

Quasi-Judicial

TECHNICAL COMMITTEE REPORT TO THE HEARING EXAMINER

Project Name: Energize Eastside

Location: Existing Puget Sound Energy (PSE) powerline corridor in the Willows/Rose Hill Neighborhood and Grass Lawn Neighborhood from the Sammamish Substation on Willows Road to NE 60th Street at the Redmond/Bellevue city limits.

Project File Numbers: LAND-2021-00487/00521, SEPA-2021-00663

Project Description: Upgrade approximately two miles of 115kV transmission lines with 230 kV transmission lines from the Sammamish substation to NE 60th Street. Includes construction at the Sammamish and Rose Hill substations to connect the substation equipment to the new 230 kV lines.

Applicant: Puget Sound Energy
6500 Ursula Place S.
Seattle, WA 98108

Applicant's Representative: Bradley Strauch, Project Manager

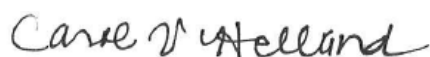
Planner: Cathy Beam, AICP, Principal Planner

Decisions Included: Site Plan Entitlement and Conditional Use Permit (RZC 21.76.050.H and 21.76.050.E.2)

Recommendation: **Approval with Conditions**

Public Hearing Date: June 6, 2022

Conclusion in Support of Recommendation: The Technical Committee has found the proposal to be in compliance with the Redmond Zoning Code (RZC), Redmond Comprehensive Plan, Redmond Municipal Code, and State Environmental Policy Act (SEPA).



CAROL V. HELLAND, Director
Planning and Community Development
Department



PHIL WILLIAMS, Interim Director
Public Works Department

Project Review Authority and Procedures

The City of Redmond **Technical Committee** is comprised of staff from different departments and disciplines who analyze project applications for compliance with city codes and regulations. Based on this analysis, **the Technical Committee** provides responses, conclusions, and recommendations (in the form of this report) to the **Hearing Examiner**. The **Hearing Examiner** will conduct a public hearing to review the **Technical Committee's** analysis and recommendations on the Site Plan Entitlement and Conditional Use Permit and receive public testimony regarding the proposal. Based upon the **Technical Committee's** recommendations and testimony received at the public hearing, the **Hearing Examiner** will make a decision to approve, approve with conditions, or deny the Site Plan Entitlement and Conditional Use Permit for the proposed Energize Eastside project.

Key Dates

Application/Completeness Date: 8/4/2021

Neighborhood Meeting Date: 10/21/2021

SEPA DS:

Project Phase I Draft Environmental Impact Statement (EIS) Issued: January 2016

Project Phase II Draft EIS Issued: May 2017

Final EIS Issued: March 2018

Public Hearing Date: 6/6/2022

Report Attachments

- Attachment 1: Land Use Application Form
- Attachment 2: Vicinity Map
- Attachment 3: Plan Set
- Attachment 4: Notice of Application and Certificate of Posting
- Attachment 5: Notice of Application Public Comments
- Attachment 6: Notice of Neighborhood Meeting
- Attachment 7: Notice of Public Hearing and Certificate of Posting
- Attachment 8: SEPA Documentation
- Attachment 9: Project Narrative
- Attachment 10: Decision Criteria Analysis
- Attachment 11: Tree Health Assessment
- Attachment 12: Wetland and Stream Delineation Report
- Attachment 13: Critical Areas Impact Assessment
- Attachment 14: Conceptual Mitigation Plan
- Attachment 15: Site Photos
- Attachment 16: Photo Simulations
- Attachment 17: Pole Finishes Report
- Attachment 18: Geotechnical Report
- Attachment 19: Stormwater Report
- Attachment 20: Noise Analysis

Attachment 21: Tree Exception Request
Attachment 22: Integrated Pest Management Plan

Technical Committee Analysis

I. Proposal Summary

Puget Sound Energy proposes to upgrade approximately 16 miles of two existing transmission lines operating at 115 kilovolts (kV) to 230 kV lines from Redmond to Renton, construct a new substation in South Bellevue (the Richards Creek substation) and continued conservation measures (collectively called Energize Eastside). PSE states the upgraded lines, new substation, and conservation measures are needed to address electrical system deficiencies identified during federally required planning studies. This project significantly improves reliability for Eastside communities, including the City of Redmond, and will supply the additional electrical capacity needed for current and anticipated growth.

The existing system is not robust enough to maintain reliable service if the entire existing PSE Eastside electric system facility is taken out of service at one time. Therefore, the Energize Eastside project will be constructed in two phases. This will allow PSE to keep the existing 115 kV facilities partially in-service during construction, allowing PSE to maintain reliable service to all customers during construction. The second phase, which includes the "Redmond Segment", is the focus of this hearing and includes upgrading approximately two miles of existing 115 kV lines with 230 kV lines between the Sammamish substation and the Redmond/Bellevue city boundary. This upgrade includes replacing existing wood H-frame poles (which have 2-3 poles each) with steel monopoles. PSE proposes to undertake this work in the existing transmission line corridor. The proposed pole locations for the rebuilt lines will generally be in the same locations as the existing poles. Use of the existing corridor (which has housed transmission lines since the 1920s and 30s) minimizes potential impacts to the environment and to adjacent uses to the fullest extent feasible. Selective tree removal will also be required within the managed corridor to meet federal vegetation management requirements and PSE standards.

As noted above, the Redmond Segment of the project includes approximately two miles of transmission line upgrade within a 100-foot-wide utility corridor that extends from the Sammamish substation to NE 60th Street at the Redmond/Bellevue city limits. The Redmond Segment includes the following activities:

- Pole replacement, including removal of approximately 35 wooden H-frames and six single poles, and the installation of 28, 230 steel monopoles comprised of 18 single-circuit monopole pairs and ten double-circuit single monopoles (for these poles 19 drilled pier foundations are planned along with nine direct-embed poles);
- Installation of 230kV transmission lines;
- Temporary access routes and staging areas;
- Stringing sites;
- Vegetation management for federally required line clearance;

- Addition of a new 230 kV line bay within the Sammamish substation; and
- Additional improvements (e.g., replacement switchgear, breakers, etc.) within the Sammamish and Rose Hill substations.

Construction activities will primarily involve the replacement of existing poles with new poles and the stringing of 230 kV transmission lines on the new poles, as well as ancillary activities to support those construction activities. Construction at the Sammamish and Rose Hill substations will include connecting the substation equipment to the new 230 kV line. Substation upgrades and transmission line construction will occur simultaneously.

Existing H-frames and some single poles that are 61 to 79 feet in height will be replaced with new steel monopoles ranging from 90 to 120 feet in height. Typically, new poles will be placed in the same general location as the existing poles. Following installation of the new poles and stringing new conductors (transmission lines), existing poles will be removed. Most of the new poles (19 total) will require a drilled pier foundation. Each pole with a foundation will require excavation with a line truck/auger of a hole up to nine feet wide and up to 46 feet deep. Reinforced-steel anchor bolt cages will be installed in the hole and filled with concrete. The steel pole will then be placed on the foundation by a crane. The remainder of the poles (nine total) will be directly embedded into the ground. Direct-embed poles will require excavation of a hole up to five feet wide and up to 25 feet deep. Wood poles being removed from critical areas and buffers will be removed and the disturbed area will be restored consistent with the approved critical area mitigation plan.

The temporary work area at each pole removal site is estimated to be approximately 2,500 square feet. The temporary work area around each pole installation site is approximately 5,000 square feet for poles with foundations, and approximately 2,500 square feet for direct-embed poles.

At the Sammamish substation, two new 230 kV line bays will be added as well as additional equipment upgrades; additional work at the substation may include installing conduits, cable trenches, grounding, security upgrades and/or drainage improvements. All upgrades to the existing substation are expected to occur within the fenced footprint of the substation. At the Rose Hill Substation, the equipment will be reconfigured and upgraded so that the station can connect to the 230 kV lines. This will include a replacement transformer and supporting operating equipment. The substation will remain generally in the same location within PSE's existing fenced facility.

II. Site Description and Context

The length of the project corridor in the city is approximately two miles beginning at PSE's Sammamish Substation along Willows Road and running generally south to the Bridle Crest Trail near NE 60th Street, including PSE's existing Rose Hill Substation on NE 80th Street. Within the north-south portion of project corridor in Redmond, two existing 115 kV transmission lines are present on wood H-frame poles. The typical width of this portion of the study area is approximately 100 feet. Approaching the substation

property, the corridor widens to approximately 200 feet and includes multiple existing 115 kV transmission lines on various types of poles.

The existing corridor was originally constructed in the late 1920s and early 1930s, and at that time the entire corridor was cleared. Construction activities resulted in a compacted subsurface in areas where the existing utility poles are installed. Since the time of original construction, the limits of the existing corridor have been continually maintained by PSE through easement rights. PSE has utilized existing access routes/paths, to replace existing utility poles as needed and manage vegetation in the corridor. Vehicles and equipment (such as cranes) have been using the corridor for required maintenance activities. Over time, development has occurred adjacent to and within the corridor, including residential development, roads, parking lots, commercial development, and the establishment of trails. Some of this development was allowed under the terms of the PSE easements and some was not.

Most of the developed portions of the corridor containing vegetation in residential, commercial, and industrial areas can be generally described as maintained yards or landscaped parcels. On parcels that have not been developed with commercial or residential uses, vegetated areas are often dominated by invasive plants including Himalayan blackberry and reed canary grass.

This is a linear project on undulating land which begins at the existing Sammamish Substation on the west side of Willows Road. The substation site is surrounded by business park and manufacturing park businesses on the north, east, and south sides. To the west lies open space mostly comprised of wetlands and a stream system. As the new power lines exit the substation to the south, they turn west over this open space before heading south uphill towards Redmond Way. This property is owned by PSE. Upon crossing Redmond Way, the powerlines continue heading south in the existing powerline corridor on an easement through several single-family residential properties before crossing NE 80th Street. Between NE 80th Street and NE 75th Street, the lines are located on PSE owned property and adjacent to the Rose Hill Substation. South of NE 75th Street, the powerline easement is adjacent to Rose Hill Middle School before entering an easement on the Sixty-01 condominium property zoned R-12 south of Old Redmond Road. The proposal continues south, entering the City of Bellevue. (See Attachment 2, Vicinity Map)

Sammamish Substation

Adjacent	Existing Land Use	Zone
North	Business parks	BP
South	Manufacturing businesses	MP
East	Manufacturing businesses	MP
West	Vacant land	BP

Rose Hill Substation

Adjacent	Existing Land Use	Zone
North	Single family homes	R4
South	PSE owned open space and transmission line	R4
East	Single family residences	R6
West	Single family residences	R4

Energize Eastside Transmission Line Corridor

Adjacent	Existing Land Use	Zone
North	Business parks	BP, MP
South	Multi-family residential	R12
East	Single family and multi-family residences	R4, R5,R6, R12
West	Single family residences	R1, R4, R6

III. Site Requirements

The site is located within the Business Park (BP), Manufacturing Park (MP), Single Family Urban Residential (R4, R5, & R6) and Multi Family Urban Residential (R12) zoning districts. The proposed Energize Eastside 230 kV transmission line is a regional utility as defined in RZC 21.78. Powerline poles are considered structures per RZC 21.78.

The Zoning Code contains a table entitled, *Regulations Common to All Uses*, for each zoning district the proposal crosses. These various tables (Table 21.08.060B, Table 21.08.080B, Table 21.08.090B, Table 21.08.110B, Table 21.14.030B, and Table 21.14.040.B) contain maximum height specific to buildings. A powerline pole is a structure; however not all structures are buildings. As such, a powerline pole is not subject to the maximum height restrictions of the zoning districts. This is one of the reasons that a Conditional Use Permit is required to establish a regional utility use.

