.

OO1-A-7

20 Seven. Last week the Bonneville Power  
21 Administration canceled a \$1.2 billion transmission line  
22 in southwestern Washington that would have carried  
23 increased electricity to California. Changing demand  
24 forecasts reduced the need for the line. Instead, the  
25 agency found it could save customers hundreds of millions

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OO1-A -6 The potential for rolling blackouts caused by a shortfall in capacity in the Eastside was estimated to occur in winter 2017/2018 or by summer 2018. This estimate does not mean that rolling blackouts would absolutely occur by that timeframe, but rather that PSE has seen that the potential for rolling blackouts could arise by then, which is why PSE began planning for the Energize Eastside project years before the potential shortfall would occur. Due to the uncertainty with timing of permits and the EIS process, the project could begin construction before the potential for rolling blackouts starts, but would not be completed until after the estimated winter 2017/2018 or summer 2018 timeframe. This does not preclude the selection of PSE's Proposed Alignment, however, as it is still the alternative that PSE maintains will accomplish the objectives that it has identified for the project.

The integrated resource approach which included battery storage was analyzed in the Phase 1 Draft EIS and was not brought forward for additional analysis as an alternative in the Phase 2 Draft EIS because it did not achieve PSE's project objectives. Also see response to comment II15-A-2.

OO1-A -7 See response to comment OO1-C-8.

OO1-A-7

Phase II Draft EIS Hearing - May 25, 2017

18

1 of dollars by employing modern technology such as flow  
2 control devices and grid batteries.

3 We request that the EIS examine how BPA's reasoning  
4 applies to PSE's proposal.

5 Thank you for considering these changes. We look  
6 forward to answers in the Final EIS or Supplemental EIS.  
7 Thank you very much.

8 MR. ANDERSEN: Hi, Todd Andersen, 4419 138th  
9 Avenue Southeast. Mine too is going to be a little bit  
10 rough. I've only had two hours to wade through this  
11 500-page document.

12 I notice the courteous behavior. I welcome that. I  
13 particularly love that, because the last time I was here  
14 Carol slapped my camera out of my hand at a public  
15 meeting. So I had a delightful conversation with a  
16 number of the technical staff and the consulting, so I'm  
17 very grateful for the courteous behavior on your behalf,  
18 Carol. It's a great improvement.

19 Stantec, Wolfgang -- sorry, Wolfgang, I'm not going  
20 to be able to get your last name because my eyes are  
21 getting too old -- we had a great conversation. I notice  
22 here he's a NACE CP specialist. Having worked for the  
23 Navy I -- he doesn't work for NACE, which is the National  
24 Association of Corrosion Engineers. He works for  
25 Stantec. I asked him if he was aware -- I said, who does

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Phase II Draft EIS Hearing - May 25, 2017

19

1 the standards body for this pipeline safety, and he goes,  
 2 NACE is what DNV, who did the pipeline safety study, is  
 3 following. Really. We in the Navy would never use NACE,  
 4 for reasons I don't have time to go into.

5 But I asked Wolfgang, I said, were you aware that  
 6 when the three corrosion organizations placed their  
 7 plaques after they fixed the corrosion on the Statue of  
 8 Liberty that the NACE plaque corroded within three weeks?  
 9 He was not aware of that.

10 So what we have is fraud on multiple levels. It  
 11 took the city more than two years to discover a quarter  
 12 of a million dollars worth of parks department fraud -- I  
 13 guarantee you it was more than that -- which is credit  
 14 card a few years ago, something that if they would have  
 15 just followed standard procedures would have been found  
 16 in a month or two, particularly if they used any of the  
 17 DOD standards.

18 Some complex fraud like utilities, the City of  
 19 Bellevue is completely ill equipped, if not complicit.  
 20 We have fraud on multiple levels.

21 First, the proven fraud by U.S. public courts or  
 22 private courts for that matter. PSE is a convicted  
 23 criminal for falsifying pipeline safety records for four  
 24 years. Fact 1.

25 Fact 2. If PSE commits fraud on Energize Eastside,

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II47-A -1 The lead agency is aware of the civil penalties imposed by WUTC on PSE for actions that led to a gas pipeline explosion.

II47-A-1

Phase II Draft EIS Hearing - May 25, 2017

20

1 the maximum fine they could face from a federal penalty  
2 is \$3 million. How do we know this fact? The appeals  
3 court reversed the \$500 million fine against Pacific Gas  
4 and Electric, my old utility. I seem to go to really  
5 great utilities. They were fined for six criminal  
6 convictions under the 2006 San Francisco Metro fire known  
7 as the San Bruno fire, which was a natural gas fire,  
8 radically different than the disaster we're going to have  
9 if Energize Eastside goes down, which killed eight  
10 people, vaporized 38 houses and injured 65. That  
11 maximum allowable fine was reduced from half a billion to  
12 \$3 million.

II47-A-2

13 Here, the kicker is Macquarie or PSE won't even pay  
14 that fine. BP will have to pay that fine.

15 I'm going to ignore the fraud from PSE -- my  
16 opinion, of course -- by way of PSE arriving at the need  
17 for Energize Eastside because Larry Johnson and others  
18 have that well in hand.

II47-A-3

19 The lines for PSE and Seattle City Light's 230 kV  
20 lines cross, yet PSE contractors only measured the lines  
21 away from that. They didn't do any field measurements.  
22 This is either professional incompetence or fraud. Given

II47-A-4

23 the maximum fine is only \$3 million and Macquarie, PSE's  
24 owner, stands to make over a billion in pure profit, my  
25 opinion is fraud.

II47-A-2 Comment noted.  
II47-A-3 Comment noted.  
II47-A-4 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

21

1 Did DNV, who did the pipeline safety study for the  
 2 EIS, find this fact that the Seattle City Light's and  
 3 PSE's lines cross over each other? No, they did not.  
 4 That means that that area of the pipeline will see  
 5 460,000 volts of potential. How many more times did the  
 6 Seattle City Light line's and PSE's lines cross or other  
 7 power lines?

8 This is just one example how fraudulent the electric  
 9 grid has been designed in Washington. It was a wild,  
 10 wild West with multiple duplicating bulk power  
 11 transmission lines put in for the last 50 years until  
 12 FERC forced Washington to create a grid planning body in  
 13 2006. That's right. ColumbiaGrid was not forced upon  
 14 Washington until 2006.

15 And even then it was not an efficient grid  
 16 management body like California ISO, the Independent  
 17 System Operator. No, not even original transmission  
 18 organization, an RTO. No, Columbia grid got a waiver and  
 19 was formed as a nonprofit organization -- sounds great  
 20 and wonderful, doesn't it -- with all the security and  
 21 benefits that a corporation is allowed.

22 MS. BRADFIELD: Todd, if you could wrap up your  
 23 comments soon.

24 MR. ANDERSEN: Just ask Charles Cook. He owns  
 25 hundreds of nonprofits.

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II47-A -5 There is a single location (in the Renton Segment) where the SCL line and the PSE line cross. Because the SCL and PSE lines are on different circuits, total voltage is not additive (total voltage would remain 230 kV). Regardless, AC interference is caused by current flow in the phase conductors and is not related to the voltage. Because the crossing is not exactly at 90 degrees, there could be some very small, insignificant levels of induction under steady state conditions. In many cases, an increase in the powerline voltage results in a corresponding decrease in the phase current, which will reduce the amount of voltage induced on a parallel pipeline. Generally, for crossing powerlines, there can be some risks, but these are primarily related to fault conditions. In this case, these risks would be pre-existing (part of existing conditions under the No Action Alternative) and not cumulative with the proposed 230 kV lines. Under fault conditions, each powerline would act independently, and not affect the other.

II47-A-5

Phase II Draft EIS Hearing - May 25, 2017

22

1 Back to the fraudulent omission in the EIS, in my  
 2 opinion. Did any of the four so-called peer reviewers  
 3 find the Seattle City Light line crossovers? No, they  
 4 did not. Did they model it? No, they did not. Has any  
 5 of the modeling been verified with actual measurements of  
 6 existing corrosion on the BP pipeline? No. Have any of  
 7 the computer models been verified with any other existing  
 8 data from actual pipelines? No, they have not.

9 And I've got some great, wonderful testimony from  
 10 the boys out there that is just going to be wonderful in  
 11 court.

12 Have any of the computer models been verified with  
 13 other service jet fuel pipelines or lines carrying leaded  
 14 gas? Yes, those lines carry leaded gas. I'm almost  
 15 done.

16 Did they analyze the corrosion effects of leaded  
 17 aviation gas? No, they did not. Why is lead still in  
 18 aviation gas? That is a whole other criminal story.

19 I have a lot more testimony here, but I'm out of  
 20 time so I will leave it at that. That is less than one  
 21 percent of the issues of the magnitude that I have with  
 22 this project.

23 MR. BIDSTRUP: Thank you. My name is Eric  
 24 Bidstrup. I live at 13714 Southeast 43rd Street, and I  
 25 am the treasurer of the Board of Directors for the

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II47-A -6 It is not clear what four peer reviewers this refers to or what crossovers this refers to. Both DNV-GL and Stantec had access to the project plans showing the entire length of the alignment. Some data regarding the existing pipeline was made available by Olympic, as described in the EIS, but some was not made available. For the EIS, this meant that reasonable worst case assumptions had to be used. The computer models used are commonly used in pipeline protection planning.

II47-A -7 The Olympic Pipeline system has not transported leaded gasoline during the last, approximately 30 years (as documented in an email from J. Stone, BP, 9/7/2017). The comment does not make clear what models it refers to. As noted in the EIS, the pipeline does transport jet fuel.

II47-A-6

II47-A-7

Phase II Draft EIS Hearing - May 25, 2017

23

1 Somerset Recreation Club at 4445 Somerset Boulevard.

2 The Somerset Recreation Club is a vital 1C3 public  
3 charity that has been a community club for Somerset and  
4 the surrounding area since 1963, for over 50 years. We  
5 have been following Energize Eastside very closely since  
6 its inception and trying to determine the impact this  
7 project would have on our facility located on Somerset  
8 hill.

9 The current PSE power lines going over Somerset  
10 bisect the northwest corner of our property and are  
11 directly over two of our tennis courts, and there are  
12 four PSE poles located on our property itself that  
13 support the power lines.

14 We did provide written comments on the first round  
15 of the EIS to Ms. Bedwell earlier. Haven't seen a  
16 response to those and we're very disappointed to see that  
17 some of the concerns we raised were not addressed in the  
18 second EIS that was published.

19 As Mr. Johnson stated earlier, part of the purpose  
20 of this testimony is to highlight where we think the EIS  
21 is inadequate or failing to address questions, and I  
22 would like to call out a few examples of that here.

23 In the first EIS, Chapter 12 Section 12.5.3.1 it  
24 states specifically that the newer higher voltage power  
25 lines would require a widening of the existing corridor

OO22-A-1

OO22-A-2

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OO22-A -1 A general comment summary and response document was produced for the comments received on the Phase 1 Draft EIS. This document is available on the project website here: [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/phase\\_1\\_draft\\_eis\\_comment\\_summary\\_report\\_final.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/phase_1_draft_eis_comment_summary_report_final.pdf).

Additionally, a detailed comment summary and response document was prepared for the comments received on the Phase 1 Draft EIS and is included as Appendix J of the Final EIS.

OO22-A -2 Section 12.5.3.1 in the Phase 1 Draft EIS discusses temporary construction impacts to recreation at a programmatic level and did not address specific potential property impacts. However, Section 2.3.2.2.3 in the Phase 1 Draft EIS does describe the potential need to widen the existing 115 kV corridor by 50 feet. The alternatives in the Phase 1 Draft EIS were described and evaluated at a programmatic level. The Phase 2 Draft EIS provides a project-specific level of detail for the alternatives considered, including specific pole types, which influences the minimum required corridor widths. For the project-level, Phase 2 Draft EIS, it was assumed that the existing corridor would not have to be widened to accommodate the 230-kV lines, which is why impacts to recreation facilities were not addressed as they relate to widening of easement widths. The Phase 2 Draft EIS more specifically discusses impacts; Section 3.6 discusses long-term impacts to recreation, and Section 4.6 discusses temporary impacts to recreation. None of the alternatives considered in the Phase 2 analysis would require the condemnation or removal of any businesses or homes in any neighborhood. As discussed in the Phase 2 Draft EIS and the Final EIS in Section 5.6, there may be temporary impacts to the Somerset Recreation Club. It is possible that the club may be temporarily closed for up to 1 day during restringing of lines. PSE would work with the club to avoid disturbance to recreation activities. After construction is completed, there would be no change to existing recreation uses at the club.

Phase II Draft EIS Hearing - May 25, 2017

24

1 as much as 50 feet and that no buildings or houses will  
 2 be allowed within the easement or below that line. If  
 3 so, that would directly impact our buildings on the  
 4 Somerset Recreation Club, a facility that's been in use  
 5 for more than 50 years, and force us to close our doors.

OO22-A-2

6 No mention of this was made in the second EIS in  
 7 assessing recreation facilities impact on Sections 3.6,  
 8 4.6 and 5.6. This is an area where we feel the second  
 9 EIS has failed to respond to.

10 As some of the earlier speakers called out as well,  
 11 no information was provided on specific pole placement  
 12 locations making it impossible for Somerset Recreation  
 13 Club or any other members of the community to make an  
 14 informed comment in terms of the impact of this project.  
 15 Again, another example where we feel the second EIS has  
 16 failed to adequately address its intended goals and  
 17 scope.

OO22-A-3

18 The Somerset Rec Club is a seasonal business. We're  
 19 effectively open from May through October every year. As  
 20 a nonprofit company, we operate on kind of basically a  
 21 shoestring budget, basically kind of keeping our swimming  
 22 pool and tennis club open year after year. Any  
 23 construction that happens during our seasonal operation  
 24 would absolutely have an impact on our membership and our  
 25 revenue and would likely bankrupt the club, again, force

OO22-A-4

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OO22-A -3 See response to comment II14-B-3.

OO22-A -4 During construction of the project, access to the club would be maintained. It is possible that the number of users would be less than average during the period that poles on the property are replaced due to noise and other construction-related impacts. However, according to PSE, construction on the Somerset Recreation Club property would only take place over 3 to 7 days within a period of approximately 2 months. PSE or the City of Bellevue could consider limiting construction to a period outside of the peak season for the club. However, an impact of 3 to 7 days is not considered a significant impact.

Phase II Draft EIS Hearing - May 25, 2017

25

1 us out of business having served the community for over  
 2 50 years. Again, we feel this is not spoken to in the  
 3 EIS and fails to meet its intended purposes and goals.

4 Similarly we currently gain some revenue as well  
 5 from some cell phone transmitters that are attached to  
 6 some of the poles on the property today. And the removal  
 7 of the existing poles and the addition of new poles  
 8 creates a very real risk to us in validating our current  
 9 lease agreements that would, again, jeopardize that as a  
 10 source of revenue for our club. This would be another  
 11 devastating impact on us and would actually put us out of  
 12 business. It's another example of what the EIS fails to  
 13 address.

14 I'm also a member of CENSE. I will add on that.  
 15 But Somerset Rec Club does have significant concerns over  
 16 the fundamental needs of this as many of the other  
 17 speakers tonight have spoken to and the potential impact  
 18 of this project to the club that has served the community  
 19 for over 50 years is very tangible and very real to us.

20 We hope Ms. Bedwell and the other members of our  
 21 local city government will speak to these concerns and  
 22 address them as the EIS moves on forward and hopefully  
 23 allow us to stay in business. We certainly have serious  
 24 concerns about this project. Thank you.

