

City of Bellevue

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August 14, 2018

Brad Strauch
P.O Box 97034, PSE 9N
Bellevue, WA 98009
Bradley.Strauch@pse.com

Re: Conditional Use (File# 17-120556-LB)
Critical Areas Land Use Permit (File #17-120557-LO).
South Bellevue Segment Energize Eastside

Dear Mr. Strauch:

City Staff have reviewed the plans you have submitted and request the following additional information to complete our review:

LAND USE REVIEW COMMENTS

Reviewer: Heidi M. Bedwell, 425-452-4862, hbedwell@bellevuewa.gov

Map Book: The submitted site plan index T-Line plans should be reordered so that each plan sheet connects to the next in sequence. As formatted it is difficult to track the proposal on contiguous properties.

Substation Site Plan: Plan should show all critical areas and buffers before improvements. For example on this plan sheet Wetland B is not shown and the wetland and stream buffers are shown as modified. These sheets should show the required buffers overlaid with the proposed development. Include a line showing area of improvements including the Substation footprint, stormwater facility and road. The Critical Areas Report should capture the areas of impact from these improvements on the required buffers.

Load Forecast: Your letter to City Manager Miyake of June 8, 2018 indicates that the peak customer demand in 2017 exceeded your load forecast for summer of 2018. This information is relevant to the Energize Eastside project, which is currently in permit review with the City of Bellevue and other Cities. This information also appears to answer questions regarding PSE's planning assumptions that have been repeated throughout the EIS and permit process.

However, it would be helpful for our response to public comments concerning PSE's assumptions and for our permit review to have documentation regarding the 2017 peak customer demand period. Specially, could you answer the following questions:

1. What was the actual peak Eastside customer demand for the summer of 2017? Please indicate what the [summer] peak load period was and express the peak in terms of hourly demand. Please clarify what is considered the Eastside in this context.
2. Does PSE have any data on what drove higher electrical consumption in 2017, and/or whether the rate of growth assumed in the needs analysis for Energize Eastside is likely to remain the same or to change, either higher or lower?

3. During the 2017 peak load period, what was the flow, if any, across the Northern Intertie?
4. During the 2017 peak load period, what was the output of PSE's power plants in the northern part of the Puget Sound Region?
5. Was there a correspondingly higher rate of growth in the winter peak customer demand in winter 2017-2018?

Alternative Pole Height-Somerset Neighborhood:

The EIS identified potential mitigation for visual impacts in the vicinity of the Somerset neighborhood. Please address the feasibility of lowering pole heights in this area with the inclusion of additional poles. Describe minimum pole height feasible taking into account no increase in EMF levels and no change to the risk to the pipeline. Describe how vegetation impacts would be different assuming more poles and lower pole height. Address pole diameter size when more shorter poles are designed and address whether C-17 pole types could be used or another pole type. Depict potential pole placement on a map and describe in a narrative the number of parcels that would be impacted by the lower poles.

Tree Removal and Vegetation Management:

Provide a narrative that clearly describes the number of trees being proposed for removal in the following areas:

- In Public ROW
- On City Owned Property (Parks etc)
- On Private Property
- Total number of trees in Critical Areas, Buffers and Structure Setbacks. Of these totals, provide a breakdown per Public ROW, City Owned Property, Private Property.

Provide a separate plan showing the proposed tree removal in Public ROW and City Owned Property.

The City is aware that PSE has continued to have discussion with property owners and other community organizations (HOA) regarding proposed tree removal. Please provide updated information about proposed tree and vegetation replacement strategies.

Relocated and reconfigured lines specific to 115 kV at Richards Creek Substation and South Segment proposal:

As part of the FEIS PSE provided information about 115 kV lines in the vicinity and south of Richards Creek Substation. Please provide this same information as part of the CUP and LO application. Confirm plan sheets reflect all re-located and reconfigured transmission lines. Revise Critical Areas analysis to reflect the total scope of proposed work associated with the Energize Eastside South Segment proposal.

Public Comment: Comments received to date have been provided to you as an electronic attachment. Provide a response to all comments submitted to date. Comments may be grouped by theme where appropriate however where additional information has been requested please provide appropriate references or documents necessary to respond to comment directly.

Critical Areas:

LUC Section 20.25H Purpose states the following, "The Critical Areas Overlay District is a mechanism by which the City recognizes the existence of natural conditions which affect the use and development of property. Through this part, the City designates and classifies ecologically sensitive and hazard areas and imposes regulations on the use and development of

affected property in order to protect the functions and values of these areas and the public health, safety and welfare, and to allow the reasonable use of private property.”

The proposed use, an Electrical Utility Facility, is an allowed use within a critical area per LUC 20.25H.055. Allowed uses must address General Performance Standards as required by LUC 20.25H.055.

Although siting objectives are relevant to the selection process for choosing a substation location, additional information regarding the impacts to critical areas at each of the substation sites is needed. Discuss how impacts to critical areas compares between locating at the Richard Creek site and the two alternate substation sites. In the case of the alternate site, impacts can include areas impacted outside of the substation footprints because of necessary connections to substation improvements.