In the BP and MP Zones, the proposal is permitted outright and requires a Site Plan Entitlement per RZC 21.14.030.C & 21.14.040.C. In the R4, R5, R6, and R12 zones the proposal requires a Conditional Use Permit per RZC Tables 21.08.060C, 21.08.080.C, 21.08.090C, and 21.08.110C. The proposal complies with all of the site requirements for the BP, MP, R4, R5, R6, and R12 zones.

IV. Neighborhood Regulations

This project is located within the Willows/Rose Hill and Grass Lawn neighborhoods. There are no neighborhood regulations specific to a regional utility use.

V. Public Notice and Comment

Requirements for public notice are contained in RZC 21.76.080.

Notice of Application: The Notice of Application for this proposal was published on 8/16/2021. The notice was posted at City Hall, the Redmond Regional Library, and four notice signs were posted on the property. Notice was also mailed to property owners within 500 feet of the powerline alignment (Attachment 4, Notice of Application and Certificate of Posting).

Public Input: During the public comment period for the Notice of Application, the city received several written comments. (Attachment 5, Notice of Application Public Comments).

The comments expressed the following concerns or requests for consideration. Staff has provided a summary of the comments and included responses below:

1. General Opposition to the Proposal

Comment: There were a number of comments expressing general opposition to the project. These includes requests to convert PSE back to a public utility, questioning the reason for the proposal and project financing, expressing concern it is not a wise investment by PSE, stating the proposal is a scheme for more power, noting PSE is not locally owned, noting the proposal does not adhere to federal regulations, and wanting accountability and transparency.

Staff Response: City staff review development proposals through the procedures set forth in the Redmond Zoning Code and the criteria established in this code. The comments of general opposition above are not within the scope of consideration for this land use decision as established by sections 21.76.070.B.3.a, 21.76.070.Y.3, and 21.76.070.K.4 of the Redmond Zoning Code.

2. Tree Regulations

Comment: Ensure compliance with city tree regulations

Staff Response: PSE submitted a Tree Health Assessment to the city that disclosed the extent of tree removal/impacts from the proposal. Energize Eastside will meet the City's 35% significant tree retention requirement. The proposal will achieve 49% significant tree retention. Trees approved for removal to meet federal vegetation management requirement will be replaced per the City's required tree replacement ratios or fees-in-lieu will be paid.

3. Health Risks

Comment: Are there any potential health effects that may result from the proposal? Should there be added safety concerns since the project is adjacent to a school and the powerlines are increasing from 115kV to 230kV?

Staff Response: Electric magnetic fields (EMF) are found wherever there is a flow of electricity, in household wiring, electrical appliances, computers or powerlines. Scientists have undertaken studies for more than 40 years to determine whether EMF has any effect on human health. To date, thorough reviews by United States and international public health agencies like the World Health Organization have

concluded that the research does not show that exposure to power frequency EMF causes adverse health effects. The Final Environmental Impact Statement (FEIS) for the Energize Eastside project summarizes relevant information and concludes that no adverse impacts from magnetic fields are expected. Section 4.8 of the FEIS provides information about electric magnetic fields. The FEIS states, "relative to the Non Action Alternative, magnetic field levels would decrease under PSE's proposed alignment for the Redmond segment because magnetic fields diminish with distance from the source. Therefore, the greater distance from the centerline of the transmission line, the lower the magnetic field levels. Taller poles generally result in lower magnetic fields. The calculated magnetic field levels generated by the project along this segment would be well below reference guidelines. Additional background information on EMF is available at: www.energizeeastsideeis.org (Chapter 4.8, *Environmental Health - Electric and Magnetic Fields*).

4. Communications Harm

Comment: What are the impacts of increased voltage on radio/cell interference?

Staff Response: The FEIS concluded overhead transmission lines do not generally interfere with radio or televisions reception, although corona can affect AM radio frequencies (www.energizeeastsideeis.org Chapter 4.8, *Environmental Health - Electric and Magnetic Fields*). No corona generated interference with police and emergency personnel community/emergency devices is anticipated. PSE will design the new 230 kV lines in consideration of the Institute of Electrical and Electronics Engineers design guidelines.

5. Grid Upgrade

Comment: Supportive of the grid upgrade to ensure reliable power.

Staff Response: PSE's last major upgrade to the backbone of the Eastside's electric grid was in the 1960s. Since then, the Eastside's population has grown eight-fold and its economy relies on power in ways it did not over 50 years ago. The upgrade is required to address system deficiencies and improve power reliability for Eastside communities.

6. Drainage Issues

Comment: Will this equipment and/or construction affect delicate drainage issues in any way since this is on a generally downhill slope?

Staff Response: PSE has submitted a Stormwater Report which was reviewed by the city's stormwater engineer to ensure the project meets the city's stormwater management requirements, including Department of Ecology stormwater regulations.

7. Upgraded Equipment Size Comparison

Comment: Is the upgraded equipment any larger than what's already existing and if so, how much larger?

Staff Response: The project includes removal of 35 wooden H-frame poles and six single poles, and the installation of 28 steel monopoles comprised of 18 single-circuit monopole pairs and ten double-circuit single monopoles. Existing H-frame and single poles are approximately 61 to 79 feet in height. The proposed monopoles will typically be between 90 and 120 feet in height.

8. Traffic Impacts During Construction

Comment: Will there be any significant or extended effects on traffic during construction?

Staff Response: Intermittent road closures or reductions in travel lanes during construction may be necessary when moving equipment and materials on and off the corridor. PSE will prepare traffic control plans as part of their city required right-of-way use permit. PSE will closely work with the City's Public Works staff on the traffic control plan.

9. Operational Noise

Comment: Will there be an increase in line or operational noise from this proposal?

Staff Response: No new noise is anticipated during the operation of the project. Noise is addressed in detail in Chapter 9 of the Phase 1 Draft Environmental Impact Statement.

10. Petroleum Pipeline

Comment: Concern raised on the safety of placing new power poles in a utility corridor collocated with a liquid petroleum pipeline(Olympic Pipeline). Studies have shown that high-voltage transmission lines can induce voltage and current on metal oil and gas pipelines with insulating coatings.

Staff Response: The full AC Interference analysis that addresses the collocation of the transmission lines and two fuel lines operated by Olympic Pipelines can be found in the library section of the Energize Eastside webpage at: www.energizeeastsideeis.org (Chapter 4.9, *Environmental Health - Pipeline Safety*).

11. Adversely Affect Property Value

Comment: Concern raised that the project would decrease home valuation along the transmission line corridor.

Staff Response: An economic analysis for the EIS did not find studies that indicated a negative effect on property values due to the replacement of lower voltage with higher voltage transmission lines in an existing utility corridor. The Draft EIS ultimately determined the impact is less than significant. A detailed discussion around property values can be found in Section 10.7.1 in the Phase I Draft EIS.

12. Harmful to Environment

Comment: Concern that the proposal is harmful to the environment.

Staff Response: A multi-year Environmental Impact Statement was performed that addresses various aspects of the proposal and its potential impact. The analysis can be found in documents located at <https://www.energizeeastsideeis.org> and <https://energizeeastside.com/>. The proposal was reviewed against the city's critical areas regulations (RZC 21.64) to ensure compliance with city requirements.

Neighborhood Meeting Notice: The Notice of Neighborhood Meeting for this proposal was mailed to property owners within 500 feet of the site on 9/30/2021.

Public input was also received during the neighborhood meeting which was held virtually on 10/21/2021. (Attachment 6, Notice of Neighborhood Meeting.)

The neighborhood meeting comments expressed the following input for consideration. Staff has included responses below:

1. Critical Infrastructure

Comment: Energize Eastside is critical infrastructure that is tied to regional growth and the economy. Reliable power and upgraded infrastructure are needed. It is important that regional infrastructure can meet future demand, especially since the pandemic has changed the way people work.

Staff Response: PSE is proposing this project to address these needs.

2. Climate Change/Dependability

Comment: Last summer's "heat dome" effect was a grave concern for community members, as we will likely continue to see this trend with climate change. Community health depends upon dependable and available power. The region cannot afford a major system failure.

Staff Response: PSE is proposing this project to address these needs.

3. Siting

Comment: Pleas Energize Eastside is sited in an existing powerline corridor as it will be less disruptive than constructing a new powerline corridor.

Staff Response: Alternative routes were discussed during the Environmental Impact Statement process and the proposal represents the City's preferred alignment.

Notice of Public Hearing: The Notice of Public Hearing for this project was posted on the site, at City Hall, and at the Redmond Regional Library on May 11, 2021. The notice was also mailed on the same date to property owners within 500 feet of the site and to individuals who provided written correspondence to the City. The notice was also included in a one-time newspaper publication (Attachment 7, Notice of Public Hearing and Certificate of Posting).

VI. State Environmental Policy Act

The State Environmental Policy Act (SEPA) requires applicants to disclose potential impacts to the environment as a result of their project. The greater proposal is located with the Cities of Redmond, Bellevue, Newcastle, and Renton, and a portion of unincorporated King County.

Pursuant to SEPA, a threshold Determination of Significance was issued on 4/30/15. To address the potential for significant environmental impacts, an Environmental Impact Statement (EIS) was prepared for the entire project, with the City of Bellevue acting as the Lead Agency because the majority of the proposed transmission line was located in that jurisdiction. The Phase II Draft EIS was published in May 2017. The Final EIS was

published in March 2018. All EIS documents can be found at <https://www.energizeeastsideeis.org/library.html>.

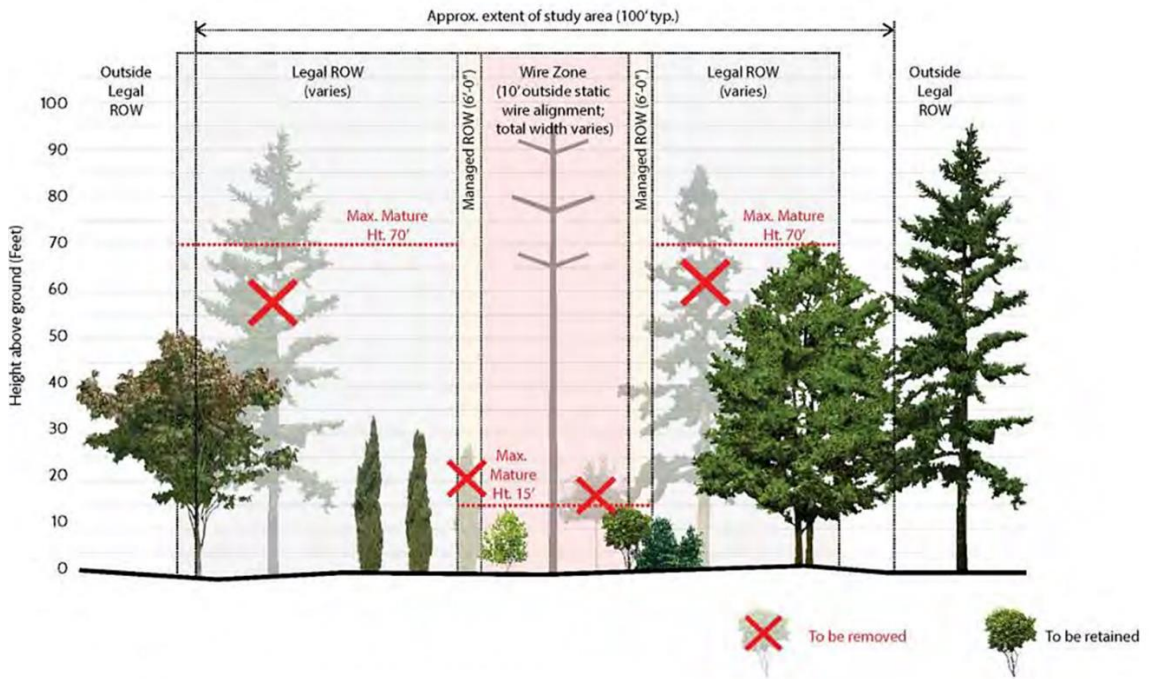
VII. Compliance with Development Regulations

A. Tree Protection

PSE will remove trees that do not meet federal clearance safety standards.

