



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

December 10, 2021

Cathy Beam, AICP
Principal Planner
City of Redmond
cbeam@redmond.gov

RE: PSE Energize Eastside Redmond Segment Tree Removal Exception Request –
December 2021 Revision

Dear Cathy:

The Energize Eastside Project (the Project) consists of Puget Sound Energy's (PSE's) proposal to upgrade approximately 16 miles of two existing 115 kilovolt (kV) transmission lines with two 230 kV lines within an existing corridor between the Sammamish Substation in the City of Redmond and Talbot Hill Substation in the City of Renton. The Project also includes construction of a new substation along the transmission corridor within the City of Bellevue.

Within the City of Redmond (City), the Project includes upgrades to approximately 2 miles of existing transmission corridor from Sammamish Substation to NE 60th Street (the Redmond Segment), as well as improvements within the Sammamish Substation fence and Rose Hill Substation fence to support the upgraded 230 kV lines. Improvements within the substations will not impact trees. Regulated critical areas in the Redmond Segment include wetlands, fish and wildlife habitat conservation areas (including streams), and geologically hazardous areas, and associated buffers.

PSE must meet federal vegetation clearance standards to ensure safe operation of the transmission line. This includes PSE's adopted standard of managing vegetation that will reach a mature height over 15 feet within the transmission line corridor. Due to the linear nature of the project, impacts to trees within critical area buffers cannot be avoided.

The Redmond Zoning Code (RZC) regulates tree removal associated with development. The code is written for parcel-based development and does not contemplate linear facilities, except in the context of utilities that serve a development project. PSE's project site is primarily made up of linear easements, as well as a transmission corridor within PSE fee owned parcels. Therefore, the trees within PSE's project site are the trees located within the transmission line corridor, which in and of itself is the development area of the project. This does not provide the opportunity to avoid removing significant trees that are not in

compliance with 230 kV vegetation management standards. Additionally, due to unavoidable tree removal within critical areas and buffers and the required removal of three landmark trees, PSE is requesting approval of an Exception from the RZC Tree Protection standards for removal of 150 trees. Of the 150 trees, 79 trees are located in wetlands, 68 trees are in wetland/stream buffers, and three landmark trees. These trees are located within Parcels 0325059002, 0325059172, and 0325059129 which are owned by PSE. See Attachment 1, Exception Request Trees.

RZC 21.72.060 Tree Protection Standards

A. Tree Protection, In General

1. In all developments, a minimum of 35 percent of all significant trees shall be retained. Trees that are located within Native Growth Protection Areas, critical areas and their associated buffers as provided in RZC 21.64, *Critical Areas*, or that have otherwise been designated for protection shall not be removed. Exceptions to this standard shall be requested and reviewed in accordance with RZC 21.72.090, *Exceptions*.

Response: The Tree Health Assessment Report demonstrates that the Project would retain approximately 49% of total trees (i.e., significant and landmark) in the Project area, and exceeds the minimum 35% retention requirement¹. RZC 21.72.030 *Exemptions*, subsection (3) provides an exemption from obtaining a permit for removal of trees within easements or rights-of-way for the purposes of constructing public streets and utilities. Although the removal is exempt from the permit requirement, mitigation for tree removal will be provided in compliance with RZC 21.72.080, *Tree Replacement*. Additionally, PSE is requesting Exception approval to remove 150 trees, 79 trees located in wetlands, 68 trees in wetland/stream buffers, and three landmark trees.

2. Landmark Trees. Landmark trees shall not be removed unless an exception has been applied for and granted.

Response: PSE is proposing removal of three landmark trees (all Douglas-fir) within the Redmond Segment as part of this Exception request. The Project would retain 18 landmark trees under the current proposal¹.

3. Hazardous Trees. Hazardous trees or dead trees posing a hazard, outside of NGPAs, critical areas and buffers, should be removed and are not considered significant trees.

Response: PSE has not identified hazardous trees within the project corridor. Trees that were identified as dead or dying have not been considered significant trees and their proposed removal does not require replacement.

¹ Watershed. 2021. PSE Energize Eastside Project, City of Redmond, Vegetation Inventory and Tree Health Assessment Report, May 27, 2021.

RZC 21.72.090 Exceptions

- A. When exceptional conditions exist that prevent the full compliance with RZC 21.72.060, *Tree Protection Standards*, the applicant may request an exception. A request for any exception shall be submitted in writing by the property owner for consideration by the Administrator, and shall accompany the application for a permit reviewed under this section. The written request shall fully state all substantiating evidence pertinent to the exception request, and include supporting maps or plans. See Attachment 2, Outreach Maps. The Administrator may also require the recommendation of a certified arborist in reviewing the exception request.
- B. Exception Criteria. An exception shall not be granted unless criteria B.1, B.2, and B.3, and B.4 of this subsection are satisfied:

1. The exception is necessary because:

- a. There are special circumstances related to the size, shape, topography, location, or surroundings of the subject property; or

Response: There are special circumstances related to the size, shape, and topography, and location of the subject property. The transmission line corridor is located within an existing, approximately 100-foot-wide regional utility corridor and on PSE owned property with existing utility facilities. Within the existing utility corridor, the proposed pole locations for the rebuilt lines will generally be in the same locations as the existing poles, however the transmission lines will be upgraded from 115 kV to 230 kV capacity, resulting in stricter vegetation management clearance requirements, and therefore the need to remove trees within the existing corridor.

