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**2023 SEPA Addendum
(issued October 12, 2023)**

CITY OF BELLEVUE

Energize Eastside Project

2023 SEPA Addendum



City of Bellevue
Development Services
450 110th Avenue NE
Bellevue, WA 98004

October 2023

Project Refinements and Updates:
Wetland Rating System, Tree Removal, Pole Heights, and Off-site Mitigation

2023 State Environmental Policy Act Addendum
to the
2018 Energize Eastside Final Environmental Impact Statement
Prepared Pursuant to the Washington State Environmental Policy Act
Chapter 43.21C RCW and WAC 197-11-625

October 2023



October 12, 2023

Dear Recipient,

The City of Bellevue has prepared this State Environmental Policy Act (SEPA) Addendum for the Energize Eastside Project, which is Puget Sound Energy's linear infrastructure project to upgrade transmission lines between Renton and Redmond, Washington and construct a new substation in Bellevue. This Addendum adds analysis and information to the Energize Eastside Phase 2 Draft Environmental Impact Statement (Phase 2 Draft EIS) issued on May 6, 2017, Final Environmental Impact Statement (Final EIS) issued on March 1, 2018, and the subsequent City of Renton Environmental Consistency Analysis/Addendum issued on December 12, 2019.

The "Current Proposal," as that term is used in this Addendum, occurs in the North Bellevue Segment, which includes the "Bellevue Central" and "Bellevue North" areas identified and studied in the Phase 2 Draft EIS and the Final EIS. The City of Bellevue evaluated four proposed design refinements in the Current Proposal and whether impact conclusions in the Phase 2 Draft EIS and the Final EIS are still correct for the Current Proposal. Project refinements include: (1) utilization of the current wetland rating system, (2) changes to the number of trees to be removed, (3) changes to proposed pole heights, and (4) the use of off-site mitigation. Based on this evaluation, the City of Bellevue determined that the potential refinements to the project would not substantially change the analysis of significant impacts and alternatives in the Final EIS and would not result in new probable significant environmental impacts. Accordingly, no supplemental environmental impact statement is required, and an Addendum was prepared.

Copies of the Addendum are available for review at on the Energize Eastside website at <https://www.energizeeastsideeis.org/>. For further information about this Addendum, please contact Reilly Pittman, Environmental Planning Manager, 450 110th Avenue NE, 98004, rpittman@bellevuewa.gov or 425.452.6800.

Sincerely,

Reilly Pittman

Reilly Pittman
Environmental Planning Manager
Development Services Department

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FACT SHEET

Applicant: Puget Sound Energy (PSE)

SEPA Nominal Lead Agency: City of Bellevue, Development Services Department

Project Location

The project involves improvements to PSE’s electrical grid in the Eastside area of King County, between Redmond in the north to Renton in the south, and between Lake Washington and Lake Sammamish. The study area follows the existing alignment of PSE’s transmission line through the jurisdictions of Redmond, Bellevue, Newcastle, King County, and Renton. The project is limited to the existing utility corridor. PSE’s proposed transmission lines and associated infrastructure will generally be in the same location as the existing utility infrastructure. Land use approvals for south Bellevue, Renton, Newcastle, and Redmond have been issued by each jurisdiction.

Proposed Action

The purpose of the project is to address a projected deficiency in transmission capacity resulting from growth in electrical demand, which could affect the future reliability of electrical service for the Eastside. PSE proposes to construct and operate a major new transformer served by approximately 16 miles of new high-capacity electric transmission lines. Electrical power would be transmitted to a new substation and the voltage lowered, or “stepped down” (transformed), from 230 kilovolt (kV) to 115 kV for distribution to local customers.

PSE has proposed a preferred alignment for the transmission lines, referred to in the Final Environmental Impact Statement (Final EIS) as “PSE’s Proposed Alignment.” The City of Bellevue oversaw the EIS process in cooperation with the jurisdictions of Newcastle, Redmond, and Renton (the Partner Cities).

The Phase 1 Draft EIS evaluated a broad range of potential technological alternatives to address the identified transmission facility deficit. The Phase 2 Draft EIS provided project-level analysis of potential environmental impacts associated with alternatives for overhead transmission line locations and construction and operation of the Richards Creek substation in south Bellevue. The Final EIS built upon this earlier analysis and evaluated alternatives and potential and cumulative environmental impacts associated with the construction and operation of PSE’s proposed alignment in the existing utility corridor. The adequacy of the Partner Cities’ environmental review of the Energize Eastside project was challenged in Superior Court (*CENSE v. City of Bellevue*, Case No. 19-2-33800-8 SEA [September 21, 2020]); and the Superior Court denied that appeal, holding that the City of Bellevue did not err when it certified that the Final EIS was adequate.

This State Environmental Policy Act (SEPA) Addendum addresses the North Bellevue Segment of the proposed route, which runs approximately 5.2 miles from Bridle Crest Trail at NE 60th Street (the Bellevue-Redmond boundary), south to just north of the existing Lakeside substation. The underlying environmental review concluded that PSE’s proposal would not result in any significant adverse environmental impacts in central Bellevue or north Bellevue. The Current Proposal occurs in the North Bellevue Segment, which includes the “Bellevue Central” and “Bellevue North” areas identified and studied in the Phase 2 Draft EIS and the Final EIS, and includes the removal of wood transmission poles and H-frame poles and replacement with steel monopoles within the existing utility corridor. The proposed pole locations for the rebuilt lines will generally be in the same locations as the existing poles.

Responsible Official: Reilly Pittman, Environmental Planning Manager
Authorized Representative for Environmental Coordinator

Contact Person: Reilly Pittman, Environmental Planning Manager
City of Bellevue, Development Services Department
rpittman@bellevuewa.gov, 425.452.6800

Required Permits: Conditional Use Permit
Critical Area Land Use Permit

SEPA Addendum

Approved by: Reilly Pittman, Environmental Planning Manager
Authorized Representative for Environmental Coordinator

Location of Permit Files: 21-104989 LO and 21-104991 LB
City of Bellevue, Development Services Department
450 110th Ave NE, Bellevue, WA 98004

Date of Issuance: October 12, 2023

EXECUTIVE SUMMARY

The Partner Cities' environmental review of the Energize Eastside project, which culminated in issuance of the March 1, 2018, Final EIS, confirmed that construction and operation of the Energize Eastside project in central Bellevue and north Bellevue would not result in significant unavoidable adverse impacts. In turn, this Energize Eastside Project 2023 SEPA Addendum confirms that PSE's Current Proposal of March 2023 is within the range of proposed development and probable environmental impacts analyzed in the Phase 2 Draft EIS and the Final EIS for the Energize Eastside project. The Current Proposal includes the following refinements to the project analyzed in the Phase 2 Draft EIS and the Final EIS: (1) wetland rating system, (2) tree removal, (3) pole heights, and (4) off-site mitigation. With the mitigation required by Part 20.25H LUC and applicable City codes, standards, and regulations, as well as proposed in the Conditional Use Permit (CUP) and Critical Areas Land Use Permit (CALUP) applications, construction and operation of the North Bellevue Segment would not result in significant unavoidable adverse impacts.

PSE proposes upgrading 5.2 miles of two existing 115 kV transmission lines with two new 230 kV transmission lines in the City of Bellevue. This North Bellevue Segment proposal is part of the larger Energize Eastside project that would also occur in south Bellevue and in the cities of Redmond, Newcastle, and Renton, and in unincorporated King County. The proposed North Bellevue Segment portion of the project would require the removal of approximately 188 wood transmission line poles and the installation of 49 230 kV-capacity steel monopoles, including eight single-circuit monopoles and 41 double-circuit monopoles.

To date, the Partner Cities (the cities of Bellevue, Newcastle, Redmond, and Renton) have prepared four State Environmental Policy Act (SEPA) environmental review documents for the Energize Eastside project:

- Energize Eastside Project Phase 1 Draft EIS (January 28, 2016).
- Energize Eastside Project Phase 2 Draft EIS (May 6, 2017).
- Energize Eastside Project Final EIS (March 1, 2018).
- Energize Eastside Project Environmental Consistency Analysis/Addendum (City of Renton, December 12, 2019).

Informed by the Partner Cities' environmental review, Bellevue, Renton, Newcastle, and Redmond have issued final land use decisions for the Energize Eastside project covering south Bellevue and attendant project sites in Renton, Newcastle, and Redmond.

The following permits are required from the City of Bellevue for the proposed North Bellevue Segment project:

- Conditional Use Permit (CUP).
- Critical Areas Land Use Permit (CALUP).

In March 2021, PSE submitted complete CUP and CALUP applications to the City of Bellevue. In response to questions from the City, PSE submitted a revised site plan as well as information supplemental to the CUP and CALUP applications on March 1, 2023. These documents constitute the “Current Proposal.”

This SEPA Addendum addresses changes to the proposed North Bellevue Segment portion of the project subsequent to the Phase 2 Draft EIS and the Final EIS and confirms that impact conclusions presented in the Phase 2 Draft EIS and the Final EIS have not changed.

CHAPTER 1

INTRODUCTION

1.1 BACKGROUND

The City of Bellevue and the Partner Cities have conducted a phased environmental review process under the State Environmental Policy Act (SEPA) for an electrical transmission line project proposed by Puget Sound Energy (PSE). The project, called Energize Eastside, is a proposal to build new electrical transmission infrastructure to serve PSE’s customers in the Eastside area, in King County, Washington. This SEPA Addendum builds upon the previous Phase 1 Draft EIS and Phase 2 Draft EIS, released in January 2016 and May 2017, respectively, and the Final EIS, issued in March 2018. The Phase 1 Draft EIS assessed a range of impacts and implications associated with broad alternatives for addressing PSE’s objectives, in a non-project or programmatic EIS. The project-level Phase 2 Draft EIS incorporated the Phase 1 Draft EIS by reference and presented a project-level assessment of several segment and route options for a new substation, overhead transmission lines, and associated components at a preliminary design level.

Based on the results of the Phase 2 Draft EIS analysis, PSE refined the proposed route of the transmission lines and associated project components, as evaluated in the Final EIS. Following publication of the Final EIS, the adequacy of the Partner Cities’ environmental review of the Energize Eastside project was challenged in Superior Court (*CENSE v. City of Bellevue*, Case No. 19-2-33800-8 SEA [September 21, 2020]). The Superior Court denied the appeal, holding that the Partner Cities’ environmental review of PSE’s Energize Eastside project was adequate under SEPA.