The Federal Energy Regulatory Commission (FERC) has certified the North American Electric Reliability Corporation (NERC) as the electric reliability organization that establishes legally enforceable mandatory standards for the U.S. bulk power system. PSE is required by NERC standards to maintain safe clearances between vegetation and utility lines. Specifically, NERC FAC-003-4 (Transmission Vegetation Management) sets forth the vegetation management requirements for transmission lines operated above 200 kV.

Under NERC FAC-003-4, PSE must manage vegetation to prevent encroachments into the Minimum Vegetation Clearance Distance of its applicable line(s). Since the project entails replacing the existing 115 kV lines with lines operating to 230 kV, the upgraded transmission lines must comply with the NERC standard and PSE's 230 kV vegetation management standard. These standards generally require the removal of trees with an expected mature height of more than 15 feet from the wire zone and managed right-of-way (ROW); and removal of trees with an expected mature height of more than 70 feet from the legal ROW. The wire zone is the area underneath transmission conductors extending out approximately ten feet horizontally from the footprint of the conductors. The managed ROW is the area that extends approximately 16 feet horizontally from the outside of the transmission wires in their static position. The legal ROW encompasses the entirety of PSE-owned properties and easements. Trimming is performed if a conflict with the transmission line can be removed through trimming branches, except in cases where trees have been previously trimmed, or trimming will make the tree potentially unsound, or the conflict cannot be alleviated long-term. After construction is complete, vegetation management is performed in three-year cycles along 230 kV transmission corridors.



There are 460 significant trees (out of 902 significant trees total) that do not meet the NERC and PSE vegetation management standards in the City and must be removed. It is important to note that most trees are already located within an existing and managed transmission line corridor and approximately 90 percent are in fair condition or worse. Three landmark trees are proposed for removal. (See Attachment 11, Tree Health Assessment)

Tree Retention and Replacement Table

Tree Type	Total	Removed	Retained
Number of Landmark Trees	21	3	18
Number of Significant Trees	881	457	424
Total Number of Trees	902	460	442
Percent of Trees	100%	51%	49%

Generally, vegetation impacts were calculated according to the following criteria:

- Remove trees within the proposed wire zone and managed ROW with a maximum potential height that exceeds 15 feet or where 20 feet of vertical clearance is provided beneath the vertical curvature of the lowest wire.
- Remove trees within the legal ROW and outside of the managed ROW, but within the maintained legal ROW, with a maximum potential height exceeding 70 feet.

PSE has acknowledged the number of regulated trees reported is an under-representation of the total number of subject trees along the project area in the city. Their consultants were denied entry by property owners to some parcels in the study

area within which crews were unable to identify, assess, map, or tally subject trees. These parcels were mostly residential. Thus, trees in some parcels were either not inventoried or only partially inventoried. A final tree removal analysis will occur prior to construction to confirm tree retention and tree removal counts and ensure the required 35% significant tree retention is met. Additional trees identified for removal are subject to tree replacement under RZC 21.72.040, *Tree Replacement*.

RZC 21.72 establishes Tree Protection regulations. Although removal of trees within easements and rights-of-way for the purpose of constructing utilities is listed under RZC 21.72.030, Exemptions, from obtaining a tree removal permit, these projects are still subject to the purpose and intent of the City's tree regulations. Removal of significant trees must be mitigated. The proposed project meets the 35% tree retention requirements established in RZC 21.72.060.A.1. Significant and landmark trees removed will be mitigated at a 1:1 and 3:1 ratio respectively. PSE intends to pay a fee-in-lieu per RZC 21.72.080.E.2 for tree removals within City rights-of-way.

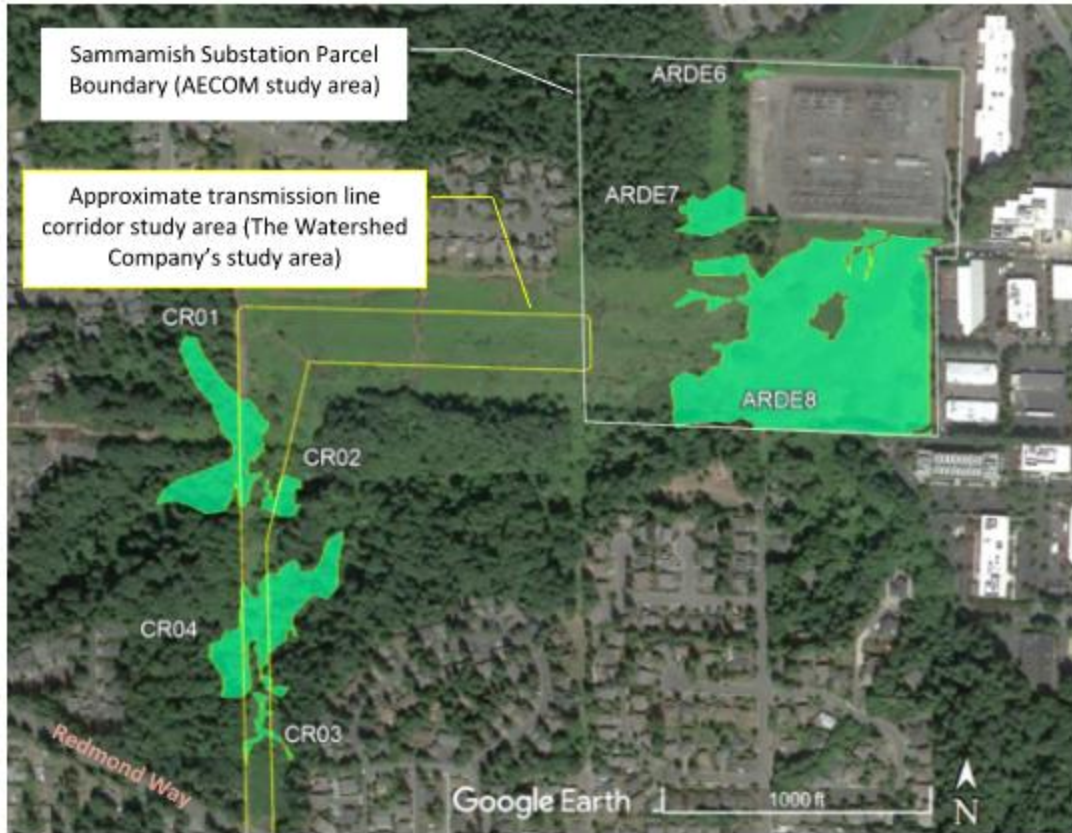
An adaptive tree replacement approach is proposed which sets out the range of tree replacement strategies for the project. The approach first maximizes tree replacement within the corridor easements. If those landowners decline to have trees planted on their property, PSE will seek out replanting at alternative properties within the City through their Energy Savings Tree Program.

RZC 21.72.060 states that trees located within Native Growth Protection Areas, critical areas and their associated buffers, or that otherwise have 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. Tree replacement associated with these trees can be found in PSE's tree exception request. (See Section XI below, Tree Exception Request.)

B. Critical Areas

Wetlands

A total of seven wetlands were delineated along the Energize Eastside corridor in the city. The wetlands include one slope/depressional and two slope wetlands on or near the substation site, and four slope wetlands located along the transmission line corridor. These wetlands occur north of Redmond Way on relatively undeveloped portions of the project corridor. Six of the seven wetlands are classified as Category III wetlands; and Wetland ARDE8 is a Category II wetland.



Map of site wetlands

Wetland CR01 is a relatively large, slope Category III wetland that extends outside of the study area to the west. It is estimated to be over two acres. Streams CR02 and CR03 are located within the wetland boundaries but contribute little in terms of hydrology to the wetland unit. Wetland CR01 hydrology is mainly provided by groundwater seeps which support associated streams that generally flow east. Vegetation primarily consists of red alder, salmonberry, reed canarygrass, small-fruited bulrush creeping buttercup, giant horsetail, and lady fern.

Project Impacts to Wetland CR01: The proposed transmission line crosses this wetland, but no pole installation/replacement will occur in this wetland or its buffer. A total of 41 trees will be removed from the combined buffer of Wetlands CR01 and CR02 to accommodate 230kV transmission conductor clearance requirements.

Wetland CR02 is a slope wetland located south of Stream CR01 and east of Wetland CR01. This Category III wetland is 0.32 acres in size. It is a forested wetland dominated by red alder in the canopy with salmonberry, Devil's club, giant horsetail, piggyback plant, lady fern, and skunk cabbage common in the shrub and herbaceous layers. Groundwater seeps are the main source of hydrology to the wetland unit.

Project Impacts to Wetland CR02: The proposed transmission line crosses this wetland. No pole installation/repair will occur in the wetland, but one pole will be installed, and two poles will be removed in the combined buffer of Wetlands CR02 and CR04. Three

trees will be removed from this wetland and 41 trees will be removed from the combined buffer of Wetlands CR01 and CR02 to accommodate required transmission conductor clearances.

Wetland CR03 is a slope 0.2-acre Category II wetland located on both sides of Stream CR04. Groundwater seeps are the largest contributing source of hydrology to the wetland unit. It contains palustrine scrub-shrub and palustrine emergent vegetation classes and includes a young City restoration site in the southeast portion of the wetland. Restoration plants dominate the scrub-shrub portion of the wetland and include salmonberry, Pacific ninebark, red-twig dogwood, Nootka rose, black twinberry, and Sitka willow among others. Outside of the mitigation area, woody vegetation includes red alder, salmonberry, and Himalayan blackberry. Small-fruited bulrush, lady fern, common rush, and reed canarygrass are common in the herbaceous layer.

Project Impacts to Wetland CR03: The proposed transmission line crosses this wetland, but no pole installation/replacement will occur in this wetland or its buffer. No trees will be removed from this wetland, but five trees will be removed from the combined buffers of Wetlands CR03 and CR04 to accommodate 230 kV clearances.

Wetland CR04 is a relatively large slope wetland located on both sides of Stream CR04, north of Wetland CR03. It extends outside of the study area both east and west and is estimated at nearly 2.5 acres. Wetland CR04 is classified as a Category III wetland. Hydrology to the wetland is mainly provided by groundwater seeps which contribute to Stream CR04, generally flowing northwest. Its vegetation consists of communities dominated by red alder in the canopy with salmonberry, skunk cabbage, lady fern, and piggyback plant common in the shrub and herbaceous layers.

Project Impacts to Wetland CR04: The proposed transmission line crosses this wetland. One pole will be installed, and two poles will be removed from the combined buffers of Wetlands CR02 and CR04. Nine trees will be removed from this wetland and three trees will be removed from the wetland buffer.

Wetland ARDE6 is a small slope/depressional wetland located at the northwest corner of the substation, approximately 0.04 acre in size. It is a Category III wetland. This wetland receives water via hillslope seep from upslope areas to the west, which is impounded by the fill associated with the substation. Standing water is present in this wetland. Surface water is conveyed to the south via a drainage ditch that runs along the edge of historic fill associated with the substation. The dominant tree species is red alder. Dominant shrubs are salmonberry and twinberry, with field horsetail and slough sedge prevalent in the herbaceous layer. Some Himalayan blackberry is also present.

Project Impacts to Wetland ARDE6: The proposal will not affect this wetland or its buffer. No pole installation/replacement will occur in the wetland.

Wetland ARDE7 is a slope wetland, approximately 0.7 acre in size. This Category III wetland occurs along the southwest edge of the substation, on a steep slope. It receives water via hillslope seep from the west, and carries this water to the east, where it tapers

into a narrow ditch south of the substation. It is also connected to a drainage ditch that runs north-south along the edge of substation fill. This wetland consists of two forested areas, which are bisected by an area associated with a cleared transmission line right-of-way. In the forested portion of this wetland, dominant tree species include red alder and Pacific willow, with salmonberry, reed canarygrass, common lady fern, and Himalayan blackberry in the understory. In the cleared area within the right-of-way, salmonberry, Himalayan blackberry, and thimbleberry are prevalent, with reed canarygrass, creeping buttercup, and bracken. Where the wetland tapers into a narrow ditch along the south edge of the substation, dominant species include narrowleaf cattail, Pacific willow, salmonberry, and reed canarygrass.

