



Phase 1 Draft EIS Comment Summary Report

April 14, 2016

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Introduction

The Energize Eastside project is a Puget Sound Energy (PSE) proposal to construct new electrical transmission lines and install a new high-voltage transformer to serve PSE customers in the area between Lake Washington and Lake Sammamish, in King County, Washington. Additional information on the proposed project can be found on PSE’s website at www.EnergizeEastside.com.

The City of Bellevue, as the State Environmental Policy Act (SEPA) nominal Lead Agency for PSE’s Energize Eastside project, is overseeing preparation of a phased Environmental Impact Statement (EIS) for the proposal. The City of Bellevue is overseeing this process in cooperation with the jurisdictions of Kirkland, Newcastle, Redmond, and Renton (collectively with Bellevue referred to as the Partner Cities). Where this document refers to “the City,” it refers to the Lead Agency as a representative of the Partner Cities. Where this document refers to the “City of Bellevue,” it refers only to that individual jurisdiction.

This report summarizes the comments received by the City of Bellevue on the Phase 1 Draft EIS, including written comments submitted via letters, the EIS project website, and emails, as well as oral testimony provided at five public meetings. The written comments received and the transcripts of oral comments were collated and are summarized within this report (see the City of Bellevue EIS project website at www.EnergizeEastsideEIS.org for submitted comments and testimony). This report identifies key themes that emerged from the comments and provides general responses to those key themes.

This comment summary document is not a part of the EIS, but it is being provided to the public and decision-makers to help guide the Phase 2 scoping process. As the next step, the Partner Cities will make a preliminary determination about which alternatives should be carried forward into the more detailed Phase 2 Draft EIS, and what elements of the environment should be evaluated. The City will conduct a second 45-day scoping process (mirroring the scoping process for Phase 1) for the Phase 2 Draft EIS. The Phase 2 Draft EIS will evaluate those alternatives carried forward for more detailed review, and will articulate the reasoning and basis if one or more alternative(s) are not being carried forward.

The Phase 2 Draft EIS will include a project-level and geographically referenced review of PSE’s proposed transmission routes and reasonable alternatives. Responses to individual comments on both the Phase 1 Draft EIS and Phase 2 Draft EIS will be provided later in the Final EIS.

What has been the public comment process to date?

The City of Bellevue determined, and PSE agreed, that an EIS is needed for the proposal. PSE submitted an application for processing of an EIS to the City of Bellevue on August 19, 2014, because Bellevue is the jurisdiction where the majority of the proposal would be located. Submittal of this application triggered the start of the SEPA process, and the five Cities with jurisdiction agreed that the City of Bellevue would be the nominal Lead Agency for the SEPA process. The scoping period began on April

How can the public continue to stay involved in the EIS process?

The next formal opportunity for public involvement in the SEPA process will occur with publication of the Scoping Notice for the Phase 2 Draft EIS, currently planned for April 14, 2016. The project website will provide up-to-date information on project status and schedule.

30, 2015, when the City of Bellevue issued a Determination of Significance and Scoping Notice for the proposal and closed on June 15, 2015. The Phase 1 Draft EIS Scoping Report summarizes the scoping process (see the City of Bellevue EIS project website at www.EnergizeEastsideEIS.org for a copy of this document).

On January 28, 2016, the City published the Phase 1 Draft EIS. The Phase 1 Draft EIS was a non-project or programmatic EIS that assessed the range of impacts associated with broad options for addressing PSE’s objectives, including alternatives and options that could potentially meet PSE’s objectives at a lower environmental cost. As required under SEPA, the publication of the Phase 1 Draft EIS was followed by a 45-day public comment period (WAC 197-11-455), which ended March 14, 2016. During this time, the public, agencies, and interested tribes were invited to review and provide comments on the document and participate in public hearings.

Five public meetings were held at different locations throughout the Eastside during the public comment period. Each meeting included an open house with information provided about the proposal and an opportunity for the public to talk to City and consultant staff, as well as PSE staff; a presentation describing the proposal, Phase 1 Draft EIS alternatives, and the EIS process; and a public hearing to take oral testimony on the Draft EIS. During the public hearing, oral scoping comments were recorded by a court reporter in the form of a hearing transcript. Hearing transcripts have been posted on the City of Bellevue EIS project website (www.EnergizeEastsideEIS.org).

The City received over 500 comments in the form of website forms, emails, oral testimony, and letters, many of which included attachments. Most of these comments were provided by email and oral testimony (Figure 1).

Comments were submitted by 1,068 individuals. Individuals who provided their names on a petition that was submitted as a single attachment to one comment letter are all included in this count. Of these, 456 signatories added individual comments to the petition. Of the 1,068 individual commenters, some submitted multiple website forms and/or spoke at more than one scoping meeting and are only counted once in this total. Some individuals submitted duplicate forms, emails, and letters. Some duplicate comments may not be represented in the total comment tally if the same comment appeared to have been submitted multiple times.

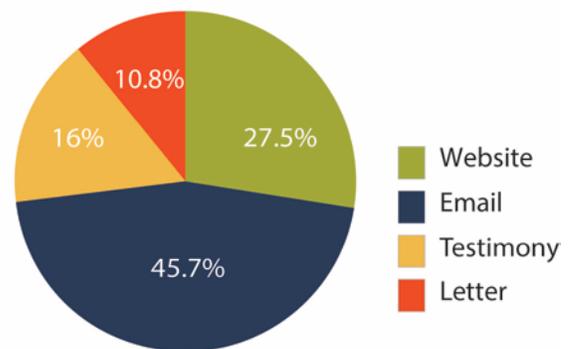


Figure 1. Comment by Type

The City also received comments from 26 different organizations (e.g., homeowner associations), 6 public agencies, and 1 Tribe (Figure 2). A comment received from an organization, the Coalition of Eastside Neighborhoods for Sensible Energy (CENSE), referenced 50 comment letters included as an attachment.



Figure 2. Number of Commenters

These written and testimony comments contained individual comments that covered a range of topics or themes. The topics or themes mentioned the most frequently are shown in Figure 3.

What are the next steps?

Following the close of the 45-day comment period on the Phase 1 Draft EIS, the City will conduct a second 45-day scoping process (mirroring the scoping process for Phase 1) for the Phase 2 Draft EIS, which will be used to refine the information included in the second Draft EIS. The Phase 2 Draft EIS will include a project-level and geographically referenced review of PSE’s proposed transmission route and alternatives.

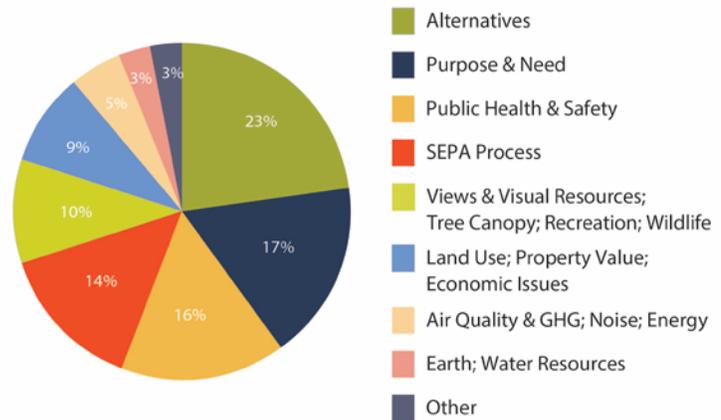


Figure 3. Comment by Major Topic

Following publication of the Phase 2 Draft EIS, another 45-day comment period will be provided. Information from the public and other stakeholders will be used to help improve the EIS before it is finalized. At the close of this comment period, a Final EIS will be prepared.