PSE’s proposal is to construct and operate a new 230 thousand volt (kilovolt or kV) to 115 kV electrical transformer served by approximately 16 miles of new high-capacity electric transmission lines (230 kV) extending from Redmond to Renton. The transformer would be placed at a new substation site near the center of the Eastside, referred to as the Richards Creek substation. Electrical power would be transmitted to the new substation and the voltage lowered, or “stepped down” (transformed), from 230 kV to 115 kV for distribution to local customers.

Figure 1-1 in the Final EIS shows the Eastside and the locations of existing substations and 230 kV transmission lines, and the area where a new substation and new 230 kV lines are proposed. This set of facilities is proposed to address a deficiency in electrical transmission capacity during peak periods that PSE has identified through its system planning process. The Phase 1 Draft EIS explained the concept of “redundancy,” stating “[t]o ensure adequate capacity even when some equipment is not working, a substantial degree of redundancy is needed in distributed generation resources” (Phase 1, Draft EIS, at 2-37); and “[i]f adequate system redundancy is not provided, electrical power

production would likely not meet the demand during certain times” (*id.* at 16-35). The project is limited to the existing utility corridor, and PSE’s proposed transmission lines and associated infrastructure will generally be in the same location as the existing utility infrastructure.

The Partner City communities and other permitting agencies have used and will use the Final EIS in making permit decisions regarding the project. The cities of Bellevue, Redmond, Newcastle, and Renton have all issued permits for Energize Eastside project components, with the Partner Cities’ environmental review informing each of those final land use decisions issued by the respective local permitting jurisdictions.

The City of Bellevue only has permitting authority for work proposed in its jurisdiction, and the North Bellevue Segment is the last portion of the Energize Eastside project to be permitted. The North Bellevue Segment as presented in the Current Proposal and in this SEPA Addendum includes the “Bellevue Central” segment and the “Bellevue North” segment, as shown in Figure 1-2 in the Final EIS. Figures on page 2-23 and page 2-25 of the Final EIS show the North Bellevue Segment location. The Current Proposal includes the following refinements to the project analyzed in the Phase 2 Draft EIS and the Final EIS: (1) wetland rating system, (2) tree removal, (3) pole heights, and (4) off-site mitigation.

1.2 PURPOSE OF THE SEPA ADDENDUM

Washington Administrative Code (WAC 197-11-706) describes a SEPA Addendum as an environmental document used to provide additional information or analysis that does not substantially change the analysis of significant impacts and alternatives in the existing environmental document. An addendum may be used at any time during the SEPA process (WAC 197-11-706). Lead agencies, such as the City of Bellevue as lead SEPA agency for Energize Eastside, are authorized to use existing environmental documents for new project or non-project actions, if the documents adequately address environmental considerations set forth in Revised Code of Washington (RCW) 43.21C.030. The prior proposal or action and the new proposal or action need not be identical but must have similar elements that provide a basis for comparing their environmental consequences such as timing, types of impacts, alternatives, or geography.

As required, the City of Bellevue as the lead SEPA agency, has independently reviewed the content of the existing documents and determined that the information and analysis to be used in the SEPA Addendum are relevant and adequate. If necessary, the lead agency may require additional documentation to ensure that all environmental impacts have been adequately addressed (RCW 43.21C.034). In this case, the City of Bellevue has determined that PSE’s Current Proposal (as submitted in March 2021 and updated in March 2023) and the project analyzed in the Phase 1 Draft EIS, Phase 2 Draft EIS, and the Final EIS are similar enough to provide a basis for comparison. Chapter 2 of this SEPA Addendum

describes the ways in which the Current Proposal is different from the proposal analyzed in the Phase 2 Draft EIS and the Final EIS.

The City of Bellevue has prepared a SEPA Addendum rather than a Supplemental EIS because the differences between the Current Proposal and the project analyzed in the Phase 2 Draft EIS and the Final EIS (EISs) are similar enough to provide a basis for comparison. If the differences among the proposals were expected to result in new significant impacts, the City would prepare a Supplemental EIS rather than an Addendum. For example, if substantially more trees were proposed for removal in the Current Proposal compared to the EISs, impacts on aesthetics and visual resources and plants and animals could be significant. If construction of new access roads were proposed in the Current Proposal and not in the EISs, potential impacts on wetlands, plants, animals, and transportation could be significant. As confirmed by the Superior Court, the prior EISs adequately reviewed alternatives and disclosed significant impacts in compliance with SEPA. The issues covered by this Addendum do not disclose any new significant impacts but rather refine and clarify the impacts already disclosed and analyzed, which is again consistent with SEPA and warrants an addendum rather than a Supplemental EIS.

Each of the four refinements to the proposal described in this Addendum are related to a subject area addressed in the EISs. Whereas a Supplemental EIS would require a 30-day (minimum) public comment period on the Draft SEIS, a public meeting, and agency distribution and SEPA-register submittal, a SEPA Addendum does not require a public comment period or public meeting.

An addendum, using existing environmental documents, adds analyses or information about a proposal but does not substantially change the analysis of significant impacts and alternatives in the existing environmental document (WAC 197-11-600 (4)). Relevant procedures for a SEPA Addendum are as follows:

1. An addendum shall clearly identify the proposal for which it is written and the environmental document it adds to or modifies.
2. An addendum for a Draft EIS shall be circulated to recipients of the initial Draft EIS under WAC 197-11-455.
3. If an addendum to a Final EIS is prepared prior to any agency decision on a proposal, the addendum shall be circulated to the recipients of the Final EIS (WAC 197-11-625).

This Addendum shall be distributed to the recipients of the Final EIS. The City of Bellevue has yet to issue final land use decisions on PSE's CUP and the CALUP permit applications for North Bellevue Segment of the Energize Eastside project.

CHAPTER 2

PROJECT REFINEMENTS FOR NORTH BELLEVUE SEGMENT

2.1 INTRODUCTION

The following sections describe major differences between the project proposed in the Phase 2 Draft EIS, Final EIS, and the Current Proposal. PSE proposes upgrading 5.2 miles of two existing 115 kV transmission lines with two new 230 kV transmission lines in the City of Bellevue. This North Bellevue Segment proposal is part of the larger Energize Eastside project for which the Partner Cities have prepared four SEPA environmental review documents, including the Phase 1 Draft EIS (January 28, 2016), the Phase 2 Draft EIS (May 6, 2017), the Final EIS (March 1, 2018), and the Environmental Consistency Analysis/Addendum (City of Renton, December 12, 2019). As discussed above, the adequacy of this environmental review was previously challenged in King County Superior Court, with the Superior Court concluding that the Partner Cities' environmental review was adequate and complied with SEPA.

In March 2021, PSE submitted complete CUP and CALUP applications for the North Bellevue Segment to the City of Bellevue. In response to questions from the City, PSE submitted a revised site plan as well as information supplemental to the CUP and CALUP applications on March 1, 2023. The March 1, 2023, documents constitute the "Current Proposal." The Current Proposal includes refinements to the project analyzed in the Phase 2 Draft EIS and the Final EIS related to the wetland rating system, tree removal, pole heights, and off-site mitigation.

2.2 CURRENT WETLAND RATING SYSTEM

The Critical Areas Report (CAR) completed in 2021 (TWC 2021) for the Current Proposal relies on a more current Washington State Wetland Rating System for Western Washington than the rating system used in the 2015 CAR (TWC 2016) for the Phase 2 Draft EIS and the Final EIS. Therefore, the Current Proposal has different boundaries for wetlands and buffers and, in turn, different wetland and buffer impacts when compared to the Phase 2 Draft EIS and the Final EIS.

Original wetland and stream delineation and the CAR for the Energize Eastside project in Bellevue completed in 2015 (TWC 2016) were based on the 2004 version of the Washington State Wetland Rating System for Western Washington (Hruby 2004), in accordance with the City of Bellevue Land Use Code (LUC) 20.25H.095. This rating system was referenced in both the Phase 2 Draft EIS and the Final EIS, and these two documents relied on the 2004 rating system for the identification of wetland and buffer boundaries and related analysis of impacts.

On May 21, 2018, the City of Bellevue LUC adopted the Washington State Department of Ecology's (Ecology) 2014 Rating System for Western Washington (Hruby, published in October 2014, as amended, and effective January 2015) (Ordinance 6417). The Applicant (PSE) reassessed impacts and submitted a revised CAR in 2021 using the amended 2014 rating system (TWC 2021). The Current Proposal is based on the 2014 rating system; therefore, impacts on wetland buffers due to tree and other vegetation removal are different due in part to the change in the basis of identifying wetland and wetland buffer boundaries.

2.3 TREE REMOVAL

The Current Proposal would remove fewer trees than anticipated in the Phase 2 Draft EIS and Final EIS, as explained below.

The proposed project analyzed in the Phase 2 Draft EIS included the removal of approximately 1,130 trees (including 440 significant trees and 551 trees removed from critical areas or buffers) from the North Bellevue Segment, broken down as follows:

- *Bellevue North (North Bellevue Segment north of NE 20th Street):* 510 trees (66 percent of the total surveyed in the segment) could be removed, including the potential removal of about 190 significant trees, and three trees from critical areas or buffers (see Phase 2 Draft EIS Section 3.4.5.4).
- *Bellevue Central – Existing Corridor (North Bellevue Segment south of NE 20th Street):* About 620 trees (81 percent of the total trees surveyed in the option) could be removed, including the potential removal of about 250 significant trees, as well as about 140 trees from critical areas, and 411 trees from the buffers (see Phase 2 Draft EIS Section 3.4.5.5).

The proposed project analyzed in the Final EIS included the removal of approximately 1,152 trees (including 415 significant trees and 243 trees removed from critical areas or buffers):

- *Bellevue North (North Bellevue Segment north of NE 20th Street):* About 510 trees (61 percent of the total surveyed in the segment) could be removed, including the potential removal of about 181 significant trees, and three trees from critical areas or buffers (see Final EIS Section 4.4.5.4).
- *Bellevue Central – Existing Corridor (North Bellevue Segment south of NE 20th Street):* About 642 trees (70 percent of the total trees surveyed in the segment) could be removed, including the potential removal of about 234 significant trees, as well as about 68 trees from critical areas, and about 172 trees from the buffers (see Final EIS Section 4.4.5.5).

The Current Proposal includes the removal of 1,043 trees or shrubs (including 433 significant trees and 202 trees removed from critical areas). Approximately 540 trees

would be removed north of NE 20th Street and 503 trees would be removed south of NE 20th Street.