Project Impacts to Wetland ARDE7: The proposed transmission line crosses this wetland, but no pole installation/replacement will occur in this wetland. A total of 20 trees will be removed in the combined buffer of ARDE7 and ARDE8 to accommodate conductor clearances.

Wetland ARDE8 is the largest of the delineated wetlands, covering 13.6 acres within the study area and extending off site. It is a predominantly a slope wetland. This Category II wetland appears to receive groundwater from several points along a steep section of the hillslope, conveying water along and just below the ground surface toward the lower gradient eastern half of the property. The general direction of water flow in the eastern portion of the site is southwest to northeast, with most water leaving the site via Willows Creek at the southeast end of the substation. The amount of water inputs into the wetland appears to have increased, and following rain events, water flows in a complex network of temporary, shallow, braided channels across the site. Vegetation is dominated by reed canarygrass in the wetter, flatter portion of the site, with the upland island surrounded by shrub vegetation in the center. The forested component occurs along the southern boundary of the study site, associated with the stream channels, and in an isolated patch near the east edge of the wetland, south of the substation. The most common shrubs in these areas were salmonberry and invasive Himalayan blackberry. Along the stream channels at the southern boundary of the property, Sitka willow and red alder are the dominant tree species. A narrow stand of cottonwoods is present near the eastern edge of the wetland, about 150 feet south of the substation.

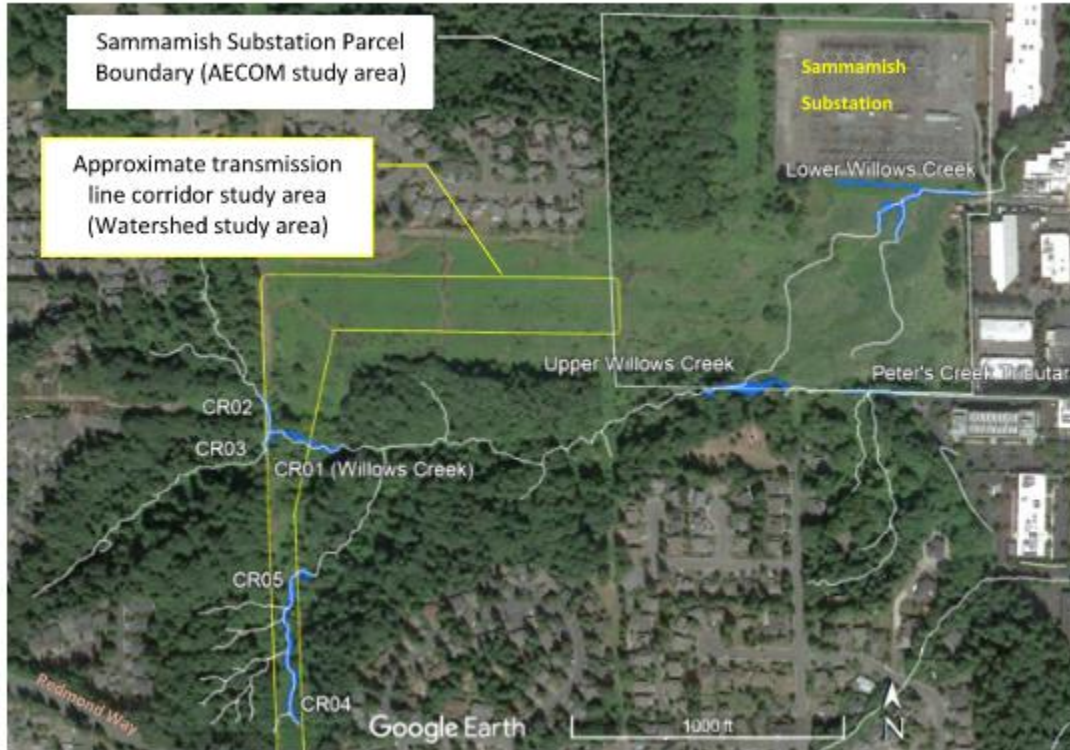
Project Impacts to Wetland ARDE8: The proposed transmission line crosses this wetland as do eight other existing transmission lines not part of this proposal. Three poles will be installed in this wetland and four poles will be removed from this wetland to accommodate 230kV conductor clearances. Two monopoles will be installed, and three poles will be removed from this wetland buffer. As noted above, 20 trees will be removed in the combined buffer of ARDE7 and ARDE8.

(See Attachment 12, Wetland and Stream Delineation Report and Attachment 13, Critical Areas Impact Assessment.)

Streams

Six streams (eight stream segments) were delineated along the proposed project corridor in the city. Streams segments flow within or adjacent to delineated wetland boundaries, located north of Redmond Way. The City classifies streams as Class I, Class

II, Class III, or Class IV based upon status as Shoreline of the State, salmonid fish use, non-salmonid fish use, and whether the stream is considered a 'headwater stream' (RZC 21.64.020).



Map of site streams

Stream CR01 is the upstream portion of Willows Creek; downstream segments on the substation property are discussed below. It is a perennial stream that begins at an approximately three-foot-wide elevated culvert under the transmission line corridor and flows east, eventually entering Wetland ARDE8. It is fed by several other streams that originate in ravines west and south of the study area.

Stream CR01 is approximately ten feet wide on average through the study area, has a gentle gradient, and contains a coarse cobble and gravel bed. The upper portion of this stream is well shaded and forested. Stream CR01 is considered to have the potential for salmonid fish use because there is no natural gradient barrier to preclude future use by downstream salmonids. It is a Class II stream, consistent with the City's classification of this feature.

Project Impacts to Stream CR01: The transmission line crosses this stream corridor, but no poles will be located in the stream or its buffer. However, trees will be removed in the buffer. Construction access will occur using an existing gravel access road over a culverted portion of the stream.

Streams CR02 and CR03 are small tributary streams to CR01 that originate in forested ravines west of the study area corridor. They are 2 to 3 feet wide on average. Within the transmission line corridor, the banks are vegetated with reed canarygrass, and the bed is made up of cobble. The streams converge from the north and south and flow into the culvert that marks the start of Stream CR01. Similar to Stream CR01, there is no natural gradient barrier to preclude future use by downstream salmonids. Therefore, Streams CR02 and CR03 are Class II streams, consistent with City stream typing requirements.

Project Impacts to Streams CR02 and CR03: A proposed transmission line runs adjacent to Streams CR02 and CR03, and a temporary access route will also run adjacent to these streams. Trees will be removed from the combined buffer of these streams.

Stream CR04 is a tributary to Stream CR01. It flows north through the transmission line corridor from a culvert outlet located north of Redmond Way. The stream is approximately six to eight feet wide on average and contains some large woody debris through the study area. Stream CR04 is a Class II stream based upon the lack of a natural gradient barrier between its location and documented salmonid fish use downstream.

Project Impacts to Stream CR04: The proposed transmission lines cross Stream CR04, but no poles will be located in this stream or its buffer and no access routes will be near this stream.

Stream CR05 is a small stream that feeds into Stream CR04. Stream CR05 appears to originate in a forested ravine west of the study area. It is conveyed under the transmission line corridor in a culvert. The delineated Stream CR05 segment is approximately 20 feet in length, between the culvert outlet and Stream CR04. Stream CR05 is not mapped by the City, although City stream mapping shows tributary streams to CR04 nearby, which are generally classified as Class III west of the transmission line corridor. Stream CR05 is considered a Class II stream based upon connectivity to Stream CR04 which is a Class II stream.

Project Impacts to Stream CR05: The project crosses this stream at a point where it is culverted. No poles will be located in the stream or its buffer and no temporary access will be required near this stream. Trees will be removed in the buffer.

Peter's Creek Tributary is a perennial Class III stream located along the southern Sammamish Substation property boundary. This small stream has been modified and is confined to a narrow channel that parallels a parking lot off-site to the south. This stream receives stormwater inputs from residential development to the south via a pipe.

Project Impacts to Peter's Creek Tributary: The proposed project will avoid Peter's Creek Tributary and its buffer.

Two segments of Willows Creek are associated with Wetland ARDE8, Upper and Lower Willows Creek. Water flows across the site, generally from southwest to northeast in a network of shallow channels that appear after rain events. Lower Willows Creek is a Class II perennial tributary to the Sammamish River that crosses under Willows Road and is channelized through office park development for almost a mile before reaching

the river. On the substation property, this segment of the stream has been modified and consists of steep banks with a confined linear channel. The Upper Willows Creek segment, also a Class II stream, is a perennial stretch of stream located along the southern property boundary, at the base of a hillslope. Overbank flooding has resulted in new channels emerging in adjacent scrub-shrub areas.

Currently, in the absence of a channel connection between the two segments of Willows Creek, water flows across the site, generally from southwest to northeast, in a network of shallow channels that appear after rain events. These sections of the stream remain hydrologically connected, although there is no longer a single defined channel to join them.

The Lower Willows Creek stream channel extends beyond the study area with 897 linear feet on the project site. Much of this segment of Willows Creek has been modified and now consists of steep banks with a confined linear channel. The riparian buffer is highly degraded and provides little shade or temperature regulation. Riparian vegetation is limited to scattered shrubs and herbaceous plants. Wildlife habitat in the riparian corridor is of moderate quality. There is documentation of coho salmon in this segment of Willows Creek.

The Upper Willows Creek is a perennial stream located along the southern property boundary, at the base of a hillslope. It occupies 276 linear feet in the study area.

In contrast to Lower Willows Creek, Upper Willows Creek is unconfined, with a broad, three-foot-wide channel with low banks that are overtopped frequently. The gradient varies between two and five percent. Overbank flooding has resulted in new channels emerging in adjacent scrub-shrub areas. The combination of unstable stream bank, moderate stream gradient and high velocity low flows limits fish habitat. Riparian vegetation on the south side of the channel is mixed conifer forest dominated by western red cedar and Douglas fir. On the north side, riparian vegetation is red alder forest and deciduous scrub-shrub dominated by salmonberry. Wildlife habitat in the riparian corridor is of moderate quality and is connected to a relatively large contiguous patch of forest habitat upstream of the study area. This stream segment could provide low quality habitat for non-salmonid fish. However, given the lack of a defined channel connection between this portion of Willows Creek and the lower segment, salmonids are not likely to be present.

Project Impacts to Willows Creek: The proposal crosses Upper Willows Creek and construction access will use an existing gravel access road over a culverted portion of the stream. Trees will be removed from the combined buffer of this stream and those of other streams and wetlands in the vicinity.

(See Attachment 12, Wetland and Stream Delineation Report and Attachment 13, Critical Areas Impact Assessment.)

Fish and Wildlife Habitat Conservation Areas

Fish and Wildlife Habitat Conservation Areas (FWHCA) within the City are rated and classified according to their characteristics, function and value, and/or sensitivity to

disturbance (RZC 21.64.020.A). The streams are considered Core Preservation Areas. Coho salmon (a Priority Species) breeding and occurrence has been mapped in the lower segment of Willows Creek. There is no suitable habitat for Endangered Species Act (ESA) listed mammals or species proposed for listing in the study area. There is no Quality Habitat in the project boundaries.

Project Impacts to FWHCAs: These impacts are addressed above under individual stream impacts.

Geologically Hazardous Areas

There are landslide and erosion hazard areas within the project area within a system of ravines and ridges north of Redmond Way. The steep slopes are in a maintained ROW corridor occupied by PSE transmission lines and an underground petroleum pipeline and is periodically maintained (i.e., mowed and brush trimmed) by PSE and the petroleum pipeline company. Some of the selected tree removal that is proposed will occur in ravines and the steep slopes. There are no mapped faults in the project area and there was no observation of any surface expression of faulting or rupturing, which would indicate impacts from seismic activity.