Summary of public comments on the Phase 1 Draft EIS

The following is a summary of public comments received on the Phase 1 Draft EIS from individuals, organized groups, and business interests. The comment summary identifies key themes that emerged from the comments and includes general responses to those key themes. Letters and comments from agencies and Tribes were reviewed and are summarized individually (see “*Summary of Agency and Tribal Comments on the Phase 1 Draft EIS*”). For the purposes of this summary memo, these comment summaries and responses are necessarily general and high-level. The Final EIS will include specific responses to the substantive issues presented in the comments received on the Phase 1 Draft EIS and Phase 2 Draft EIS.

The submitted comments reflected a wide variety of requests, perspectives, issues of concern, and ideas. Many comments were statements of either support or opposition to the project or particular alternatives. Most comments expressed concern about or opposition to PSE’s proposal, although some individuals and organizations did express support. Other than expressing opposition or support for the proposal, the comments generally fit into one or more of the following 10 major topics:

1. EIS process and content (including the level of appropriate detail and questions about the agency decision-making process).
2. Purpose and need for the project.
3. Alternatives evaluated in EIS.
4. Public health and safety (particular focus on issues related to Olympic Pipeline).
5. Earth.

6. Tree canopy, recreation, and wildlife.
7. Air quality and greenhouse gases.
8. Views and visual resources.
9. Noise.
10. Land use, property values, and economic issues.

From these major topics, key themes that emerged from the comments are identified. For each key theme there is a brief narrative summarizing the theme and the range of comments addressing that theme, and a response to the issues raised in the comments.

PSE (the applicant) commented on several aspects of the Phase 1 Draft EIS. PSE comments primarily focused on the analysis, impact conclusions, and mitigation measures. PSE also addressed questions raised by the public on the need for the project. Other comments reassert PSE's preference for Alternative 1, Option A, and use of existing corridors where possible. These comments are briefly summarized under the relevant key themes below.

Several commenters provided comments directed at the City's overall decision-making process or project process. Many of these comments were not directly related to the SEPA process or Phase 1 Draft EIS. These included comments requesting a transparent and equitable decision-making process and access to all unredacted project data and documentation. These comments, to the extent they were related to the EIS process, are summarized below.

Topic 1 – EIS Process and Content

This issue includes comments related to the overall adequacy of the material presented in the Phase 1 Draft EIS, as opposed to comments addressing the adequacy of resource-specific technical content. Many of the comments in this category are similar to those provided during scoping.

Key Theme 1-1: Objectivity and overall adequacy of the Draft EIS

The comments under this theme included general criticism or concern regarding the objectivity of the Phase 1 Draft EIS, based on technical material included within the Draft EIS, or based on the assessment of impacts. This group of comments includes specific statements that the Phase 1 Draft EIS did not include an independent evaluation of the need for the project and did not put forth viable alternatives to PSE's proposal, and therefore was not objective and/or displayed bias in favor of the applicant. Another theme among these comments was that the Phase 1 Draft EIS was inadequate in general, including specific statements that the Draft EIS minimized the project's environmental effects, included inaccurate or incomplete information, or simply that the Draft EIS had many deficiencies, such as unsupported opinions and unsupported summary conclusions.

Response:

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. 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 EIS's. The consultant team is working with the City on the City's behalf to evaluate the proposal according to the City's adopted SEPA policies.

As outlined in WAC 197-11-060 (3)(a), it is the responsibility of the Lead Agency to make certain that a proposal that is the subject of environmental review is properly defined. The process of defining the proposal includes a complete and impartial understanding of the need for the project, to enable a thorough understanding of the project's objectives and technical requirements, and in order to accurately identify feasible and reasonable project alternatives for consideration in the EIS. As noted in WAC 197-11-060(3)(a)(iii), proposals should be described in ways that encourage considering and comparing alternatives, and agencies are encouraged to describe proposals in terms of objectives rather than preferred solutions. An understanding of the need for the project helps in clarifying the objectives that have been used to develop the broad alternatives. Specific responses to questions about the need for the project are provided under *Topic 2: Purpose and Need*.

This EIS will not be used to reject or validate the need for the proposal. Rather, 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 all alternatives identified.

The opinions of commenters concerning the completeness and adequacy of the Phase 1 Draft EIS are noted. The City believes that the Draft EIS contains a reasonably thorough analysis of the potential environmental impacts of the project, as required by SEPA. As discussed in the Phase 1 Draft EIS, environmental information was compiled based primarily on literature reviews and communications with knowledgeable resource agencies. Any assumptions made in the analysis were explained so that the reader could understand what was assumed and why. Every attempt was made to use the most current data and information reasonably available prior to publication. Specific issues with the Phase 1 Draft EIS analysis that are raised in these comments are addressed below in the appropriate topic and key themes sections.

Key Theme 1-2: SEPA process, including phased EIS

The comments under this theme addressed various aspects of the SEPA process for the project. Many commenters expressed criticism of the phased environmental review process. This group of comments includes specific statements that in order to conduct a true phased review, the City would prepare a Phase 1 Final EIS following the comment period on the Phase 1 Draft EIS, and would use the analysis in the Phase 1 Final EIS to narrow the range of alternatives to be analyzed in Phase 2.

Several commenters stated that the length of the document was overwhelming. One comment noted that the document exceeds 150 pages when WAC 197-11-425(4) states in part: "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." The commenter requested that future iterations of the EIS be limited to no more than 150 pages, with detailed information in appendices. Several commenters requested that the City extend the Draft EIS comment period to allow people more time to review the EIS and background documents before submitting comments.

Several commenters requested that the City pause the EIS process and further review the need for this project.

Several commenters said the length of the SEPA process is frustrating for landowners who feel they cannot make major decisions about their properties until a final decision is made about the proposal.

Response:

The City acknowledges the opinions of the commenters concerning the sufficiency of the Draft EIS and SEPA process. As described in Section 1.5 of the Phase 1 Draft EIS, the Phase 1 Draft EIS is the first phase of a two-phase Draft EIS process to evaluate the potential for significant environmental impacts. 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 will be made, or is required, following the release of the Phase 1 Draft EIS; therefore, no action was taken under the purview of SEPA. As such, the City believes that a programmatic EIS was not required. The information presented in the Phase 1 Draft EIS is intended to help determine the scope of issues to be covered in the Phase 2 Draft EIS, and to ensure that the decision-making process is transparent and equitable consistent with the commitment made by the City to the public.

The Phase 1 Draft EIS contains a reasonably thorough but broad discussion of the potential environmental impacts of the range of options available to address PSE's identified objectives for the project. The Phase 1 Draft EIS, together with the Phase 2 Draft EIS, will contribute to meaningful analysis of the project, reasonable alternatives to PSE's proposal, and its impacts, as required by SEPA.

The City acknowledges that the Phase 1 Draft EIS exceeded 150 pages. This was due to the complexity of the information considered, the number and variety of alternatives evaluated, and the extent of the geographic area considered (in particular, the number of local jurisdictions that could potentially be affected by the project, each with its own policy and regulatory framework). The City notes that the length of the EIS is not uncommon when compared against other similarly complex EIS documents. The summary information provided in Chapter 1 is intended to provide information that can assist the public in its review. The Phase 2 Draft EIS will consider a more focused project scope, and every effort will be made to limit the Draft EIS text, with technical information provided in appendices.

The City provided a 45-day public review and comment period for the Phase 1 Draft EIS, which is consistent with SEPA regulations for allowing adequate time for Draft EIS review and comment. The City provided timely and broad distribution of the Phase 1 Draft EIS, wide noticing, web postings, and periodic updates to encourage public awareness of the Draft EIS and comment period. The Partner Cities also posted the Phase 1 Draft EIS on the agencies' websites and held five public meetings on the Draft EIS.