25 MR. RECTOR: Thank you. Wayne Rector. I live

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OO22-A-4

OO22-A-5

OO22-A-6

OO22-A -5 The City of Bellevue has no policies ensuring or encouraging the maintenance of private leases for telecommunications devices. In the project area, cellular equipment is co-located along the existing corridor in several locations. Upon completion of construction of the project, PSE has stated that they will work with telecom companies to reinstall the equipment onto the 230 kV poles, per local jurisdiction regulations and if requested by the telecommunications companies. However, according to PSE, installation on the proposed 230 kV poles would be subject to greater limitations than on the existing 115 kV lines. For more information, see Section 2.1.2.2 of the Phase 2 Draft EIS.

OO22-A -6 Comment noted. Information on the need for the project is presented in Section 1.3 of the Phase 2 Draft EIS, with additional discussion included in Appendix J of the Final EIS (see the Topic OBJ).

Phase II Draft EIS Hearing - May 25, 2017

26

II48-A-1

1 at 13614 Southeast 10th Street in Bellevue. While I  
 2 haven't had a chance to read the entire Environmental  
 3 Impact Statement, I don't believe it adequately addressed  
 4 some of the conditions that I've witnessed living in this  
 5 corridor.

6 I'm fortunate enough to have the power line, both BP  
 7 oil lines and the PSE high pressure natural gas main all  
 8 intersect on the corner of my property. I've seen the  
 9 existing power lines have trees fall into them during a  
 10 windstorm, take down the main lines, very large  
 11 explosions. It happened to be in the wintertime when it  
 12 was raining so there was not any significant chance of  
 13 starting a fire, but I have seen during the summer during  
 14 times of very high temperatures the existing power lines,  
 15 they sag in the heat. They droop down and they arc to  
 16 the trees. I've had to call PSE and say, hey, there's  
 17 sparks going from these power lines to the trees.

II48-A-2

18 In the existing corridors under the existing  
 19 vegetation clearing plans, they are not adequate, and I  
 20 don't think that they are addressed adequately for severe  
 21 conditions, especially given the likelihood of more  
 22 severe environmental conditions with climate change.  
 23 We're likely to see higher precipitation events and there  
 24 are several slide areas in unstable slopes along the  
 25 existing corridor.

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II48-A -1 The Partner Cities believe that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA.

II48-A -2 Although trees would be removed, the corridor will continue to be vegetated with low growing shrubs, small trees, and grasses, which would function to reduce erosion. Soils and geology were analyzed in the Phase 1 Draft EIS, Sections 3.6 and 3.7; impacts under all alternatives would be less-than-significant with regulatory compliance, and implementation of industry standards, geotechnical recommendations, and best management practices (BMPs). See also Section 4.11 in the Final EIS for additional information on slope stability.

Phase II Draft EIS Hearing - May 25, 2017

27

1           There are probably going to be more very hot days  
 2           with hot periods of high electricity usage which are  
 3           going to lead to more cases of the same scenarios that  
 4           I've already witnessed. And if that happens at a time  
 5           when we've had an extended period of hot weather, there's  
 6           a lot of fire danger in the community where we've got  
 7           these greenbelts and trees right by houses. You've got  
 8           hillsides. And there's no infrastructure to support  
 9           firefighting. All of the fire hydrants are way up the  
 10          hill. By the time the fire gets to the fire hydrants,  
 11          the houses that are on the side of the street are going  
 12          to be gone.

II48-A-3

13           And if anything happens with the new lines that  
 14           affect the oil pipelines, you've got several new  
 15           developments that have happened along that corridor that  
 16           are downhill from the pipelines that are subject to  
 17           having oil leaking downhill and potentially being  
 18           ignited. And I don't see any of that being adequately  
 19           addressed in the EIS.

II48-A-4

20           So I'm going to be -- after doing a little more  
 21           studying, I'm going to be submitting some additional  
 22           written comments. But thank you for the opportunity.

23           MR. ABEL: Hello. My name is Mike Abel. I  
 24           live at 4401 138th Avenue Southeast in Bellevue.

II46-A-1

25           I would like to express my opinion that the Phase 2

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II48-A -3 As described in the Phase 1 Draft EIS, neither the No Action Alternative nor the Energize Eastside project alternatives would significantly increase the demand for public services, or hinder the delivery of services. The Pipeline Safety section of the Phase 2 Draft EIS and the Final EIS discuss the potential damage that a fire could cause if the transmission line were to cause a leak and/or ignition of fuel from the Olympic Pipeline system. The Bellevue Fire Department was interviewed to determine if they had the capacity to respond to a pipeline fire incident; their response was that they do, but that staff, training, and equipment could be extensive. If an event exceeds the capacity of the department, surrounding fire and emergency medical service agencies would provide back-up in accordance with existing agreements. For more details, see the discussion of Key Theme SVC-1 in Appendix J of the Final EIS.

II48-A -4 See response to comment II7-A-1 for information on the pipeline safety risk assessment conducted for the Phase 2 Draft EIS. As acknowledged in Section 7.1 of the Pipeline Safety Technical Report (Appendix I-5 of the Phase 2 Draft EIS), in the event of a pipeline leak and ignition, there are literally thousands of possible pool fire size configuration scenarios based on local conditions. Based on comments received on the Phase 2 Draft EIS, additional qualitative discussion of possible pool fire scenarios has been included in the Final EIS (see Section 4.9.6). Given that it is not practicable to specify every situation along an 18-mile corridor, the EIS Consultant Team believes that the analysis provided in the Phase 2 Draft EIS, the Technical Report, and the Final EIS is a reasonable approach to characterizing possible consequences of a pipeline incident in order to identify potential impacts of the project and foster informed decision-making by the Partner Cities.

II46-A -1 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

28

II46-A-1

1 EIS fails to adequately address the safety concerns of  
 2 co-locating the proposed Energize Eastside power lines  
 3 with the existing Olympic Pipeline.

II46-A-2

4 Section 3.9 of the EIS is presented as a smorgasbord  
 5 of federal rules and regulations dealing with pipeline  
 6 construction and operation. It appears to be intended to  
 7 convey the message that adequate safeguards exist to  
 8 ensure safety both during construction and after  
 9 construction. I would like to point out that most of  
 10 these regulations have been in place for decades. Over  
 11 the years these longstanding rules and regulations failed  
 12 to prevent numerous leaks and explosions.

13 They failed to prevent the 1989 San Bernardino  
 14 explosion. They failed to prevent the 1999 Bellingham  
 15 explosion. They failed to prevent the 2010 San Bruno  
 16 explosion. They failed to prevent the 2015 Fresno,  
 17 California leak and explosion. Most recently they failed  
 18 to prevent the Colonial Pipeline explosion in Alabama in  
 19 November of last year.

20 Time does not permit me to list all of the  
 21 incidents.

22 The Pipeline and Hazardous Material Safety  
 23 Administration tallied 2,700 incidents in the period from  
 24 1990 through 2009. Of those incidents, approximately  
 25 three percent of 81 were classified as serious where

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II46-A -1 Comment noted.

II46-A -2 It is correct that some amount of risk is inherent with transmission lines and pipeline systems. The Phase 2 Draft EIS addresses this by presenting an estimate of the probability of the reasonable worst-case scenario occurring, including before the project is built, while it is being constructed, and during operation. The pipeline safety risk assessment considered national incident data on similar pipeline systems to estimate the probability of pipeline failures, both under existing conditions (115 kV transmission lines) and with new 230 kV transmission lines. In many cases, and in particular for pipeline damage caused by construction activities, incidents in the national database occurred as a result of failure to follow proper procedures. Even with reasonable worst-case assumptions used in the risk assessment, and in consideration of rates of pipeline incidents from all causes of damage, the results indicate that there would be a very small increase in total risk with the project. With implementation of the mitigation measures described in Section 4.9.8 of the Final EIS, conditions related to potential for fault damage on the pipeline due to coating stress and arc distances would likely improve over the existing operational baseline risk (see Section 3.9.5.4 of the Phase 2 Draft EIS and updated Section 4.9.5.4 of the Final EIS). This does not dispute the fact that the potential public safety impacts could be significant in the unlikely event a pipeline incident were to occur as a result of electrical interference or construction damage.

Phase II Draft EIS Hearing - May 25, 2017

29

II46-A-2

1 serious is being defined as involving fatalities and/or  
2 injuries requiring hospitalization.

3 Further, the PHMSA sought to classify the cause of  
4 these incidents. The No. 1 cause is documented to be  
5 damage related to excavation.

II46-A-3

6 PSE is proposing to build up to 18 miles of 230 kV  
7 lines co-located with the Olympic pipeline. Using  
8 conservative estimates of pole spacing of 800 feet, this  
9 equates to approximately 120 foundation excavations  
10 adjacent to the gas pipeline. That's 120 opportunities  
11 to damage or degrade the pipeline. This does not even  
12 consider the options where two poles are required to  
13 straddle the pipe, in which case the number of  
14 excavations doubles.

15 But those are issues over which we have some degree  
16 of control.

II46-A-4

17 Now, shifting gears to things we cannot control.  
18 The EIS also fails to address the possible effects of  
19 seismic activity in the region. It is well documented  
20 that the Seattle fault bisects the City of Seattle and  
21 continues east through Bellevue roughly along the I-90  
22 corridor. The co-located power lines and pipeline cross  
23 this fault perpendicularly. We have all heard about the  
24 possibility of the magnitude 9 megaquake.

25 A temblor of this magnitude would certainly have

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II46-A-3

See response to comment II29-E-3.

II46-A-4

Earthquake-related hazards and seismic activity, specifically related to the Seattle fault, were addressed in Phase 1 of the Draft ES, Section 3.3.3.4. It is correct that a major earthquake of the magnitude expected on the Seattle Fault could cause pipeline rupture in certain areas on the Eastside (Earthquake Engineering Institute and Washington Military Department Emergency Management Division, 2005). See Section 4.11 of the Final EIS, which further clarifies this subject. Nonetheless, as stated in the Phase 1 Draft EIS, the proposed project would not increase the probability of an earthquake to occur or increase the amount of damage that would occur to the pipeline in an earthquake. See also response to comment II20-A-1.

Phase II Draft EIS Hearing - May 25, 2017

30

II46-A-4

1 disastrous consequences to the combined pipeline and  
2 power line. But to be honest, if we ever get the big  
3 one, we will likely have even far greater issues to deal  
4 with.

II46-A-5

5 A more likely scenario is a moderate earthquake  
6 along the lines of the magnitude 6.7 Nisqually earthquake  
7 in 2001. Subsequent to that event, the Earthquake  
8 Engineering Research Institute conducted an analysis to  
9 predict the effects of a similar 6.7 magnitude earthquake  
10 should it occur along the Seattle fault. The results of  
11 that analysis were published in 2005 in a report entitled  
12 "Scenario for a Magnitude 6.7 Earthquake on the Seattle  
13 Fault." This document specifically identifies the  
14 Olympic Pipeline as being at risk for rupture in such a  
15 moderate magnitude earthquake.

16 In closing, I refer to the headline of an article  
17 that appeared in the January 27, 2017 "Seattle Times."  
18 It reads: Washington's 30-year earthquake drill for the  
19 'Big One': Order studies, ignore them. Repeat.

20 In my opinion, this EIS's lack of attention to the  
21 seismic hazards of the region is exactly the kind of  
22 action that the "Seattle Times" author had in mind when  
23 he penned that headline. Thank you.

24 MS. STRONK: Good evening. My name is Sue  
25 Stronk, 12917 Southeast 86th Place in Newcastle. I'm a

II46-A -5 See response to comment II20-A-1.

Phase II Draft EIS Hearing - May 25, 2017

31

1 CENSE member and support the No Action Alternative.

2 This EIS is flawed and tainted by PSE's influence

3 and should be stopped now and restarted. I realized this

4 myself, but it is conveniently stated in writing in

5 Chapter 2, page 20. In describing PSE's public outreach,

6 it says: In 2014 PSE convened the Energize Eastside

7 Community Advisory Group, often referred to as the CAG.

8 One of those PSE contractors hired in that CAG process

9 has its name throughout the EIS document. They are

10 credited on every before and after photo simulation, gave

11 data on EMF and quoted outdated undergrounding costs.

12 This company was hired and paid by PSE in the CAG process

13 and then hired and paid again by ESA who prepares this

14 document, which ultimately is paid for by PSE. This data

15 needs to be unbiased and fair in the content or it

16 becomes invalid for analysis.

17 The word significant describing impacts is rarely

18 addressed in this document. However, under the scenic

19 views section describing Newcastle, it states the impacts

20 would be significant right beside my house. It says, The

21 poles would almost double in height and be closer to

22 neighboring residences making a strong contrast with the

23 existing. It would also be in conflict of the Newcastle

24 Comprehensive Plan that calls for transmission lines to

25 be sited and designed to minimize visual impacts to

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II36-B -1 Power Engineers is a contractor hired by PSE to prepare the visual simulations and report on EMF. They are not part of the EIS Consultant Team.

The EIS was prepared under the direction of Environmental Coordinator for the City of Bellevue, in consultation with the co-lead agencies, the Partner Cities of Kirkland, Newcastle, Redmond, and Renton. As the Lead Agency under SEPA, the City of Bellevue's responsibilities are to provide full disclosure of the expected environmental impacts of the Energize Eastside project and to document objective analysis of those impacts, so that decision-makers have adequate environmental information for the permitting and decision-making process. The City of Bellevue hired a consultant team comprised of qualified firms with extensive experience conducting independent analysis and preparing SEPA EISs. The EIS Consultant Team is working with the City of Bellevue on its behalf to evaluate the proposal according to the City of Bellevue's adopted SEPA policies. No member of the team is currently working for PSE or has a personal or financial interest in the outcome of the project. For all firms working on the EIS Consultant Team, disclosures were made to the City of Bellevue about any past work for PSE. The City of Bellevue determined that this past work did not constitute a conflict of interest for reviewing this project. The EIS Consultant Team conducted a peer review of Power Engineers' methodology and found that it is consistent with industry standards. Although Power Engineer's methodology varied slightly from common practice for GPS data collection, it was determined that the minor variance did not result in inaccurate simulations. Key viewpoints were reviewed and selected by the EIS Consultant Team (ESA).

II36-B -2 Simulations are provided showing views along the entire alignment (see Section 3.2 of the Phase 2 Draft EIS and Appendix C). Figure 3.2-22 in Newcastle shows an outdated pole configuration from a distance. This has been rectified in the Final EIS (see Chapter 3, Errata, of the Final EIS). However, the correct pole configuration was shown in Figure 3.2-21 in Newcastle, as well as in Appendix C. The correct simulation was used for the analysis, and no changes have been made to the text. Please note that PSE's Proposed Alignment as presented in this Final EIS shows typical pole heights in the Newcastle Segment as being up to 95 feet in height under the No Variance Option, and 80 feet under the Variance Option. Photo simulations are provided in Section 4.2 and Appendix C of the Final EIS. Appendix C of the Final EIS also includes detailed information on the significance criteria applied in the analysis.

Phase II Draft EIS Hearing - May 25, 2017

32

1 adjacent land uses.

2 I would like to note, these same significant impacts  
3 that I will experience beside my house will be true for  
4 so many others along this project. But here, where  
5 significant impacts are described, you don't see any  
6 before and after photos. The photo simulations for  
7 Newcastle have not been updated to represent the 100-foot  
8 tall poles now proposed for our area.