Project Impacts to Geologically Hazardous Areas: Temporary and maintained access routes for track-mounted or wheeled equipment will be used to install new poles and remove old poles. Equipment access may potentially increase the risk of localized erosion in steep slope and erosion-prone areas and cause temporary impacts to wetland vegetation. Minor regrading and addition of small amounts of quarry spalls or gravel might be necessary to stabilize portions of the existing access routes. Additionally, timber driving mats may be needed to temporarily cross stream(s) and move through wetland areas. However, driving equipment on timber mats is likely not feasible on slopes greater than about five percent. The existing access routes may require either prior removal of select trees and/or trimming of overhanging limbs to access the pole sites. (See Attachment 18, Geotechnical Report.)

Frequently Flooded Areas

Frequently Flooded Areas include floodplains, flood fringes, Federal Emergency Management Agency (FEMA) floodways, and zero-rise floodways. The 100-year floodplain of the Sammamish River is well outside of the study area to the east.

Critical Aquifer Recharge Areas

No Critical Aquifer Recharge Areas are mapped in or near the proposed project.

Critical Areas Mitigation

RZC 21.64.010.I requires all significant adverse impacts to critical areas functions and values to follow standard mitigation sequencing. PSE will meet these requirements through project design, implementing best management practices, restoring disturbed areas, and implementing compensatory mitigation for impacts to critical areas and their buffers that cannot be avoided.

Engineering and environmental constraints were evaluated by PSE during the design process to avoid and minimize critical areas impacts associated with Energize Eastside.

The proposal has been designed to the greatest extent possible to utilize an existing transmission corridor and associated disturbed areas that were historically used for access and maintenance. The proposed pole locations have been adjusted to avoid wetlands and streams and their buffers where feasible. The project avoids permanent impacts to Wetlands CR03, ARDE6, and ARDE7. Impacts to remaining wetlands will occur through the removal of trees for transmission line clearances. To minimize impacts, construction is planned to occur between spring and fall to avoid the wettest part of the year when wetlands are most susceptible to damage. Temporary access routes have been designed to minimize impacts to wetlands, streams, and their buffers. Best Management Practices (MBPs) such as temporary mats will be laid down over vegetation to access poles and prevent plant mortality associated with heavy equipment. Temporary access routes will avoid crossing stream channels and will avoid areas with forest cover to minimize vegetation removal.

Permanent unavoidable impacts to wetlands include 170 square feet of permanent Category II wetland impact, 8,120 square feet of Category II wetland vegetation conversion impact, 12,370 square feet of Category II wetland vegetation conversion impact, 100 square feet of permanent buffer impact, and 21,690 square feet of buffer tree removal impact. Vegetation conversion impacts are impacts where vegetation in a wetland is permanently changed from one wetland class to another, in this case from forested to scrub-shrub or emergent wetlands. Conversion impacts may result in a partial loss or reduction in wetland functions, but do not result in a total loss of wetland functions.

PSE is proposing to mitigate for Energize Eastside impacts on PSE-owned property at the Willows Creek Stream Relocation Project/Sammamish Substation Mitigation site, south of PSE's Sammamish Substation and within the transmission line corridor that contain the two project transmission lines. The Willows Creek Stream Relocation Project is a comprehensive project designed to improve riparian, wetland, and stream functions and habitat in the Willows Creek watershed, as well as alleviate flooding onto adjacent properties due to excessive sedimentation in the existing Willows Creek channel. The mitigation required for the Redmond portion of the proposal is 100,240 square feet of wetland enhancement and 8,030 square feet of buffer enhancement. A portion of this resource enhancement is available within the Willows Creek Stream Relocation Project, which totals 50,700 square feet of wetland enhancement. An additional 54,200 square feet of wetland enhancement and 8,030 square feet of buffer enhancement area is available on the Sammamish Substation Mitigation site. The combination of enhancement available at the Willows Creek Stream Relocation Project and Sammamish Substation site for the Redmond Segment is 104,900 square feet. The proposal follows an 8:1 enhancement ratio for Category III wetland impacts, a 12:1 enhancement ratio for Category II wetland impacts, a 1:1 enhancement ratio for buffer impacts, which uses a modified mitigation ratios of 0.5 for wetland vegetation conversion and restoration of stream buffers equivalent to 0.25 times the amount of impacted buffers as compensation for trees removed in buffers. Functions provided through the mitigation include habitat structure and quality as well as moderately improved water quality and hydrologic functions as a result of increased dense woody vegetation. There will be no permanent impacts to other aquatic resources, including streams. This required mitigation will meet city wetland mitigation ratios as outlined in

RZC 21.64.030.B and will meet the riparian stream corridor performance standards and mitigation requires specified in RZC 21.64.020.F.

RZC 21.64.010.L.2 outlines location and timing of mitigation. The mitigation site is a component of the Willows Creek Project located in the Willows Creek Sub-Watershed, which has been designated in the City's Watershed Plan as a priority area for restoration. The mitigation site is considered on-site mitigation as project associated transmission lines are located on the same site. The site is located in WRIA 8 (Cedar Sammamish) and the Sammamish River watershed, resulting in no-net-loss of functions on a watershed scale. Consolidating mitigation at this location verses spot mitigation along the linear corridor will provide higher habitat value and functions, as well as ensure long-term mitigation survival. In addition, since PSE owns the parcel, this ensures long-term protection of the mitigation site.

The primary goals of the Willows Creek Stream Relocation Project are as follows:

- Reestablish a Willows Creek stream channel and riparian corridor to reduce flooding, provide fish passage through an existing partially blocked culvert and enhance habitat while preserving PSE's ability to use and maintain the site for current and foreseeable utility purposes.
- Provide compensatory mitigation for wetland and stream functions impacted by Energize Eastside project (as well as the Sammamish-Juanita Powerline project that was approved under LAND-2020-00198).

These goals will be accomplished by implementing the following project components:

- Wetland enhancement of approximately 2.4 acres of Wetland ARDE8 through integrated vegetation management and enhancement plantings. This includes the proposed meander belt of Willows Creek, which will retain wetland characteristics.
- Replacement of a partial fish barrier culvert on Willows Creek with a new, fish passable stream simulation box culvert.
- Reestablishing the Willows Creek channel through Wetland ARDE8, restoring 1,450 linear feet of instream habitat and enhancing riparian vegetation.
- Upstream large woody debris placement to slow down sediment transport.

(See Attachment 14, Conceptual Mitigation Plan)

C. Stormwater

The Energize Eastside corridor is primarily located in the Cedar-Sammamish Watershed (Water Resource Inventory Area [WRIA] 8). Within WRIA 8 the project is constructed within two separate drainage basins. The north end of the study area is within the Sammamish River basin, and the southern portion is located within the Kelsey Creek drainage basin.

The areas of new impervious surface and land disturbing activity will be limited to isolated work areas associated with each utility pole removal or installation as well as access routes to facilitate tree removal. The proposed site and drainage conditions will result in only minor permanent changes from the existing conditions. This is due to the

small footprint required for the proposed utility poles and through construction methods that are intended to minimize impacts to the site.

The stormwater runoff from the developed portions of the corridor is managed through a combination of local parking lot/private property drainage systems and roadway drainage systems. The existing drainage components are comprised of a variety of collection and conveyance systems that include closed pipe networks, ditches, and culverts. The stormwater runoff from the undeveloped portions of the corridor is very limited, relying on occasional ditch and culvert systems that ultimately sheet flow to the adjacent roadway drainage systems, disperse into natural areas, or directly into a downstream water body.

The proposed site and drainage hydrology will result in only minor permanent changes from the existing hydrology. Minimal impervious area will be added as a result of the proposed utility poles. The proposal will largely maintain existing site hydrology and no flow control or conveyance facilities are required.

The proposal will create less than 2,000 square feet of new plus replaced impervious surface and creates less than 50 acres of new impervious surface within a hydraulically connected subbasin. However, it will require greater than 7,000 square feet of land disturbing activity. (See Attachment 19, Stormwater Report)

VIII. Criteria Applicable to all Land Use Permits

Proposed land use actions within the City must comply with the criteria listed in RZC 21.76.070.B.3.a. These criteria are applicable to all land use permits to ensure overall consistency between proposed land use permits, applicable regulations, and the Comprehensive Plan. Staff's analysis of whether the proposal meets the decision criteria is below.

- i. A proposed project's consistency with the City's development regulations shall be determined by consideration of:
 - A. The type of land use;
 - B. The level of development, such as units per acre or other measures of density;
 - C. Availability of infrastructure, including public facilities and services needed to serve the development; and
 - D. The character of the development, such as development standards.

Staff Response:

Technical review staff have completed a comprehensive review of the applicant's proposal against all adopted regulations. The proposed Energize Eastside project will address electrical system deficiencies, improving reliability and adding capacity for Eastside communities. Transmission lines are categorized as a Regional Utility and are permitted outright in the Business Park and Manufacturing Park zoning districts and require a Conditional Use Permit in the residential (R4, R5, R6, and R12) zoning districts. The level of development for these facilities is not measured in density. There are no specific development standards for Regional Utilities.

- ii. Upon review of a land use permit and accompanying site plan, the decision maker shall determine whether building design and/or site design complies with the following provisions:
 - A. The Comprehensive Plan, RZC 21.02, *Preface*, RZC Article I, *Zone-Based Regulations*, RZC Article II, *Citywide Regulations*, and the Appendices that carry out these titles;
 - B. The provisions of RMC Title 15, *Buildings and Construction*, that affect building location and general site design;
 - C. The Washington State Environmental Policy Act (SEPA) if not otherwise satisfied;
 - D. RZC Article VI, *Review Procedures*, to the extent it provides the procedures to ensure compliance with the requirements in subsections B.3.a.ii.B and B.3.a.ii.C of this section;
 - E. Both within and outside the Transition Overlays, decision makers authorized by the RZC to decide upon discretionary approvals may condition such approvals and development permits, including but not limited to site plan approvals, to minimize adverse impacts on other properties and uses, and to carry out the policies of the Comprehensive Plan.

Staff Response:

City staff have reviewed the proposed transmission line project and determined it complies with the City’s Comprehensive Plan, Zoning Code, Municipal Code, SEPA policies and has followed the review procedures set forth in the Zoning Code for a Site Plan Entitlement and Conditional Use Permit. The Site Plan Entitlement is elevated to a Type III permit consistent with the process for Conditional Use Permits per RZC 21.76.050.E.2. RMC Title 15 does not apply as transmission lines are not subject to the Building Code. As noted in the State Environmental Policy Action section of this report, the City of Bellevue, acting as Lead Agency for this multi-jurisdictional project, issued a Determination of Significance and completed an EIS on the project proposal that can be found at www.energizeeastsideeis.org.

The proposed project specifically addresses the following Comprehensive Plan goals and policies.