Concerning the request to pause the EIS process to further review the project need, the City must evaluate PSE's proposal to construct 230 kilovolt (kV) overhead transmission lines. The City does not have the authority under SEPA to make a determination that there is no need for a proposal or to change the applicant's objectives and proposal for purposes of review under SEPA (see the responses under *Topic 2 – Purpose and Need*). Rather, its role is to understand the proponents' objectives and evaluate reasonable alternatives which meet the proposal's objective at a lower environmental cost.

The City acknowledges that the SEPA EIS process can be lengthy. The time needed to review a proposal and prepare an EIS depends on the complexity of the project, the amount of information

already available, and the need to complete additional analysis or studies. SEPA rules also place specific requirements on public comment periods. As part of the process, the City and EIS Consultant Team must have sufficient time to review and analyze the proposal, develop alternatives, conduct analysis, and prepare the EIS. The City and the other Partner Cities will use the information in the EIS when making decisions to approve, deny, or place conditions on any future application submitted by PSE. Agencies can review permit applications concurrent with the SEPA process but cannot make permitting decision until after the Final EIS is issued.

Key Theme 1-3: Completeness of Draft EIS scope

The comments under this theme include a variety of issues related to the completeness of the Phase 1 Draft EIS scope. These comments included questions about the incorporation of scoping comments, requests for additional information on economic impacts, and requests for a comparison of alternatives through the lens of reliability vs. costs (both monetary and environmental impacts).

Comments relating to incorporation of scoping comments stated that the Phase 1 Draft EIS does not meaningfully consider all scoping comments. Commenters identified a number of scoping comments, including comments stating positions on specific alternatives that they assert were either not addressed, or addressed in a cursory fashion.

Several commenters requested that the analysis weigh potential effects of the alternatives on different resources against electric reliability. Some comments stated that reduced reliability would be preferable to the impacts associated with constructing and operating the project (Alternative 1, Option A mentioned specifically). Other commenters requested that the analysis weigh the relative costs between the alternatives and include an examination of the most cost-effective and most fair cost allocation of alternatives. One comment reflecting this topic stated that the City has a fiduciary duty to its citizens to explore all viable alternatives for reliable, affordable electricity, and that the project will have substantial impacts to Eastside residents for the benefit of foreign investors.

At least one commenter stated that for each alternative/option considered, there should be a preliminary quantitative assessment of the impact on PSE's tariff and rate schedules and a preliminary lifecycle cost estimate.

Several commenters stated they were concerned that they would experience utility rate increases and have to pay for the construction of the transmission line. These commenters often expressed that they would unfairly be bearing a cost burden for the benefit of PSE shareholders and energy users in Canada and California (see also Key Theme 2-1: Objectives of proposal (to address reliability issues or to increase capacity for other purposes). These comments were similar to, or the same as, comments made during scoping.

Response:

Under SEPA, decision-makers in the permit process are not required to choose the alternative with the least impacts identified in an EIS. The EIS is intended to provide decision-makers with options (within their jurisdiction or regulatory authority to impose) that could reduce or eliminate some or all of the impacts of the project. An EIS is not intended to be a cost-benefit analysis for a project; rather, an EIS is intended to provide environmental information to be considered alongside economic and other policy considerations in reviewing projects that could significantly impact the environment. An EIS can include economic information at the discretion of the Lead Agency, but such economic information is not required.

The scoping comments received for the Phase 1 Draft EIS were considered in determining the alternatives studied in the Phase 1 Draft EIS. This consideration took into account what technically viable alternatives should be included and what issues are important for the range of considerations in the Draft EIS. For example, Alternative 2 considered a number of components that were requested to be considered together as a way to generate a viable alternative to new transmission lines. The Draft EIS follows the SEPA direction (WAC 197-11-402) that an EIS should analyze only probable, significant adverse impacts and that the discussion of insignificant impacts is not required (and if included it should be brief). Accordingly, the Draft EIS does not address or only briefly addresses impacts that are speculative and not probable, or probable but insignificant.

For the Phase 1 Draft EIS, the City determined that it was not feasible to develop sufficiently detailed information on the relative costs associated with all alternatives because the alternatives were very broadly defined, and costs could vary widely depending on system components, design, and location. Without such detail, it would also not be possible to compare the effects on utility rates. The City did determine that a preliminary assessment could be made of how significant the effects could be on property taxes due to changes in property values, and therefore whether the project would be likely to adversely affect budgets for public services. Additional economic information could be included in the Phase 2 analysis since it will address a specific project design. That determination will be made during the scoping process for the Phase 2 Draft EIS. It is not expected that the EIS will evaluate who would profit from the project.

Several commenters requested that the analysis weigh potential environmental impacts against PSE's objectives. Other commenters requested that the analysis weigh the relative costs among the alternatives. The City acknowledges that this project is being undertaken to supply future electrical capacity and improve the reliability of the Eastside's electrical grid as described in Section 1.3 of the Phase 1 Draft EIS, What is the Purpose and Need for the Energize Eastside Project? Environmental impacts and fiscal responsibility are important factors considered in deciding how to achieve those goals, but they are not the reasons why this project is being undertaken; therefore, they were not included as elements of the purpose and need.

Topic 2 – Purpose and Need

This topic includes comments related to the overall purpose and need for the project as presented in Chapter 2 of the Phase 1 Draft EIS. Many comments are similar to comments raised during Phase 1 Draft EIS scoping.

Key Theme 2-1: Objectives of proposal (to address reliability issues or to increase capacity for other purposes)

This group of comments includes questions about the overall objectives of PSE's proposal. Comments about specific planning data and assumptions are addressed below under Key Theme 2-2: Disagreement with PSE's planning data and assumptions and how they define project need.

Numerous commenters questioned the need for the project and PSE's motives for the project. These included specific comments requesting clarification of the need and whether it is related to growth and/or reliability/peak demand, and the size of the need and timing of the need. Several expressed doubt that the demand is well justified by the studies examined by the EIS Consultant Team, and requested that each of the issues be supported with more detail. Numerous comments expressed doubt that the purpose was honest in depicting the intention of the project. Some commenters stated

that PSE is incentivized to build an expensive, oversized solution to the problem because it leads to higher returns on equity.

Commenters stated that PSE has provided inconsistent or confusing reasons to justify the purpose and need for the project. One comment suggests PSE has conflated separate issues related to transmission capacity deficiency (load growth) and peak demand assumptions. It was further suggested that these two issues have separate solutions, and that conflating these issues has limited the examination of viable alternatives in the Draft EIS.

Several commenters made statements and raised questions about whether there is a direct relationship between Bonneville Power Administration (BPA) and PSE facilities, whether BPA and PSE have made arrangements to avoid cost allocation and NEPA requirements for the project, and whether PSE has appropriately defined the project purpose. The following is a sample of the most frequently provided comments.

- Commenters alluded to a PSE objective to transmit and sell electrical power outside of PSE's service area (to Canada and California) and questioned how that expands the project need and scope from PSE's stated project intent.
- Commenters questioned how much of the project's need is based on the ability to participate in additional power "wheeling" outside the region.
- Commenters suggested by not including the Energize Eastside project in the regional transmission plan, PSE avoids FERC Order 1000 compliance and side-steps NEPA review.
- Commenters asserted that the Phase 1 Draft EIS does not adequately address appropriate cost allocation for this project.
- Commenters suggested the project is for the benefit of a foreign-based hedge fund in Australia and that PSE customers will pay and Eastside communities will suffer impacts.