9 I have two other requests. AC current density.  
10 Above 20 amps can cause pipe corrosion. The EIS says  
11 there are two short segments with readings of 22 to 35  
12 amps currently. Please define these locations where  
13 pipelines could be corroding today.

14 And the other thing I would like to ask is what  
15 exactly is the use of the fiberoptic cable and does PSE  
16 profit from it. Thank you.

17 MS. MEDLEY: I'm Janis Medley. I live at 4609  
18 Somerset Drive Southeast in Bellevue, and I've lived  
19 their for 10 years.

20 I came to the EIS with several questions, and one of  
21 them was similar to what Mike brought up. I was wanting  
22 to find out how many poles would be on the preferred  
23 route. I did find that information fairly quickly by  
24 looking at the construction summaries, and it turns out  
25 there will be 162 poles. And then my thought is also

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II36-B -3 As explained in the AC Interference Analysis report, corrosion impacts arising from an AC current density above 20 amps per meter squared (A/m2) are difficult to accurately predict (i.e., are unpredictable). Current density at two locations was calculated as currently exceeding 20 A/ m2. A 34 A/m2 value was calculated based on 2013-14 winter maximum loads in Somerset where the 16-inch pipeline leaves the transmission line corridor. A 25 A/m2 value was calculated based on 2013-14 winter maximum loads near the Lake Hills Connector where the 20-inch pipeline goes from the east side of the corridor to the west side. Typically, peaks in theoretical AC current density occur with low soil resistivity and at points of divergence between the transmission lines and pipelines along the corridor. It is important to note that as stated in DNV-GL's report, "The winter peak loading scenarios were evaluated for this study, as they resulted in the worst-case levels of AC interference on the collocated pipeline segments (i.e., winter peaks exceed summer peaks as the system can carry more load due to ambient cooling conditions)." Additionally the report states that "...Winter peak loading scenarios represent the maximum current loading scenarios the transmission lines are expected to experience, which is expected to be limited to a week or less per year."

By using PSE's Proposed Alignment (see Final EIS) and operating both lines at 230 kV, the theoretical current density during winter peak loads did not exceed 20 A/m2 in the DNV-GL study. This proposed system also would be lower than the existing conditions.

II36-B -4 The fiber-optic cable is used solely by PSE for communication along its transmission line. The fiber-optic cable is not used by other parties. As described in further detail in Chapter 2 the Final EIS, PSE proposes to use a single cable that is both a protection against faults caused by lightning and a fiber-optic cable.

Phase II Draft EIS Hearing - May 25, 2017

33

1 that's 162 opportunities for, as the hole is drilled,  
2 pipeline problems or accidents.

3 So I was curious to see how many of these poles  
4 would be in the concrete foundations and how many would  
5 be in the less invasive and embedded directly in the  
6 ground up procedure. So when I went to Chapter 2, page  
7 49, I found that it says approximately 160 to 180  
8 concrete poll foundations would need to be installed  
9 along the 18-mile route. That kind of stopped me in my  
10 tracks, because if there is only 160 poles on the route,  
11 that means that all 160 poles will be embedded in  
12 concrete and require 25- to 50-foot foundations filled  
13 with concrete and rebar. So I want to know if that is  
14 accurate and in fact that there will be no embedded  
15 poles. So that is a question I would like to see  
16 answered.

17 And then there really isn't any specific information  
18 on how deep the holes will be for directly embedded  
19 poles. There was a formula in Appendix A, page 5, that  
20 says that the depth of the pole will be 10 percent of the  
21 pole height plus two feet. So if you take the average  
22 90-foot pole, does that mean it's only going to be  
23 embedded into the ground 11 feet? So that's another  
24 question I want answered.

25 So I was explaining that those kind of specifics

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II43-A -1 Revised pole location data are included in the Final EIS analysis (see Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review. According to PSE, based on refined design plans, approximately 60% of the poles would be directly embedded and require no foundations.

II43-A -2 Each pole is embedded to a depth specified by a design engineer taking into account soil characteristics and structural loads on the pole. For directly embedded poles, this is generally 10 percent of the height above ground plus 2 feet. Therefore, a 110-foot pole would be approximately 13 feet into the ground. As described in Chapter 2 of the Phase 2 Draft EIS and the Final EIS, the depth of drilled pier foundations can be as deep as 50 feet. Impacts from placing foundations are not expected to be significant; therefore, it is not necessary for the EIS to know the precise depths of each pole.

II43-A -3 See response to comment II43-A-2.

II43-A-1

II43-A-2

II43-A-3

Phase II Draft EIS Hearing - May 25, 2017

34

1143-A-3

1 were very difficult to find in the EIS. So I suggest  
2 that when you have the summary part on how the poles are  
3 installed, that would be an important piece of  
4 information because if you're comparing a 50-foot hole  
5 with an eight-foot diameter compared to an 11-foot hole  
6 with just a four-foot diameter, that's a significant  
7 difference and would have definitely have differing  
8 impacts on the project.

9 I have a lot more questions and I will be submitting  
10 those in writing before June 21.

1143-A-4

11 I want to close by saying that Energize Eastside is  
12 a symptom of a much larger problem. That larger problem  
13 is inadequate regulation of our state's utilities. If  
14 the Washington State Utilities and Transportation  
15 Commission had the authority to evaluate the need for a  
16 project, we most likely would not be here tonight. We  
17 would not have spent three years of our lives trying to  
18 identify the dangers of co-locating Olympic Pipeline with  
19 Energize Eastside or trying to predict the environmental  
20 degradation that Energize Eastside will cause on our  
21 communities. Perhaps the only environmental benefit of  
22 Energize Eastside is that it has awakened many ratepayers  
23 to the need for regulatory reform.

24 MS. HALVERSON: My name is Maryanne Halverson  
25 and I live in the Bridle Trails area at 13701 Northeast

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1143-A-4 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

35

1 32nd Place next to Puget Sound easement and the 115 kV  
2 line. I have lived there for nearly 40 years.

II45-A-1

3 Tonight I would like to speak to the subject of  
4 safety because there is more of a safety risk than is  
5 portrayed in this EIS. The risk seems to fall completely  
6 on the property owners.

II45-A-2

7 As you know, the Olympic Pipeline run jet fuel  
8 through the same PSE easement. In my viewpoint, a  
9 transmission line near or on top of a pipeline is far  
10 more risky than is portrayed in this document. A year  
11 and a half ago we had a common, yet severe winter  
12 windstorm. During this storm a quad of cables crashed  
13 down across our pasture. I immediately put our horses in  
14 the barn and called PSE. With potentially half of this  
15 transmission line out of service, I was surprised that  
16 neither our home nor any neighbors had lost electricity.

17 Then when I called PSE I was quite shocked their  
18 representative did not understand that this was a  
19 transmission line which I believe to impact many, many  
20 customers. My husband made two subsequent calls. And  
21 after three days this critical piece of infrastructure  
22 was repaired.

23 The following week the PSE representative reported  
24 here to the Bellevue City Council that no transmission  
25 lines came down during the storm. Really. I would have

II45-A -1 Comment noted.  
II45-A -2 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

36

1 thought with our deficiency in local reliability this key  
2 line would have made a difference in reliability.

3 Now, as to safety, as this line came down it came in  
4 contact with an invisible dog fence. The electric  
5 current shot up into the circuit box and burned out  
6 several appliances. The line also came in contact with  
7 another neighbor's outside television dish. The exact  
8 same thing happened.

9 Interestingly when the homeowner damages were  
10 brought to the attention of PSE, as I understand it, PSE  
11 said they had no legal responsibility and they provided  
12 no compensation.

13 So there you are. We pay all the property taxes,  
14 suffer the inconveniences and must bear the safety risk.  
15 It's obvious to me that the safety risks of this new  
16 higher powered 230 kV line are real, and in the real  
17 world are certainly significant.

II45-A-3

18 But the risks of the lines themselves are nothing  
19 compared to the potential of an explosion and a  
20 catastrophe with this pipeline should they ever come in  
21 contact.

II45-A-4

22 For these reasons alone, this Environmental Impact  
23 Statement is not satisfactory. Thank you.

II45-A-5

24 MS. DEMUND: Hi. My name is Jeanne Demund. My  
25 address is 2811 Mountain View Avenue North in Renton,

- II45-A-3 Comment noted.
- II45-A-4 See response to comment II7-A-1.
- II45-A-5 The Partner Cities believe that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA.



Phase II Draft EIS Hearing - May 25, 2017

37

1 Washington. I don't live along any of the currently  
2 proposed routes, but I remain extremely concerned about  
3 this project.

II30-B-1

4 The EIS analyzes the risks of various types of  
5 negative events and slices and dices them in many  
6 different ways. But in every case, the conclusion is  
7 that statistically speaking, the increased risk is  
8 little.

II30-B-2

9 Figure 3.9-7 that I referred to the other night,  
10 this little comforting circle that looks like the pool  
11 fire will only catch a couple of houses and comfortably  
12 states that maybe only one person might be killed if the  
13 pipeline leaked. It does not even look at the secondary  
14 effects of the fire that will certainly start with the  
15 12,000, 8,000 and even 4,000 BTU circles that comfortably  
16 but misleadingly appear to only touch a couple of houses.

II30-B-3

17 I believe that the EIS is defective if it is indeed  
18 an environmental impact statement in that it gives no  
19 description or modeling of the results of any of these  
20 events should they occur no matter what the level of risk  
21 is. That is something that we as a community must be  
22 able to look at.

23 The drafters of the EIS I feel seem to have  
24 forgotten that we are not statistics. We are not risk  
25 calculations. We are people who are concerned about the

- II30-B -1 Comment noted.
- II30-B -2 See response to comment II30-A-4.
- II30-B -3 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

38

1 safety of our families, our homes, our neighborhoods.  
2 And we are the people who will suffer the consequences if  
3 the dice you are rolling on our behalf come up snake  
4 eyes. And we're the people who are going to pay for this  
5 project to the tune of a billion dollars over its  
6 lifetime.

I130-B-3

7 No less important, we are people, we are voters who  
8 have taken a lot of time to educate ourselves on the  
9 relevant technical issues and who have legitimate  
10 questions about the need for this project and genuine  
11 alternatives to offer to our communities to deal with any  
12 reliability or transmission issues that may exist.

13 Instead, we are told that that's not the process.

I130-B-4

14 PSE has stage managed this process from the  
15 beginning with expensive consultants to handle  
16 stakeholders and come up with the desired results. I  
17 challenge the elected officials of the four Partner  
18 Cities backed up by their planning departments to demand  
19 that PSE talk to the citizens' groups who have been  
20 working on this, demand that PSE be transparent about the  
21 assumptions and data behind their needs assessment --  
22 also not covered in this EIS -- and demand that they  
23 engage in a discussion about the communities' analysis  
24 and alternatives. It could happen. I challenge you all  
25 to color outside the lines.

I130-B -4 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

39

1 I was part of a community group that negotiated with  
 2 the City of Renton, the Department of Ecology on the  
 3 state Shoreline Management Plan. We came up with  
 4 creative solutions that got both homeowners and Ecology  
 5 more of what we wanted and more of what they wanted.

II30-B-5

6 If PSE really wants the best solution, not just a  
 7 big project with 10 percent profit, it can happen with  
 8 true community involvement.

9 In my comments on Tuesday night, I ended by saying  
 10 PSE has refused to engage in an honest discussion of the  
 11 need or of alternatives. If they are so sure they are  
 12 right, what are they afraid of? Now I'm asking the four  
 13 Partner Cities, why aren't you standing up for us, for  
 14 the citizens and making PSE deal with us honestly, openly  
 15 and like the intelligent, committed community we are.  
 16 What are the cities afraid of?

II30-B-6

17 MR. OLSON: Good evening. My name is Court  
 18 Olson, and I live at 15817 Southeast 26th Street in  
 19 Bellevue, well out of sight of these proposed project  
 20 developments, thankfully, but not out of mind. I'd like  
 21 to just give you a few macro level comments.

22 But before I do that, I need to give you a little  
 23 bit of background on myself so that at least you might  
 24 consider me and be respectful of my comments.

25 I've been in the building industry for nearly 40

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II30-B -5 Comment noted.

II30-B -6 Comment noted. See response to comment II32-A-1.

Phase II Draft EIS Hearing - May 25, 2017

40

1 years now, commercial buildings. I've got civil  
2 engineering degrees and certified construction manager  
3 and recently certified energy efficiency expert, so I  
4 know a little bit about buildings and the energy that  
5 they consume.

6 And the National Department of Energy says that 81  
7 percent of the electricity that's going across the wires  
8 that we see around our communities is going to buildings,  
9 so that's where the consumption is for the most part.  
10 And I also know that our energy code is tightening in  
11 this state every three years because I helped to get the  
12 legislation passed that requires that.

13 I also have seen the demand per capita dropping  
14 steadily for more than 10 years. I've also been  
15 attending for the past year the Puget Sound Energy  
16 Integrated Resource Plan for 2017 development meetings  
17 and I've looked at their 2015 edition. They do this  
18 every two years.

19 I did a little calculation. Based on PSE's own  
20 projection of increased demand for their entire area,  
21 which I'm not sure that I believe, but anyway, using that  
22 number and using PSE's 2015 IRP, Integrated Resource  
23 Plan, report, prediction of the energy efficiency  
24 improvements that they're going to be sponsoring and  
25 developing in their area and using the population

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II21-B -1 See response to comment II21-A-1.

II21-B-1

Phase II Draft EIS Hearing - May 25, 2017

41

II21-B-1

1 projections by King County and the greater Puget Sound  
 2 regional governments, I take the current usage of PSE  
 3 energy and I project it at the population rate of  
 4 increase, the larger of the two numbers, and then I  
 5 subtract PSE's own projection for energy efficiency  
 6 improvements. And over 20 years the demand level is  
 7 flat. After 20 years there is a half a percent increase.  
 8 So my macro level comment is, why are we doing this?  
 9 Thank you.

10 MS. BRADFIELD: So I believe Court was the last  
 11 person who was signed up to speak. Is there anyone else  
 12 in the audience who hasn't spoken yet who would like to  
 13 speak? I see a gentleman in the back.

14 MR. ALLRED: Hello, and thank you for the  
 15 opportunity to speak again. My name is Curtis Allred.  
 16 I'm at 13409 Southeast 43rd Place in Bellevue. And the  
 17 proposed project won't block my view or reduce my  
 18 property value or anything, but I have sympathy for those  
 19 who it will.

II29-B-1

20 I just want to start with an observation that in  
 21 Phase 1 we had something like 700 pages of EIS  
 22 documentation and Phase 2 is another 900 pages, and yet  
 23 as you can see from the -- well, it's a total of 1,600  
 24 pages or so. And as you can hear from the current  
 25 testimony, that's still not sufficient to cover all of

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II29-B -1 The Partner Cities believe that the Draft EIS contains a  
 reasonably thorough analysis of the potential environmental  
 impacts of the project, as required by SEPA.

Phase II Draft EIS Hearing - May 25, 2017

42

1 the problems and risks with Energize Eastside.

II29-B-1

2 I'd like to focus on the three major issues that I  
3 think provide sufficient grounds to support the  
4 conclusion that the only rational option at this time is  
5 the No Action Alternative. The three big issues are the  
6 danger, the environmental damage and the lack of need.

7 The danger, you've heard plenty of testimony  
8 describing several pipeline explosions in recent years.  
9 There has been at least two incidents where PSE power  
10 lines falling on the Olympic Pipeline have caused  
11 basically drilling through the pipe, the electric arc  
12 drilled through the pipeline. And when I submit my  
13 written comments, I'll provide those references.