Goal/Policy	Staff Response
<p>LU-14 Encourage the provision of needed facilities that serve the general public, such as facilities for education, libraries, parks, culture and recreation, police and fire, transportation and utilities. Ensure that these facilities are located in a manner that is compatible with the City’s preferred land use pattern.</p>	<p>The project will use an existing powerline corridor and not require any new easements from adjoining property owners.</p>

Goal/Policy	Staff Response
<p>UT-1 Ensure that adequate public utilities and facilities are planned for, located, extended, and sized consistent with the planned growth described in the Goals, Vision and Framework Policies; Annexation and Regional Planning; and Land Use Elements.</p>	<p>The project is needed because an additional 230 kV bulk power source and substation are required to serve the growth of the Eastside region, inclusive of Redmond, and meet federal planning requirements. PSE studies have consistently concluded that the power source must be centrally located in the defined Eastside region. Energize Eastside will serve all uses in the Eastside service area, including industrial, commercial, residential, and public facilities in the city.</p> <p>The proposed transmission lines will be sited in the existing utility corridor and traverse a variety of land uses including single-family residential, multi-family residential, and commercial districts. The corridor predates the 1960s when vigorous residential development began in the city and the existing land use patterns already integrate the current utility facilities, keeping the proposal compatible and consistent with local context and land use patterns.</p>
<p>UT-2 Design and maintain public utility facilities to meet service standards identified in the Capital Facilities Element and corresponding functional plans.</p>	<p>PSE is the electrical service utility for Redmond. PSE plans, constructs, and maintains the necessary electrical services required by its customers. The Redmond utility plan focuses on developing and maintaining utilities at the appropriate levels of service in order to accommodate growth.</p>
<p>UT-9 Promote the efficiency of utility placement both in cost and timing through methods such as the following:</p> <ul style="list-style-type: none"> • Collocate public and private utilities in shared trenches or utility corridors, provided that such joint use is consistent with limitations as may be prescribed by applicable legal and safety considerations; • Coordinate facility planning so that utilities may locate in 	<p>The proposed transmission line upgrade is located within an existing corridor that was established in the late 1920s and early 1930s and is mostly composed of easements on private property. Residential and commercial development has occurred around the easement areas, limiting public access.</p> <p>The new transmission lines would be constructed within PSE’s existing 115 kV transmission line corridor, which is co-located in the same corridor as two</p>

Goal/Policy	Staff Response
<p>transportation corridors and other dedicated rights-of-way;</p> <ul style="list-style-type: none"> • Provide timely notice to utilities or coordinate with them when the construction or repair of existing and new roadways, bridges, or sidewalks is anticipated; • Provide a reasonable regulatory climate, recognizing that utilities provide a critical service to the community; • Provide expeditious permitting, recognizing that avoiding utility project delay can minimize service disruptions and associated costs for residents and businesses; • Design new public infrastructure to allow for projected future utilities that may be placed within those facilities at a later time; and encourage joint use of utility corridors for utilities, recreation and appropriate nonmotorized connections. 	<p>existing petroleum pipelines. Use of the existing transmission line corridor is the most efficient in both cost and timing for the proposed system upgrade. Construction coordination will occur with Olympic Pipeline Company, which operates petroleum pipelines generally located along the PSE easement.</p>
<p>UT-11 Balance the need for provision of utilities at a reasonable cost with the need to protect the environment and natural resources.</p>	<p>The proposed transmission line replacement will have temporary construction impacts on surrounding environment and natural resources as some of the transmission poles are within critical areas. Siting of poles within wetlands has been minimized to the maximum extent possible through design. Construction impacts will be minimized to the greatest extent feasible through use of existing or historic access routes that were used for initial pole installation and/or maintenance activities. Mitigation will be required for impacts that cannot be avoided or minimized.</p>
<p>UT-12 Design, locate and construct facilities to minimize adverse impacts to the</p>	<p>Existing poles within wetlands will be replaced outside of wetland areas to the</p>

Goal/Policy	Staff Response
<p>environment and to protect environmentally sensitive areas. Take into account both individual and cumulative impacts. Minimize impacts through actions such as:</p> <ul style="list-style-type: none"> • Using construction methods and materials to prevent or minimize the risk of overflows into watercourses and water bodies; • Locating utility corridors in existing cleared areas; • Locating utility facilities and corridors outside of wetlands; • Minimizing crossings of fish-bearing watercourses; • Using biostabilization, rip rap or other engineering techniques to prevent erosion where lines may need to follow steep slopes; and • Minimizing corridor widths. 	<p>greatest extent feasible. Buffer impacts will be limited to the pole footprint and selective vegetation management activities required by federal clearance standards.</p> <p>The transmission line will use an existing utility corridor. The lines will cross six streams in the corridor. However, the aerial crossing of the transmission line will not impact the streams and no in-water work will occur. No natural open surface water systems in Redmond will be affected.</p> <p>Appropriate temporary erosion control measures will be used during work activities.</p>
<p>UT-58 Work with energy service providers to ensure energy facility plans reflect and support Redmond’s Land Use Plan and that energy resources are available to support the Land Use Plan.</p>	<p>The proposal is needed because an additional 230 kV bulk power source is required to serve the Eastside region, inclusive of Redmond, and meet federal planning requirements. PSE studies and annual review have consistently concluded that the power source must be centrally located in the defined Eastside region. The transmission lines will connect the new power source (a new transformer) with existing 230 kV substations in the region at the Sammamish substation in Redmond and the Talbot Hill substation in Renton.</p> <p>The corridor is identified in the Utilities Element of the Comprehensive Plan on both Map UT-1 (Existing Electrical Facilities) and Map UT-2 (Proposed Electrical Facilities).</p>
<p>UT-60 Coordinate and seek to cooperate with other jurisdictions when energy transmission facility additions or improvements cross jurisdictional boundaries. Include</p>	<p>The proposed transmission line upgrade is a linear utility project that crosses through multiple jurisdictions (including the cities of Redmond, Bellevue, Renton, Newcastle, and portions of</p>

Goal/Policy	Staff Response
<p>efforts to achieve consistency between jurisdictions in permit timing.</p>	<p>unincorporated King County). The north segment of this project will traverse Redmond and Bellevue while the south segment will traverse the cities of Bellevue, Renton, Newcastle, and King County. Phase 1 and Phase 2 Draft Environmental Impact Statements (DEIS) were developed co-operatively by the cities mentioned above. The FEIS for the Energize Eastside project can be found at www.energizeeastsideeis.org.</p>
<p>UT-61 Recognize the current Electrical Facilities Plan, authored by Puget Sound Energy, as the facility plan for electrical utilities serving Redmond and the vicinity. Use this plan, where it is consistent with Redmond’s land use goals, as a guide in identifying and preserving utility corridors and locating electrical facilities.</p>	<p>The need for additional 230 kV bulk transmission capacity in the Eastside region was identified and has been included in PSE’s Electrical Facilities Plan for King County since 1993.</p>
<p>UT-62 Allow electrical utility facilities as a permitted use where appropriate to ensure that land is available for the siting of electrical facilities.</p>	<p>Two of the zoning districts the project corridor is located within (BP and MP) allow regional utility uses as a permitted use. However, the other four zoning districts (R-4, R-5, R-6, and R-12) consider such facilities as conditional uses.</p>
<p>UT-64 Encourage pruning of trees to direct growth away from overhead utility lines, education about proper placement and choice of landscape plants, and encourage phased replacement of vegetation located improperly in the right-of-way. To the extent possible, maintain ecological functions and values when managing vegetation located in critical areas.</p>	<p>Vegetation in the existing utility line corridor is routinely managed. The corridor was initially disturbed during the original transmission line construction, and disturbance from vegetation maintenance is regular and ongoing. Selective trees will be removed as part of the transmission line upgrade. Federal clearance requirements must be met with the upgrade from a 115 kV transmission corridor to a 230 kV transmission corridor, resulting in additional vegetation management within the existing corridor. Additionally, PSE is considering only transmission-line compatible trees and shrubs within the corridor for plantings. This vegetation is typically native to the Pacific Northwest.</p>

Goal/Policy	Staff Response
<p>UT-65 Ensure that pruning of trees necessary for safe and reliable utility service is performed in an aesthetic manner to the greatest extent possible and performed according to professional arboricultural specifications and standards.</p>	<p>PSE has been meeting with property owners along the existing corridor to discuss tree replacement and will continue to work together to develop property-specific landscaping and tree replacement plans. PSE will work with individual property owners to replace trees on private property. Where individual property owners decline to have new trees planted onsite, PSE will work with the City to place additional trees offsite.</p>
<p>UT-66 Discourage the use of herbicides to control vegetative growth around utility facilities, encourage alternative methods such as mowing or selective treatment, and encourage more environmentally friendly herbicides.</p>	<p>PSE uses an Integrated Vegetation Management approach to manage incompatible vegetation within its utility corridors. PSE contractors employ state licensed applicators and works with them to establish a mix of EPA registered herbicides that are applied at the lowest amount to attain the required control of incompatible vegetation. Establishing a plant community dominated by low growing species using selective herbicide application has been shown to be very effective.</p>
<p>UT-67 Require designs that incorporate known and accepted low-cost technological methods of reducing magnetic fields or the exposure to them when siting high-voltage electrical facilities until further research provides more information on the health effects of electromagnetic fields. Methods may include:</p> <ul style="list-style-type: none"> • Line configurations that reduce field strength, • Sufficient right-of-way widths, and • Sufficient height of lines from the ground for high-voltage transmission facilities. 	<p>PSE has conducted studies on potential health effects of the proposed transmission line upgrade, which have been peer reviewed through the State Environmental Policy Act (SEPA) review process and addressed in the Environmental Impact Statement (EIS) for the proposal. The EIS concluded no unavoidable significant adverse impacts were identified that could result from the project related to health effects (www.energizeeastsideeis.org Chapter 4.8, <i>Environmental Health - Electric and Magnetic Fields</i>).</p>
<p>UT-89 Require proposed developments, expansions of existing uses and construction projects, both public and private,</p>	<p>PSE has proactively addressed potential safety concerns related to construction safety and the potential for interactions between the project and two collocated</p>

Goal/Policy	Staff Response
<p>located near hazardous liquid pipeline to:</p> <ul style="list-style-type: none"> • Show the location of the liquid pipeline corridors in relation to proposed structures, utilities, or clearing and grading activities; • Use techniques prior to and during construction to minimize the potential for disturbing the pipeline; • Identify and mitigate potential erosion over pipelines from stormwater discharge; • Use setbacks and other site design techniques to minimize the potential hazard; and • Develop emergency plans as appropriate. 	<p>Olympic Pipeline petroleum pipelines. The EIS concluded that while there are safety risks for occupants of adjacent properties associated with the high voltage transmission lines and the presence of the Olympic Pipeline system; these risks will not increase with the proposal. PSE continues to coordinate with Olympic Pipeline to ensure that PSE's design and construction activities are planned with safety input from Olympic. In addition to ensuring that PSE's transmission poles are located a safe distance from the pipelines, where pipelines are adjacent, PSE's construction plan involves physically locating the pipeline ahead of construction to further mitigate any potential impact.</p>
<p>UT-90 Coordinate with the pipeline operator when developments are proposed near a hazardous liquid pipeline corridor to reduce the potential for problems. Methods include but are not limited to:</p> <ul style="list-style-type: none"> • Notifying the pipeline operator of proposed development projects located within one-quarter mile of a pipeline corridor; • Seeking the pipeline operator's participation in preconstruction meetings for projects located within 150 feet of a pipeline corridor; • Requesting the operator to determine if additional measures above the normal locating process are necessary to physically verify pipeline locations before proceeding to develop; and • Seeking monitoring by the pipeline operator of development that involves land disturbance or other significant work within 	<p>PSE regularly coordinates with other non-city utilities, including monthly meetings with the Olympic Pipeline company to discuss and coordinate on the proposal. This ongoing coordination aids in PSE ensuring that its construction and operational planning is integrated with other co-located facilities.</p>

Goal/Policy	Staff Response
the pipeline corridor, or within 30 feet of a pipeline, whichever is greater.	

IX. Site Plan Entitlement Decision Criteria (RZC 21.76.070.Y.3)

Review and approval of a Site Plan Entitlement is required for any public, semi-public, or private proposal for new construction or exterior modification to a building or site, including multifamily, attached dwelling units in non-single-family zones, commercial, industrial, utility construction, expansion, or exterior remodeling of structures, parking, or landscaping, where the proposed use is shown as permitted in the applicable permitted use chart.

Below are the decision criteria for Site Plan Entitlements.

- a. The Technical Committee, composed of the Department of Planning and Public Works, shall review all Development Review permits with the State Environmental Policy Act and the RZC.