Response:

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 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. Also, an EIS is not a permit, although it is intended to be used by officials making decisions about whether to approve, deny, or conditionally approve permits for a project.

SEPA requires that the City evaluate the proposal as described by the applicant. Therefore, the EIS must evaluate PSE's proposal to construct 230 kV overhead transmission lines and does not have the authority to question PSE's motives or change the applicant's proposal for purposes of review under SEPA. The City does have the responsibility to ensure that the evaluations are based on reasonable assumptions that are developed using industry standard methods. The City has done so by having qualified electric engineering professionals review planning methods and assumptions.

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 and PSE has a regulatory responsibility to keep power moving through the grid.

Comments and questions regarding FERC Order 1000 cost allocation requirements and related NEPA review were previously raised in a complaint directed to FERC and have previously been addressed by FERC (see “Letter Clarifying Bonneville Power Administration’s role in Energize Eastside” and “Letter Clarifying ColumbiaGrid’s role in Energize Eastside” within the documents section of the City of Bellevue EIS project website: www.EnergizeEastsideEIS.org).

Key Theme 2-2: Disagreement with PSE’s planning data and assumptions and how they define project need

Several commenters requested further data and independent analysis to ascertain the validity of the first project objective, “Address PSE’s identified deficiency in transmission capacity.” These comments assert that the PSE Eastside Needs Assessment is based on flawed assumptions and is limiting the evaluation of viable alternatives. These comments further state that the independent studies cited in the Phase 1 Draft EIS were cursory and are not sufficient because they either did not run their own load flow studies, or they used load scenarios and assumptions provided by PSE (which commenters assert are flawed). These comments requested access to unredacted data and additional independent studies to identify the base case scenario and assumptions used in the load flow analysis.

Several commenters cited a load flow study completed by Rich Lauckhart and Roger Schiffman (and submitted with their comments), which rejects PSE’s needs assessment for the project. Commenters requested that the City pause the EIS process and review the need for this project by either accepting the Lauckhart/Schiffman analysis or contracting for an independent study that includes an “honest, transparent and verifiable” load flow study.

Commenters pointed to five main findings of the Lauckhart/Schiffman study. Each of these main findings is listed in bold below, followed by a response that is intended to clarify the issue presented. The responses were developed by the EIS team after review of the Lauckhart/Schiffman analysis by Stantec, an engineering firm on the EIS team, and requests for additional information from PSE regarding its planning assumptions and results.

Lauckhart/Schiffman study finding #1: PSE modified data to increase transmission of electricity to Canada from 500 megawatts (MW) to 1,500 MW, which during winter peak loads creates instability in the regional grid. (The Lauckhart/Shiffman study authors assert this is an unrealistic level of electricity transmitted to Canada.)

Response:

PSE did modify the Western Electricity Coordinating Council (WECC) model to reflect this amount of peak energy flow to Canada. According to Stantec, modification of the WECC model is common accepted practice, where an individual utility provider is using the model to evaluate its specific system.

PSE confirmed that the value for the energy flow to Canada (over the Northern Intertie) that is in the base case was set at 500 MW by WECC, as a starting place for planning studies. Planners are expected to adjust that value to reflect firm transmission commitments, as required by North American Electric Reliability Corporation (NERC) planning standard TPL-001-4 R1. PSE used the value set in its agreements with the regional planning authorities, specifically from the ColumbiaGrid Biennial Plan.

Neither the 500 MW nor the 1,500 MW numbers reflect the maximum flows that actually occur over the Northern Intertie during winter conditions. BPA data shows 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. According to Stantec, this is the type of adjustment that utility providers are expected to make when using the WECC model for system planning.

Furthermore, of the energy flowing over the Northern Intertie, only a small portion flows through the Eastside. The EIS team asked PSE to clarify how much of the Northern Intertie flow was flowing through the substations on the Eastside where the capacity deficiency has been identified. PSE clarified that 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. The lower value would be the amount of flow expected under normal conditions (with all regional grid systems functioning). Stantec confirmed that this was consistent with their expectations, given the presence of higher capacity lines in the region that would have lower resistance than PSE's existing 115 kV lines, and therefore would be more likely to carry the load flowing north over the Intertie. If the Energize Eastside project were built, PSE indicated that according to the model, this flow would increase to 45 MW under normal conditions. Under conditions where other portions of the regional grid are not fully functioning, the flow on the proposed lines could rise to as much as 120 MW. Stantec again confirmed that this was a reasonably expected outcome, because the new lines would have lower resistance than the existing lines. While increased flow through the Eastside to the Northern Intertie is an expected result of the upgraded capacity on the Eastside, the increase is not one of PSE's objectives for the Energize Eastside project, but simply a byproduct of the capacity increase.

Lauckhart/Schiffman study finding #2: PSE assumed that six local generation plants were out of service, adding 1,400 MW of demand for transmission. This assumption also causes problems for the regional grid. (The Lauckhart/Schiffman study authors questioned PSE's rationale for this assumption.)

Response:

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 ran the model with a group of plants "out of service" for the "low generation scenario" in testing its system. PSE also ran a "low-average generation" scenario with 1,000 MW of generation turned on, to determine if running generation would relieve the overloads seen with the low generation scenario. PSE found that, while the transmission line overloads seen with the low generation scenario were relieved by running generation, the transformer overloads were not relieved for the full 10-year planning period. In the "winter scenarios," adding 1,000 MW of Puget Sound area generation resulted in 15 MW of change in loading at the Talbot Hill substation, which is not enough to address the increased demand over the 10-year planning period.

Having these plants out of service was not the only stress that was modeled. PSE indicated that their studies identified up to 40 different contingencies that violated the NERC standards over the 5-10 year study period. In other words, while having the Puget Sound area generation plants out of service was one scenario that contributes to the transmission capacity deficiency PSE has identified, there are others that also could result in violations of the reliability standards, regardless of whether these generators were considered to be "on" or not. Stantec reviewed the results showing there were cases

in which, even with these plants set as “on” in the model, there were still overloads in the Eastside, indicating that those overloads are a problem local to the Eastside.

Lauckhart/Schiffman study finding #3: The study authors assert that even if the regional grid could sustain the level of demand under the condition set up by the first two findings, it is unlikely that regional grid coordinators would continue to deliver 1,500 MW to Canada while emergency conditions were occurring on the Eastside.

Response:

PSE indicates that it has a responsibility for planning its system according to NERC requirements. Operation of the system as it relates to the flows on the Northern Intertie is up to BPA and not within PSE’s control. The EIS Consultant Team will discuss this with BPA officials to clarify whether they would adjust flows on the Northern Intertie in order to address transmission capacity deficiencies on the Eastside, and whether it is reasonable for PSE to assume that any such curtailments would continue for the 10-year planning period.

Lauckhart/Schiffman study finding #4: The WECC base case contains a default assumption that PSE may not have corrected. The ratings for critical transformers are based on “summer normal” conditions, but the simulation should use significantly higher “winter emergency” ratings. The study authors suggest the default value could cause PSE to underestimate system capacity and overstate urgency to build the project.

Response:

PSE used multiple WECC base cases for different study years and seasons, as confirmed by Stantec. PSE was asked and has confirmed that it used all the correct ratings in the model, including adjusting for summer, winter, and emergency conditions as required for each scenario evaluated. Stantec confirmed that results are consistent with such adjustments being made, although they did not independently verify settings in PSE’s model.

Lauckhart/Schiffman study finding #5: The base case shows a demand growth rate of 0.5 percent per year for the Eastside. This is much lower than the 2.4 percent growth rate that PSE cites as motivation for Energize Eastside.