II29-B-3

14 The new transmission line is going to quadruple the  
15 energy-carrying capacity of the existing line, providing  
16 much more energy to the pipeline, and it will replace the  
17 wooden poles with metal poles, providing additional  
18 conductive paths when the sections of the line collapse.

19 Seismologists say there is a 10 to 15 percent  
20 probability that there will be a magnitude 9 or larger  
21 earthquake during the lifetime of this transmission line,  
22 which is 50 years or so. A quake of this size will  
23 certainly rupture the pipelines and bring down the power  
24 lines. So it seems to me we should be here discussing  
25 ways to remove the existing transmission lines from the

II29-B-4

II29-B-5

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II29-B -3 Regarding the potential for downed power lines, given the anticipated upgrades to PSE's infrastructure under the project, including the use of steel versus wood poles and newer standards not applicable during the original installation, it is anticipated that the risk of downed power lines will be lower than with the existing poles. Given stricter NERC vegetation management standards that the project would be subject to, these risks would be further reduced.

Arc fault is a function of the fault current entering the ground at a specific structure, and the associated voltage rise of that structure. If a current were induced on the pipeline by a fault, the pipeline would be energized for approximately 0.05 seconds until the protection clears the fault. It would be energized to the voltage of the faulted structure (not the full 230 kV), and would dissipate along the pipeline (i.e., attenuate as the current discharges to the earth). Installation of the shield wire on the 230 kV lines will significantly reduce the current flowing into the soil from the faulted structure by distributing the current to multiple structures. This will also reduce the arcing distance. In all likelihood, the arcing distance and risk will be reduced compared to existing conditions. As described in Section 3.9.3.3 of the Phase 2 Draft EIS, the existing transmission lines do not have a shield wire, and although other protective measures are in place, information provided by Olympic was insufficient to determine potential arcing distances for the existing pipelines. Because no data were available from Olympic to estimate the arc distances for the existing Olympic Pipeline system within the existing 115 kV corridor, for purposes of the risk assessment, the existing pipelines were assumed to have the same ground fault arc distances and potential for arc-caused pipeline releases as for Alternative 1. Using this assumption in the risk assessment calculation likely overstates the overall change in risk associated with Alternative 1 because the proposed design for Alternative 1 includes a shield wire, the potential arcing distance is known, and pole grounds would be placed at sufficient distance to avoid arcing damage to the pipelines.

Steel poles act as a grounding rod and direct lightning current into the ground where it dissipates into the earth. This is due to the conducting characteristics of steel and the surface area in contact with the soil. Replacement of wood poles with steel poles and a shield wire would actually help to decrease or mitigate AC interference on the pipelines, as the fault current would be distributed via multiple structures (paths) instead of all the fault current discharging via one path to earth.

Phase II Draft EIS Hearing - May 25, 2017

43

II29-B-5

1

pipeline corridor rather than beefing them up.

II29-B-6

2

On environmental damage there's not much I can add

3

there. You've heard lots of testimony about the loss of

4

thousands of trees, unsightly poles and wires that will

5

rise above the treetops creating just a visual scar that

6

will be around for many, many years.

II29-B-7

7

So the third point is the need. Justification of

8

the project is not part of the EIS analysis. And,

9

unfortunately, there's no regulatory process in

10

Washington that requires PSE to justify the project in a

11

transparent and truly independent manner. PSE cites five

12

independent studies to validate the need, three of which

13

were contracted by PSE and the other two were

14

commissioned by the City of Bellevue and only validated

15

the process, did PSE follow it. They did not run the

16

simulations and validate those.

II29-B-8

17

So what is the need. PSE claims that the new

18

transmission line is needed to address a transient and

19

unlikely scenario on the coldest day of winter with six

20

local power generation sources offline and 1500 megawatts

21

of power going to Canada.

II29-B-9

22

And furthermore, it's based on a 2.4 percent growth

23

rate, which is much higher than other utilities and city

24

planners use in their forecasting. This is an improbable

25

and short duration scenario and there are plenty of

II29-B -4 See response to comment II20-A-1.

II29-B -5 Comment noted.

II29-B -6 In some areas, the poles would rise above the tree line; in other areas, they would not. This occurrence would be contingent on the height of surrounding trees and the topography. If poles rise above the tree line, it is likely they will be more noticeable and create more contrast. This is evaluated in the Phase 2 Draft EIS, Section 3.2.3.

II29-B -7 Comment noted. See response to comment II2-B-9.

II29-B -8 See response to comment II29-C-4.

II29-B -9 The Phase 1 and Phase 2 Draft EISs explored a range of reasonable alternatives, as required by SEPA. Also see response to comment II15-A-2.

Phase II Draft EIS Hearing - May 25, 2017

44

II29-B-9

1 modern technologies for solving the situation and won't  
2 cost as much, are safer and have less environmental  
3 destruction. Some are described in Alternative 2.

4 I just have a few more seconds left and I will wrap  
5 up here.

II29-B-10

6 So basically in summary, it's dangerous,  
7 environmentally destructive and not needed. And the EIS  
8 says in the first few pages, the EIS is intended to  
9 identify reasonable alternatives that could attain or  
10 approximate PSE's objective at a lower environmental  
11 cost.

12 So I believe that given that statement the only  
13 sensible choice is the No Action Alternative. And if an  
14 independent analysis in the future says we need  
15 additional capacity, then Alternative 2B should be  
16 studied. Thank you.

17 MS. BRADFELD: Loretta, would you like to  
18 comment?

19 MS. LOPEZ: Loretta Lopez, vice president of  
20 the Bridle Trails Community Club and a member of CENSE.  
21 My address is 13419 Northeast 33rd Lane, Bellevue, 98005.

22 I agree with the others with respect to the lack of  
23 an adequate regulatory framework for the statewide  
24 framework for this type of issue. However, we have  
25 city framework -- a city framework that we can use and we

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II29-B -10 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

45

1 have SEPA. So we have some regulatory framework and we  
2 should use it.

3 Section 1.3 on page 1.4, the EIS cites the WAC, WAC  
4 197-11-0603(A), the lead agency is responsible for  
5 ensuring that a proposal is the subject -- that is the  
6 subject of environmental review is properly defined. The  
7 process of defining the proposal includes an  
8 understanding of the need of the project to enable a  
9 thorough understanding of the project's objectives and  
10 technical requirements.

II31-B-1

11 This is the point that we as citizens have  
12 repeatedly asked about, and we have repeatedly been  
13 denied an answer. We want to know why there is a need  
14 and the basis for that. Why do we want that? Because we  
15 refuse to suspend our reasoning processes. We want to be  
16 able to analyze.

17 The City of Bellevue has spent a lot of money on all  
18 types of projects to prove that we're smart, that we have  
19 smart city planning, we have smart traffic lights, we  
20 have smart water infrastructure and sewer infrastructure.  
21 We understand the need to be smart, and we believe in  
22 being smart. And, therefore, we want an answer to our  
23 questions. Why do we need this.

II31-B-2

24 We continue to get the answer that that's not part  
25 of the EIS. But it is. We cannot go through this

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II31-B -1 The purpose and need for the project are summarized in Section 1.3 of the Phase 1 and Phase 2 Draft EISs. Additionally, PSE prepared the Eastside Needs Assessment, which includes a more detailed explanation of the project need. The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding the purpose and need for the project (See Topic OBJ). The Lead Agency has limited authority to question an applicant's motives and cannot use SEPA authority to alter the objectives of an applicant for purposes of review under SEPA.

II31-B -2 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

46

1131-B-2

1 process and spend millions of dollars without knowing  
2 why. And so far we've gotten no answer. It's very  
3 frustrating and it's unacceptable.

1131-B-3

4 With respect to the issue of alternatives, that is  
5 one of the points that the EIS is suppose to address.  
6 And it doesn't mean alternative routes, it doesn't mean  
7 alternative 1950's infrastructure structure. Where is  
8 the demand response? Where is the battery storage?  
9 Where is the smart vision for the future? Why is it that

1131-B-4

10 the City of Bellevue continues to tell us that we must be  
11 smart, and yet on this project, we are not. And we  
12 object. We object strongly. It is unacceptable for us  
13 to have to go through this with no answers for three and  
14 a half years. Thank you.

15 MS. BRADFIELD: Is there anyone else who hasn't  
16 spoken yet who would like to comment?

17 MR. HALVERSON: I'll finish my comments.

18 MS. BRADFIELD: Okay. I think there is three  
19 people who would like to speak more, so that would be  
20 Todd, Warren, Brian and Court. I think, Warren, you were  
21 the first one to raise your hand.

22 MR. HALVERSON: Again, I must say I would like  
23 to echo what the last speaker said and stand here and  
24 look at everybody. But what I would like to do is I do  
25 have some comments that I didn't make a little bit

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1131-B -3 See response to comment 1115-A-2.

1131-B -4 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

47

1 earlier. I kind of adjusted them to a smaller version,  
2 but I think they are very significant, and after reading  
3 500 pages, which I have done.

OO7-B-1

4 And I want to reflect again on trees. So I will  
5 read these comments. When an EIS concludes that cutting  
6 down or trimming 4,000 to 10,000 trees is less than  
7 significant, the impacts are easily mitigated. There is  
8 something really wrong. I could kind of be funny and  
9 say, hey, maybe all of the consultants came from  
10 California or maybe Wisconsin. But we're in the  
11 Northwest. Trees are important.

OO7-B-2

12 We completely support the request by many citizens  
13 that the exact location of trees being removed and  
14 trimmed need to be in this EIS process or this EIS is  
15 incomplete, incomplete.

OO7-B-3

16 The other point that I want to make about the EIS in  
17 terms of trees is a very troubling one, and that is  
18 there's the vegetation maintenance schedule that's  
19 brought up by PSE where the 115 kV line is different than  
20 the 230 kV line, that now they show wire zones, managed  
21 right-of-ways, danger zones, but there is no analysis of  
22 this in the EIS. Then what happens, though, is they pass  
23 this on without commenting on how many trees that can be  
24 cut down. And here is the clincher. Saying manage  
25 right-of-way will be coordinated with the property owner.

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- OO7-B -1 Comment noted. The Phase 2 Draft EIS, Section 3.4.5, includes information on vegetation clearing based on design details available at that time; the Final EIS includes additional information on tree clearing based on refined project design details.
- OO7-B -2 See response to comment II139-A-3.
- OO7-B -3 Section 3.4.1.3 of the Phase 2 Draft EIS details PSE's Vegetation Management Program, which describes the wire zones, managed rights-of-way, and danger tree zones. Property owners will have the opportunity to provide input to PSE on the vegetation to be removed on the easement on their property. Danger tree zones, which can extend outside of the right-of-way or easement, would not change as a result of this project. The decision to remove a tree from the danger tree zone is based on a combination of tree height, species, health, and distance from the wires. As at present, if a tree outside of the right-of-way appears to be an imminent threat to the transmission line, PSE will approach the owner to request permission to remove it. No trees outside of the right-of-way or easement would be removed without property owner permission. PSE does not anticipate needing to remove any trees outside of the right-of-way or easement in order to build the Energize Eastside project. This information was updated in the Final EIS at Section 4.4.1.1.

Phase II Draft EIS Hearing - May 25, 2017

48

1 Restore vegetation to as like or better condition in  
2 working with the property owner.

OO7-B-3

3 This seems quite disingenuous if the City supports  
4 this project and then asks each property owner to work it  
5 out over the next 18 months. The City needs to work all  
6 of this out submitting an EIS or approving an  
7 application.

OO7-B-4

8 I could also point out, I would like to, in terms of  
9 at least the Bridle Trails area plan, at least the  
10 comments and the publicity of Bellevue being a city and a  
11 park, at least when it comes to an objective of having a  
12 40 percent tree canopy in Bellevue. That doesn't make  
13 sense. This project doesn't make any sense at all.  
14 Replacing thousands of mature tree with siblings just  
15 doesn't seem to support these characterizations.

OO7-B-5

16 While I have just a couple of more minutes, I'd like  
17 to point out something, because I've lived there for 40  
18 years and I'm not too sure many people have seen this.  
19 And I'm going to call this -- this is not just a  
20 corridor. This is an industrial corridor through  
21 residential neighborhoods. It's not the suburbs; it's  
22 not downtown. It's an industrial corridor. I've had  
23 firsthand experience since I have lived in Bellevue for a  
24 long time. The City has enabled through their land use  
25 procedures and environmental statements, the addition of

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- OO7-B -4 Comment noted.
- OO7-B -5 The Cities of Bellevue, Newcastle, and Renton, as well as King County consider the proposed project an electrical utility, an allowed or conditionally allowed use consistent with their zoning code (see Appendix B of the Phase 2 Draft EIS). See response to comment II138-A-2 regarding telecommunication facilities.

Phase II Draft EIS Hearing - May 25, 2017

49

OO7-B-5

1 a second pipeline, the addition of electrical line on the  
2 poles, and the allowance of telecommunication facilities  
3 to be built on these poles.

OO7-B-6

4 As Carol well knows, there's legislation maybe to  
5 even increase the ability to use those poles by various  
6 vendors. Even your visuals don't show all of the stuff  
7 that's on these poles. This is an example of how each  
8 individual project is being termed less than significant.  
9 The cumulative effect and interrelationship of utilities  
10 is really significant creating industrial blight in our  
11 neighborhoods.

OO7-B-7

12 It's a dead zone. In fact, you guys have used those  
13 words in here. It's a dead zone, and we end up paying  
14 the taxes on it.

15 With new roads -- think about this -- grading those  
16 roads, removing all of that vegetation is going to create  
17 a huge issue and also a wind tunnel. For those that  
18 don't live here, that is a wind tunnel. When you take  
19 down all of those trees, you're also putting at risk a  
20 lot of people in houses next to those trees because one  
21 of them supports another. And I've seen, at least on  
22 five occasions where I live, trees go right through  
23 houses.

24 Is that a safety risk? Is that something that  
25 anybody is concerned about? I don't know. It doesn't

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OO7-B -6 The potential for future telecommunication facilities (underbuild) was considered as part of the scenic views and aesthetic impact analysis (see Section 3.2.5.1 of the Phase 2 Draft EIS). PSE and the Partner Cities have limited authority over the telecom underbuild equipment. Underbuild located on a 115 kV line may be undergrounded in certain situations, such as when a 115 kV line is converted to 230 kV, or considered at select crossing areas to reduce pole height. Under PSE's Proposed Alignment, underbuild is expected on poles for cellular equipment at eight locations (see Section 2.1.2.2 of the Final EIS). The potential for aesthetic impacts resulting from cellular equipment placed on the 230 kV poles is addressed in Section 4.2.5 of the Final EIS. A potential mitigation measure identifying limitations on the number of cellular equipment facilities that could be installed on the proposed 230kV poles is identified in Section 4.2.6 and Appendix M of the Final EIS.

OO7-B -7 For all alternatives considered in the Phase 2 Draft EIS, the transmission lines would be placed predominantly within a right-of-way that already includes 115 kV transmission lines. The same land uses would be present once the project was built as at present. While the project is expected to have some adverse visual impacts, it is not expected to cause urban blight, which is typically defined as the presence of abandoned buildings and evidence of disrepair and decay due to neglect. The high value of existing homes adjacent to the existing transmission lines is sufficient evidence to conclude the project is unlikely to result in abandonment of properties.