2.4 POLE HEIGHTS

Pole heights north of NE 20th Street are shorter than analyzed in the Phase 2 Draft EIS and the Final EIS. South of NE 20th Street, pole heights are slightly taller than analyzed in the Phase 2 Draft EIS and the Final EIS. The three tallest proposed poles south of NE 20th Street are located approximately 50 feet south of NE Bellevue-Redmond Road and approximately 35 feet north of the edge of the Richards Creek substation. The taller pole heights south of NE 20th Street are required to comply with Federal Energy Regulatory Commission (FERC) regulations for pole spacing and conductor sag because the Current Proposal includes fewer overall poles than anticipated in the Phase 2 Draft EIS.

The North Bellevue Segment of the proposed project analyzed in the Phase 2 Draft EIS included the following typical pole heights:

- *North of NE 20th Street:* 95 foot typical pole height with a 100 foot maximum height.
- *South of NE 20th Street:* 95 foot typical pole height with 115 foot maximum height (see Phase 2 Draft EIS pp. 2-25, 27).

The North Bellevue Segment of the proposed project analyzed in the Final EIS included the following typical pole heights:

- *North of NE 20th Street:* 93 foot typical pole height with a maximum height of 100 feet.
- *South of NE 20th Street:* 96 foot typical pole height with a maximum height of 113 feet (see Final EIS pp. 2-23, 25).

Current Proposal pole heights range between 77 feet and 125 feet, with an average height of 99 feet and a median height of 95 feet. The three tallest proposed poles are located near NE Bellevue-Redmond Road and adjacent to the Richards Creek substation.

- *North of NE 20th Street:* Proposed pole heights range from 86 feet to 105 feet with two poles 100 feet or higher. Average proposed pole height is 94 feet, and the median proposed pole height is 95 feet.
- *South of NE 20th Street:* Proposed pole heights range from 77 feet to 125 feet with 10 poles 100 feet or higher and three poles 115 feet or taller. Average proposed pole height is 101 feet and median proposed pole height is 97 feet.

2.5 OFF-SITE MITIGATION

The Current Proposal includes off-site mitigation, which was not considered in the Phase 2 Draft EIS or the Final EIS. The Phase 2 Draft EIS and Final EIS proposed general mitigation, such as replacement of wetland acreage based on replacement ratios in the Critical Areas Ordinance (CAO), replacement of lost buffer area, avoiding locating poles in wetland and wetland buffers where possible, and on-site enhancement or restoration of buffers where pole placement or clearing would occur. After construction, disturbed areas would be replanted with native vegetation that would meet transmission line clearance requirements. The Phase 2 Draft EIS relied on the CAR prepared by The Watershed Company (TWC 2016), which identified specific potential mitigation opportunities on parcels owned by public entities or PSE and located within, adjacent, or in proximity to the North Bellevue Segment. These mitigation opportunities included mitigation at: (1) Viewpoint Park and the adjacent PSE property (including Wetland CB01 and its critical area buffer) to improve habitat function, (2) Kelsey Creek Park to improve function by removing invasive species, (3) PSE Lakeside substation to improve riparian and wetland function by removing invasive species, and (4) Coal Creek Park to improve habitat function.

The Phase 2 Draft EIS and Final EIS also proposed measures to mitigate tree removal, including an in-lieu fee for trees removed in the City's right-of-way. In the Bridle Trails Subarea in the City of Bellevue, the Phase 2 Draft EIS and Final EIS proposed planting replacement trees as required under the City's Tree Retention and Replacement Code (LUC 20.20.900). Both EISs also assumed compliance with City of Bellevue code requirements, including the Critical Areas Overlay District (Part 20.25H LUC), the Transportation Code's tree protection ordinance (LUC 14.06.100), and the Tree Retention and Replacement Code (LUC 20.20.900).

The Final EIS relied on the 2021 CAR and proposed public properties for mitigation consideration in addition to those proposed in the Phase 2 Draft EIS. However, discussions between the Applicant and the City of Bellevue concluded that City of Bellevue Parks & Community Services-owned and other public properties were not a viable mitigation option (TWC 2021). In addition, the PSE-owned properties under consideration for mitigation were determined not to provide an appreciable functional lift. Therefore, the four specific mitigation opportunities at Viewpoint Park, Kelsey Creek Park, Lakeside substation, and Coal Creek Park were removed from consideration.

The Current Proposal also relies on the 2021 CAR (TWC 2021) and proposes an additional mitigation opportunity for impacts on wetlands and combined wetland and stream buffers. Using Ecology's revised Wetland Rating System for Western Washington (Hruby 2014), the 2021 CAR proposed 14,456 total square feet of mitigation using both on-site mitigation (at the Richards Creek substation site) and off-site mitigation, at the Keller Farm Mitigation Bank (KFMB). The acreage of proposed mitigation is less in the Current Proposal when compared to the Phase 2 Draft EIS and the Final EIS because Ecology's

guidance for the on-site enhancement area (Department of Ecology 2018, as cited in TWC 2021) limits impacts on vegetation conversion caused by the removal of an estimated 202 trees in critical areas.

As on-site mitigation, the Applicant currently proposes to improve 9,930 square feet of wetland and wetland buffer as wetland habitat within Wetland A at the Richards Creek substation site. This proposed on-site mitigation is adjacent to the proposed South Bellevue Segment mitigation area at the substation and would increase the functional lift of the wetlands and wetland buffer and provide long-term management benefits because PSE owns the property. The remainder of the proposed mitigation, 4,526 square feet, will be met through the purchase of mitigation credits from KFMB, an off-site mitigation area that is outside of the drainage basin. City of Bellevue critical areas regulations, at LUC 20.25H.085.A.4 and LUC 20.25H.105.B.3, allow off-site mitigation outside of the drainage basin through a CAR. A CAR was prepared in 2021 for the Current Proposal; therefore, off-site mitigation outside the drainage basin is allowed, subject to compliance with the City's critical areas regulations.

The Current Proposal contains a proposed Adaptive Tree Replacement Plan (PSE 2023) for tree removal, including Landscape and Tree Replacement Plans for each property owner, payment of fees by the Applicant covering the estimated cost of mitigation for tree removal (including materials and labor), and tree planting at the Richards Creek substation site. A financial guarantee for the estimated cost of mitigation for tree removal would be issued prior to the issuance of the clearing and grading permit and commencement of tree removal activities. Similar to the EISs, under the Current Proposal, an in-lieu fee for trees removed in the City's right-of-way would be imposed on the Applicant. Under the Current Proposal, where trees are not replaced on-site due to property owners' preferences, replacement trees will need to be planted outside the study area.

CHAPTER 3

COMPARISON OF ENVIRONMENTAL IMPACTS UNDER THE PHASE 2 DRAFT EIS, FINAL EIS, AND CURRENT PROPOSAL

3.1 INTRODUCTION

The following sections summarize construction, operation, and cumulative impact conclusions for the Phase 2 Draft EIS, Final EIS, and Current Proposal for the following SEPA elements: Water Resources, Plants and Animals, and Aesthetics and Visual Resources. These three elements were chosen out of the list of elements analyzed in the Phase 2 Draft EIS and Final EIS because the project refinements would affect only these elements. The update to the wetland rating system affects estimates of the wetland and buffer area, impact estimates, and mitigation requirements, which are addressed in the Water Resources element and the Plants and Animals element, due to habitat within wetlands and buffers. The proposed number of trees to be removed potentially affects vegetation and habitat, which are addressed in the Plants and Animals element. The pole heights potentially affect views, which are addressed in the Aesthetics and Visual Resources element.

The following SEPA elements analyzed in the Phase 2 Draft EIS or Final EIS were not addressed in this Addendum because the project refinements would not change the analysis in the Phase 2 Draft EIS or Final EIS: land use and housing, greenhouse gases, recreation, historic and cultural resources, electric and magnetic fields, pipeline safety, economics, and earth resources. As stated in the Final EIS Chapter 1, as required by SEPA (WAC 197-11-440(6)), elements of the environment that are not significantly affected do not need to be included in an EIS. The following are elements of the environment evaluated in the Phase 1 Draft EIS that would not be significantly affected by the proposed project and were therefore not analyzed in the Phase 2 Draft EIS, the Final EIS, or this Addendum: public services, utilities, transportation, energy and natural resources, and noise.

3.2 WATER RESOURCES

3.2.1 Construction

Phase 2 Draft EIS

Construction impacts on water resources would primarily be associated with installing transmission poles, access roads, and staging areas. Construction could potentially cause temporary water quality impacts on nearby water bodies. Impacts would be temporary and minor with the implementation of best management practices (BMPs) and temporary and therefore less-than-significant. Installation of the transmission poles would require excavation for pole foundations. Excavations would be 4 to 8 feet in diameter and could extend 25 to 50 feet deep. Poles in the existing corridor would be replaced in approximately the same location as existing poles, minimizing the amount of additional clearing and disturbance required. Existing poles would be removed and disposed of at an approved landfill.

Construction would require clearing of trees and vegetation within the clear zone (in the managed right-of-way). Clearing would also expose bare soil and potentially increase erosion and sedimentation during construction. Implementation of BMPs and sediment and erosion control plans would reduce potential impacts. Disturbed areas would be replanted and stabilized following construction to prevent future erosion (see Phase 2 Draft EIS Section 3.4 regarding replacement vegetation). Therefore, these impacts would be temporary and less-than-significant.

The Phase 2 Draft EIS states that installation of poles in wetlands or buffers would require the clearing of vegetation and excavation, which would disturb soils and could cause minor, temporary increases of erosion and sedimentation. Construction vehicles could compact soils and damage wetlands or buffers. PSE would implement BMPs and provide mitigation in compliance with applicable critical areas regulations, including mitigation requirements described in Phase 2 Draft EIS Appendix D. Specialized equipment, such as tracked vehicles, would be used to minimize the extent of wetland disturbance. Implementation of BMPs and compliance with these requirements would result in less-than-significant impacts on wetlands and buffers.

No poles would be placed in stream beds, but the transmission line would cross streams in several locations, as described in Phase 2 Draft EIS Table 4.3-1. These crossings would consist of overhead transmission wires, which would not impact the stream directly. Restraining the wires would not require construction equipment or activities in the stream, so no impacts would occur. Construction would not require diversion or dewatering of any streams. For these reasons, impacts on streams would be less-than-significant.