Response:

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 that the Lauckhart/Schiffman report cites for the Eastside reflected average growth for PSE’s entire system. PSE subsequently recognized that the load for the Eastside area studied in the EIS is growing 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.

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. confirm the project

need. Stantec reviewed both analyses and found them to be in accord with standard industry practice for electrical system planning.

PSE also provided specific comments on the Energize Eastside Phase 1 Draft EIS (March 14, 2016) which are posted on the City of Bellevue project website at www.EnergizeEastsideEIS.org.

Topic 3 – Alternatives Evaluated in the Phase 1 Draft EIS

This topic includes questions, concerns, and opinions about the alternatives evaluated in the Phase 1 Draft EIS. The largest proportion of these comments expressed a preference for or against one or more of the alternatives or options. Alternative 1, Option A generated the most “against” comments, many more than any other alternative. Alternative 2 generated a large number of “for” comments, more than any other alternative, followed by the No Action Alternative. A smaller number of comments expressed support for Alternative 1, Option A, followed by Option C. Few comments expressed support for Alternative 1, Options B and D, or Alternative 3.

The EIS is intended to be an impartial, factual document for use by the public and decision-makers. Comments strictly expressing support or opposition are not considered factors in the analysis of impacts presented in the EIS. However, these comments are acknowledged here to provide the complete picture of comments received on the Phase 1 Draft EIS. To the extent these comments also provided information on the reasons for support or opposition to an alternative or option, the most commonly cited reasons are summarized here.

No Action Alternative

Comments expressing opinions about the No Action Alternative were primarily in support of the alternative. A smaller number of commenters expressed opposition to the No Action Alternative.

The following is a sample of comments expressing support for the No Action Alternative:

- Best short-term solution; new technologies and innovations will be available in the future.
- Most sensible solution; the need for the project has not been demonstrated.
- Few negative impacts compared to the other alternatives.

Those opposed generally stated that delaying the project or taking “no action” would result in undesirable impacts to the community and the economy should this alternative result in electrical fluctuations or blackouts.

Alternative 1: New Substation and 230 kV Transmission Lines

This alternative refers to PSE’s proposal to resolving the stated transmission capacity deficiency. The types of lines considered for Alternative 1 were categorized into four options as follows: **Option A** – new overhead transmission lines in existing PSE corridors or public right of way; **Option B** – use existing Seattle City Light overhead transmission lines; **Option C** – underground transmission lines; and **Option D** – underwater transmission lines.

Alternative 1 – General

Many of the comments indicated opposition to Alternative 1, but did not refer to a specific option. The following is a sample of comments expressing opposition:

- Transmission line is a solution that is vastly bigger than we need – it will have a capacity exceeding 1,000 MW when only 70 MW are required in the foreseeable future.
- Puts “all eggs in one basket” – ratepayers would finance an upfront cost of more than a quarter billion dollars to build a transmission line that has reliability and security risks.
- High costs to the community, but no justification for the project.

Option A

Most of the comments indicated opposition to Alternative 1, Option A.

The following is a sample of comments expressing support:

- Reasonable use of land resources (use of existing PSE utility corridors).
- Most predictable and cost-effective option.
- Technically feasible.
- Proven infrastructure; low-risk.

The following is a sample of comments expressing opposition:

- Antiquated solution.
- Places transmission lines too close to aging fuel pipelines.
- Risky, unsightly (“industrial blight”), inflexible and overly expensive, in both environmental and financial terms.
- Vulnerable to extreme weather, fires, landslides, terrorism, solar flares, pipeline accidents, and errors of human judgment.
- If only one power pole falls, a big piece of electricity supply would be out of service.
- Environmental impacts are unacceptable: loss of trees; loss of homes; community character impacts.
- Unacceptable impacts; significant adverse impacts.
- Lack of flexibility and opportunity for innovation; not a sustainable solution.

Option B

Several comments expressed opposition, indicating that the option is not practical for financial or political reasons. Some commenters indicated support for Alternative 1, Option B, indicating the option is a reasonable use of land resources (use of existing SCL utility corridor). This included comments asserting that FERC 1000 gives the authority to require SCL to allow use of its corridor by PSE.

Options C and D

A small number of comments indicated support for Alternative 1, Option C or Option D but generally did not give specific reasons for support other than these options avoid overhead transmission lines.

Alternative 2: Integrated Resource Approach

The focus of Alternative 2 is on energy conservation and use of technologies other than transmission lines to address the project objectives. Many comments indicated support for Alternative 2, or components of it. Many comments suggested Alternative 2 needs to be further developed and reviewed by independent experts; these comments are summarized under *Key Theme 3-1, Alternatives Considered in the Draft EIS*. Below is a summary of comments indicating support for Alternative 2:

- The smart technology solution.
- Safer and less costly alternative.
- More scalable, more reliable and more cost effective.
- Promotes smart, sustainable growth, more energy-efficient, and less damaging to the environment.
- Solutions available that are more economical than transmission lines.

Comments in opposition generally stated that the alternative relies on unproven technology, is unreliable and risky, and will jeopardize economic vitality on the Eastside that pose greater financial risk than the cost associated with upgrades to PSE's aging infrastructure.

PSE commented that Alternative 2 includes elements that have limited feasibility and are not in their control, and therefore could not be reliably implemented or approved by NERC.

Alternative 3: New 115 kV Lines and Transformers

Under Alternative 3, new 115 kV transmission lines would be constructed in existing or new rights-of-way around a broad portion of the Eastside. Numerous comments expressed opposition to this alternative. The following is a sample of comments expressing opposition:

- Would build three times as many transmission lines all over the Eastside; not a realistic option.
- Highly inefficient; a line this far from the high-density source of the loads does not make sense.
- Included only to make Alternative 1 look "less horrific."

PSE commented that Alternative 3 would result in impacts significantly greater than impacts identified for Alternative 1. PSE further commented that this alternative does not meet the longevity requirement stated in the project objectives.

Key Theme 3-1: Alternatives considered in the Draft EIS

This theme incorporates comments relating to the definition or specification of alternatives evaluated in the Phase 1 Draft EIS. These comments include statements suggesting that more work should be done to further refine or modify the alternatives. Several comments of this type requested further development and refinement of Alternative 2. Some comments questioned the viability or reasonableness of certain alternatives or options.

Several commenters requested further definition of Alternative 1, Option A to understand potential transmission line routes. Others requested further information on what existing transmission poles would be replaced and the timeline for replacement. Commenters also requested confirmation that new transmission poles would be constructed at least 50 feet from the pipelines (citing BPA policy). Additional comments related to public safety issues related to Alternative 1 are summarized under *Topic 4 – Public Safety and Health Effects*.

Many of the comments stated that Alternative 2 was developed and defined based on outdated data and studies, and requested that the alternative be revisited using independent experts with experience with modern electrical grid technologies, including demand-side management and distributed energy resources. Several commenters referred to findings from a CENSE-sponsored third-party evaluation of Alternative 2, the EQL study, stating that the analysis shows PSE and the EIS consultants made significant errors in their analysis of alternative technologies. Several commenters mentioned Northwest Power Council's Seventh Power Plan, and suggested a carefully developed plan would be superior to Alternative 1, Option A in terms of cost, safety, and environmental protection.

Among the comments were suggestions for size and location of distributed generation facilities, asserting that these facilities could be sized for rare peak loads and not for daily 230 kV transmission. Similar comments suggested there are viable grid battery technologies that could address short-term emergency peak loads.

Several commenters proposed use of batteries, demand-side reductions, distributed generation and other new technologies, underground lines, underwater lines, and upgrades to existing systems, but did not specify how these proposed solutions differ, or are the same as, existing alternatives or options included in the Phase 1 Draft EIS.