Phase II Draft EIS Hearing - May 25, 2017

50

1 seem to be. So those are my comments, and my final  
2 comments about trees.

007-B-8

3 I think I did talk about economics a little bit. I  
4 did appreciate the fact that you have 13 pages covering  
5 economics. I do think it's totally inadequate and I  
6 think it's inadequate particularly when it comes to  
7 property values. We've shown, you know, national studies  
8 will show that it is at least two to nine percent  
9 decrease in property values. Local Realtors and  
10 assessors will tell you 10 to 30 percent. That's not in  
11 here.

007-B-9

12 I'm troubled by the ecological value of 9,852 trees  
13 being \$37,000. Really? When PSE was offered a million  
14 dollars for 300 trees on 148th, a million dollars in  
15 mitigation fees. Something, something is really off  
16 here. Something is really off here. That's really  
17 troublesome where that's going, how much mitigation for  
18 all those trees.

19 So that pretty much says what I'd like to say about  
20 the economics. I think you do owe the city and everybody  
21 else to truly come up with an accounting for fixed costs  
22 associated with new roads, construction expenses, new  
23 water retention facilities, storm water retention  
24 facilities, a dollar cost figure, a huge dollar cost  
25 figure.

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- 007-B -8 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1.
- 007-B -9 The total services value provided by the "forest" per year (gross carbon sequestration value + avoided runoff value + pollution removal value) was estimated/calculated as \$37,858. The cost of replacing the trees with similar trees is presented in the Phase 2 Draft EIS as the "structural value," which ranges between \$5.5M to \$10.7M, depending on the option combination chosen, and is considered a one-time cost (see Table 3.10-7 in the Phase 2 Draft EIS).

Phase II Draft EIS Hearing - May 25, 2017

51

007-B-10

1 But most troubling, as I indicated to you, was the  
 2 cost associated with the comment of this being the most  
 3 efficient alternative. It is not; it is not. We would  
 4 like to see those statistics for the other alternatives.

5 So I thank you very much for taking additional  
 6 comments.

7 MR. ELWORTH: Brian Elworth. Hey, I've got a  
 8 175-amp arc welder, and it's got a 25 arc volt from the  
 9 electrode to the material I'm cutting. That will cut  
 10 material like that pipe as if it were butter. It will  
 11 cut right through like butter.

12 So now instead of taking 26 arc volts, let's take  
 13 230,000 volts. Instead of 175 amps, let's take, oh,  
 14 let's say the winter peak load of 1,300. We're looking  
 15 at something like 71,000 times the power of my arc welder  
 16 up on those power lines suspended by what's essentially a  
 17 lightning rod. So the concept of safety, I don't think  
 18 you're getting it.

19 You know, I view the EIS like the house you're  
 20 building. And you build Phase 1, and you say, come look  
 21 at it. But it collapses under the weight of public  
 22 comment. So here's this pile of rubble. And we say fix  
 23 it. No, no, no, you go on and build Phase 2, and you  
 24 hear it's collapsing under the weight just like the first  
 25 one. You've got two piles of rubble here, not a house.

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007-B -10 The alternatives considered in the Phase 1 Draft EIS but not brought forward for additional analysis in the Phase 2 Draft EIS are described in Section 2.2 of the Phase 2 Draft EIS. SEPA does not require a cost comparison between the alternatives selected for analysis.

Phase II Draft EIS Hearing - May 25, 2017

52

1           So you're going to continue this process. You are  
 2 going to get finally done, and you are going to stand  
 3 back and say, this looks like a home. What I see is a  
 4 pile of rubble. Our only hope is that PSE doesn't hook a  
 5 gas line to that pile of rubble, because it will be  
 6 replaced by a gigantic crater.

7           Now what I want to get to is that early on, very  
 8 early on, I provided a reference. I think the book is  
 9 free. It's on research ethics. I don't think you've  
 10 read it, I guess. What you need to do is go dig that up.  
 11 It's part of the public record. You need to internalize  
 12 the message in research ethics, the point of that book.  
 13 You need to adopt that methodology, and you need to use  
 14 that as a yardstick to measure the quality of the EIS.  
 15 You're going to find out it comes up way short.

OO4-E-1

16           So you also need to consider what's called non  
 17 advocate review. You know, when we're working on a big  
 18 project, we're all excited about it. We have other  
 19 people who have no vested interest in the project, but  
 20 with that expertise to look at and say, did we do it  
 21 right. You guys are not involved. Look at it. We'll  
 22 explain our design. Would you look at it. That non  
 23 advocate review is important. Consultants should be no  
 24 advocate consultants. When they're on somebody's  
 25 payroll, they're instantly tainted.

OO4-E-2

- OO4-E-1    Comment noted. No response is provided because the comment relates to how research should be conducted generally and does not specifically identify any deficiency in the analysis.
- OO4-E-2    See response to comment I136-A-5.



Phase II Draft EIS Hearing - May 25, 2017

53

1 DNV GL has a great reputation. But if you look at  
2 their report, it's founded on unvetted data, so it's  
3 garbage in, garbage out. No matter how precise they did  
4 their study, it's garbage in, garbage out.

5 And Stantec, and all of these other ones that are on  
6 somebody else's payroll, their vested interest is giving  
7 a good positive answer to the people who are paying them,  
8 not coming up with an independent estimate. If they  
9 were to do their own evaluation and sort of bites the  
10 hand that feeds them, they'd be out of business.

11 So, of course, DNV GL, if you look at the conclusion  
12 in that report, they soft pedal major issues. I actually  
13 expect a little bit better from them on that. But they  
14 did not call out the critical shortcomings of this other  
15 than saying, well, you better talk to the pipeline guys  
16 when one of your circuits goes down because the step  
17 voltage will kill the guy who has to turn off the pipe  
18 when it starts leaking.

19 Back to that arc welder. So, you poke a hole in it  
20 from an arc through the tower down to the ground, that  
21 thing is going to leak 20,000 gallons per hour without  
22 any detection because that's still well below the federal  
23 threshold. So you get a fireball fed like 26,000 gallons  
24 of flammable fluid. That's the scenario.

25 You need to address those kind of scenarios. You

OO4-E -3 See response to comment I136-A-5.

OO4-E-3

OO4-E-3

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Phase II Draft EIS Hearing - May 25, 2017

54

OO4-E-3

1 need to put that kind of information in the EIS. How are  
 2 you going to mitigate that? How are you going to prevent  
 3 that from happening? I actually don't see how with this  
 4 project, but it's your job to figure it out because  
 5 you're advocating this PSE solution. Thank you.

6 MR. ANDERSEN: Todd Andersen. So don't get  
 7 discouraged guys. The Bellevue City government is not  
 8 the only part of our government that is completely  
 9 collapsed. We have lots of government at multiple  
 10 levels.

11 My kindergarten son over here who is playing  
 12 Minecraft, he checked out a tree house book No. 17. It's  
 13 called "Tonight the Titanic" page 35. The Titanic is  
 14 sinking, said Jack. But no one understands, says Annie.  
 15 It's exactly right.

II47-B-1

16 The earthquake stuff is just a multiplicity of  
 17 things that is brought up. There was not a single  
 18 mention of concentrated energy infrastructure in the EIS.  
 19 Who could you go to to look at this? Well, you could go  
 20 to the Congressional Research Services, because over the  
 21 last two decades multiple mayors who are now either hard  
 22 core lefty congressmen or hard core righty congressmen  
 23 are holding hands beautifully together having the  
 24 Congressional Research Services -- which it should not be  
 25 done by them. It should actually be done by stuff that

II47-B -1 In selecting alternatives to be evaluated in an EIS, the Lead Agency is not obligated to consider every conceivable scenario. The SEPA Rules note that use of the word "reasonable" is intended to *limit* (emphasis added) the number and range of alternatives, as well as the amount of detailed analysis for each alternative. Alternatives discussed in the EIS must meet the objectives of the proposal. The Phase 1 Draft EIS explored a range of reasonable alternatives at a programmatic level, including alternatives that explored developing technologies. See Section 2.2 of the Phase 2 Draft EIS for a detailed explanation of why various alternatives were not carried forward for analysis.

Phase II Draft EIS Hearing - May 25, 2017

55

1 Newt Gingrich got away with, but we won't go into that --  
 2 looking into the concentrated infrastructure.

3 Let me tell you how bad the pipeline leak is going  
 4 to be. I ran survivability programs in the United States  
 5 Navy. I ran survivability programs for new generation  
 6 aircraft. I wouldn't let my engineers put more than 40  
 7 gallons into a fuel vulnerability test because it would  
 8 take us 20 minutes to put it out, and we had three -- we  
 9 had four foam -- we had the equivalent of four foam  
 10 trucks right there, parked right on the pad. That's on a  
 11 concrete pad.

12 The last time this pipeline busted, 277,000 gallons.  
 13 And that was on the 16-inch pipeline. If we have an  
 14 earthquake, there's going to be multiple ruptures. The  
 15 instant that fuel comes out, it is on fire. We know that  
 16 for a fact.

17 Even in Newcastle they had a little tiny test pipe  
 18 that popped, leaked aviation gas. Immediately on fire.  
 19 The Navy shuts down all operations at two -- write this  
 20 down -- at 2,000 volts per meter. All operations are  
 21 shut down. Luckily for the Navy that rarely occurs, and  
 22 most of it in the Mojave Desert. So they rarely shut  
 23 stuff down.

24 As soon as this pipeline busts, it's going to take  
 25 down the PSE power lines within a minute. And if you

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II47-B -2 See response to comment II20-A-1 for information on seismic risks. As described in Section 3.9.4 of the Phase 2 Draft EIS, major risks to the public from unintentional pipeline releases relate to the characteristics of the pipeline product, the presence of ignition sources, and the release setting. If an ignition source is present, the accumulate fuel "pool" could catch fire. The potential risk of a fire occurring due to pipeline rupture is described in Section 3.9.5, *Risks from Operation*, and Section 4.9.1, *Risks from Construction*.

II47-B-2

II47-B-2

Phase II Draft EIS Hearing - May 25, 2017

56

1 think I'm exaggerating here, go look at Elon Musk's  
2 rocket shot that popped and look at the tower structures  
3 that are a good 200 feet away. Within two seconds  
4 you'll see puffs of smoke coming off all of that  
5 structure that's 300 feet tall. That is paint and primer  
6 vaporizing. Two seconds. That's on metal structure.  
7 Wooden structures, immediately on fire. Fuel fires.  
8 None of the fire departments are going to fight this  
9 fire. They're going to take what limited foam trucks  
10 they have to just protect the guys that are evacuating  
11 neighborhoods, plural, just to evacuate the  
12 neighborhoods. Even if you brought all 20 trucks over  
13 from Sea-Tac, none of them would be assigned to fight a  
14 fire. They would be all purely for backup to evacuation.  
15 They are just going to let this thing burn out.

16 There was a comment that a bunch of these guys  
17 brought up. DNV quotes, contrary to the good guy,  
18 Booking -- he is a good guy -- but contrary to what he  
19 said, DNV does not quote NACE, rightfully so. Three  
20 weeks corrosion on the Statue of Liberty. The other two  
21 engineering organizations, here we are two decades later,  
22 no corrosion.

23 They quote a natural gas pipeline association for  
24 their safety guidelines. When was that guideline  
25 written? One year previous. Who wrote those guidelines?

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II47-B -4 See response to comment II114-A-5.

II47-B-4

Phase II Draft EIS Hearing - May 25, 2017

57

1 The same three bachelor degree guys that wrote the report  
2 for DNV, the exact same. They switched who was the  
3 auditing manager and who was the review manager and who  
4 was the grunt. The exact same three guys. It is  
5 unbelievable that you guys would publish this report.

6 I will quote the EIS section, just one of the  
7 laughable moments, 3.8.6, mitigation measures. No  
8 adverse impacts for magnetic fields are expected.  
9 Therefore, no mitigation is proposed. I would agree with  
10 that, because magnetic fields are irrelevant. There is  
11 only electromagnetic fields that are the issue. As  
12 quoted in section -- continuing the exact quote from this  
13 section -- as quoted in Section 3.9.7, mitigation  
14 measures for pipeline safety -- and this is comma --  
15 mitigation for potential corrosion of the pipeline could  
16 include optimized geometry of the phase conductors in a  
17 triangular pattern which results in higher cancellation  
18 of the magnetic fields. If that mitigation is  
19 incorporated into the project, it would further reduce  
20 magnetic field levels at the ground level from the  
21 proposed transmission lines.

22 This is my comments. Any triangular pattern is  
23 insignificant reduction compared to the other facts not  
24 analyzed. It's a deadly joke, and in my opinion, a  
25 fraudulent statement. It's like children wrote this

II47-B -5 Comment noted.

II47-B-5

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Phase II Draft EIS Hearing - May 25, 2017

58

1 report or lawyers or Russian poetry majors.

2 MS. BRADFIELD: Todd, if you could wrap up your

3 comments soon.

4 MR. ANDERSEN: I'm getting there. Only one

5 mention of internal inspection devices in the entire EIS.

6 The professional criteria for these is called PIG's.

7 Probably why the EIS doesn't mention it is because if

8 PIG's were mentioned, people would go research that.

9 PIG's are pipeline inspection gauges, the professional

10 term.

11 No inspection data was given by BP. Why is that?

12 How could this be proprietary or security issues? All of

13 that can be scrubbed for security issues. The real

14 reason in my opinion is that when you see the random

15 areas of that pipe half eaten away currently, BP does not

16 want that revealed and invite more scrutiny. This is the

17 reason Shell and Exxon sold the Olympic pipeline after

18 the Valdez accident to the safety corrupt and just plain

19 corrupt British Petroleum.

20 EDM Services was given new data. It says, quote,

21 these assumptions likely understate the risk. No pooh

22 pooh Sherlock. Having worked for the Navy and having run

23 several survivability programs -- I'll go back to a

24 direct quote from the document on page 432 of 574. In

25 absence of national collection data, EDM Services used

II47-B-6

II47-B -6 The City and the EIS Consultant Team contacted Olympic during the development of the Phase 1 Draft EIS, and made additional inquiries during the project-specific phase of the EIS. Certain information was not available from Olympic for use in the Phase 2 Draft EIS due to proprietary or security reasons. In addition, as project applicant, PSE does not have the ability to require Olympic to publicly release information.

Phase II Draft EIS Hearing - May 25, 2017

59

1 national data on releases associated with all  
2 pipeline and -- all pipelines and attempted to identify  
3 releases that may have been caused by pipeline proximity  
4 to electrical utility facilities. Unfortunately, the  
5 reports on external corrosion cause releases do not  
6 include data to identify whether the releases were caused  
7 by electrical interference --

8 MS. BRADFIELd: Todd --

9 MR. ANDERSEN: -- with corrosion.

10 MS. BRADFIELd: -- could you please pause your  
11 comments for now and if you have more to say, you can  
12 come back after others have spoken.

13 MR. OLSON: Court Olson again. I appreciate  
14 the opportunity to come back. As I suggested in my  
15 earlier comments, I just don't see when I do the math,  
16 and the math is pretty basic, any justification for  
17 increased demand because PSE is a for-profit corporation  
18 that leads me to conclude the motivation is most likely  
19 the nine percent guaranteed profit that our regulatory  
20 commissions allow.

21 I want to remind you folks, if you don't know, that  
22 in the 2015 IRP, or Integrated Resource Plan, that PSE  
23 submitted to the regulatory commissions, they had their  
24 hands slapped because they way overestimated demand  
25 according to UTC. It's my understanding that this

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II21-C-1 Comment noted.