Staff Response: The entire Energize Eastside proposal is located with the Cities of Redmond, Bellevue, Newcastle, Renton, and portions of unincorporated King County. Pursuant to SEPA, a threshold Determination of Significance was issued on 4/30/15. To address the potential for significant environmental impacts, an Environmental Impact Statement (EIS) was prepared for the entire project, with the City of Bellevue acting as the Lead Agency because the majority of the proposal is located within that jurisdiction. The FEIS was issued on 3/1/18.

The Technical Committee has reviewed the proposal against the criteria in the Redmond Zoning Code.

- b. The Landmarks and Heritage Commission will review all Certificates of Appropriateness for compliance with the RZC.

Staff Response: The project does not include a structure with Historic Landmark Designation (RZC 21.76.020.E.3.b) and the proposed project scope is not subject to the Landmarks and Heritage Commission review.

X. Conditional Use Permit Decision Criteria (RZC 21.76.070.K.4)

A Conditional Use Permit is required for any land use designated as requiring a Conditional use Permit in the applicable permitted use chart.

Below are the decision criteria for Conditional Use Permits.

- a. The conditional use is consistent with the RZC and the Comprehensive Plan.

Staff Response: The Conditional Use conforms to the Land Use Tables in the RZC and is consistent with relevant policies in the Comprehensive Plan as noted in Section VIII above.

- b. The conditional use is designed in a manner which is compatible with and responds to the existing or intended character, appearance, quality of development, and physical characteristics of the subject property and immediate vicinity.

Staff Response: The proposal is compatible with and responds to the existing character, appearance, quality of development, and physical characteristics of the subject property and immediate vicinity. Because Energize Eastside is sited in an existing electrical facility corridor shared with another utility (the Olympic Pipeline system), the project will both improve reliability to adjacent uses and will not introduce a change in land use. It will consolidate the transmission lines onto fewer poles, which, although larger, will not increase visual clutter and could reduce it in some areas. The collocation of PSE's utility structures with Olympic Pipeline consolidates vegetation impacts to a single corridor in the City. Various pole treatments will be employed to complement the natural environment, and vegetation management will maintain the general appearance of landscaping as currently exists. Although a number of trees will be removed, the remaining and proposed trees will partially screen views of the taller poles. Telecommunications providers with equipment on the existing poles will be given the option to transfer their equipment onto the new poles.

Contrast with the natural environment would increase because the poles would be approximately 30 to 40 feet taller than the existing poles on average, with a typical pole height of approximately 90 to 120 feet depending on the pole configuration. The new poles will be taller than much of the surrounding vegetation, and additional clearing will be required, particularly in areas where a large number of trees are within the transmission line corridor. Tree removal would be most noticeable south of Redmond Way and from Old Redmond Road to the southern terminus of the segment. Because the tree removal would occur within the existing corridor, the degree of contrast created by the clearing would be minor. The pole height and configuration would increase the contrast with surrounding residential development. Despite the height increase and additional clearing, the built environment would be unchanged because transmission lines already exist in the corridor. The new transmission line would have consistent form and height throughout the segment and would reduce visual clutter by reducing the number of poles. (www.energizeeastsideeis.org Chapter 4.2, *Scenic Views and the Aesthetic Environment*).

- c. The location, size, and height of building, structures, walls and fences, and screening vegetation for the conditional use shall not hinder neighborhood circulation or discourage the permitted development or use of neighboring properties.

Staff Response: The location, size, and height of the proposed powerlines does not hinder neighborhood circulation. The proposed transmission line upgrade will

not discourage development or use of neighboring properties. PSE proposes siting Energize Eastside along the same corridor used by existing transmission lines. This corridor has been established for almost a century. Because adjacent land uses and properties already integrate transmission line facilities, they will not be materially impacted by replacement of the existing transmission line facilities.

- d. The type of use, hours of operation, and appropriateness of the use in relation to adjacent uses minimize unusual hazards or characteristics of the use that would have an adverse impact.

Staff Response: The Energize Eastside proposal is an electrical transmission line and therefore does not have code regulated hours of operation.

- e. The conditional use is such that pedestrian and vehicular traffic associated with the use will not be hazardous or conflict with existing and anticipated traffic in the neighborhood.

Staff Response: The proposal is an electrical transmission line and does not generate pedestrian and vehicular traffic. The transmission line upgrade will not add to or conflict with traffic during operations. Temporary road closures or reductions in travel lands during construction may be necessary when moving equipment and materials on and off the corridor. PSE will prepare traffic control plans as part of their city required right-of-way use permit. PSE will closely work with the City's Public Works staff on the traffic control plan.

- f. The conditional use will be supported by adequate public facilities or services and will not adversely affect public services to the surrounding area or conditions are established to mitigate adverse impacts on such facilities.

Staff Response: The Energize Eastside project is an infrastructure project intended to deliver bulk electricity to the surrounding area. The transmission line upgrade will consist of replacing two existing 115 kV transmission lines within an existing 100-foot-wide corridor, with two 230 kV lines in the same corridor together with necessary upgrades within the fenced footprint of two existing substations. No new permanent public access or other additional public facilities will be required to accommodate the upgraded lines. PSE's proposal project will not interfere with public services in this surrounding area and so there is no need for mitigation.

XI. Tree Exception Request

The applicant has applied for a tree exception request as authorized under RZC 21.72.090, where exceptional conditions exist that prevent full compliance with RZC 21.72.060, *Tree Protection Standards*, and/or RZC 21.72.080, *Tree Replacement*.

The proposed Energize Eastside project is linear and, therefore, challenging to adhere to City tree protection standards. Although the City's 35% tree retention requirement

will be met, PSE is requesting Exception approval to remove 150 trees: three landmark trees, 79 trees within wetlands and 68 trees within wetland/stream buffers.

An exception shall not be granted unless the below criteria have been 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
 - b. Strict compliance with the provisions of this code may jeopardize reasonable use of property; or
 - c. Proposed vegetation removal, replacement, and any mitigating measures proposed are consistent with the purpose and intent of the regulations; or
 - d. The granting of the exception or standard reduction will not be detrimental to the public welfare or injurious to other property in the vicinity; or
 - 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 of the neighborhood.

Staff Response: There are special circumstances related to the size, shape, 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 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 115kV to 230 kV capacity, resulting in stricter vegetation management clearance requirements, and thus the need to remove trees within the existing corridor. Wetlands and streams are located in the northern end of the proposal.

Strict compliance with the provisions of this code would prohibit the upgrade of the transmission line from 115kV to 230 kV. The corridor was initially disturbed during the original transmission line construction in the late 1920s and vegetation management is regular and ongoing. The conversion from 115kV to 230kV transmission lines requires PSE to maintain trees at a lower height (15 feet) than is required for the existing 115kV line (25 feet) to comply with the North American Electric Reliability Corporation (NERC) standard.

The proposed vegetation removal, replacement, and mitigating measures are consistent with the purpose and intent of the regulations. This exception request includes removal of 150 trees: 79 of those trees located in wetlands; 68 trees located within wetland/stream 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 the Sammamish Substation.

The granting of the 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 line, and their removal is necessary to provide required clearances from the upgraded 230kV lines.

2. If the exception is granted below the required minimum retention standard of 35 percent, tree replacement shall be at 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 a 1:1 replacement when accompanied by a three-tier vegetative 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 the number that would otherwise be required by this paragraph, the applicant shall plant the trees that would otherwise be required on site or contribute the difference to the tree replacement fund, or a combination of the two.

Staff Response: Although removal of trees within easements for the purposes of constructing public utilities is exempt from obtaining tree removal permits, these improvements are subject to the purpose and intent of the tree regulations per RZC 21.72.030A.3. There were 902 trees assessed as part of this proposal. Four hundred forty-two trees will remain. This results in 49% tree retention.

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.

Staff Response: PSE is not proposing tree removal in a Native Growth Protection Area.

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

Staff 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 strictly adhering to the requirements of the tree protection standards, including the need to remove trees within a critical area buffer due to the linear nature of the project. Mitigation for the critical area buffer impacts associated with the proposed tree removal will be provided within the Willows Creek Relocation Project south of the Sammamish Substation which is the north terminus of the Energize Eastside project. 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.

The Planning Director approved the Exception Request for the removal of three landmark trees and 147 trees within critical areas and their buffers at the April 27, 2022 Technical Committee meeting. Mitigation for the trees removed within critical areas and their buffers will provide functional lift within the Willows Creek Stream Relocation Project south of the Sammamish Substation.

(See Attachment 21, Tree Exception Request.)

XII. Vesting/Approval Expiration

The approval of this Site Plan Entitlement and Conditional Use Permit shall expire two years from the date approval was final, unless significant action proposed in the application has been physically commenced and remains in progress (RZC 21.76.090.C.1). Extensions can be granted on a yearly basis if proper justification is demonstrated (RZC 21.76.090.C.2). Requests for extensions shall be submitted in writing to the Technical Committee via the project planner at least 30 days prior to the approval expiration.

XIII. Conclusions and Recommendations

The Technical Committee has conducted its various reviews on this proposal, including ensuring compliance with the Redmond Zoning Code, Redmond Comprehensive Plan, Redmond Municipal Code and State Environmental Policy Act. The Technical Committee recommends the Hearing Examiner **approve the Energize Eastside Site Plan Entitlement/Conditional Use Permit subject to conditions** listed in Section XIV.

XIV. Recommended Conditions of Approval

A. Site Specific Conditions of Approval

The following table identifies those materials that are approved with conditions as part of this decision.

Item	Date Received	Notes
Land Use Permit Plan Set	4/19/2022	<i>and as conditioned herein and on the plan set in Attachment 3.</i>
Conceptual Mitigation Plan	4/19/2022	<i>and as conditioned herein.</i>
Tree Health Assessment	4/19/2022	<i>and as conditioned herein.</i>
Tree Removal Exception Request	4/19/2022	<i>and as conditioned herein.</i>
Integrated Pest Management Plan	4/19/2022	<i>and as conditioned herein.</i>
Stormwater Report	4/19/2022	<i>and as conditioned herein.</i>
SEPA EIS Documents	6/21/2021	<i>and as conditioned herein.</i>

The following conditions shall be reflected on the construction drawings, unless otherwise noted:

1. Development Engineering - Stormwater/Clearing and Grading

Reviewer: Jody Conyers, Senior Engineer

Phone: 425-556-[2468]

Email: jconyers@redmond.gov

a. Water Quantity Control:

- i. The proposed work does not meet the thresholds for detention. No BMPs are needed.
Code Authority: RZC 21.74.020.D;RMC 15.24.080(9)

b. Water Quality Control

- i. The proposed work does not meet the thresholds for storm water quality treatment. No BMPs are needed.
Code Authority: RZC 21.74.020.D; RMC 15.24.080(8)

- c. Public Stormwater Easements.** Public easements will be required for any public stormwater conveyance systems on private property. No public easements are anticipated for this project.
Code Authority: RZC 21.74.020.C

- e. Clearing and Grading.** No site-specific requirements, all general standards apply.
Code Authority: RMC 15.24.080

f. Temporary Erosion and Sediment Control (TESC).

- i. Rainy season work permitted October 1st through April 30th with an approved Wet Weather Plan. Construction during the rainy season should be avoided to the greatest extent possible to minimize impacts to wetland resources.
Code Authority: RMC 15.24.080

- g. Floodplain Management.** Project is not in the floodplain.
Code Authority: RZC 21.64.010 and 21.64.040

- h. Department of Ecology Notice of Intent Construction Stormwater General Permit.** Notice of Intent (NIO) must be submitted to the Department of Ecology

(DOE) at least 60 days prior to construction on a site that disturbs an area of one acre or larger. Additional information is available at: www.ecy.wa.gov/pubs/0710044.pdf.

Code Authority: Department of Ecology Rule

- i. **Critical Landslide Hazard Areas.** No site-specific requirements, all general standards apply.