The presence of construction vehicles and equipment in the vicinity of streams and wetlands could result in accidental spills of fuel, oil, hydraulic fluid, and other chemicals.

These fluids could reach wetlands, streams, or groundwater if spills are not controlled. Prior to issuance of the clearing and grading permit, construction contractors would be required to develop spill prevention plans that would be implemented to minimize impacts, so these impacts would be less-than-significant. Construction for pole installation would also require excavation up to 50 feet, which could encounter shallow groundwater. This could require dewatering to remove groundwater that seeps into excavation areas. The uncontrolled release of dewatering water could contaminate surface waters. Use of sediment tanks to settle soil particles and potentially filter or treat water pumped from the excavations would prevent contamination. Because the area of excavation for each pole would be limited to approximately 8 feet in diameter, any dewatering would be minimal, and impacts would be less-than-significant.

Excavation also has the potential to change or interfere with the flow patterns of shallow groundwater, and dewatering could cause drawdown of groundwater levels. However, the limited extent of the excavations would not impact groundwater flows or levels. Pump tests would be conducted prior to construction to determine the potential for drawdown and settlement, and appropriate mitigation measures would be developed to minimize impacts. PSE will establish staging sites to store equipment and materials. Generally, PSE will use already developed areas for staging, minimizing the need to clear new areas, but some new areas will likely be required. Clearing of these areas could increase erosion and sedimentation to adjacent water resources, but implementation of BMPs would minimize impacts. New staging areas would be restored following construction, so impacts would be temporary and less-than-significant.

North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS): No transmission poles would be located in streams, wetlands, or buffers, so no impacts would occur.

- *North of NE 20th Street:* The transmission line would cross three streams. No new clearing would be required. Stringing the wires across the streams would not cause impacts because no construction activities would occur in the streams.
- *South of NE 20th Street:* The transmission line would cross three streams in this option in the existing corridor.

The Phase 2 Draft EIS found that impacts on water resources due to project construction would be less-than-significant.

Final EIS

Impacts on water resources were found to be similar to the Phase 2 Draft EIS, with the following updates:

- The Final EIS identifies PSE's Proposed Alignment as entirely within the existing corridor, so any impacts associated with new corridors would not occur.

- *North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Final EIS):*
 - *North of NE 20th Street:* No transmission poles, staging areas, or stringing sites would be located in streams, wetlands, or buffers. The transmission line would not cross any streams in the existing corridor.
 - *South of NE 20th Street:* No transmission poles would be located in streams. Two poles are proposed in wetlands and nine poles would be located in buffers (these would replace existing poles). Staging and stringing sites would be located outside of critical areas, to the extent feasible. The transmission line would cross 13 streams or surface water drainage features.

The Final EIS found that impacts on water resources due to project construction would be less-than-significant.

Current Proposal – North Bellevue Segment

Under the Current Proposal, impacts would be similar to the Phase 2 Draft EIS and the Final EIS, with the following updates:

- No poles would be placed in wetlands, streams, or stream buffers. Impacts on wetland buffers would be minimized and limited to pole foundations and selective vegetation management.
- Six poles would be removed from wetlands, resulting in a temporary disruption to wetlands and 150 square feet of restored wetland area.
- A total of 18 streams are located along the North Bellevue Segment corridor. Kelsey Creek, the most prominent stream in this segment, crosses the corridor south of Bel-Red Road and is the northernmost stream in the North Bellevue Segment. Stream channels are often co-located with wetlands, located in the vicinity of the Lake Hills Connector, near Kelsey Creek Park. Impacts would remain less-than-significant because the aerial crossings of the transmission line would not affect the streams, or their buffers, and no in-water work would occur. The differences among the numbers of stream crossings reported in the Phase 2 Draft EIS, the Final EIS, and the 2021 CAR (TWC 2021) (the Current Proposal) may be due to the time of year delineations were conducted and the related effect on whether streams were evident or classified as streams rather than seasonal ponding.
- Twenty-five poles would be removed from combined wetland and stream buffers, resulting in a temporary disruption to buffers (TWC 2021).

Changes to impact magnitudes compared to the Phase 2 Draft EIS and the Final EIS are primarily due to the removal of poles from wetlands and buffers; these impacts would be short-term and temporary, terminating at the end of the construction period. Restoration of the wetlands and buffer areas after construction is described in Section 2.5.

The Current Proposal is similar enough to the project analysis in the Phase 2 Draft EIS and the Final EIS such that impact conclusions for construction impacts on water resources remain the same (less than significant).

3.2.2 Operation

Phase 2 Draft EIS

In general, long-term impacts on water resources would be less-than-significant. All impacts would be minor and could be fully mitigated through compliance with applicable regulations and implementation of BMPs. The types of impacts associated with the transmission line and poles would be similar for all segments. The Phase 2 Draft EIS states that any installation of poles, permanent access roads, or other transmission facilities in wetlands, streams, or their buffers could lead to a loss of acreage or function. Although the preliminary design indicates that some poles could be located in streams, PSE has the flexibility to move the poles by up to 25 feet in either direction along the corridor and would not place new poles directly in streams. The Phase 2 Draft EIS analysis assumed that any poles proposed near streams would be located within stream buffers and not the stream bed. Similarly, PSE would move poles to avoid locating them in wetlands to the extent feasible. However, in some places it may not be possible to avoid putting new poles in wetlands. PSE would not locate permanent access roads in wetlands. Any poles in wetlands or buffers would require compliance with critical areas and shoreline management ordinances, which require avoidance and mitigation. The size of disturbance and the permanent reduction in wetland or buffer acreage would be small (generally less than 25 square feet per pole). The impacts would be minor and could be fully mitigated through compliance with applicable regulations. Therefore, impacts would be less-than-significant.

The new 230 kV transmission lines would require tree removal along the existing and new corridors. As described in Phase 2 Draft EIS Section 3.4.1.3, Plants and Animals, PSE's Vegetation Management Program would prevent tall trees and noxious weeds from growing in the new and existing corridors. Low vegetation would be allowed to grow in the corridor, and there would be no areas of exposed soil following construction. Therefore, erosion and sedimentation would not increase, and no long-term impacts on water quality are expected; impacts would be less-than-significant.

Permanent access roads for the maintenance of poles and transmission lines would create increased pollution-generating impervious surfaces. Runoff from these surfaces could affect water quality; however, PSE will rely on existing roads to access the corridor to the extent possible, and any new permanent roads would be short segments connecting to existing roads. New roads would include stormwater treatment systems that meet state and local requirements. Therefore, impacts of these roads on stormwater runoff and water quality would be less-than-significant. Maintenance of poles would be limited to regular upkeep. Access roads to poles and transmission lines would also be maintained. These maintenance activities would likely include grading and pavement repair, which

would comply with applicable regulations. Therefore, they would have a less-than-significant impact on water resources.

The presence of maintenance vehicles and equipment in the vicinity of streams and wetlands could result in accidental spills of fuel, oil, hydraulic fluid, and other chemicals. These fluids could reach wetlands, streams, or groundwater if spills are not controlled. Prior to issuance of the clearing and grading permit, maintenance contractors would be required to develop spill prevention plans that would be implemented to minimize impacts, so these impacts would be less-than-significant. Once installed, poles would not affect stormwater runoff, groundwater infiltration, or shallow groundwater flow. The new poles would be steel and would not generate substances that could contaminate surface or groundwater. Where old poles treated with a wood preservative are removed and replaced with steel poles, a potential source of groundwater and water contamination would be removed. The completed transmission line would not generate any pollutants that would affect existing Ecology 303d listings for streams and rivers along the new and existing corridors. The project would not generate sediment that would increase turbidity. Tree removal in riparian areas could increase stream temperatures and affect 303d listings. Avoiding tree removal by pruning or topping trees in compliance with critical areas regulations would help maintain shading and reduce temperature increases.

North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS): In general, impacts on water resources would be less-than-significant along this segment because the project would follow the existing corridor and would result in only minor alterations to or disturbances of water resources.

- *North of NE 20th Street:* No poles would be placed in streams, wetlands, or buffers, so no impacts would occur.
- *South of NE 20th Street:* No poles would be placed in stream buffers, so no impacts would occur. All of the wetlands along the existing corridor are Category III or IV with relatively small buffers. Some of the Category IV wetlands are too small to be regulated by the City of Bellevue. The existing three poles in wetlands would be reduced to two with this option (one pole would be removed). Replacing the poles would cause a minor reduction in wetland acreage that would be mitigated in accordance with CAO and permit requirements. Therefore, there would be no long-term impact on wetlands. The number of poles in buffers would be reduced from 14 to six, resulting in beneficial impacts. The existing corridor is outside the Kelsey Creek shoreline jurisdiction, so no impacts would occur related to shorelines.

The Phase 2 Draft EIS found that impacts on water resources due to project operation would be less-than-significant.

Final EIS

Impacts would be similar to the Phase 2 Draft EIS, with the following updates:

- The Final EIS identifies PSE’s Proposed Alignment as entirely within the existing corridor, so any impacts associated with new corridors would not occur.
- In some locations, replacement poles may require larger footings than the existing poles, resulting in a small net increase in disturbance within wetland buffers. The impacts would be minor and could be fully mitigated through compliance with applicable regulations. Therefore, impacts would be less-than-significant.
- *North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS and Final EIS):*
 - *North of NE 20th Street:* None of the poles would be placed in wetlands, streams, or stream buffers, so no impacts would occur.
 - *South of NE 20th Street:* The existing three poles in wetlands would be reduced to zero poles within this segment, rather than two poles with the Phase 2 Draft EIS, which would result in a benefit to wetlands. The number of poles in buffers would be reduced from 14 poles to nine poles, resulting in beneficial impacts, although not as much of a benefit as with the Phase 2 Draft EIS.

The Final EIS found that impacts on water resources due to project operation would be less-than-significant.