II21-C-1

Phase II Draft EIS Hearing - May 25, 2017

60

II21-C-1

1 project originated well before 2015 when they were making  
2 those, I'm tempted to say outrageous demand projections.

II21-C-2

3 So I think this whole thing is without merit. But  
4 if someone can show that it really is, and I would be  
5 surprised if they could, there are alternatives in the  
6 EIS as someone mentioned just a few minutes ago, and  
7 knowing buildings as I do, if we just ramped up our  
8 energy efficiency programs, we could not only handle any  
9 increase demand but decrease demand into the future, well  
10 into the future.

II21-C-3

11 I could cite research studies from the Department of  
12 Energy and others that show we could cut our energy  
13 consumption in half in nearly all of our buildings, and  
14 that's where most of this energy consumption is going.

15 And another option is if, as we suspect, the demand  
16 requirements are due to peak load and summer air  
17 conditioning, but more likely in winter heating loads,  
18 then on those days of extreme cold in winter, why not set  
19 up a battery system to take care of that peak. And  
20 there's always the option of demand response which PSE  
21 says they're going to start experimenting with, where we  
22 shut down certain industries at those peak demand load  
23 times.

24 So there are a variety of options really to this  
25 project that would mean the project is totally

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II21-C-2 See response to comment II15-A-2.

II21-C-3 See response to comment II15-A-2.

Phase II Draft EIS Hearing - May 25, 2017

61

1121-C-3

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unnecessary even if there was increased demand.

Lastly, I just have to underscore because my biggest passion in the last 10 years has been towards climate change mitigation, and trees are one of our biggest defenses. We need to be planting trees, a lot more trees, instead of cutting them down as PSE with their profit motive is inclined to do. Thank you.

MS. BRADFIELD: Don, would you like to come forward.

MR. MARSH: Thank you. It's hard to follow some of the amazing comments that we've just heard, but I was really moved by Loretta's very eloquent statement about being smart, and it made me think of one of the smartest things that my organization CENSE has done.

So very early in the project we suspected that there was something wrong with PSE's numbers, and we said that a lot. PSE responded, all you have to do is get the proper clearance. You can look at our load flow study and you will see how necessary is. We didn't immediately follow-up on that, because we were a little bit worried that we might not be able to understand a load flow study. It sounded intimidating, so we didn't follow-up right away.

But then we were joined by experts such as Rich Lauckhart, who was PSE's former vice president of power

1121-C-4 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

62

1 planning, and all of a sudden we had the expertise that  
2 we needed to evaluate what was going on with that load  
3 flow study.

4 So we asked PSE, okay, now can we see the load flow  
5 study, and they wouldn't give it to us, and they wouldn't  
6 give us clearance anymore. So we went to the Federal  
7 Energy Regulatory Commission and we said, we think we  
8 should be able to see this. And the Federal Energy  
9 Regulatory Commission, FERC, said yes, you have a need to  
10 see this, it's a legitimate need and you are not a  
11 terrorist, you are not a security risk, so yes, you can  
12 see the data.

13 Well, PSE still refused to give us the data. I  
14 think they were scared now that we could actually  
15 understand what's in that load flow study. But since  
16 they wouldn't give us that information, we hired Rich  
17 Lauckhart and a transmission analyst named Roger  
18 Schiffman. They got the data that PSE shares with FERC.  
19 We got that data from them, not from PSE.

20 They ran a load flow study using the state of the  
21 art computer models, and they determined that PSE's  
22 scenario that Energize Eastside is based on is a  
23 situation that cannot happen. And the reason is they're  
24 feeding so much energy into the system to not only meet  
25 our peak demand but also to send that 1500 megawatts to

OO1-B -1 See response to comment I12-B-5.

OO1-B-1

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Phase II Draft EIS Hearing - May 25, 2017

63

OO1-B-1

1 Canada. In that scenario, there is not enough  
 2 electricity that can come over the 11 transmission lines  
 3 that cross the Cascades that feed us the majority of our  
 4 power, especially when the local generation plants are  
 5 turned off for some reason, and we don't know why PSE did  
 6 that, but there's not enough capacity to move that much  
 7 electricity into this area.

8 What would happen is the voltage would drop in our  
 9 area. You can't allow voltage to drop because it  
 10 destroys equipment. Computers fry, motors malfunction.  
 11 So in order to keep the voltage from dropping, what would  
 12 happen is there would be rolling blackouts, not just on  
 13 the Eastside, but the Puget Sound area if that scenario  
 14 was allowed to happen. But that wouldn't be allowed to  
 15 happen because BPA would all of a sudden turn off the  
 16 1500 megawatts to Canada. They would turn that off  
 17 within 15 minutes and then the problem would be solved.

OO1-B-2

18 So we put that study, it's the Lauckhart Schiffman  
 19 load flow study, into the first phase of the EIS. And we  
 20 thought for sure that would bring some sanity to this  
 21 process. Well, PSE looked at it and they sort of brushed  
 22 it off. They didn't contradict any particular detail of  
 23 that study and it was all laid out what the conclusions  
 24 were. They didn't question any of the numbers; they just  
 25 said, oh, you didn't study enough scenarios and maybe you

OO1-B-2 Comment noted.

Phase II Draft EIS Hearing - May 25, 2017

64

OO1-B-2

1 got a little confused about what the real requirements  
2 were. This is their former vice president of power  
3 planning. Somehow he got confused.

OO1-B-3

4 We would like some acknowledgment that that is a  
5 good study. It's the only study that we have that's  
6 transparent and independent at this point. So until we  
7 get an independent load flow study or until PSE reveals  
8 the details of their load flow study to people to have  
9 the proper clearance -- and by the way, I have the proper  
10 clearance from FERC along with Rich Lauckhart -- until we  
11 can see that data we are not convinced that they didn't  
12 make a mistake in running that. As I said, we ran into a  
13 critical limitation in the regional grid that just does  
14 not validate their assumptions.

15 That would be very helpful in clarifying the need  
16 and the purpose is to look at that study and get an  
17 independent opinion, not from PSE. PSE has a vested  
18 interest in validating that report. Get a neutral party  
19 to look at that report, look at PSE's report, if they can  
20 get it, and let us know what's happening. And that I  
21 believe is smart. Thank you.

22 MS. BRADFIELD: Is there anyone else who wants  
23 to comment? I believe this gentleman here hasn't spoken.

24 MR. SCHWARTZ: I just have one quick comment to  
25 make. David Schwartz, 13805 Southeast 58th Place,

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OO1-B -3 As discussed in the Phase 1 and Phase 2 DEISs, the EIS Consultant Team did review the planning model and found that PSE had used standard planning practices. In determining the capacity deficiency for 2024, PSE used best available data and industry-standard utility planning modeling. As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included.

Phase II Draft EIS Hearing - May 25, 2017

65

II42-A-1

1 Bellevue. PSE's estimates are that their demand, our  
2 demand, will grow upwards of six times the rate that  
3 Seattle's will, based on Seattle City Light's  
4 projections. They make no effort to explain this  
5 whatsoever. Does Seattle look like there's nothing going  
6 on there? It's going like gangbusters. So on what basis  
7 does PSE suggest that we will have six times the growth  
8 than Seattle.

9 This is just one of many, many incongruent things  
10 about this proposal. Thank you.

11 MS. BRADFIELD: So I believe Todd and Brian,  
12 you each wanted to add additional comments; is that  
13 right?

14 MR. ELWORTH: Just one last comment. Measured  
15 response. When my wife sends me to the grocery store to  
16 buy some carrots, I don't drive my pickup truck and fill  
17 the bed of it with carrots, because that's not a measured  
18 response.

19 You look at the cold weather temperature scenario  
20 that PSE has laid out. You look at the magnitude of the  
21 energy, the power and the time that is required and you  
22 can represent that as a stack of pennies about nine  
23 pennies tall. You look at PSE's solution to solve that  
24 problem, their energy capacity of that line is about as  
25 tall as the Space Needle. Nine pennies, Space Needle.

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II42-A -1 PSE used regional planning employment and population projections provided by the Puget Sound Regional Council and accounted for known growth expectations of its major customers when forecasting demand.

Phase II Draft EIS Hearing - May 25, 2017

66

1 That's not a measured response.

2 So what I'd ask perhaps is that you put a table in

3 the EIS that lists all of the options and just put

4 another column adjacent to those and just say rational

5 response, irrational response. So things like the no

6 response is the rational response. The alternative from

7 CENSE, rational. The 230 kV power lines, irrational.

8 You don't have to draw any conclusions but just put that

9 information in there so people can see that this is an

10 irrational solution. It is not scaled to the problem

11 that PSE says we have. Thank you.

12 MS. BRADFIELD: So this is Todd Andersen again.

13 MR. ANDERSEN: Todd Andersen. Macquarie a year

14 ago invested \$200 million into a grid storage management

15 company, so they are going to take batteries and manage

16 it. Two hundred million dollars. What you might not

17 know is that PSE -- Macquarie, right when they bought

18 PSE, they bought a portfolio of seven green energy

19 companies from a friend of mine who is the first VP of

20 Tesla. The right hand of Macquarie who bought the green

21 energy companies, as soon as the left-hand side spent the

22 \$4 billion to buy PSE, said, what the heck are you guys

23 doing. And they immediately sold off these companies.

24 When they started the -- I forget the name of it,

25 but President Obama started it in 2010. I'll just call

OO4-F-1

OO4-F-2

- OO4-F -1 The comment refers to whether there is a need for a project of this type. Please refer to Appendix J, Topic OBJ for a discussion of how the need for the project figures into the EIS process.
- OO4-F -2 The Phase 1 Draft EIS acknowledges that the project would provide more than adequate capacity to meet the projected need in the 10-year planning horizon. However, as discussed in the Phase 1 Draft EIS, there is no intermediate size of transmission facility that would work within the regional grid. See Section 2.2.1.15 for discussion of 115 and 230 kV transmission lines.

Phase II Draft EIS Hearing - May 25, 2017

67

1 it an energy policy for the United States. Clean Power  
2 Plan. Exactly right. Macquarie went crazy. They  
3 hired -- I have two great stories about Edison that are  
4 highly relevant to what we're talking about. They hired  
5 the Edisons -- - don't blame that on Thomas -- to -- the  
6 Edisons sounds like a very benign company, but it's a  
7 nonprofit, only works for for-profit electric utilities.  
8 By the way, 80 percent of the utilities in the United  
9 States are government run, and they are run so  
10 efficiently that nea.org looked at all 137 government-run  
11 facilities and compared it to the for-profit utilities,  
12 and they had 28 percent cheaper electrical rates. Thank  
13 you city for doing a good job for us.

14 If you just compare PSE's rates and just use the  
15 utility commissions numbers for Tacoma Power, which has  
16 for more legacy infrastructure than PSE does, 25 percent  
17 cheaper rates. And that's with the utility commission  
18 commenting, oh, that doesn't include all of the extra  
19 taxes that Tacoma Power has to pay to the city and the  
20 county that PSE doesn't have to pay.

21 Great storage. If it wasn't falsified, it would be  
22 a perfect comment.

23 Back to concentrated energy obstruction and  
24 terrorist threats. It took me 10 minutes to figure out  
25 how to take down both the Seattle City Light lines, PSE

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Phase II Draft EIS Hearing - May 25, 2017

68

II47-C-1

1 lines, and the light lines, Olympic Pipelines, and that  
2 can easily be done for 200 bucks. You have no comments  
3 about concentrated energy infrastructure. And I  
4 encourage you to go to Congressional Research Service --  
5 it's a part of the Library of Congress -- and get the  
6 multiplicity of reports that have been demanded by former  
7 mayors of cities that have had their cities on the East  
8 Coast and on the Gulf completely trashed because of  
9 natural disasters and how long it's taken them -- months  
10 -- to bring those areas back up on line, with just water  
11 and electricity and natural gas, and you will be shocked.

12 In the absence of national data collection, the  
13 contractor that was the peer review for the -- my opinion  
14 -- the fraudulent study by DNV -- whatever the heck their  
15 name is. A little side note on these fraudulent studies.  
16 Exponent, which is the same size as DNV, which the city  
17 hires particularly for the electrical reliability  
18 studies, they're the ones that sold the California state  
19 that the MTBE was a safe additive to replace lead. MTBE  
20 was so toxic that the aircraft industry refused it from  
21 the get-go, which is why we still have lead. So every  
22 time you see that little GEICO plane flying around, he's  
23 spreading lead.

24 And as you all know, that plethora of Ph.D.'s that  
25 said that was safe, that all got yanked for groundwater

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II47-C-1 See response to comment number II47-B-1.

Phase II Draft EIS Hearing - May 25, 2017

69

1 contamination. The father of my childhood friend, Cesar  
2 Gonzalez, said, Todd, when they got us those barrels of  
3 MTBE fuel, we banned it within eight hours.

4 So that's the level of corruption that we have in  
5 our society. And you guys are the second to the last  
6 defense, because if you guys let this thing go through,  
7 it's going to the courts.

8 So in the absence of national co-location data, so  
9 looking for pipelines that somebody has been dumb enough  
10 to put high power lines above them, the EDMS services  
11 used national data on -- this is a direct quote -- used  
12 national data on releases associated with all pipelines  
13 and attempted to identify releases that may have been  
14 caused by a pipeline's proximity to electrical utility  
15 facilities. Unfortunately, the reports on external  
16 corrosion-caused releases do not include data to verify  
17 whether the releases were caused by electrical  
18 interference with cathodic protection systems. The  
19 reports also do not identify whether the releases were  
20 caused by excavation damage related to overhead power  
21 line construction.

22 But don't worry -- this is my comments now -- don't  
23 worry. We can predict the increased risk as just nine  
24 percent greater than doing nothing. Wow, what precision.  
25 I'm just amazed at that, just amazed at that.

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II47-C-2 The pipeline safety risk assessment conducted for Phase 2 Draft EIS considered historical pipeline incident data on similar pipeline systems in order to estimate the probability of pipeline failures, both under existing conditions (115 kV transmission lines) and with new 230 kV transmission lines. As the commenter notes, the available data sources on release incidents do not distinguish between co-located and non-co-located pipelines. The PHMSA incident database does not include an inventory of pipelines that are co-located with high-voltage transmission lines, nor do the incident data reports identify incidents that occurred where the pipeline was co-located with high-voltage transmission lines. As a result, it is not possible to directly develop and quantify the difference in risk that may exist between a co-located pipeline system and those that are not co-located with transmission lines. This limitation is described in Section 3.9.5.1 of the Phase 2 Draft EIS.

In the absence of national collocation data, EDM Services supplemented national data on releases associated with all pipeline incidents with information obtained from review of a number of publications and reports, including DNV GL's AC Interference Study (2016), to estimate the likelihood of various size pipeline releases.

II47-C-2

Phase II Draft EIS Hearing - May 25, 2017

70

1 MS. BRADFIELD: Todd, can I pause you for just  
2 a moment. We had a new person walk in and I just wanted  
3 to ask if you have any comments.

4 MR. ANDERSEN: The last statement is, if that  
5 is not technical fraud, I don't know what is.

6 MS. BRADFIELD: Sir, please come forward.

7 MR. MOHAGHEGH: Massoud Mohaghegh. I have  
8 lived in Somerset since 1971.

9 MS. BRADFIELD: I'm sorry, could you also state  
10 your address.

11 MR. MOHAGHEGH: 4451 138th Avenue Southeast,  
12 Bellevue, Washington. I have the pleasure of looking at  
13 those power lines every day. But even more important, I  
14 have a vacant lot that's almost adjacent to those wires  
15 and we've been trying to build a house there for a period  
16 of time. According to the city, that's all sensitive  
17 area, and I know the hoops the city is making us go  
18 through before we can build anything there. And if the  
19 same rules apply to them, they wouldn't be able to build  
20 anything. This is sensitive area according to city.  
21 That's it.