Some commenters suggested Alternative 3 and certain options under Alternative 1 were “red herring” alternatives, put forward to make PSE's proposal (Alternative 1, Option A) look favorable by comparison. There were questions about how the transmission line under Alternative 3 would help ease downtown Bellevue's power needs, suggesting a line far to the east of high-density loads does not make sense and is inefficient. Comments questioned why Alternative 1, Options B, C, and D were included, asserting they would be either politically unacceptable or cost prohibitive due to state regulations, and would not be implemented.

One commenter suggested different transmission alternatives, including adding a new 230/115 kV transformer at the Lakeside substation and looping the existing SCL double circuit 230 kV line through the Lakeside substation. The suggested route includes the line east along I-90 then north to the substation along the existing PSE right-of-way, and west near the Lake Hills Connector until the SCL lines are once again intercepted. The commenter suggested this alternative has significantly less environmental impact than 18 miles of new transmission lines. It was further suggested that PSE

reevaluate the Lake Tradition Option and BPA's best technical solution by building a second Monroe-Echo Lake transmission line.

Several commenters requested maps that show the specific locations where each alternative (or option) would have construction impacts.

PSE provided a number of comments and clarifications related to the definition of Alternative 1, Option A. PSE commented that the complexity of rebuilding the SCL line under Alternative 1, Option B is understated in the Phase 1 Draft EIS, emphasizing that taking the SCL line out of service and rebuilding in place has not been studied electrically or agreed to by SCL. The comments further state that the definition of Option B omits additional reconductoring that would be needed (outside the study area), and additional miles of new 230 kV line corridor that would be needed to connect the SCL line to the Sammamish substation and separately to Lakeside substation. PSE commented that Option B would potentially require clearing the entire SCL corridor and possibly require acquisition of additional easement. Given these omitted elements, PSE commented that analysis of Option B either understates or overstates impacts, depending on the resource.

Response:

The Phase 1 Draft EIS includes a programmatic level analysis that reflects the level of detail at which alternatives were defined at the time the EIS was prepared. The Phase 1 Draft EIS evaluates the high-level aspects of the project (see Chapter 1 of the Draft EIS for more information). Phase 2 will include a more specific and detailed review of alternatives based on the outcomes of Phase 1, and will focus on project design and construction. For example, more detailed information on pole replacement and design will be provided.

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 City 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.

Other transmission alternatives were initially considered as described in Chapter 2 of the Phase 1 Draft EIS. However, these solutions were found to overload either transmission lines or transformers and therefore would not meet PSE's stated project objectives. Therefore, these alternatives were not studied further in the Draft EIS.

Key Theme 3-2: Comparative summary of impacts

This theme includes comments about the summary of impacts presented in the Phase 1 Draft EIS (Chapter 1), such as specific concerns about the ability to compare alternatives based on their impacts, a critique of the format used for summarizing impacts, and disagreement with specific conclusions in the summary.

Several commenters identified inaccurate conclusions made for Recreation in Table 1-3 for Alternative 2 (Minor to Significant), noting that the conclusion is misleading based on findings in the EIS. Other comments requested clarification on the difference between conclusions of "significant" as presented in Tables 1-2 and 1-3 and "significant unavoidable adverse impacts" as presented in the summary sheets in Chapter 1 for key findings.

Response:

The SEPA Rules require that the EIS summary “shall include a summary of the proposal, impacts, alternatives, mitigation measures, and significant adverse impacts that cannot be mitigated” (WAC 197-11-440 [4]) and that the EIS should present “a comparison of the environmental impacts of the reasonable alternatives....” (WAC 197-11-440 [5] [vi]). Lead Agencies are granted leeway in how they choose to present and format information on the comparative impacts of the alternatives. The presentation of such information in the Phase 1 Draft EIS meets the requirements of the regulations, and the City believes the summary content is suitably clear and organized. The City notes that Tables 1-2 and 1-3 in the Draft EIS are only a portion of the summary, and that greater detail is included in the Chapter 1 narrative summaries for each element. The tables display impacts in a way to facilitate side-by-side comparison of alternatives.

The City acknowledges an error in Table 1-3, in the presentation of impacts for Recreation under Alternative 2. Impacts conclusions should have been stated as Negligible to Minor. A correction will be issued in an errata sheet included with the Phase 2 Draft EIS.

As clarification, a “significant impact” is defined by WAC 197-11-794 as “a reasonable likelihood of more than a moderate adverse impact on environmental quality.” Some significant impacts can be mitigated, while others cannot. Those that cannot are considered “significant *unavoidable* adverse impacts.” In each chapter, there is a discussion of what was considered a significant impact for the respective element of the environment. In the evaluation of impacts, the EIS team considered those impacts that have a low likelihood of occurrence but would be severe if they occurred.

Topic 4 – Public Safety and Health Effects

Key Theme 4-1: Phase 1 Draft EIS scope, analysis, and conclusions – public safety

Public safety was a main area of concern during the scoping process and continued to be a main area of concern in the comments received on the Phase 1 Draft EIS.

The largest number of these comments asserted that the risks associated with locating transmission lines adjacent to the fuel pipeline operated by the Olympic Pipe Line Company (OPLC) were not adequately addressed in the Phase 1 Draft EIS, or conclusions were understated. Comments were primarily about the evaluation of risk of catastrophic explosions and leaks, both during and after construction. Commenters asserted that the Draft EIS did not adequately evaluate risks from (1) excavation and vibration; (2) natural disasters including earthquakes; and (3) corrosion. Concern was expressed that there is a high risk of damaging the pipeline during excavation because the pipeline is not buried deeply and is quite old (approximately 40 years old).

Several commenters asserted that locating transmission lines in the same area as fuel pipelines is much riskier than described in the Phase 1 Draft EIS. Commenters cited a new study by DNV-GL that considers several criteria to establish risk level (e.g., separation distance, HVAC power line current, co-location length, and co-location angle). These commenters asserted that, based on these four criteria, Energize Eastside would be considered “high risk” per industry standards. Others referred to comments made by Dr. Frank Cheng, “Safety of Co-location of Electric Power Lines and Pipelines.”

Several commenters pointed to BPA’s policy of not locating transmission lines within a certain distance (50 feet) of a buried pipeline running parallel to a transmission line. These commenters

questioned if this separation could be provided for this project given that the proposed power lines would cross not only existing PSE right-of-way but also established neighborhoods.

Arcing to trees, the ground, or structures, as well as the risk of towers falling in storms or earthquakes, continued to be significant concerns identified by commenters. Several commenters asserted that small punctures or weaknesses in the pipeline may result in leaks that are hard to detect and could be catastrophic if they are ignited. As during scoping, the large explosion in Bellingham in 1999 was given as an example many times for this issue. Commenters asserted the risk of a similar scenario occurring was not adequately addressed in the Phase 1 Draft EIS.

Several commenters requested that the EIS analyze a worst-case analysis involving a pipeline rupture and ignition of fuel occurring in the most densely populated area of the proposed new transmission line. Among these comments was also the assertion that 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, commenters maintained impacts should be regarded as significant regardless of the likelihood of occurrence. To mitigate these potential impacts, it was recommended, at a minimum, that the liquid-fuel lines be depressurized during construction of tower foundations and erection of towers and cable.

Several commenters stated that OPLC is currently under a Final Order by the Office of Pipeline Safety to rectify deficiencies in its corrosion control program. The commenters pointed to an inspection conducted in August 2014 that led to the Final Order, noting that the condition has gone uncorrected for 18 months, and the company has a further 18 months to complete corrective action (asserting that this time period overlaps with PSE's proposed construction). These comments also requested an examination of prior incidents involving leaks and explosions due to construction activity near pipelines and risks associated with co-location of flammable liquid pipelines and electrical power transmission infrastructure.