Current Proposal – North Bellevue Segment

Under the Current Proposal, impacts would be similar to the Phase 2 Draft EIS and the Final EIS, with the following updates:

- One tree would be removed from Wetland A (Category IV), resulting in an impact on Wetland A. Wetland A was classified as a Category III wetland in the Phase 2 Draft EIS and Final EIS using the 2004 Wetland Rating System and reclassified as a Category IV using the revised 2014 Wetland Rating System.
- One tree would be removed from Wetland CB01 (Category III), resulting in an impact on Wetland CB01. Wetland CB01’s category was not reclassified when the revised 2014 Wetland Rating System was implemented.
- One stream buffer, an unnamed tributary of Valley Creek, would be affected by the project.
- Thirty-four existing poles would be removed from wetland and stream buffers, resulting in an addition of 1,039 square feet of buffer. Following pole removal, the holes will be filled with dirt, restored with native grass seed, and left to naturally regenerate. This would add to the buffer area and represent a long-term benefit to wetland and stream buffers.
- Nine new poles would be placed in wetland and stream buffers, resulting in 63 square feet of permanent buffer impact in the Kelsey Creek subbasin and 59

square feet of permanent buffer impact in the Richards Creek subbasin (TWC 2021).

No natural open surface water systems in Bellevue would be affected by the Current Proposal in the North Bellevue Segment. The permanent impacts on water resources would occur due to the removal of trees and large shrubs incompatible with proposed 230 kV transmission lines under federal regulations. Proposed mitigation is discussed in Chapter 4 of this Addendum.

The Current Proposal is similar enough to the project analysis in the Phase 2 Draft EIS and the Final EIS such that impacts conclusions remain the same (less than significant).

3.2.3 Cumulative Impacts

The Phase 2 Draft EIS and the Final EIS state that no long-term impacts on water resources would occur as a result of Alternative 1 (PSE's Proposed Alignment), and the project is not expected to contribute to indirect or direct impacts resulting from other projects; therefore, no cumulative impacts on water resources would occur.

Project activities under the Current Proposal that affect water resources are similar enough to the project activities proposed under the Phase 2 Draft EIS and the Final EIS such that cumulative impacts associated with the Current Proposal would be the same (less than significant) as with the Phase 2 Draft EIS and Final EIS.

3.3 PLANTS AND ANIMALS

3.3.1 Construction

Phase 2 Draft EIS

The Phase 2 Draft EIS stated that impacts on plants and animals during construction could include noise disturbance, habitat alteration or loss (vegetation clearing), degradation of aquatic habitat, and introduction of invasive plant species.

Increased construction noise and human activity could cause some animal species to temporarily relocate to surrounding habitats, or in some instances to be displaced. Construction activities would not cause excessive noise disturbances. No impacts on terrestrial species are expected because although the Phase 2 Draft EIS states that the study area provides potential habitat for several bird, mammal, reptile, amphibian, and fish species protected by federal, state, or local environmental laws and regulations, it also finds that protected wildlife species are not known to occupy habitat within the study area. Although three protected fish species (Chinook salmon, steelhead, and lamprey) occur in Kelsey and Richards creeks, stream habitat would not be substantially affected by the project. Complying with environmental permit requirements would minimize the potential for impacts and implementing construction BMPs for Alternative 1 would

eliminate or substantially reduce such impacts. Most construction activities would typically be limited to the immediate area around the pole locations, where vegetation could be removed to allow a safe working space for equipment, vehicles, and materials. The amount of ground disturbance would be limited. Disturbing these small, isolated areas would require wildlife to move only short distances to avoid direct effects, and limit indirect effects to surrounding habitat. Pole locations would be chosen to minimize the disturbance of sensitive or critical areas by typically allowing placement within approximately 25 feet of the existing poles.

Construction activities that disturb the vegetation and soil would result in the short-term loss or alteration of habitat for ground-oriented species, thereby decreasing the value of the habitat for wildlife. The primary factor resulting in habitat loss would be the amount of area needed to install the poles and wires along the corridor. Stringing new wires would require additional staging areas to pull the wires and achieve the correct wire tension, potentially requiring some minor grading or ground disturbance. Overall, the amount of ground-disturbing activities associated with installing the poles and stringing the new conductors would be limited, and disturbed areas would be replanted to the extent practicable. As a result, these activities would have less-than-significant impacts on fish and wildlife habitat.

Construction activities adjacent to streams or within wetlands have the potential to increase sedimentation of aquatic habitats, due to runoff from disturbed areas. While most segments and options analyzed in the Phase 2 Draft EIS avoid critical areas and their buffers, there are a few instances where pole placements could result in potential impacts. Complying with state and local stormwater permit BMPs, including installing temporary erosion control measures prior to ground-disturbing activities, would minimize or eliminate potential impacts. In addition, the limited amount of disturbed area, and the flexibility of locating poles, would minimize the potential for turbid runoff from reaching sensitive habitats. As a result, expected impacts would be less-than-significant.

Construction activities adjacent to critical areas or their buffers have the potential to result in accidental spills of oils, fuels, solvents, and other chemicals from construction equipment. If not controlled, such spills could enter nearby surface waters and adversely affect aquatic species. However, such impacts would be minimized or eliminated by fulfilling permit requirements and implementing spill prevention and control plans. As a result, expected impacts would be less than significant.

The Applicant would replant disturbed areas after construction to reduce the space and opportunity for invasive species to become established, and continue to selectively use herbicides for vegetation management, in accordance with existing permits and associated BMPs. Therefore, less-than-significant impacts on plants and habitats are expected.

North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS): Habitat would be temporarily lost due to pole installation. Impacts

from installing new poles on available habitat would be less-than-significant because the segment is in the existing corridor with available access, which minimizes ground disturbance and short-term impacts on aquatic species and habitats. Impacts would include discriminating use of growth regulators and herbicides in accordance with existing management plans and permits.

- *North of NE 20th Street:* An estimated 21 poles would be installed. No poles would be located in wetlands, streams, or buffers. Several protected fish species could occur in Valley Creek in this segment; however, no poles would be located in streams.
- *South of NE 20th Street, Existing Corridor:* An estimated 11 transmission poles would be installed. Several protected fish species occur in the streams in this option. However, no poles would be located in streams or buffers.

The Phase 2 Draft EIS found that impacts to fish, wildlife, or plants due to project construction would be less-than-significant.

Final EIS

Impacts were found to be similar to the Phase 2 Draft EIS with the following updates:

- The Final EIS identifies PSE's Proposed Alignment as entirely within the existing corridor, so any impacts associated with new corridors would not occur.
- Potential impacts related to sedimentation and to aquatic habitats are described in more detail compared to the Phase 2 Draft EIS in Table 5.3-1 of the Final EIS.
- *North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Final EIS):*
 - *North of NE 20th Street:* Approximately 17 poles would be installed, none in streams, wetlands, or buffers.
 - *South of NE 20th Street:* Approximately 24 poles would be installed, two poles in wetlands and nine poles in buffers. No poles would be installed in streams.

The Final EIS found that impacts on fish, wildlife, and plants due to project construction would be less-than-significant.

Current Proposal – North Bellevue Segment

Impacts on fish, wildlife, and plants would be similar to the Final EIS, with the following updates:

- Limited disturbance is expected within fish and wildlife habitat areas and wetlands.

- Existing impacts on wetlands and their associated wildlife and plant habitat would be avoided by relocating six poles from wetland to non-wetland areas, which would allow approximately 150 square feet of wetland area to be restored. Following pole removal, the holes will be filled in with dirt and restored with an appropriate native wetland seed mix and left to naturally regenerate.
- Buffer impacts will be limited to the pole footprint and selective vegetation management activities required by federal clearance standards.
- *North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS and Final EIS):*
 - *North of NE 20th Street:* Approximately 19 poles would be installed, none in streams, wetlands, or buffers.
 - *South of NE 20th Street:* Approximately 26 poles would be installed, none in streams or wetland, and 12 in buffers. Two of the 12 would be relocated from in-wetland to the adjacent buffer.

The Current Proposal is similar enough to the project analysis in the Phase 2 Draft EIS and the Final EIS such that impacts conclusions remain the same (less than significant).

3.3.2 Operation

Phase 2 Draft EIS

The primary long-term impacts of the project on plants and animals are the effects of removing mature trees along the existing corridor. Most of the study area is developed as urban, suburban, and exurban areas, providing limited and low-quality wildlife habitat. In addition to the existing habitat conditions, ongoing maintenance activities within and adjacent to the managed right-of-way would continue to occur after the project is built along the existing corridor. These activities include periodic trimming or the removal of trees within the vegetation management zones, in accordance with established management criteria. The potential new route options typically occur in areas that are much more developed than the existing corridor, or along existing roadways. As a result, the habitat along these new alignments typically consists of landscaped or maintained vegetated areas.

The analysis of impacts on plants considered the total number of trees potentially removed in the study area, the percentage of trees removed of those surveyed by segment or option, and the density of trees removed within a given segment or option. The analysis also addressed both total trees and significant trees.

Poles would be replaced in about the same locations as the existing poles, with a small number within or near critical habitat areas. However, PSE has flexibility in the placement of new poles, making it possible to maximize avoidance of these areas. For general planning purposes, it was assumed that the new poles can be placed anywhere within

approximately 25 feet of the locations of the existing poles. This means that a pole currently located in a wetland or floodplain, for example, may be replaced with a pole in the wetland buffer or outside of floodplain habitat, and in some cases outside of the buffer. Most of the new poles would be installed outside of critical habitat areas. There would also be an overall reduction in the number of poles in critical habitat buffer areas. As a result of the reduced number of new poles, the reduced number of poles in sensitive habitats, the limited habitat disturbance that typically occurs from installing and removing poles, and mitigation required by each jurisdiction, impacts would be less-than-significant.

Replacing existing poles (typically H-frame structures) with primarily single or tandem monopoles could reduce roosting or nesting opportunities for birds in the study area because poles are sometimes used for these purposes. Habitat reductions along the existing corridor would be due to a decrease in the total number of poles. The project would reduce the electrocution and collision rates for avian species. Changes to project-related mortality of avian species would be less-than-significant.

The project would result in less-than-significant impacts on fish or fish habitat, as project activities would not result in direct impacts on stream habitat, and effects on riparian or floodplain habitat functions would be minimized through mitigation to the extent practicable. The project activities would not result in substantial ground disturbance, or a substantial increase in the amount of impervious surface area, so changes in stream water quality and quantity are not expected to occur. Construction BMPs would be implemented to further minimize or eliminate impacts from project activities, and PSE would avoid placing poles in streams, floodplains and wetlands, and associated buffers to the extent feasible.

