

June 1, 2015

VIA E-MAIL & U.S. MAIL

David Pyle, Senior Planner

Carol V. Helland, Environmental Coordinator

City of Bellevue

PO Box 90012

Bellevue, WA 98009-9012

RE: Puget Sound Energy "Energize Eastside" 230 kV Transmission Line Project
Proposal EIS Scoping

Dear Ms. Helland:

Below please find the City of Bellevue's initial comments regarding the appropriate scope for the above-referenced transmission line project proposal (the "Proposal") in connection with the Phase 1 Environmental Impact Statement ("EIS"). While Bellevue has agreed to act as Lead Agency for purposes of environmental review, this project will cover area in up to five Eastside cities. The Bellevue City Council submits these comments on behalf of the City of Bellevue and its citizens to help ensure that the EIS adequately considers sufficient feasible and reasonable alternatives to the Proposal under the State Environmental Policy Act.

As an over-arching comment, while the scoping notice does address the purpose of the EIS as follows: To evaluate the proposal to build, "as necessary" the project, to supply future electrical capacity and improve electrical grid reliability for the Eastside (including the principal permitting jurisdictions), the DEIS should provide a more detailed statement of purpose and need.

It is the Bellevue City Council's understanding that the current proposed draft scope of the Phase 1 EIS includes study of four alternatives. In analyzing these alternatives, the EIS scope should include the following:

1. Alternative 1 – New Transformer and Transmission Line

- Analyze energy demand and use forecast methodologies, including methodologies for determining "right size" extent of need for new transformer and transmission line
- Explore alternative route alignments, including alignments informed by the following conceptual frameworks:
 - Prioritizing alignment through areas driving growth and need

- Options for collocation with existing or proposed infrastructure that consider safety impacts

Note: the City Council understands that as outlined in the notice of scoping period, in the event that Alternative 1 is selected during the Phase 2 of the EIS process for the Proposal, additional detailed impacts of alternate routes may be analyzed at a project level. Nonetheless, alternate routes should be considered as part of the Phase 1 analysis of proposed Alternative 1 with respect to potential significant adverse impacts, in order to allow an informed choice among Phase 1 alternatives.

- Explore undergrounding of transmission line, including undergrounding entirety of line or segments of line
- Explore submerged routes (lake)
- Analyze pole design considerations (height, form, location)

2. Alternative 2 – Demand Side Reduction/Non-Wire Technologies

Explore use of new technologies and conservation efforts, including:

- Grid management
- Battery Storage
- Consideration of anticipated increase in distributed generation (e.g., rooftop solar)
- Other alternatives that meet reliability standards

3. Alternative 3 – New Transformer – Existing Substation

- Infrastructure Alternatives to the 230KV, including new transformers and new/rewired 115kv transmission lines
- Use of existing Seattle City Light Transmission Line through regional partnership
- AC/DC conversion
- Upgrade or conversion of existing transmission lines in region through partnerships to meet supply and reliability needs

4. All Alternatives (including Alternative 4, no action)

- Combined, or hybrid alternatives should be identified and explored. These alternatives should consider combining or blending one or more elements of each of the 4 alternatives in light of the proposed objectives. For example, combinations of demand-side reduction and use of new transformers and existing transmission lines should be included with the scope of analysis. Other examples of hybrid alternatives should be identified based on potential to mitigate reasonably anticipated significant adverse environmental impacts.
- Compatibility considerations with surrounding land uses and infrastructure should be identified and explored for all alternatives, particularly in the context of the built environment and populations in proximity to the proposed facilities and alternatives.

Thank you for this opportunity to provide comment regarding the scoping of this EIS.

Very truly yours,

Claudia Balducci, Mayor

City of Bellevue