22 MS. BRADFIELD: Unless anyone has further  
23 comments, that will close the comment period.

24 (Public comments concluded at 8:37 p.m.)  
25

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II44-A -1 For an evaluation of the potential impacts to sensitive areas and the permit process required, see Section 3.4 of the Phase 2 Draft EIS.

II44-A-1

ENERGIZE EASTSIDE  
PHASE 2 DRAFT ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING/PUBLIC TESTIMONY

2:00 p.m.  
Saturday, June 3, 2017

Rose Hill Elementary  
8110 128th Avenue Northeast  
Kirkland, Washington

KIMBERLY MIFFLIN, CCR, CSR  
NORTHWEST COURT REPORTERS  
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Phase II Draft EIS Hearing - June 3, 2017

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PANEL MEMBERS

CAROL HELLAND - SEPA Responsible Official, City of Bellevue  
HEIDI BEDWELL - EIS program Manager  
CATHY BEAM - City of Redmond Project Contact  
MARK JOHNSON

PUBLIC SPEAKERS

WARREN HALVERSON  
DON MARSH  
GEORGE JOY  
JOY PALTIEL  
TODD ANDERSEN  
MICHELLE NICKOLS  
LORETTA LOPEZ

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Phase II Draft EIS Hearing - June 3, 2017

3

1 MR. HALVERSON: My name is Warren Halverson.  
 2 I live at 13701 Northeast 32nd Place, and that's about  
 3 a mile or two from here. I'm a board member of CENSE,  
 4 and I'm here today as president of Canter Green  
 5 Homeowners' Association Bridle Trails. My neighbors  
 6 in Bridle Trails have asked me to speak on their  
 7 behalf in further augmenting previous testimony. I do  
 8 this with caution and one caveat.

007-C-1

9 The EIS is required to substantiate purpose and  
 10 need. Thus as a good corporate citizen, you would  
 11 think that PSE without asking would want this analysis  
 12 done in detail before adding to the record.

007-C-2

13 My caveat is that, unfortunately, to date,  
 14 neither PSE or the EIS team have proven that this  
 15 project is needed. The fact you have removed even the  
 16 slightest analysis of this from Phase 2 and simply  
 17 have referred back to Phase 1 where virtually no  
 18 analysis was done is very troublesome.

007-C-3

19 Once again, we request your team provide current  
 20 Eastside load flow study at the transformer level and  
 21 a current Eastside customer demand forecast with  
 22 numerics and assumptions as part of this EIS. Until  
 23 this is done there can be no serious consideration of  
 24 the alternatives or the environmental impacts.

25 Actually, at this stage of the EIS, one can only

- 007-C-1 Comment noted.
- 007-C-2 See response to comment I131-A-6.
- 007-C-3 Comment noted.



Phase II Draft EIS Hearing - June 3, 2017

4

OO7-C-3

1 conclude that the most cost efficient and effective  
2 course is the No Action Alternative.

OO7-C-4

3 However, my neighbors shared with me their  
4 perspective concerning Energize Eastside. It will  
5 destroy nearly 4,000 trees, grading level acres of  
6 land and plant 100-foot poles beside or on top of two  
7 major pipelines. They told me Energize Eastside  
8 creates both industrial blight and a high-risk  
9 industrial corridor in our beautiful and rural Bridle  
10 Trails neighborhood. Yet for every element in the EIS  
11 the EIS team concludes there are no significant  
12 consequences. My neighbors want you to know that  
13 these types of conclusions defy common sense.

OO7-C-5

14 Secondly, my neighbors say you have completely  
15 downplayed your analysis concerning the impact of  
16 these poles and the visual and aesthetic elements.  
17 These metallic poles are 100 feet high and Bridle  
18 Trails may even tower -- and trees in Bridle Trails  
19 may even tower over some of this. Conversely, the  
20 poles would be over the 100 feet.

OO7-C-6

21 At a minimum then we request the EIS show exact  
22 pole locations exact to truly assess visual  
23 consequences. Currently, your pole aesthetic analysis  
24 and visuals do not account for or portray the current  
25 electrical line, the new safety line and potential

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OO7-C -4 Comment noted. The EIS does acknowledge some of the impacts listed. No poles are planned on top of pipelines, and there would not be a "high-risk industrial corridor" created in the Bridle Trails neighborhood. The EIS also does not conclude that all impacts are less than significant. Potential significant impacts are summarized in Chapter 6 (Significant Unavoidable Adverse Impacts) of the Phase 2 Draft EIS, and the "Summary Sheets" at the end of Chapter 1 summarize impacts by element of the environment.

OO7-C -5 The proposed maximum pole height for the Bellevue North Segment is 100 feet. In some areas, the poles would rise above the tree line; in other areas they would not. This occurrence would be contingent on the height of surrounding trees and the topography. See Section 3.2.5.4 of the Phase 2 Draft EIS for a discussion of impacts in the Bridle Trails area (as part of the Bellevue North Segment).

OO7-C -6 See the response to comment OO7-E-4.

Phase II Draft EIS Hearing - June 3, 2017

5

007-C-6

1 attachments to these poles. While the EIS downplays,  
 2 pole attachment is only going to get worse and further  
 3 add to the industrial blight in our neighborhoods. We  
 4 urge you to acknowledge and explore the implications  
 5 of current routes and attachment programs such as  
 6 A.T.&T.'s using shared power lines to replace  
 7 fiberoptic cables.

007-C-7

8 We want you to consider recent legislation HB  
 9 1233, HB 1921 and 5711 which provides for more freedom  
 10 and less regulatory control over poles, including the  
 11 city. In effect, these poles will provide more  
 12 opportunities like an economic opportunity to  
 13 companies other than PSE to make more money.

007-C-8

14 I might note that the issue of blight was raised  
 15 with industrial-sized poles placed on 24th and 152nd.  
 16 I'll attach this. Ironically, when one of these was  
 17 erected in Lake Hills, the City's Art Commission went  
 18 to the EBCC and proposed a deco on the poles for  
 19 mitigation, of course at our expense. In spite of all  
 20 of this, the EIS states there are basically no  
 21 significant impacts.

007-C-9

22 I have some pictures too. I'm going to run out  
 23 of time here, but there is a person and there is a  
 24 pole. We all know how big those poles are. According  
 25 to the blue poles that are up there, they are huge;

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007-C-7 The referenced legislation is in regard to small scale cellular installations. The project is not expected to provide more opportunities for these facilities than already exist. There would actually be fewer poles than at present. Although taller poles might be more attractive sites for these installations, there would be greater restrictions on when maintenance could occur due to the higher voltage lines. A mitigation measure to limit the number of telecommunication facilities that could be installed on the proposed 230 kV poles is included in the Final EIS, Section 4.2.6.

007-C-8 Blight refers to areas that have been abandoned and fallen into disrepair; the project is not expected to result in blight or other significant impacts to land use. The pole referenced in the comment is located in Redmond and was designed consistent with Art Deco architectural style in response to the Redmond Design Commission recommendations. The Phase 2 Draft EIS did find significant impacts in some areas with regard to visual impacts (Bellevue Central Segment Bypass Options, some Bellevue South options, and Newcastle), and recreation (Bellevue Central Segment Bypass Options). The Final EIS also identifies some, but fewer, potential significant impacts associated with PSE's Proposed Alignment (see Section 4.2.5, as well as Section 8.2).

007-C-9 Comment noted.

Phase II Draft EIS Hearing - June 3, 2017

6

007-C-9

1

they are huge. They have significant impacts.

007-C-10

2

We therefore humbly but urgently ask you that the

3

visual analysis for locations include more views --

4

there's only one Bridle Trails -- nearby distance and

5

area showing the heights of poles related to the tree

6

canopy and environment and more analysis concerning

7

esthetic impacts on the community.

007-C-11

8

Third, while the EIS does consider trees in

9

several chapters, my neighbors say the analysis is

10

inaccurate as to accumulative effect upon environment,

11

including steel tubes, storm water damage, height of

12

trees and views and rights-of-ways and easements

13

and economic impacts. We request a section in one of

14

the chapters specifically summarizing the

15

environmental economic impacts of trees.

007-C-12

16

Fourth, my neighbors are very troubled by the

17

many issues raised concerning vegetation management

18

zones, i.e., tree removal which is 3.4, expansive

19

nature of this based upon a NERC study, questionable

20

as to its authority, but let's not go there. Herein,

21

we point out that the difference between a 115 kV

22

versus 230 kV. Herein you introduce wire zones,

23

managed right-of-way zones and expansive category

24

called danger zones. This is significant. This is a

25

significant difference between today's no action

- 007-C -10 Only one simulation was created for the Bellevue North Segment because, based on the project design and the topographic and vegetation conditions of the segment location, it was determined that one simulation was representative of the entire segment. However, an additional simulation has been drafted to confirm this is the case (see Table 4.2-1 and Figure 4.2-7 of the Final EIS). It was taken from NE 29th Place because that was thought to provide the best example of more contrast along the segment as a result of vegetation removal and curves in the alignment that require slightly larger poles.
- 007-C -11 It is not clear what inaccuracies the comment is referring to. The economic value of lost ecosystem services due to reduced tree cover is included in Section 3.10.4.3 of the Phase 2 Draft EIS.
- 007-C -12 See response to comment 007-B-3.

Phase II Draft EIS Hearing - June 3, 2017

7

1 alternative and Energize Eastside, yet it is buried in  
 2 the EIS. Removal or trimming of the trees is going to  
 3 particularly be expansive, and Bridle Trails will have  
 4 many beautiful 100 plus firs, cedar and hemlocks,  
 5 which incidentally, you should note are not suggested  
 6 as replacement trees because they're too big.

007-C-12

7 Let's put this into perspective. What is really  
 8 being said here is PSE is going to expand the removal  
 9 of trees based upon the criteria, and my neighbors are  
 10 asked to work it out with PSE in the case of  
 11 outside the managed right-of-way to in light of better  
 12 conditions.

13 So it is my hope that if PSE and the City approve  
 14 this project, the property owners will not be stuck  
 15 with working out all of these impacts on his or her  
 16 property. I trust PSE, but they are going to have a  
 17 lot of contractors out there.

18 Let's focus a little bit further. I won't go  
 19 into the economic impacts because we know there are  
 20 significant economic impacts. So my neighbors,  
 21 though, are finally requesting something very simple.

007-C-13

22 PSE actually applies for a permit. We request the  
 23 City of Bellevue provide mitigation guidelines similar  
 24 to the city for PSE and property owners. And we  
 25 request the City appoint an ombudsman to mediate the

007-C-13 As part of permit review, the City of Bellevue will consider this suggestion regarding a means to ensure mitigation such as site restoration after tree removal and tree replacement are completed in a timely manner by PSE.

Phase II Draft EIS Hearing - June 3, 2017

8

1 situations where the property owner and PSE cannot  
2 agree. Mitigation guidelines should provide a dollar  
3 value for all fir, hemlock and cedar trees.

OO7-C-13

4 In conclusion, both myself and Bridle Trails  
5 neighbors request you make the significant changes  
6 that are requested herein before the City take action  
7 on any application.

8 I will add one little anecdotal comment, if you  
9 don't mind. I was recently struck by comments at a  
10 King County Flood Control meeting. Ironically one of  
11 PSE's contractors requested during the submittal of  
12 testimony to do an EIS for them. I was naive and  
13 surprised to hear her say that in a sales context.

OO7-C-14

14 The EIS is basically a process to sell your  
15 proposal. The No Action Alternative is there so  
16 participants reject it and they can move on to the  
17 Preferred Alternative. The longer the process and the  
18 more that you string it out the better off you will be  
19 to be able to have your project proven. And this was  
20 by one of their previous contractors. My caveat is, I  
21 hope this is not the case here. Thank you.

22 MR. MARSH: Hello again. My name is Don  
23 Marsh, and I am president of CENSE, the Coalition of  
24 Eastside Neighborhoods for Sensible Energy, an  
25 all-volunteer organization. For the past three years,

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OO7-C-14 Comment noted.

Phase II Draft EIS Hearing - June 3, 2017

9

1 we have been shedding light on PSE's Energize Eastside  
2 project, engaging multiple industry experts to help us  
3 understand all aspects of this proposal.

4 We have identified seven issues that need to be  
5 corrected in the Phase 2 Draft EIS.

6 One. The Phase 1 Draft EIS stated that the EIS  
7 would be divided into two phases. Quote, The Phase 1  
8 Draft EIS broadly evaluates the general impacts and  
9 implications associated with feasible and reasonable  
10 solutions. The Phase 2 Draft EIS will be a  
11 project-level evaluation, describing impacts at a  
12 site-specific and project-specific level, end quote.

13 From this description, we expected to see a  
14 specific route with specific pole locations and a list  
15 of the specific trees that would be removed. These  
16 are maybe out online. We don't think they are exactly  
17 specific, and they are not included in the document.  
18 So without these specifics, how can the public and how  
19 can the EIS consultants evaluate or comment on the  
20 environmental impacts of this project?

21 We request the cities to publish a Supplemental  
22 EIS when a final route is chosen and the specific  
23 information regarding poles and trees is known.

24 Two. The EIS states it is important to  
25 understand the need for the project, to enable a

OO1-C-1

OO1-C-2

OO1-C -1 See response to comment II14-B-3.

OO1-C -2 As described in the Phase 1 and Phase 2 Draft EISs, an EIS is intended to evaluate the probable significant environmental impacts of a proposed project or program. The EIS does not evaluate whether or not a project is needed, although it does take into account the project objectives in establishing what alternatives should be included. The comment summary included as Appendix J of the Final EIS includes responses to questions regarding the purpose and need for the project (see "Topic OBJ").

Phase II Draft EIS Hearing - June 3, 2017

10

1 thorough understanding of the project's objectives.

2 However, the EIS doesn't include any data or  
3 charts to substantiate the need. It only says that  
4 PSE determined there was a need, and it cites two  
5 outdated documents that are collectively known as the  
6 Eastside Needs Assessment. Eastside demand for  
7 electricity has not increased in the way these  
8 documents assumed.

OO1-C-2

9 We request that the EIS present 10 years of  
10 historical data for Eastside demand and an updated  
11 forecast so the public can observe the trends over  
12 time and develop a thorough understanding of the  
13 project's objectives.

14 Three. The EIS states that Energize Eastside  
15 will improve electrical reliability. The public  
16 understands this to mean there will be fewer or  
17 shorter power outages after the project is built.  
18 However, PSE has stated that Energize Eastside will  
19 not improve reliability metrics for any neighborhood  
20 in Bellevue.

OO1-C-3

21 We request that the EIS quantify the projected  
22 improvement in reliability using an industry standard  
23 metric such as the average reduction in outage  
24 duration per customer per year. Using this metric,  
25 stakeholders can compare the cost effectiveness of

OO1-C-3 There is no standard metric for "rolling blackouts avoided." As described in Chapters 1 and 2 of the of the Phase 1 Draft EIS, PSE's objective is to meet FERC requirements for protecting the regional grid. PSE's planning studies suggest that without additional transmission capacity, meeting FERC requirements could mean placing their Eastside customers at risk of future rolling blackouts, to avoid causing damage to the surrounding grid. PSE wants to avoid rolling blackouts because of the cost and inconvenience they would create for its customers. Attempting to specifically predict or estimate the probability of events that could lead to load shedding is nearly impossible because of the number of potential events that could cause a piece of the transmission system to go out of service.