Despite the amount of potential tree removal, habitat suitable for the urbanized species that typically occur in the area would remain. In addition, the number of trees removed from sensitive habitats would be minimized or avoided, and any removal would be mitigated as required by local critical area ordinances. Although several protected aquatic species occur in streams within this segment, stream and riparian habitat would not be substantially affected. In some cases, removal may be avoided by trimming. Any removal would be mitigated as required by local critical area ordinances. Extensive tree removal would reduce the quality and quantity of wildlife habitat, and the reduction in the number of poles would also reduce potential avian nesting and roosting habitat. However, the reduction in poles would reduce potential impacts on wetland, riparian, or floodplain habitats or functions, which support aquatic-oriented species. No impacts on terrestrial species are expected because protected plant or terrestrial wildlife species are not known to inhabit the study area.

North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS): About 1,130 trees could be removed, including 440 significant trees, and 554 trees from critical areas or buffers in the North Bellevue Segment.

- *North of NE 20th Street:* About 510 trees (66 percent of the total surveyed in the segment) could be removed, including the potential removal of about 190 significant trees, and three trees from critical areas or buffers. Although two protected fish species (Chinook salmon and lamprey) occur in Valley Creek, stream habitat would not be substantially affected by the project.
- *South of NE 20th Street:* About 620 trees (81 percent of the total trees surveyed in the option) could be removed, including the potential removal of about 250 significant trees, as well as about 140 trees from critical areas, and 411 trees from the buffers. Although three protected fish species (Chinook salmon, steelhead, and lamprey) occur in Kelsey and Richards creeks, stream habitat would not be substantially affected by the project.

The Phase 2 Draft EIS found that impacts on fish, wildlife, and plants due to project operation were less-than-significant.

Final EIS

Impacts are similar to the Phase 2 Draft EIS, with the following updates:

- The Final EIS identifies PSE's Proposed Alignment as entirely within the existing corridor, so any impacts associated with new corridors would not occur.
- PSE has the management flexibility of pruning rather than removing trees where adequate clearance can be maintained. To the extent practicable, the number of trees removed from sensitive habitats would be minimized, and any removal would be mitigated as required by local critical area ordinances. With mitigation, the effects of impacts on critical areas would be less-than-significant.
- Few trees would be removed that provide direct canopy shade for streams, with most occurring in the buffer areas away from the actual stream channel. Therefore, changes in the amount of direct shade provided to the stream would likely have no measurable effect on water temperature or instream habitat.
- Trees would also be selectively cut, leaving smaller or preferred species trees and understory shrub vegetation in place, to continue to provide stream shade and future wood recruitment functions.
- The small trees and understory vegetation that would remain in place would replace some of the rainfall interception capabilities lost through tree removal actions, helping to maintain runoff regulation functions during storm events. While the character of vegetation in critical areas would change in some areas of the transmission line corridor, there would be no substantial change in the amount of pervious surface area (overall vegetated area), and much of the vegetation functions would be maintained.
- There is some evidence that the avoidance of powerlines may be related to the ability of species to see ultraviolet light corona, which can be emitted from

powerlines (see Final EIS Section 4.4.5.1). This characteristic could result in the wires being even more detectable to some avian species, thereby potentially further reducing electrocution or collision mortality or injury rates. Although electrocution and collision rates are expected to be lower, the higher voltage lines would produce greater electric and magnetic fields and corona light effects than the existing 115 kV transmission lines, resulting in the potential for greater impacts on some wildlife species. Such impacts tend to be variable and often unquantifiable or inconclusive, particularly for free-ranging species in the wild (see Final EIS Section 4.4.5.1).

- Electric and magnetic fields generated by powerlines could also affect the behavior or migratory/navigational capabilities of some ground-oriented species, such as mammals and insects (see Final EIS Section 4.4.5.1). While the electric and magnetic fields around the 230 kV lines would be stronger than the existing 115 kV lines, the wires would typically be higher off the ground, which is expected to reduce the potential effects on low-flying insects or ground-oriented wildlife species. Therefore, any incremental changes in electric and magnetic fields along PSE's Proposed Alignment are expected to result in less-than-significant effects on these species.

North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Final EIS): About 1,152 trees could be removed, including 415 significant trees, and 243 from critical areas (streams or wetlands) or buffer. This represents a less than 2 percent increase in total trees to be removed, 6 percent fewer significant trees, and 56 percent fewer trees removed from critical areas when compared to the Phase 2 Draft EIS.

- *North of NE 20th Street:* About 510 trees (61 percent of the total surveyed in the segment) could be removed, including the potential removal of about 181 significant trees, and three trees from critical areas or buffers.
- *South of NE 20th Street (Existing Corridor):* About 642 trees (70 percent of the total trees surveyed in the segment) could be removed, including the potential removal of about 234 significant trees, as well as about 68 trees from critical areas, and about 172 trees from the buffers.

The Final EIS found that impacts on fish, wildlife, and plants due to project operation would be less-than-significant.

Current Proposal – North Bellevue Segment

Under the Current Proposal, impacts on plants and animals would be similar to the Phase 2 Draft EIS and the Final EIS, with the following updates:

- Approximately 1,043 trees or shrubs would be removed (9 percent fewer than in the Final EIS), including 433 significant trees (4 percent more than the Final EIS), and 202 trees removed from critical areas (17 percent fewer than the Final EIS).

- Removal of trees would result in conversion of habitat from forested to shrubby or herbaceous vegetation habitat, which will be compensated for through mitigation at the Richards Creek substation site and purchase of mitigation credits at the KFMB. Habitat conversion impacts would occur in nine wetlands because the maximum potential height of existing vegetation is not compatible with the clearances required for the proposed overhead 230 kV transmission lines.

The Current Proposal is similar enough to the project analysis in the Phase 2 Draft EIS and the Final EIS such that impact conclusions remain the same (less than significant).

3.3.3 Cumulative Impacts

The Phase 2 Draft EIS and the Final EIS state that urbanization has resulted in an overall loss and degradation of available fish and wildlife habitat throughout the study area, although current regulations have slowed the trend of habitat loss to a degree, and in the case of fish passage in particular, future projects will likely improve habitat. The project would contribute to the trend toward degradation directly by removing trees and altering available habitat conditions, and indirectly by continuing to supply energy to support a growing, developing region. Mitigation would help to reduce cumulative impacts, but it would not immediately replace all habitat lost. Replacing large significant trees with smaller planting-sized trees would not fully replace the habitat functions provided by the existing conditions. In accord with regulations, over time the loss of function would be replaced through replacement trees and habitat restoration, reducing the net impact of development.

The Current Proposal's project activities that affect fish, wildlife, and plants are similar enough to the project activities proposed under the Phase 2 Draft EIS and the Final EIS such that cumulative impacts associated with the Current Proposal would be the same as with the Phase 2 Draft EIS and Final EIS.

3.4 SCENIC VIEWS AND AESTHETICS

3.4.1 Construction

During the Phase 1 Draft EIS evaluation, the EIS Consultant Team determined that construction impacts on the aesthetic environment and scenic views, due to their temporary nature, would be less-than-significant. Areas cleared for temporary construction activities (including construction access roads) would be replanted post construction; the presence of construction vehicles, equipment, materials, and personnel would end; and increased light and glare would terminate after construction. No further evaluation of construction (short-term) impacts on scenic views and the aesthetic environment was conducted for the Phase 2 Draft EIS or the Final EIS. The Current Proposal's project activities that affect aesthetics and visual resources are similar enough to the project activities proposed under the Phase 2 Draft EIS and the Final EIS such that

impacts on aesthetics and visual resources associated with construction of the Current Proposal would be the same as with the Phase 2 Draft EIS and Final EIS and would be less-than-significant.

3.4.2 Operation

Phase 2 Draft EIS

As described in Section 3.2.5.1 of the Phase 2 Draft EIS, contrast with the natural environment results from inconsistency with natural setting (vegetation, topography, etc.). This includes the removal of vegetation, changes to topography (grading), or introduction of new infrastructure whose height and form do not blend with the height and form of the surrounding natural environment.

- *Vegetation Removal.* Periodic trimming and tree removal would occur within the managed right-of-way in accordance with PSE's vegetation management criteria (see Phase 2 Draft EIS Section 3.4). The width of the managed right-of-way would depend on the pole configuration (see Phase 2 Draft EIS Appendix E). However, in general it would extend 16 feet from the outside transmission wires and 6 feet from wire-free side of poles. PSE would trim or remove trees that mature to a height of 15 feet or greater in the managed right-of-way for a 230 kV transmission corridor, and trees that mature to a height of 25 feet or greater in the managed right-of-way for a 115 kV transmission corridor. A more detailed discussion of vegetation removal and PSE's Vegetation Management Program is provided in Phase 2 Draft EIS Section 3.4. Tree removal within an existing utility corridor that is already subject to PSE's vegetation management criteria would generally produce less contrast with the natural environment than areas where a new corridor is created.
- *Changes to Topography.* Grading can cause substantial contrast with the natural environment if it is inconsistent with the underlying topography of the area. Minimal grading is expected for the transmission line.
- *Blending with Natural Setting.* The project would place poles in some areas with high density of tree stands, and some with low density of tree stands surrounding the existing or new corridor. In general, poles placed in areas with no trees would result in greater contrast because it would introduce a new type of geometry in an area where that geometry does not currently exist. Contrast can also occur if the poles are taller than the existing tree stands. Contrast with the natural environment would be low in areas where the poles would be surrounded by vegetation and would not protrude above the tree line. The project would be constructed in areas with varying topography. Areas where the poles would be placed on ridges are more likely to contrast with the natural environment because they would become a prominent feature on the landscape (being taller than all of the surrounding landforms). Conversely, poles that are located next to rises in topography would be more likely to blend with the surrounding landscape because

they would not extend into the skyline and would be less visible from areas located at higher elevations.