Several commenters requested that OPLC be involved in the EIS process and in the decision-making process to ensure accurate information is included and all relevant information is available for decision-makers. These comments requested a full description of the "operating plan" for the pipelines to understand how safety risks would be mitigated. Other commenters requested that the EIS include a "truly independent assessment" of both PSE and OPLC findings, calculations, and recommendations, suggesting both companies have a reputation for accidents and lack of proper safety measures and practices. Other commenters requested that the evaluation of safety issues within the PSE easement and requirements (including separation requirements) include input from the affected communities and CENSE representatives, in addition to PSE and OPLC.

PSE comments requested that the Draft EIS clarify that if an existing utility corridor is used, PSE would commission an appropriate engineering analysis of soil conditions as they relate to conductivity and corrosiveness of underground utilities. Results would be used to determine appropriate grounding and cathodic-protection needed. PSE also commented that the Draft EIS should further acknowledge that PSE and OPLC would evaluate the construction and operational parameters related to the replacement of the two existing 115 kV lines with both a 230 kV and a 115 kV line. The evaluation will include electrical interaction potential, cathodic protection, and proximity.

Response:

The City acknowledges that public safety is of paramount concern. The City and the EIS Consultant Team contacted OPLC during the development of the Phase 1 Draft EIS, and will be making additional inquiries during the project-specific phase of the EIS. The EIS team will also examine the studies cited by commenters. The discussion, analysis, and characterization of public safety will be refined in the Phase 2 Draft EIS, with greater focus on project-level details. In particular, additional information on specific locations where electrical lines would be co-located with the pipeline and best practices will be included in the Phase 2 Draft EIS.

Key Theme 4-2: Phase 1 Draft EIS scope, analysis, and conclusions – health issues

Health was an area of concern during the scoping process and continued to be an area of concern for some commenters on the Phase 1 Draft EIS.

Some commenters stated that the risks associated with electric and magnetic fields (EMF) were not adequately addressed in the Phase 1 Draft EIS, or conclusions were understated.

Some comments requested information on EMF health risks at specific locations adjacent or near proposed project locations, especially at schools located adjacent or near transmission line corridors or new or expanded substations. Other comments suggested that placement of a 230 kV line parallel with the existing SCL 230 kV line poses higher health risks than acknowledged in the EIS.

At least one commenter requested additional information on impacts of corona, citing studies on corona effects on air pollution and related health effects, and potential for corona to drift in the wind.

Response:

These comments generally repeated information that was included and analyzed in the Phase 1 Draft EIS. The Phase 1 Draft EIS did not have background EMF measurements (such as near the SCL lines) because it did not address specific locations. The City and the EIS Consultant Team will examine any new issues and studies that were not examined in the Phase 1 Draft EIS. The Phase 2 Draft EIS will include more specific data on expected EMF levels.

Topic 5 – Earth

Key Theme 5-1: Phase 1 Draft EIS scope, analysis, and conclusions – earth

Several commenters expressed concern about seismic conditions at project locations. One commenter suggested that Figure 3-2 may incorrectly display seismic hazard areas (showing liquefaction areas instead).

Some commenters stated that the Phase 1 Draft EIS understated the potential risks of excavating or boring near homes and near the Olympic Pipeline. Among these comments was the statement that vertical boring of holes for transmission poles causes significant vibration that can lead to 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, or months after transmission line construction is complete.

Several commenters stated that many houses are within a “fall-zone” of proposed 130-foot-tall monopoles, if the monopoles were to fall due to seismic events or sustained high winds.

Response:

The City and the EIS Consultant Team will review comments received on seismic, erosion, and vibration-related concerns. These comments and any new information will be used to refine the discussion, analysis, and characterization of earth issues in the Phase 2 Draft EIS.

In response to the question on Figure 3-2, seismic hazard areas were mapped on the figure according to King County and city data. Seismic hazard areas include liquefaction zones, which occur in the lower nearly-level areas underlain by alluvium soils, generally located near bodies of water.

Topic 6 – Tree Canopy, Recreation, and Wildlife

Key Theme 6-1: Phase 1 Draft EIS scope, analysis, and conclusions –tree canopy, recreation, and wildlife

There was great concern regarding the loss of trees, with many commenters citing the potential removal of 8,000 trees under Alternative 1, Option A. Several comments stated that trees should be given higher value and weighting in any analysis. Many commenters stressed the value of trees in their communities. Among these included comments that the trees provide a unique and “park-like” character to their cities and neighborhoods; they said the loss of the trees would affect their quality of life. Commenters asked the Cities of Bellevue and Newcastle to stand by their mottos of a “City in a Park.” Several commenters noted that the trees buffer views and noise from highways and other high-intensity land uses. Commenters were also concerned about the loss of trees because they provide wildlife habitat, evapotranspiration, and shade as well as sequestering carbon. Commenters stated that these capabilities would not be replaced immediately by replanting young trees, and long-term maintenance and operations would require trees to continually be pruned and removed when seen as nuisances. These comments were similar to those provided during scoping.

Several commenters provided additional information relating to habitat, natural areas, and species presence within the study area. Some commenters requested evaluation of EMF/corona impacts on insects (e.g., bees) and wildlife.

PSE commented that the Phase 1 Draft EIS overstates the impact of a new transmission line on avian species (Alternative 1), and understates the impact of constructing 60 miles of 115 kV transmission lines under Alternative 3.

Several commenters requested information on potential clearing and other impacts in Bridle Trails State Park, Coal Creek Natural Area, and other recreation areas within the project corridor. Several commenters noted that the existing PSE right-of-way is used by nearby residents for walking and biking, and suggested that the Phase 1 Draft EIS fails to address how the project would affect this use.

PSE commented that the Phase 1 Draft EIS assumed a worst-case tree removal scenario, which they assert is unlikely to occur particularly for Alternative 1, Option A. PSE also commented that the analysis overstated the impacts of Option A and understated the impact of Alternative 3 on avian species. For specific comments, see PSE’s Comments on the Energize Eastside Phase 1 Draft EIS (March 14, 2016) included on www.EnergizeEastsideEIS.org.

Response:

The City and the EIS Consultant Team will review comments received on tree canopy, recreation, and wildlife related to the project-level review in the Phase 2 Draft EIS. A worst-case analysis is required by SEPA when there are areas of uncertainty. These comments and any new information will be used to refine the discussion, analysis, and characterization of these issues in the Phase 2 Draft EIS. The Phase 2 Draft EIS is also expected to include a more detailed estimate of potential tree loss and identify more specific measures to mitigate tree loss.

Topic 7 – Air Quality and Greenhouse Gases

Key Theme 7-1: Phase 1 Draft EIS scope, analysis, and conclusions –air quality

Several commenters stated that the EIS should fully assess, address, and mitigate carbon emission and sequestration issues for all alternatives. Several comments related to the carbon sequestration provided by trees and that these capabilities would not be replaced immediately by replanting young trees to compensate for the removal of 8,000 trees (under Alternative 1, Option A). At least one commenter stated that there should be no net reduction in carbon sequestration capacity as a result of the project, and that the City should require carbon offsets for all incremental fossil fuel based power that flows through the transmission line. Also relating to power that flows through the transmission line, there were comments requesting that the air quality and greenhouse gas impacts of coal strip mining and generation should be considered in the analysis.

Some comments also requested further analysis of air quality impacts and greenhouse gas emissions related to gas turbines under Alternative 2.

Response:

The City and the EIS Consultant Team will review comments received on air quality and greenhouse gases. These comments and any new information will be used to refine the discussion, analysis, and characterization of these issues in the Phase 2 Draft 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 strip mining and generation are not included because they are outside the scope of the EIS analysis.