- b. Strict compliance with the provisions of this code may jeopardize the reasonable use of the property; or

Response: Strict compliance with the provisions of this code would prohibit the upgrade of the transmission line from 115 kV to 230 kV. The corridor was initially disturbed during the original transmission line construction in the 1920s and vegetation maintenance is regular and ongoing. However, the conversion from 115 kV to a 230 kV line requires PSE to maintain trees at a lower height (15 feet) than is required for the existing 115 kV line (25 feet), to comply with the North American Electric Reliability Corporation (NERC) standard. The Project is needed to address electrical system deficiencies identified during federally required planning studies. This Project significantly improves reliability for Eastside

communities, including the City, and will supply the additional electrical capacity needed for current and anticipated growth.

- c. Proposed vegetation removal, replacement, and mitigating measures proposed are consistent with the purpose and intent of the regulations; or

Response: The proposed vegetation removal, replacement and mitigating measures are consistent with the purpose and intent of the regulations. There are 150 trees to be removed under this Exception request, with 79 of those trees located in wetlands, 68 trees within critical area buffers, and three landmark trees. PSE proposes to mitigate for the impact to critical areas and their buffers through providing functional lift within the Willows Creek Stream Relocation Project site south of Sammamish Substation. An Adaptive Tree Replacement approach is being proposed which sets out the range of tree replacement strategies for the Project. The approach proposes to first maximize tree replacement within the easements in the Redmond Segment corridor. If landowners in the corridor decline to have trees planted on their property, PSE will then seek out replanting at alternative properties within the City through the Energy Savings Trees program or on other properties. Additional information about the Adaptive Tree Replacement approach can be found in the Vegetation Inventory and Tree Health Assessment Report (The Watershed Company 2021). The purpose and intent of the tree regulations within RZC 21.72 includes mitigating for environmental consequences of tree removal on or off-site to achieve no net loss of trees and their habitat value.

- d. The granting of this exception or standard reduction will not be detrimental to the public welfare or injurious to other property in the vicinity; or

Response: The granting of this exception will not be detrimental to the public welfare or injurious to the property in the vicinity. The trees compromise the safe operation of the transmission lines and their removal is necessary to provide required clearance from the upgraded 230 kV lines. The dominant species of trees to be removed from wetlands are Lombardy poplar, a non-native tree; the dominant species of trees to be removed from critical area buffers are red alder, a fast growing riparian species. Habitat value for tree removal can be replaced through mitigation at the Willows Creek Stream Relocation Project site south of the Sammamish Substation through native species installation.

- e. The strict compliance with the provisions of this code would be in conflict with the increased density of urban centers or the Marymoor Design District and result in development that would be inconsistent with the adopted vision for the neighborhood.

Response: This criterion is not applicable to the Energize Eastside, Redmond Segment project location.

2. If an exception is granted below the required minimum retention standard of 35 percent, tree replacement shall be a minimum of three trees for each significant tree removed. Tree replacement ratios may be modified for master plans within urban centers and local centers to allow for 1:1 replacement when accompanied by a three-tier vegetation replacement plan. In the Marymoor Design District, rather than increase the tree replacement ratio, the canopy coverage requirement in RZC 21.72.080.H.3 shall be increased to 20 percent of the site area. When the total number of replacement trees required to meet the canopy requirement is less than otherwise would be required by this paragraph, the applicant shall plant the trees that would otherwise be required on site or contribute the different to the tree replacement fund, or a combination of the two.

Response: The Tree Health Assessment Report demonstrates that the Project would retain approximately 49% of total trees (i.e., significant and landmark) in the Project area, and exceeds the minimum 35% retention requirement². RZC 21.72.030 *Exemptions*, subsection (3) provides an exemption from obtaining a permit to remove trees for removal of trees within easements or rights-of-way for the purposes of constructing public streets and utilities. Although the removal is exempt from the permit requirement, mitigation for tree removal will be provided in compliance with RZC 21.72.080, *Tree Replacement*.

3. Native Growth Protection Area (NGPA). Trees within an established Native Growth Protection Area shall not be removed, except when removal has its specified purpose.

Response: PSE is not proposing to remove trees from within a Native Growth Protection Area.

4. Proposed tree removal, replacement, and any mitigation proposed are consistent with the purpose and intent of this section.

Response: The proposed tree removal, replacement and mitigation are consistent with the purpose and intent of this section. Exceptional conditions exist that prevent PSE from fulfilling the requirements of the tree protection standards, including the need to remove trees within a critical areas and their buffers due to the linear nature of the Project. Mitigation for the critical area buffer impacts from removing these trees will be provided within the Willows Creek Stream Relocation Project south of Sammamish Substation. Providing consolidated mitigation at one site in lieu of spot mitigation along the corridor will result in more habitat lift and potential for mitigation success.

² Watershed. 2021. PSE Energize Eastside Project, City of Redmond, Vegetation Inventory and Tree Health Assessment Report, May 27, 2021.

Thank you for your consideration of this Exception request. If you have questions regarding this letter, feel free to contact me at 425-457-5572 or karen.worcester@pse.com.

Sincerely,

A handwritten signature in black ink that reads "Karen Worcester". The signature is written in a cursive style with a large initial "K" and a stylized "W".

Karen Worcester
Senior Land Planner, PSE