- *Contrast with the Built Environment:* Contrast with the built environment results from inconsistency with the built setting (buildings, utility infrastructure, etc.). This includes introducing infrastructure that has a height and/or form that is incompatible with the surrounding built environment, introducing infrastructure that is inconsistent in height and form itself, or creating more visual clutter.
- *Incompatible Height and Form with Surrounding Built Environment.* All segments and options would result in new or additional utility infrastructure being introduced into the built environment. Contrast with the built environment would be most substantial where new infrastructure is introduced (e.g., a new transmission line is placed in an area where there currently is no transmission infrastructure). Contrast could also occur where the height and form of the new infrastructure are inconsistent with the surrounding structures (buildings and other utility infrastructure). For this analysis, existing typical pole heights (65 – 95 feet) were used when describing the change in height from existing to proposed. It is possible that some pole heights may reach the maximum pole heights listed in Phase 2 Draft EIS Chapter 2. However, having one or a few taller poles alone would not result in a significant impact because of the limited extent of the impact.
- *Inconsistent Project Height and Form.* Depending on the segment and option, the height and form of the transmission infrastructure vary in consistency. More contrast would occur in areas where the pole configuration or height would change. Almost all of the pole configurations would be made of steel with patina applied to provide a rust-colored look. Some variability in pole height is possible within areas identified as having a consistent pole height and form, depending on whether or not the typical or maximum pole height is used (usually based on topographic or other constraints). Having one or a few taller poles would not be considered a significant impact because of the limited extent of the impact.
- *Visual Clutter.* Visual clutter occurs where there is a dense presence of poles, wires, and other utility infrastructure. Higher contrast would occur in areas where more poles would be required than under existing conditions, and there would be more wires. There is the potential for a reduction in contrast in areas where the number of poles and wires would be reduced (i.e., removal of underbuild).
- *Obstruction of Scenic Views.* Scenic views would not be impacted to the same degree under all of the segments or options. Where scenic views would be obstructed, the obstruction could be caused by the placement of a pole in a new location; increased diameter of the pole, blocking more of a scenic view than under existing conditions; increased pole height resulting in poles protruding into scenic views; or lines being raised into a spot on the horizon where they would impact previously unobstructed scenic views.

- *Viewer Sensitivity.* As described in Phase 2 Draft EIS Section 3.2.3.1, viewer sensitivity applies to both the aesthetic environment and scenic views and was determined by examining viewer exposure and viewer awareness. Relevant plans, policies, and regulations were also reviewed to identify potential impacts that would affect more sensitive viewers (Phase 2 Draft EIS Table 3.2-4). Some jurisdictions have policies that apply to the project and address potential impacts on scenic views, the aesthetic environment, or both. Only those jurisdictions with applicable policies relating to the project and scenic views or the aesthetic environment were included. Phase 2 Draft EIS Table 3.2-4 provides an overview of applicable policies that describe what scenic views and elements of the aesthetic environment should be protected and identifies the project’s potential inconsistencies with these policies. Policies suggesting measures for reducing scenic view and aesthetic impacts are summarized as potential mitigation measures in Phase 2 Draft EIS Section 3.2.6.

North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS and Final EIS):

- *North of NE 20th Street:* Impacts on the aesthetic environment would be less-than-significant. The transmission line would be in the existing corridor, and there would be minimal contrast with existing conditions. Viewer sensitivity is low because there are few sensitive viewers.

The project would be consistent with existing plans and policies because the tree removal (0.5 percent of trees within the Bridle Trails Subarea) is not expected to substantially change the existing wooded, natural, rural, and equestrian character of the Bridle Trails Subarea (see Phase 2 Draft EIS Appendix C). In addition, no trees would be removed from the lower slopes of the bluff adjacent to State Route 520 (SR 520) at approximately 136th Avenue NE, so the visual separator between residential areas and the freeway would not be removed (see Phase 2 Draft EIS Appendix C). There would be no impacts on scenic views because the degree of additional obstruction of views from the transmission line would be minimal.

Contrast with the natural environment would be minimal because the proposed 95-foot poles would in most cases be shorter than the surrounding vegetation or would appear shorter than surrounding vegetation due to vegetation density (see Phase 2 Draft EIS Figure 3.2-9). In general, the topography does not affect the visibility of the transmission line along this segment because dense, tall vegetation obscures the view of the transmission line. Within the built environment, the poles would be approximately 35 feet taller than existing conditions, and the pole diameter would be wider than existing conditions, contrasting more with the surrounding houses and existing utility infrastructure. The new transmission line would have consistent form and height throughout the segment and would

reduce visual clutter by reducing the number of poles. Impacts would be less-than-significant.

No scenic views from parks, trails, or outdoor recreation facilities would be significantly impacted. There are occasional views of the Cascades along the transmission corridor, views of the Olympics from Northrup Way, and views of Mount Rainier along SR 520. Changes in the transmission infrastructure from 115 kV transmission lines to 230 kV transmission lines are not expected to negatively impact views from those locations because the changes would occur within an existing transmission corridor, and the increase in height would move the wires farther above drivers' line of sight of visual resources. Impacts would be less-than-significant.

Sensitive viewers along the North Bellevue Segment north of NE 20th Street are primarily residential viewers and users of the two unnamed trails and Viewpoint Park. In general, because of the high density of tall vegetation, only residential viewers close to the transmission line would be able to view it. The closer viewers are to the transmission line, the less likely they are to view the lines because increasing the existing pole height by 35 feet would raise the lines out of their line of sight. The presence of dense vegetation also reduces the likelihood that the transmission line would be visible from any of the recreational resources, except where it directly crosses them. In addition, none of these resources are identified as having scenic qualities, and a transmission line already crosses these resources. The Bridle Trails Subarea Plan (City of Bellevue 2015) protects the wooded, natural, rural, and equestrian character of the subarea, and it encourages retention of vegetation on the lower slopes of the bluff adjacent to SR 520 at approximately 136th Avenue NE to provide a visual separator between residential areas and the freeway. It is estimated that approximately 0.5 percent of trees in the Bridle Trails Subarea as a whole would be removed for the project. No trees would need to be removed directly north of SR 520. Overall, viewer sensitivity is considered low.

- *South of NE 20th Street:* Impacts on the aesthetic environment would be less-than-significant because the transmission line would be within the existing corridor, and contrast with the existing environment would be minimal. Viewer sensitivity would be low because the project would not be inconsistent with study area plans or policies. Scenic view impacts along this corridor would be less-than-significant.

Contrast with the natural environment would be greater where tall vegetation is not present or is limited (e.g., at the Glendale Country Club). Most of the vegetation removal would occur south of the Lake Hills Connector. In general, the topography reduces the visibility of the line to the west because the decline in elevation is steep enough that views of the transmission line from the west are blocked by vegetation and housing in the foreground. Contrast with the built environment would be slightly greater than existing conditions because the poles would be approximately 40 feet taller south of NE 20th Street and the pole

diameter would be wider than the existing poles. However, a transmission line already exists in the corridor, and the new transmission line would have consistent form and height throughout the corridor and would reduce visual clutter by reducing the number of poles. Impacts would be less-than-significant.

Scenic view impacts along this corridor would be minimal because topography and vegetation obscure scenic views from most of the study area.

Sensitive viewers along the corridor are residential viewers and recreational users. Kelsey Creek Park is the only recreational resource identified by the City as being used for its natural setting. The presence of dense vegetation reduces the likelihood that the transmission line would be visible from Kelsey Creek Park. The project would directly cross and/ or follow the SE 3rd Trail, the SE 10th Trail, three unnamed trails, the Highland–Glendale Property, and Skyridge Park. However, because none of these resources are identified by the City as being used for their views or natural setting, and a transmission line already crosses these resources, viewer sensitivity to the change is expected to be low. The project would not be inconsistent with the Wilburton/NE 8th Street Subarea Plan (City of Bellevue 2022) because it would not substantially change the following key views: From SE 1st Street and Main Street at the transmission line right-of-way at 136th Avenue (see Figure 3.2-10 in the Phase 2 Draft EIS). A transmission line already exists, and the project would only change the height and form of the line.

The Phase 2 Draft EIS found that impacts on aesthetics and visual resources due to project operation were less-than-significant.

Final EIS

Impacts on scenic views and aesthetics are similar to the Phase 2 Draft EIS, with the following updates:

- Several commenters throughout the EIS process described impacts of the project on the visual quality of the aesthetic environment as resulting in “blight.” While SEPA does not provide a definition of blight, as defined in RCW 35.81.015, a “blighted area” means: *An area which, by reason of the substantial physical dilapidation, deterioration, defective construction, material, and arrangement and/or age or obsolescence of buildings or improvements, whether residential or nonresidential;...inappropriate uses of land or buildings; existence of overcrowding of buildings or structures; ...deterioration of site;... or any combination of such factors...[that] substantially impairs or arrests the sound growth of the municipality or its environs...* In general, this is interpreted to mean areas that have been abandoned and fallen into disrepair; the project is not expected to result in blight or other significant impacts on land use (see Final EIS Section 4.1.5).
- Typical pole heights were used when describing the change in height from existing to proposed. Typical pole heights vary throughout the corridor depending on the pole configuration used, differences in topography, and other factors. For the Final

EIS, consistent form means that the pole configuration would continuously be either single-circuit or double-circuit. In general, single-circuit poles are used in pairs and have typical heights between 50 and 96 feet. The Final EIS states that double-circuit monopoles are singular (not in pairs) and have typical heights between 95 and 99 feet (see Final EIS Tables 2.1-1 and 2.1-2). However, these typical pole heights vary depending on the segment. Segment-specific typical pole heights can be taller than the typical heights presented for the whole project. Consistent form generally correlates with consistent height in a given segment. Areas with higher contrast can occur where there is a variety of single-circuit and double-circuit poles in close proximity.

- Although it was assumed in the Phase 2 Draft EIS that all of the pole configurations would be made of steel with patina applied to provide a rust-colored look, the Final EIS considered various finishes as being equally likely, including galvanized (light gray), self-weathering (reddish brown), or painted (powder coat). Finishes could be specified by location to better blend with the background or sky. Section 4.2.6 of the Final EIS describes considerations for selecting pole finishing that can be used by PSE and the Partner Cities to determine which finishing type would contrast less with the surrounding environment.
- Cellular Equipment. Comments on the Phase 2 Draft EIS requested more detailed analysis of the appearance of cellular equipment on the 230 kV poles. As stated in the Final EIS Section 2.1.2, cellular equipment exists in eight locations spaced through the project corridor. PSE has proposed replacing existing cellular equipment, if requested by the cellular provider. One of the locations has been identified for decommissioning, so cellular equipment is proposed to be placed in seven locations.

For the Bellevue North and Bellevue Central segments (as defined in the Final EIS), the Final EIS analysis included a review of refined project design details for PSE's Proposed Alignment and updated simulations, with results revised relative to the Phase 2 Draft EIS to reflect the new information. The new information and analysis have not altered the conclusions presented in the Phase 2 Draft EIS regarding significant impacts on scenic views and the aesthetic environment. The by-segment results have been revised relative to the Phase 2 Draft EIS, incorporating the more detailed information in the permit applications on pole locations and vegetation clearing. The new information and analysis have not altered the conclusions presented in the Phase 2 Draft EIS regarding significant impacts on scenic views and the aesthetic environment.

