June 8, 2015

VIA E-MAIL & U.S. MAIL

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

Within this context the Bellevue City Council, operating in its role as representatives of the community, submits these comments 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. The City of Bellevue engaged an independent analysis of the Energize Eastside Proposal (the Independent Technical Analysis, or ITA). This study validated the need for a solution to address growth in Bellevue, the reliability of the electric grid on the Eastside, and regional power flows. We would like the Phase 1 programmatic portion of the EIS to include within its scope the examination of the other potential solutions to the demonstrated need; including:

- Alternative infrastructure solutions;
- Alternatives to a wired solution (including advancements in new technology alternatives); and
- Alternative alignments for the Proposal.

In examining these solutions we would like the Phase 1 EIS scope to consider elements of the environment and environmental health, including earth, air, water, plants and animals, neighborhood impacts, visual impacts, aesthetics, land use, community character, feasibility considerations, compatibility with surrounding uses, safety and reliability.

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). It is our recommendation that 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 –**Adding a new 230kV to 115kV substation and connecting it with the Talbot Hill and Sammamish substations via a new 230kV transmission line**

    a. Comparative study of Alternative 1 with alternatives to this proposal which meet local need as identified in the Independent Technical Analysis, including alternative infrastructure solutions (the "right size" need) and alternative route alignments and voltage configurations to the Proposal informed by the following conceptual frameworks:

        i. Prioritizing alignment through areas driving growth and need;
        ii. Options for collocation with existing or proposed infrastructure that consider environmental health and physical safety impacts including those impacts associated with seismic events.

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.

    b. Analyze energy demand and use forecast methodologies, including methodologies for determining "right size" extent of need for new transformer and transmission line;

    c. Examine impact on elements of the environment of designing the Proposal to NERC Transmission Planning Standards TPL-001-4;

    d. Whether the Proposal's transmission line technology represents an industry standard amongst alternative infrastructure solutions;

    e. Explore as part of the alternative the impacts to the environment of undergrounding the transmission line including submerged routes (lake location), including entirety of line or segments of line

    f. Analyze pole design considerations (height, form, location)

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

    a. Explore use of new technologies and conservation efforts including:
        i. Grid management
        ii. Battery storage
        iii. Consideration of anticipated increases in distributed generation (e.g. rooftop solar)
        iv. Other alternatives that meet reliability standards

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

a. Combined, or hybrid alternatives should be identified and explored. These alternatives should consider combining or blending one or more elements of each of the four alternatives in light of the proposed objectives. For example, combinations of demand-side reduction and use of new transformers and existing transmission lines or regional alternatives (described below) 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;

b. Other alternatives examined through the Puget Sound Area Study Team (PSAST) including regional alternatives to determine transmission facility expansions to address south-to-north transfers including the existing Seattle City Light transmission line (Maple Valley-SnoKing 230kV);

c. AC/DC conversion technologies;

d. Examine the feasibility of alternatives, including potential practical barriers to implementation and the potential financial impact to ratepayers of choosing one of the alternatives over the other alternatives; and

e. Because this project is cast as a solution to solving both local and regional capacity and redundancy, it may be that BPA or other federal funding may be sought by PSE for construction of Energize Eastside. If federal funds are used, or federal permits are involved, the National Environmental Policy Act ("NEPA") does call for an analysis of economic impacts of the project. Therefore, if that is the case, for all the alternatives, examine the impacts during and after construction to adjacent property, including noise, traffic, visual impacts, vibration, and any other potential significant adverse impacts.

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

Very truly yours,

Claudia Balducci, Mayor
City of Bellevue