Topic 8 – Views and Visual Resources

Key Theme 8-1: Phase 1 Draft EIS scope, analysis, and conclusions –views and visual resources

Many of the comments in this category were similar to those provided during scoping and are addressed in the Phase 1 Draft EIS. Many commenters asserted that the proposed 230 kV transmission line would negatively impact views from their individual houses as well as negatively change the look of their neighborhoods and cities. Commenters were concerned about the visual impact from the loss of trees and installation of up to 130-foot-tall poles.

Several commenters were from the Somerset and Olympus neighborhoods. Commenters from the Somerset neighborhood cited property covenants that address protection of views. At least one commenter included a document titled *View Guideline for Somerset*, requesting that the guideline be included in the analysis.

Response:

The City and the EIS Consultant Team will review comments received on views and visual resources. These comments and any new information will be used to refine the discussion, analysis, and characterization of views and visual resource issues in the Phase 2 Draft EIS. The Phase 2 Draft EIS will also include additional mitigation measures based on adopted policies of the study area communities. SEPA analysis does not, however, extend to evaluating consistency with private covenants.

Topic 9 – Noise

Key Theme 9-1: Phase 1 Draft EIS scope, analysis, and conclusions –noise

Many of the comments in this category were similar to those provided during scoping and are addressed in the Phase 1 Draft EIS. Many commenters asserted that noise from the larger transmission line would be louder than the existing line. At least one commenter stated that noise (crackling, popping sounds known as corona noise effects) from existing lines can be heard on damp, quiet nights, and increasing the voltage means the lines will be heard all the time. Other commenters requested information on how noise from 230 kV lines would be mitigated.

Some commenters suggested that noise from peak generation plants under Alternative 2 is understated in the Phase 1 Draft EIS. Other comments requested additional information on noise impacts during staging and construction of Energize Eastside.

PSE commented that noise impacts from peak generation facilities under Alternative 2 were understated in the Phase 1 Draft EIS. PSE further commented that these facilities produce high levels of noise and would be operating significantly more often than described in the Draft EIS as they must run in advance of a transmission event, and not just during peak times.

Response:

The City and the EIS Consultant Team will review comments received on noise. If any components of the project being carried into Phase 2 are expected to have significant noise impacts, they will be evaluated in greater detail in the Phase 2 Draft EIS. These comments and any new information will be used to refine the discussion, analysis, and characterization of these issues in the Phase 2 Draft EIS.

Topic 10 – Land Use, Property Values, and Costs

Key Theme 10-1: Phase 1 Draft EIS scope, analysis, and conclusions –land use and housing

The largest number of comments under this theme related to the potential for homes to be condemned under Alternative 1, Option A. These comments asserted that the corridor would need to be widened in places for safety purposes (such as through areas of Newcastle). These comments requested information on the number and location of homes that would potentially be condemned. Several commenters stated that Option A would have negative impacts on neighborhood character. Other commenters requested information on mitigation for impacts.

Response:

The Phase 1 Draft EIS evaluated worst-case scenarios for the need to acquire property for a transmission line, for use of either new or existing corridors and did not evaluate a specific design

alignment. Actual impacts are likely to be lower than these worst-case impacts and will be evaluated in greater detail in the Phase 2 Draft EIS. These comments and any new information will be used to refine the discussion, analysis, and characterization of these issues in the Phase 2 Draft EIS.

Key Theme 10-2: Phase 1 Draft EIS scope, analysis, and conclusions – property values and costs

The largest number of comments under this theme stated that the impacts on property values were not adequately addressed in the Phase 1 Draft EIS, or conclusions were understated. A frequent comment was that the transmission line would decrease property values 10 to 30 percent. The perceived safety and health concerns as well as visual impacts described above were given as the reasons for impacts to property values. Several commenters asserted that using Bellevue as an example to demonstrate potential effects of a reduced residential tax base on overall city revenue for services was inappropriate. These comments stated that the level of impact in smaller cities like Newcastle would be proportionally higher than Bellevue, which has a larger and more diverse tax base.

Several commenters asserted that residents can expect an increase in local taxes to offset the decrease in the local property tax base resulting from declining property values. These comments were also made during scoping. A handful of comments stated that rate increases to pay for the project combined with loss of property values would place a double financial burden on adjacent property owners. Several commenters requested information on how reduction in property values and loss of property tax revenue would be mitigated.

Response:

The City acknowledges that effects on property values and property tax rates are of high concern to many residents, particularly in relation to Alternative 1, Option A, as demonstrated by the large number of comments received on this topic. During EIS scoping, a number of public comments were received on the topic. As described in the Phase 1 Draft EIS, the effect of a transmission line on property values is an economic rather than an environmental issue as defined by SEPA. However, the issue was discussed in the land use analysis to the extent that a change in property values could result in a change in land use. The Phase 1 Draft EIS used Bellevue as an example because the extent of impacts would be greatest there (transmission line corridor three times as long in Bellevue as in Newcastle and including an expanded substation). For the project-level analysis in Phase 2, additional economic information could be provided for other jurisdictions to identify potential changes in land use. These comments and any new information will be used to refine the discussion, analysis, and characterization of these issues in the Phase 2 Draft EIS.

Summary of Agency and Tribal Comments on the Phase 1 Draft EIS

The following is a brief summary of agency and Tribe comments received on the Phase 1 Draft EIS.

Agency comments from nearby and affected cities generally stated support for the project objective and support for infrastructure needed to provide safe and reliable electrical supply. Several comments stated opposition to the No Action Alternative and Alternative 2, based on issues of reliability and the potential to affect economic development in their communities. Some comments also noted that meeting the project objective must be tempered with the longer term vision and flexibility necessary

to embrace emerging technologies. Among these was a comment that the Draft EIS should include an analysis of PSE's Integrated Resource Plan (IRP) currently under review by the Washington Utilities and Transportation Commission (WUTC) to evaluate possible long-term impacts of large-scale transmission infrastructure on regional clean energy goals.

Agency comments requested further definition and analysis of impacts associated with Alternative 3, if the alternative is carried forward into Phase 2.

Agency comments addressed various aspects of the analysis of impacts. The City of Newcastle (one of the Partner Cities) provided detailed comments related to environmental health and safety; aesthetics and scenic resources; and land use. Comments included specific requests related to agency coordination and review and Olympic Pipeline Company involvement.

Agency comments included a request from the City of Sammamish, as an affected city, to be included in the ongoing SEPA process as a stakeholder with special interest. Other specific requests were made with regard to the Partner Cities Interagency Agreement.

The Muckleshoot Indian Tribe Fisheries Division provided comments addressing various aspects of Alternative 1, Option D. Comments stated the alternative does not fully describe potential impacts to fish, water resources, and Muckleshoot Tribal fishing.

Specific agency and Tribe comments can be viewed on the City of Bellevue EIS project website at www.EnergizeEastsideEIS.org.

These agency and Tribe comments will be used to refine the discussion, analysis, and characterization of these issues in the Phase 2 Draft EIS.

Where can interested parties get more information?

The City of Bellevue remains available to answer questions and provide information about the SEPA process for the proposal. Information is available on the project website, hosted by the City of Bellevue on behalf of the five Partner Cities, at www.EnergizeEastsideEIS.org.

Interested parties may also contact Heidi Bedwell, Energize Eastside EIS Program Manager at the City of Bellevue, at 425-452-4862 or on the City of Bellevue EIS project website at info@EnergizeEastsideEIS.org.

Additional information about the proposed project can be found on PSE's website at www.EnergizeEastside.com.