North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS and Final EIS):

- *North of NE 20th Street:* Analysis of this segment was revised for the Final EIS to incorporate changes in the pole height and form associated with PSE's Proposed Alignment. Impacts on the scenic views and the aesthetic environment in the North Bellevue Segment would be less-than-significant, as described in the Phase

2 Draft EIS. The transmission lines would be in the existing corridor, and there would be minimal contrast with existing conditions.

The Final EIS updates the typical pole height from 95 feet to 93 feet and the difference in height between existing poles and proposed poles as 40 feet (compared to 35 feet). The new transmission lines would have consistent form and height throughout most of the segment and would reduce visual clutter by reducing the number of poles. The one exception would be where pairs of single-circuit monopoles would be used south of NE 24th Street to cross SR 520. This would not create significant adverse impacts because it would be in a highly vegetated area to the north of SR 520 and in a commercial area abutting SR 520 to the south. Overall, impacts would be less-than-significant.

Sensitive viewers along the North Bellevue Segment are primarily residential viewers and users of the two unnamed trails, the 520 bike trail, and Viewpoint Park. The Final EIS proposes that two cellular towers would be placed in the North Bellevue Segment; one tower would be placed north of NE 20th Street.

- *South of NE 20th Street:* Analysis of this segment was revised in the Final EIS to incorporate changes in the pole height and form associated with PSE's Proposed Alignment.

Near the Lakeside substation, contrast would be more noticeable due to tree removal.

The new transmission lines would have consistent form and height throughout the segment, except for where the lines would cross Bel-Red Road and would cross the Lakeside substation and tie into the Richards Creek substation. The change in pole configuration at the Bel-Red Road crossing would not result in significant adverse effects because it would be in a commercial parking lot, with the primary viewers being drivers on Bel-Red Road. Specific to residential areas north of the Lakeside substation, localized increased clutter would be created through the addition of more poles at the substation and the introduction of new pole configurations (see Final EIS Figure 4.2-8, showing key viewpoint [KVP] 5). This would be visible to only a few residential viewers, and the degree of additional clutter would not dominate the aesthetic environment to the degree that significant adverse impacts would occur. In general, and overall, the project would reduce visual clutter by reducing the number of poles. Therefore, impacts would be less-than-significant.

Kelsey Creek Park hosts a high number of recreational visitors and is used year-round. The presence of dense vegetation reduces the visibility from Kelsey Creek Park; however, it would be visible from some locations (see Final EIS Figure 4.2-9, showing KVP 6). Where visible, only the upper portion of the transmission lines could likely be seen. Due to the distance between the transmission lines and the park (approximately 0.34 mile), the project would not substantially alter the natural setting of Kelsey Creek Park. Chestnut Hill Academy is less than 100 feet to

the east. Tree removal would make the Lakeside substation more visible; however, because the majority of the tree removal would be located farther south, impacts would be minor. Overall, viewer sensitivity is low.

The Final EIS proposes that two cellular towers would be placed in the North Bellevue Segment; one tower would be placed south of NE 20th Street.

The Final EIS found that impacts on aesthetics and visual resources due to project operation would be less-than-significant.

Current Proposal - North Bellevue Segment

Impacts on scenic views and aesthetics would be similar to the Phase 2 Draft EIS and the Final EIS, with the following updates:

- Current Proposal pole height maximum (125 feet) is not higher than the overall maximum stated in the Phase 2 Draft EIS (125 feet) or the overall maximum stated in the Final EIS (135 feet). Aesthetic and visual resource impact conclusions based on maximum pole heights would therefore be the same as the Phase 2 Draft EIS and Final EIS.
- *North Bellevue Segment (Bellevue North and Bellevue Central [Existing Corridor] in the Phase 2 Draft EIS and Final EIS):*
 - *North of NE 20th Street:* When percentage differences are calculated for each individual proposed pole height compared to the Final EIS typical height (93 feet), a range of differences result: 8 percent shorter to 13 percent taller. The average percent difference is 1 percentage point taller, and the median percent difference is 2 percentage points taller.
 - *South of NE 20th Street:* When percentage differences are calculated for each individual proposed pole height compared to the Final EIS typical height, a range of differences result: 17 percent shorter to 45 percent taller. The average percent difference is 10 percentage points taller, and the median percentage difference is 7 percent taller. The three tallest proposed poles are located either adjacent to NE Bellevue-Redmond Road (a major arterial in a commercial and light industrial area) or adjacent to the Richards Creek substation, a light industrial area with surrounding vegetation. Drivers on NE Bellevue-Redmond Road are the primary viewers of the poles adjacent to NE Bellevue-Redmond Road. These poles would not result in significant adverse environmental impacts or impacts that differ from those evaluated in the Phase 2 Draft EIS or the Final EIS.

The Current Proposal is similar enough to the project analysis in the Phase 2 Draft EIS and the Final EIS such that impact conclusions for aesthetics and visual resources remain the same (less than significant).

3.4.3 Cumulative Impacts

The Phase 2 Draft EIS and the Final EIS state that in general, as development occurs, there is an increased likelihood that scenic views and the aesthetic environment will be adversely impacted. Development can result in large buildings or structures that block or obscure views, and the trend of urbanization and densification results in changing views and vistas. The Energize Eastside project will contribute to that trend, by providing electricity to supply projected development. The incremental visual impact from the project will add to the increasingly urbanized visual environment within the study area. Because development is expected to conform to each community's plans, policies, and regulations regarding aesthetics, these cumulative impacts are not expected to be significant.

The Current Proposal's project activities that affect aesthetics and visual resources are similar enough to the project activities proposed under the Phase 2 Draft EIS and the Final EIS such that cumulative impacts associated with the Current Proposal would be the same as with the Phase 2 Draft EIS and Final EIS and are not expected to be significant.

CHAPTER 4

MITIGATION MEASURES AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

4.1 INTRODUCTION

This section describes mitigation measures and significant unavoidable adverse impacts under the Phase 2 Draft EIS, Final EIS, and Current Proposal.

4.2 WATER RESOURCES

4.2.1 Mitigation Measures

Current Proposal mitigation measures for water resources prior to construction, during construction, and during operation would be the same as those listed for Bellevue North and Bellevue Central (Existing Corridor) in Phase 2 Draft EIS Section 3.3.6, Final EIS Section 4.3.6, and Final EIS Appendix M. In addition, PSE proposes to enhance approximately 9,930 square feet of wetland area in Wetland A of the Richards Creek substation site, for project impacts occurring in wetland and stream buffers in the Richards Creek subbasin and the Kelsey Creek subbasin. The remaining proposed mitigation, approximately 4,526 square feet, will be mitigated (consistent with critical areas regulations in Part 20.25H LUC) through the purchase of mitigation credits from the KFMB.

4.2.2 Significant Unavoidable Adverse Impacts

The Draft EIS and Final EIS state that significant unavoidable adverse impacts on water resources would not occur because there would be no long-term impacts. The Current Proposal's project activities that affect water resources are similar enough to the project activities proposed under the Phase 2 Draft EIS and the Final EIS such that significant unavoidable adverse impact conclusions associated with the Current Proposal would be the same as with the Phase 2 Draft EIS and Final EIS (no significant unavoidable adverse impacts on water resources).

4.3 PLANTS AND ANIMALS

4.3.1 Mitigation Measures

Current Proposal mitigation measures for plants and animals prior to construction, during construction, and during operation would be the same as those listed for Bellevue North and Bellevue Central (Existing Corridor) in Phase 2 Draft EIS Section 3.4.6, Final EIS Section

4.4.6, and Final EIS Appendix M. In addition, proposed mitigation for project impacts includes enhancement of Wetland A at the Richards Creek substation site (improving wildlife habitat and native species/diversity) and purchase of mitigation credits from the KFMB. The proposed mitigation for wetland and buffer impacts caused by the Energize Eastside project will be mitigated using the best available science to the extent allowable in compliance with Part 20.25H LUC, the City of Bellevue's critical areas code. Proposed mitigation, which includes enhancement of Wetland A at the Richards Creek substation site and purchase of mitigation credits from the KFMB, will result in measurable habitat improvements to critical area functions and values. The 2021 CAR (TWC 2021) includes more details about mitigation.

4.3.2 Significant Unavoidable Adverse Impacts

The Draft EIS and Final EIS state that significant unavoidable adverse impacts on plants and animals would not occur because there would be no long-term impacts. The Current Proposal's project activities that affect plants and animals are similar enough to the project activities proposed under the Phase 2 Draft EIS and the Final EIS such that significant unavoidable adverse impact conclusions associated with the Current Proposal would be the same as with the Phase 2 Draft EIS and Final EIS (no significant unavoidable adverse impacts on plants and animals).

4.4 SCENIC VIEWS AND AESTHETICS

4.4.1 Mitigation Measures

Current Proposal mitigation measures for scenic views and aesthetics prior to construction, during construction, and during operation would be the same as those listed for Bellevue North and Bellevue Central (Existing Corridor) in Phase 2 Draft EIS Section 3.2.6, Final EIS Section 4.2.6, and Final EIS Appendix M.

4.4.2 Significant Unavoidable Adverse Impacts

The Draft EIS and Final EIS state that significant unavoidable adverse impacts on scenic views and aesthetics would not occur for the North Bellevue Segment. The Current Proposal's project activities that affect aesthetics and visual resources are similar enough to the project activities proposed under the Phase 2 Draft EIS and the Final EIS such that significant unavoidable adverse impact conclusions associated with the Current Proposal would be the same as with the Phase 2 Draft EIS and Final EIS (no significant unavoidable adverse impacts on scenic views and aesthetics).

CHAPTER 5

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CHAPTER 6

ACRONYMS AND ABBREVIATIONS

BMP	best management practice
CALUP	Critical Areas Land Use Permit
CAO	Critical Areas Ordinance
CAR	Critical Areas Report
CUP	Conditional Use Permit
Draft EIS	Draft Environmental Impact Statement
Ecology	Washington State Department of Ecology
EIS	Environmental Impact Statement
Final EIS	Final Environmental Impact Statement
KFMB	Keller Farm Mitigation Bank
kV	kilovolt
KVP	key viewpoint
LUC	Land Use Code
PSE	Puget Sound Energy
RCW	Revised Code of Washington
SEIS	Supplemental Environmental Impact Statement
SEPA	State Environmental Policy Act
SR 520	State Route 520
TWC	The Watershed Company
WAC	Washington Administrative Code