

CITY COUNCIL STUDY SESSION ITEM

SUBJECT

City Council Scoping Letter Comments on Energize Eastside Phase 2 Draft EIS

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POLICY ISSUES

State Law/Growth Management Act

The City of Bellevue has the authority to regulate land use and, under GMA, the requirement to consider the location of existing and proposed utilities and potential utility corridors in land use planning. The City must also plan for the provision of essential public facilities such as utilities consistent with the goals and objectives of its Comprehensive Plan, taking into consideration the public service obligation of the utility involved.

Comprehensive Plan

The Utilities Element Comprehensive Plan policies for non-managed utilities at UT-72 through UT-75 describe a framework for implementing the electric service system; requiring siting analysis; identifying tools to avoid, minimize and mitigate the impacts of new and expanded electric utility facilities; and providing highly reliable electric service for Bellevue customers.

This framework supports official City Council comment on the proposed Energize Eastside project through the EIS scoping process.

DIRECTION NEEDED FROM COUNCIL

X Action
X Discussion
— Information

The City Council began review of comments for the Phase 2 DEIS scoping comment period submittal at its May 9, 2016 Extended Study Session. Council directed staff to return with a final draft of the comment letter (See Attachment 1) for review and Council-directed action.

BACKGROUND/ANALYSIS

Phase 2 Draft EIS Scoping

The Phase 2 Draft EIS Process is underway. This second phase of the Energize Eastside environmental review process will be a project level evaluation addressing a No Action Alternative and specific transmission line segment alternatives within the Action Alternative (PSE's Proposal). Additional reasonable project-specific alternatives may be identified during Phase 2 scoping.

The purpose of Phase 2 Scoping is to help the City of Bellevue and the partner cities identify those elements of the environment to be studied in the Phase 2 Draft EIS, as well as to allow the public to suggest reasonable alternatives to the proposal that may address the project purpose and need and present fewer environmental impacts. Phase 2 scoping is informed by the programmatic-level evaluations, particularly the description of the project's purpose and need as identified by PSE, included in the Phase 1 Draft EIS and by public comments submitted on the Phase 1 Draft EIS.

Several Action alternatives and a No Action Alternative are proposed to be analyzed in the Phase 2 Draft EIS. These are summarized here for purposes of drafting the comment letter and are detailed in the Request for Comments on Scope.

- The No Action Alternative is a baseline against which action alternatives can be compared.
- The Action Alternative defined by the proponent is a new substation at Lakeside (Richards Creek) and new 230kV transmission lines. There are three major alignment segments and two of the segments propose route variations.

Council comments from May 9

Councilmembers asked for a number of issues to be included in Phase 2 Draft EIS analysis, which are included in the revised proposed comment letter included as Attachment 1. (Attachment 1a is the strike draft of the May 9, 2016, draft for comparison.) These include:

- Emphasize a desire for energy efficiency, demand response, and distributed generation components of Alternative 2 of the Phase 1 DEIS to be considered as techniques for controlling projected growth in demand and for addressing resultant lower demand as part of the Phase 2 analysis of the No Action Alternative;
- Expanded explanation of the conclusions included in the Phase 1 Draft EIS regarding the proposal's impacts to property values under the land use element of the environment;
- A request that the Phase 2 Draft EIS clearly differentiate between construction and operations safety impacts and identify effective mitigation for both;
- A desire to include analysis of noise and access impacts that may during construction of the project;
- Including a comment that that the partner jurisdictions reviewing the project should coordinate best practices and other mitigation and regulations across all jurisdictions;
- Including a request to coordinate construction of the project and associated mitigation with any city Capital Investment Project (CIP) project in order to reduce the duration of construction impacts, for example, with the City's project on Newport Way;
- Include a request to analyze the impacts of tree and vegetation removal along this significant corridor using the "ecosystem service value" methodology as a way of quantifying the impacts to elements of the environment.

Phase 1 DEIS Alternative 2

In addition to the above suggested revisions to the Council comment letter, Councilmembers asked for clarification about why Phase 1 Alternative 2, the Integrated Resource approach—is not likely to be analyzed at a project level in Phase 2.

"The focus of Alternative 2 is on energy conservation and use of technologies other than transmission lines to address the project objectives. Alternative 2 would address the projected

deficiency in transmission capacity on the Eastside by reducing growth in peak period demand through energy efficiency, storing and releasing energy when needed to address peak demand, and providing reliable additional peak period energy sources in the area where the transmission capacity is deficient.”

-Phase 1 Draft EIS Project Alternatives p. 2-32

“In order to fully address the identified capacity need, Alternative 2 would include a combination of [components]...in a theoretical mix of measures and anticipated energy conservation for each component.”

-Phase 1 Draft EIS Project Alternatives p. 2-35

In analyzing with more precision how much each of the components of Alternative 2 would need to be sized, the Phase 1 Draft EIS concluded that these components would be unlikely to be able to meet project objectives of capacity, cost, reliability and electrical and non-electrical criteria:

“...it is not sufficient...to look at the transmission capacity deficiency and replace that with an equal amount of non-transmission resources, such as energy efficiency or new generation.”
“[T]his alternative could address the project need but results in uncertainty about how much infrastructure would be installed and how much additional supply would be needed [and be able to be provided] each year.”

-Phase 1 Draft EIS Project Alternatives p. 2-34

These analyses are detailed in the Phase 1 Draft EIS on pp. 2-32 to 2-42.

While a complete analysis of Alternative 2 and its effectiveness at addressing the purpose and need for the project as described in Phase 1 will be included in the Final EIS, the following does provide some insight into the reasonableness of Alternative 2:

“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... 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...”

-Phase 1 Draft EIS Comment Summary p. 17

“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.”

-Phase 1 Draft EIS Comment Summary p. 17

Phase 2 Draft EIS - timeline

Similar to Phase 1, following scoping the EIS consultant, in collaboration with City staff, will research and analyze a reasonable range of viable construction alternatives culminating in the issuance of a Draft Environmental Impact Statement (SDEIS).

Following publication of the Phase 2 Draft EIS and receipt and consideration of public comment, a Final EIS will be issued that incorporates the information from both phases. SDEIS issuance is anticipated in early 2017 and FEIS issuance anticipated in late spring or early summer 2017. The FEIS will inform the drafting of conditions that would be attached to the future Conditional Use Permit and ultimately, with existing City codes and regulations, govern development of the proposed electrical facility through construction and long-term operations.

ATTACHMENTS

1. Draft Council comment Phase 2 Draft EIS scoping letter
- 1a. Strike draft of comment letter from May 9 to May 16