Phase II Draft EIS Hearing - June 3, 2017

11

OO1-C-3

1 PSE's preferred solution with other alternatives.

OO1-C-4

2 Four. The EIS references a report on pipeline  
 3 safety produced by the safety consultant DNV GL.  
 4 However, the EIS does not highlight the two top  
 5 findings of the report. First, that PSE's preferred  
 6 route known as Willow 2 violates safety standards and  
 7 has an unpredictable risk range. Second, that PSE's  
 8 alternate route, Willow 1, would not be safe without  
 9 significant design changes. These are important  
 10 factors in the choice of routes and the safety of  
 11 nearby homes and schools.

OO1-C-5

12 We request that the EIS specifically describe how  
 13 DNV GL's recommendations will be incorporated into the  
 14 project's design.  
 15 Five. The EIS states that seismic hazards are  
 16 less than significant and do not require further  
 17 study. The public still has unanswered questions.  
 18 What might happen if the Seattle fault, which roughly  
 19 parallels the I-90 freeway, were to slip up to 10  
 20 feet during a major earthquake? Would the Olympic  
 21 Pipelines running perpendicular to the fault be  
 22 ruptured? Would higher voltage levels and bigger  
 23 poles made of conductive steel pose any greater risk  
 24 of igniting a catastrophic fire? A man-made  
 25 catastrophe might follow a natural disaster, requiring

- OO1-C -4 See response to comment OO1-A-4.
- OO1-C -5 See response to comment I120-A-1 for information on seismic hazards.

Phase II Draft EIS Hearing - June 3, 2017

12

1 the attention of emergency responders at the same time  
2 they are needed elsewhere.

OO1-C-5

3 We request that the EIS quantify how much  
4 Energize Eastside might increase risk in these  
5 circumstances.

OO1-C-6

6 Six. The EIS states that the Eastside will face  
7 rolling blackouts in the summer of 2018. Even though  
8 we disagree with that prediction, the only solution  
9 that could be built fast enough to meet that timeline  
10 is a grid battery. PSE says its Richards Creek  
11 substation would take 18 months to build. Even if  
12 construction began today, the substation would not be  
13 operational by next summer. PSE's solution does not  
14 meet the company's required timeline and must be  
15 eliminated as a viable alternative to address the  
16 stated need.

OO1-C-7

17 We request that the EIS re-evaluate the potential  
18 of batteries using current data from grid battery  
19 installations such as the one Tesla built in Southern  
20 California to protect customers from rolling  
21 blackouts. That battery started operation just three  
22 months after the contract was signed.

OO1-C-8

23 Finally, seven. Last week the Bonneville Power  
24 Administration canceled a \$1.2 billion dollar  
25 transmission line in southwestern Washington that

OO1-C -6 See response to comment OO1-A-6.

OO1-C -7 See response to comment II15-A-2.

OO1-C -8 The BPA project is a separate project governed by a different set of objectives. PSE's determination of purpose and need was developed to address a transmission shortfall specifically within the Eastside area. BPA's determination to cancel its transmission line project does not affect PSE's pursuit of the Energize Eastside project.

Phase II Draft EIS Hearing - June 3, 2017

13

OO1-C-8

1 would have carried increased electricity to  
 2 California. Changing demand forecasts reduced the  
 3 need for that line. Instead, the agency found it  
 4 could save customers hundreds of millions of dollars  
 5 by employing modern technology such as flow control  
 6 devices and grid batteries.

7 We request that the EIS examine how BPA's  
 8 reasoning applies to PSE's proposal.

9 Thank you for considering these changes. We  
 10 look forward to answers in the Final EIS or  
 11 Supplemental EIS.

12 MR. JOY: My name is George Joy. I live  
 13 in a residence in Kirkland, 13536 Northeast 66th  
 14 Street. I'm here as a homeowner. My house happens to  
 15 be immediately west of the proposed layout for the new  
 16 line.

17 I just wanted to second what I heard before about  
 18 several aspects, but I just want to pick on one or  
 19 two, which for me is the visual impact is of critical  
 20 concern. There are existing poles going through the  
 21 same access path, and they are, I think -- I don't  
 22 know what the height is, but they're clearly  
 23 substantially shorter than the proposed poles of 100  
 24 feet tall.

II72-A-1

25 And to me, the ability to actually assess what

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II72-A-1 The approximate locations of the poles are provided in Appendix A of the Phase 2 Draft EIS. The height and width of poles, the width of the wire and number of wires, as well as the potential for underbuild is described in Chapter 2 of the Phase 2 Draft EIS. Refined pole location data are provided for PSE's Proposed Alignment in the Final EIS (see Chapter 2 and Appendix A), and accessible on the EIS project website ([www.energizeeastsideeis.org](http://www.energizeeastsideeis.org)) for the public to review.

Phase II Draft EIS Hearing - June 3, 2017

14

1 the effect of the industrial grade poles would be on  
 2 my immediate household is very hard without knowing  
 3 the actual location of the poles, the height of the  
 4 poles, the width of the poles, the number of wires  
 5 that is strung between the poles, the width of those  
 6 wires and whether the wires are going to be -- those  
 7 cables are going to be in a final state or can we  
 8 expect in subsequent years to have additional cables  
 9 added, whether they are electrical or of a telecom  
 10 nature.

II72-A-1

11 All of these are particularly concerning to me  
 12 especially because it seems like I don't have even any  
 13 way to make a statement what that could be. But I've  
 14 seen numbers for how this could affect property  
 15 values. I think they're varied. I've seen numbers of  
 16 like five percent. And that's a substantial hit on  
 17 somebody's house who happens to be located near the  
 18 proposed line. It could be \$50,000, \$100,000. So  
 19 that's the kind of loss I'm looking at if I choose to  
 20 resell my house.

II72-A-2

21 I'd like to know what the PSE's plan is to take  
 22 care of homeowners like myself. Thank you.

23 MS. PALTIEL: My name is Joy Paltiel. I  
 24 live in Bellevue, Washington, 13615 Southeast 58th  
 25 Place.

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II72-A-2 The comment summary included as Appendix J of the Final EIS includes responses to comments on the Phase 1 Draft EIS, including questions regarding depreciation of property values. For more information, see Topic Econ - Key Theme 1.

Phase II Draft EIS Hearing - June 3, 2017

15

1 I'm curious to know if PSE will accept any  
2 financial responsibility should poles fall, should  
3 there be damage in the construction of this. I just  
4 want to know because it seems like we as a community  
5 as Washington state are accepting a lot of the  
6 responsibility for what it is doing. I want to know  
7 what PSE is willing to give and what responsibility as  
8 far as insurance, as far as if there is a mess made by  
9 it, do you fix it. Thank you.

10 MR. ANDERSEN: Hi. Todd Andersen, 4419  
11 138th Avenue Southeast, Bellevue. Washington. Given  
12 that this response of this audience is relatively  
13 small, I want to let you know what the legal facts are  
14 that have been proven by Pacific Gas and Electricity.

15 THE FACILITATOR: Can you turn around and  
16 speak?

17 MR. ANDERSEN: I want to speak to who  
18 matters.

19 THE FACILITATOR: Sir, we need to capture  
20 this.

21 MR. ANDERSEN: If PSE commits fraud on this  
22 event and they're convicted of it, their maximum  
23 federal fine is \$3 million. And if you think that I'm  
24 just pulling it out of the air, research the San Bruno  
25 fire that happened in San Francisco, which I could see

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II73-A-1 The role of the EIS is to provide information about the environmental consequences. Issues of assuring financial responsibility may also be considered in the permit process.

II73-A-1

Phase II Draft EIS Hearing - June 3, 2017

16

1 over Senator Dianne Feinstein's house, I could see the  
2 fire, the fine -- they were convicted, Pacific Gas and  
3 Electric was convicted of six criminal offenses. The  
4 first federal judge fined them over a half a billion  
5 dollars. And the highest, the judge gave them the  
6 highest fine he could give them for six convictions.  
7 Killed eight people, injured 64, vaporized 38 houses.  
8 The maximum fine he could give them was \$3 million.  
9 He did make the CEO and six executives do 10,000 hours  
10 of community service.

11 So that's what you're looking at. All of you who  
12 are in these neighborhoods who are not part of this  
13 fight, you need to be out there, because this disaster  
14 is far greater than you think. If you review the  
15 pipeline safety proposal, it is so fraudulent on so  
16 many fronts. And this history goes back more than 100  
17 years if you look at the entire history of the fossil  
18 fuel industry.

19 I have land in the middle of it, so I'm  
20 speaking against my economic book. But when you go  
21 look at the history of squashing the regulatory  
22 process, it's just decade after decade after decade of  
23 fraud and corruption. I encourage you to read a wide  
24 variety of books on it. (Author's name indiscernible.)  
25 You should read the history pages of her book, because

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Phase II Draft EIS Hearing - June 3, 2017

17

1 she's quite excellent on it, but there are a ton of  
 2 them. But unless people get involved, when the next  
 3 earthquake happens these power lines will further  
 4 accelerate the corrosion and the stress corrosion on  
 5 those pipes. It's not even mentioned in any of these  
 6 documents. But if you go to any pipeline technology  
 7 journal, there's thousands of pages on stress.

8 All it's going to do is make the slightest  
 9 earthquake pop, and when that pops -- I did fire  
 10 protection testing in the military, and I limited all  
 11 of my engineers to 40 gallons of jet fuel. And at a  
 12 bare minimum this is going to put in 100,000 gallons.  
 13 The last time it popped it was over 200,000 gallons.  
 14 And the fire department won't put that out, because an  
 15 earthquake will pop in multiple places, and even if  
 16 all the pumps are turned off just the flow of the  
 17 hills will push out 500 psi of fuel. And you're going  
 18 to have the entire Eastside lit up.

19 So what's happening here is concentration of  
 20 energy. There is a concentration of further energy  
 21 infrastructure, and there's lots of congressmen who  
 22 had this happen to them when they were mayors that  
 23 have been trying to get this going, both on the hard  
 24 core conservative and hard core liberal side. But the  
 25 oil industry doesn't want anybody to look at it. So

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II47-D -1 The project would not increase the risk due to seismic activity. With implementation of the mitigation measures described in Section 3.9.7 of the Phase 2 Draft EIS, conditions related to potential for fault damage on the pipeline due to coating degradation and arc distances would likely improve over the existing operational baseline risk (see Section 3.9.5.4). Also, the pipeline operator is responsible for safe operation of the pipeline. If an earthquake damaged the pipeline coating to the extent that the pipeline was vulnerable to corrosion, it would be the pipeline operator's responsibility to protect the pipeline.

II47-D-1

Phase II Draft EIS Hearing - June 3, 2017

18

1 that's all. Thank you.

2 MS. NICKOLS: My name is Michelle Nickols.  
3 I live in Redmond at 8204 133rd Avenue Northeast.

4 I'm not very technical about all these things but  
5 I just read a few studies about co-relation with power  
6 lines like this and the electromagnetic field and the  
7 effects on health for people living in the nearby  
8 area. And I'm just generally concerned about my  
9 family and my kids growing up living next to these  
10 power lines.

11 So I'm just wondering what exactly has been  
12 researched in this area and if there is any particular  
13 documents that I could look up and what research has  
14 been done. Thanks.

15 MS. LOPEZ: Loretta Lopez, 13419 Northeast  
16 33rd Lane, Bellevue, 98005. I'm the vice president of  
17 Bridle Trails Community Club.

18 And I'll start with Bridle Trails Community Club  
19 became involved with the issue of electrical  
20 reliability in 2007, 2006. We persuaded the City of  
21 Bellevue to conduct finally a feasibility and a  
22 reliability study. One of the results of that  
23 electric reliability study ERS issued in 2008 was that  
24 the City needed to hire someone. There was no one on  
25 the City staff who was capable and had technical

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I174-A-1 Extensive health studies have not found a causal link between adverse health effects and EMF from electrical transmission lines (see Section 8.6.1.4 of the Phase 1 Draft EIS). In addition, the Phase 2 Draft EIS reported that calculated magnetic field levels generated by the proposed project would be well below reference guidelines.

I174-A-1

Phase II Draft EIS Hearing - June 3, 2017

19

1 expertise with respect to electrical reliability,  
2 actually with respect to transmission with respect  
3 with anything to do with power transmission.

II31-C-1

4 The Bridle Trails Community Club has continued to  
5 ask the City to hire someone if only as a part-time  
6 consultant. The City has not done that. And the  
7 reason I raise this is this: It is not -- the City of  
8 Bellevue as the lead city on the EIS is clearly not  
9 able to assess deficiencies, electrical reliability,  
10 transmission issues. And yet the City should and we  
11 expect the City to stand as our representative to  
12 assess what PSE is proposing. Clearly the City does  
13 not have the capability to do that.

II31-C-2

14 And that's one of the fundamental problems with  
15 this EIS. PSE has a burden of proof on this issue.  
16 The citizens do not have to prove, how shall I say, we  
17 do not have the burden of proof. PSE has to prove  
18 that they, in fact, need to build this and we've gone  
19 over this many times. The City's position is that  
20 this EIS does not address, does not have to address  
21 the need, and our position is that simply cannot be.

22 The City of Bellevue needs to make sure that PSE  
23 proves, not just asserts, proves. And what does proof  
24 mean? Proof means the numbers, proof means that we  
25 have transparency.

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II31-C-1 Comment noted.

II31-C-2 See response to comment II31-A-6.

Phase II Draft EIS Hearing - June 3, 2017

20

1 We have many, many engineers and a lot of brain  
 2 power in this community. What we need is the numbers,  
 3 because we cannot assess this without those numbers.  
 4 And the City has consistently failed to provide those  
 5 numbers for us. This EIS cannot proceed until we see  
 6 the numbers and we can analyze them.

7 With respect to some of the points that are made  
 8 in the EIS, in particular the conclusion that there's  
 9 no significant impact in Bridle Trails as a result of  
 10 this proposed project, I don't understand what the  
 11 definition of significant is then, and so I would like  
 12 something that's more objective with respect to how  
 13 does one assess -- how is significance assessed in  
 14 this EIS.

15 And then, of course, my grave disappointment in  
 16 this whole process that has taken millions of dollars,  
 17 thousands of volunteer hours, and yet we still don't  
 18 have the answers. We have graciously and respectfully  
 19 asked for those answers and we have been rejected  
 20 every single time. I can't imagine why. And I wonder  
 21 why is it, what is it, what is it about this that is  
 22 so secret? What is it? Why can't we look at the  
 23 numbers? Why do we have to believe the statements of  
 24 PSE?

25 And I can't imagine that the City of Bellevue

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- II31-C-3 The significance criteria are included in each section presenting the impacts to the various elements of the environments in the subsections labeled as "Magnitude of Impact."
- II31-C-4 See response to comment II31-A-6.

II31-C-3

II31-C-4



Phase II Draft EIS Hearing - June 3, 2017

21

1 employees would try to block us because that's not  
2 what the City does. The City encourages  
3 participation, engagement with its citizens. And so  
4 the big question here in my mind is what is going on  
5 and why. There is a very simple solution to all of  
6 this. Give us the numbers so that we can review them.  
7 Thank you.

8 (Public comments concluded at 3:15 p.m.)  
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