Geologic Hazard Areas

Geologic Hazard Areas are not only regulated for issues of slope stability and safety, but these areas also frequently include vegetation that provides additional critical areas functions. The Critical Areas Report should quantify impacts to vegetation and their critical area functions within a Geologic Hazard Critical Area and associated buffers or structures setbacks. Appropriate mitigation is necessary to address impacts to these functions (ie habitat, hydrology, water quality etc). Provide a discussion of the existing functions these areas provide and describe proposed mitigation to replace these impacted functions.

Page 24 of the South Bellevue Critical Areas Report identifies mapped areas of 40% slope but goes on to state “many of these areas are developed and include rockeries, landscaped residential or commercial development slopes and cut slopes associated with paved roadways.” The critical areas regulations do take into consideration the presence of rockeries or other retaining features, and areas containing these features are not considered steep slopes. However, the code does not distinguish between natural and un-natural (i.e., man made slopes). Therefore, even if a slope qualifies as a steep slope but contains residential or commercial landscaping, these areas are still regulated as a steep slope and should not be removed from impact analysis.

Please revise areas excluded from analysis consistent with the critical area regulations described above. If areas continue to be excluded because of the presence of retaining features, please explain and identify which map pages these areas can be found so we can evaluate concurrence with these regulations.

See below for additional request regarding Landslide Deposits from the Clearing and Grading reviewer.

Functional Buffer

The code recognizes degraded conditions and does not use the term “Functioning Buffer.” It is recognized that many buffers may be degraded (i.e., have little to no vegetation or contain structures). The Critical Areas Report (see page 27) appropriately recognizes the lack of function provided by existing impervious surfaces. It is unclear however what is meant by the term development as used in this report. As noted above in comments associated with geologic hazard areas, commercial and residential landscaping may provide some critical area function and should not be disregarded in the report. When these areas are within the prescribed buffers their function should be considered and mitigation should take into account impacts to these functions.

Stream Realignment Mitigation

The project proposes to mitigate for wetland, and stream and wetland buffer impacts through both wetland enhancement and stream restoration. The applicable provision is as follows:

Wetlands Enhancement as Mitigation. Impacts to wetland critical area functions may be mitigated by enhancement of existing significantly degraded wetlands. Applicants proposing to enhance wetlands must produce a critical areas report meeting the requirements of LUC 20.25H.110 and 20.25H.230 that identifies how enhancement will increase the functions of the degraded wetland and how this increase will adequately mitigate for the loss of wetland area and function at the impact site. An enhancement proposal must also show whether existing wetland functions will be reduced by the enhancement actions.

The Critical Areas Report does not address whether existing wetland functions will be reduced by the enhancement actions. As shown on figure 2 of the report, wetlands are located within the proposed stream realignment area. Address how the functions in these areas will be maintained as part of the proposed mitigation. Prepare a written response to all applicable standards in LUC 20.25H.105 and 110.

Proposed plans show disturbance and mitigation offsite and outside of PSE property and easement. Confirm PSE has an easement right or is in conversation with adjacent property owner to establish the proposed mitigation.

CLEARING AND GRADING REVIEW CONDITIONS OF APPROVAL

Reviewer: Tom McFarlane, 425-425-6825, tmcfarlane@bellevuewa.gov

Geotechnical Considerations

Landslide Deposits

The Washington State Department of Natural Resources (DNR) has completed a final draft of a map of landslide deposits in the City of Bellevue. A copy of the May 2018 final draft is attached. The map indicates landslide deposits in the area of the proposed Richards Creek Substation. The geotechnical report and addenda for the Richards Creek Substation do not mention landslide deposits in this area. Please have the geotechnical engineer review the DNR map and provide comments on the map and on potential impacts of landslide deposits on the proposed Richards Creek Substation.

TRANSPORTATION REVIEW COMMENTS

Reviewer: Molly Johnson, 425-452-6175, majohnson@bellevuewa.gov

1. It is understood the Richards Creek Substation will not have full-time staff or employees working on-site and thus will not have trip generating characteristics other than for maintenance purposes. Please provide a letter or memo that documents that the only trips going to the site are for maintenance purposes and the approximate frequency of the trips (weekly/monthly, etc.). If this understanding is not correct and there are full-time onsite employees, please provide a level one traffic report. For more information on what a level one report entails, please follow the link:
<https://development.bellevuewa.gov/cms/one.aspx?portalId=5588383&pageId=5653616>

2. For review of the clearing and grading permit, construction details will need to be added to the plans for the new driveway approach, driveway pavement section, and turnaround facility, for example. The civil engineering plans for review on the clearing and grading permit will also need to include the attached construction notes.

Right of Way Use Permit

- A Right-of-Way Use permit is required for work in the right-of-way and is generally required for hauling on City streets. Check with the Transportation Department at (425) 452-4189 or rightofwayuse@bellevuewa.gov

Please submit the revisions requested above within 60 days from the date of this letter or by Monday October 15, 2018. If no revision is received within 60 days the application may be canceled without further notice. You can reach me directly at (425)452-4862 or at hbedwell@bellevuewa.gov.

Sincerely,

Sent via email

Heidi M. Bedwell
Environmental Planning Manager
City of Bellevue
(425) 452-4862
hbedwell@bellevuewa.gov

cc: File