Code Authority: RZC 21.64.060.B

2. **Planning Department**

Reviewer: Cathy Beam, AICP, Principal Planner

Phone: 425-556-2429

Email: cbeam@redmond.gov

a. **Site Specific Conditions**

- i. Critical areas mitigation for this project will be constructed as part of the future Willows Creek Stream Relocation Project located behind the Sammamish Substation. The applicant shall apply for a clearing and grading permit for the relocation project prior to approval of the civil construction drawings for Energize Eastside. As an option, the applicant can provide the City with a phased schedule for the Willows Creek Stream Relocation Project implementation with milestones for anticipated permitting and construction. If chosen, this latter option shall be mutually agreed upon by both the City and PSE.
- ii. PSE shall implement proposed pole finishes consistent with the recommendations found in Attachment 17, *Pole Finishes Report*.
- iii. PSE shall develop a public outreach plan that details how PSE will provide information to the public about the types and locations of expected construction impacts and mitigation measures. As part of the plan, a construction outreach team shall work with affected property owners to minimize constructed-related impacts throughout the duration of project construction. PSE shall submit to the City quarterly reports summarizing status of public outreach efforts including issues raised by the community and how PSE is addressing concerns. Reports shall be submitted to the Planning Department through project completion.
- iv. Any approval conditions required due to other state or federal permits shall be incorporated into the construction drawings.
- v. PSE shall identify any area where a helicopter or large crane will be used to lift foundation rebar and/or poles over adjacent properties and into place, or to facilitate stringing the new transmission lines. PSE or its contractor shall provide copies of any congested air permit issued by the Federal Aviation Administration (FAA). PSE shall coordinate with the City's construction inspection group.

- vi. PSE shall implement their Integrated Pest Management (IPM) Plan as shown in Attachment 22. Use of herbicides shall be in accordance with state and federal guidelines and only implemented by a Washington State Department of Agriculture licensed herbicide applicator. PSE shall give the City 48 hours' notice in advance of any herbicide use to Tom Hardy, Environmental and Utility Services Division of the Public Works Department.
 - vii. A Tree Exception Request has been granted to allow the removal of 79 significant trees within wetlands, 68 significant trees within wetland/stream buffers, and three landmark trees. The applicant shall snag the trees in the wetlands and wetland/stream buffers where possible to provide habitat value. The height of the snag shall be less than the potential striking distance of a structure or pedestrian pathways. Tree remains after snagging shall be left within the critical areas and their buffers.
 - viii. PSE shall provide replacement plantings for landmark trees and significant trees removed. The proposal includes removal of three landmark trees and 457 significant trees. Per RZC 21.72.080.B, significant trees and landmark trees shall be replaced at a 1:1 and 3:1 ratio respectively. Therefore, PSE shall plant 466 replacement trees, or pay a fee-in-lieu, or some combination thereof (RZC 21.72.080.B). However, the tree replacement numbers may vary based on actual conditions at the time of construction. PSE will provide an inventory of those trees removed during construction and the final number of replacement trees.
- b. Tree Preservation Plan.** A Tree Preservation Plan depicting all significant and landmark trees required to be preserved as part of the site development must be provided with the civil construction drawings.
Code Authority: RZC 21.72.060.D
- c. Tree Health Assessment.** An updated tree health assessment shall be provided during the Civil review process.

Code Authority: RZC 21.32
- d. Critical Areas Mitigation Plan.** All required enhancement and mitigation must be shown on the civil drawings. This includes any required planting, signage, fencing, wetland or stream enhancement, etc. that is required in the report.

Code Authority: RZC Appendix 1
- e. Monitoring Program and Contingency Plan.** A five-year monitoring program shall be prepared and implemented to determine the success of the critical areas mitigation project and identify any necessary corrective

actions. A contingency plan shall be established prior to civil drawing approval for indemnity in the event that the mitigation project is inadequate or fails.

Code Authority: RZC 21.64.010.P

- f. Critical Areas Recording.** Prior to issuance of the civil permits, the City and PSE shall determine a mechanism whereby the regulated critical area and its associated buffers are protected consistent with RZC 21.64.010.R.4. This mechanism shall prohibit development other than what is required to install, maintain and mitigate for utility services as well as habitat enhancement and restoration.

Code Authority: RZC 21.64.010.R.4

- g. Final Critical Areas Report.** A final Critical Areas Report must be submitted with the civil construction drawings. All required enhancement and mitigation must be shown on the civil construction drawings. This includes any required planting, signage, fencing, wetland or stream enhancement, etc. that is required in the report. If report is greater than two years old at time of civil review, an updated report shall be submitted.

Code Authority: RZC Appendix 1, Section G

- h. Bonds.** Bonds for Tree Preservation, Tree Replacement and Critical Areas Mitigation shall be provided no less than five days prior to construction drawing approval. Drafts of the Bond Agreements, Bond Quantity Worksheets and Bond Calculation Worksheets shall be submitted at time of construction drawing application.

Code Authority: RZC 21.76.090.F

- i. Hazardous Liquid Pipelines:** PSE shall develop a Construction Management and Access Plan in coordination with Olympic's Damage Prevention Team that are mutually agreed upon by both parties. These plans shall outline the specific actions that PSE will take to protect the pipelines from vehicle and equipment surcharge loads, excavation, and other activities in consideration of Olympic's general construction and right-of-way requirements and in consultation with Olympic on Energize Eastside project design. This Plan shall be submitted to the City of Redmond for its review and approval before construction permit issuance.

- i. Notify 'one-call' 811 utility locator service at least 48 hours prior to PSE or PSE-designated contractors conducting excavation work. (Olympic's line marking personnel will then mark the location of the pipelines near the construction areas. These procedures are

- designed to ensure that excavation will not damage any underground utilities and to decrease potential safety hazards.)
- ii. Field verify the distance between the pipelines and transmission line pole grounds.
 - iii. Add the pipeline location and depth to project plans and drawings and submit to Olympic for evaluation. To the extent that Olympic determines pipeline location and depth is secure or confidential information, this information is not required to be submitted to the city under this condition.
 - iv. Arrange for Olympic representatives to be on-site to monitor construction activities near the pipelines.
 - v. Identify demarcation and protection measures as recommended and required by Olympic.
 - vi. Provide all necessary information for Olympic to perform pipe stress calculations for equipment crossings and surface loads (surcharge loads). Based on pipe stress calculations and in coordination with Olympic, provide additional cover that may include installing timber mats, steel plating, or temporary air bridging; utilize a combination of these; or avoid crossing in certain identified areas to avoid impacts on the Olympic pipelines.
 - vii. Incorporate additional measures related to minimizing surcharge loads included in Olympic's general construction and right-of-way requirements.
 - viii. The Construction Management and Access Plan will identify contractor responsibilities including appropriately sized construction zones to protect the general public, construction timing limits, and other mitigation measures that will limit the exposure of the general public to potential pipeline incidents.
 - ix. No excavation or construction activity will be permitted in the vicinity of a pipeline until appropriate communications have been made with Olympic's field operations and its Right-of-Way Department. A formal engineering assessment (conducted by Olympic) may be required.
 - x. No excavation or backfilling within the pipeline right-of-way will be permitted for any reason without a representative of Olympic on-site giving permission.
 - xi. Coordinate with Olympic regarding excavation and other construction activities to ensure that pipeline operating pressures are reduced prior to these activities when necessary.
 - xii. As directed by Olympic, use soft dig methods (e.g., hand excavation vacuum excavation, etc.) whenever the pipeline(s) are within 25 feet of any proposed excavation or ground disturbance below original grade.
 - xiii. Coordinate with Olympic to ensure that an Olympic representative, trained in the observation of excavation and pipeline locating, is on-site at all times during excavation and other ground-disturbing activities that occur within 100 feet of the pipelines where the pipelines are co-located with the proposed transmission lines.

- xiv. Where excavations are within 20 feet of the Olympic Pipeline system, the project geotechnical engineer shall consider temporary casing to reduce the risk of sloughing under the pipeline.
- xv. As required by Olympic, steel plates or mats will be placed over the pipelines to distribute vehicle loads where construction equipment needs to cross over the pipelines.
- xvi. Utility settlement monitoring points will be established on the Olympic Pipeline corridor at the direction of Olympic where drilled shafts will be within 15 feet of a pipeline (or another distance as stipulated by Olympic) to monitor settlement during installation of the drilled shafts. Settlement monitoring points will be installed so that baseline readings of the settlement monitoring points may be completed prior to the contractor mobilizing to the site. Monitoring will continue during construction on a daily basis and twice a week in the three weeks following construction. The monitoring readings will be reviewed by the Engineer on a daily basis. If measured settlement exceeds one inch, or an amount specified by Olympic, the integrity of the utility will be tested, and PSE will work with Olympic to repair any damage to the utilities as a result of construction.

Code Authority: RZC 21.16 and Comprehensive Plan Policy UT-89

- j. Archaeological and Historic Preservation:** At all times, PSE shall monitor for potential impacts to archaeological resources and shall implement its Inadvertent Discovery Plan where applicable. A professional archaeological monitor shall be present for those areas that have not been previously investigated to monitor all ground disturbing activities and that an archaeological MIDP shall be prepared and submitted to DAHP and the interested Tribes for review prior to ground disturbance.

Code Authority: RZC 21.30.070.D

- k. Construction Parking Requirements Contact Information:** A sign shall be posted on-site visible to the public throughout the duration of all construction activity per the Construction Contact Sign Handout. Construction activities consist of all site work including, but not limited to grading, landscaping, infrastructure and building permit related construction. Applicant and contractor shall work with the city planner prior to construction drawing approval to determine location(s) of sign(s). Contact information shall remain up-to-date and visible at all times. The assigned city planner shall be notified within two business days when the contact person has been changed and a picture of the updated sign shall be e-mailed. Construction Parking requirements for the project shall be denoted on the bottom portion of the sign per handout instructions.

Code Authority: RZC 21.76.070.B.3.a.ii.A; Comprehensive Plan TR-19
Parking requirements for the project shall be denoted on the bottom portion of the sign per handout instructions.

B. Compliance with City of Redmond Codes and Standards

This approval is subject to all applicable City of Redmond codes and standards, including the following:

Transportation and Engineering

RMC 12.08:	Street Repairs, Improvements & Alterations
RZC 21.76.020.G:	Site Construction Drawing Review
RZC 21.76.020.H.6:	Preconstruction Conference
RZC 21.76.020.H.7:	Performance Assurance
City of Redmond:	Record Drawing Requirements, February, 2021
City of Redmond:	Standard Specifications and Details (current edition at time of Hearing Examiner decision issuance)

Stormwater/Clearing and Grading

RMC 15.24	Clearing, Grading, and Storm Water Management
RZC 21.64.060	Geologically Hazardous Areas
City of Redmond	Standard Specifications and Details (current edition at time of Hearing Examiner decision issuance)
City of Redmond	Stormwater Technical Notebook, Issue No. 8, Amended June 5, 2019
Department of Ecology	Stormwater Management Manual for Western Washington (amended December 2017)

Planning

RZC 21.32, 21.72:	Landscaping and Tree Protection
RMC 6.36:	Noise Standards
RCZ 21.64:	Critical Areas

C. Next Steps Following Hearing Examiner Ruling

If approved by the Hearing Examiner, before beginning construction of your project, there are other review processes that must be completed. The next step for this project includes the Right-of-Way Use Permit review processes. All engineering/planning review of final constructions drawings will be through this process.

This process will include review and approval of construction and landscape drawings, as well as collection of performance bonds Right-of-Way Use Permit review and

inspection fees. Construction drawings must be submitted per the **Civil Drawing Checklist** and the Hearing Examiner's Findings of Fact and Conditions of Approval. The drawings must be reviewed and approved by all applicable divisions of Public Works and Development Services. The **Civil Drawing Checklist** can be found on the City's website. For information regarding the Right-of-Way Use Permit review process, please contact Steve Hartwig at 425.556.2877 or shartwig@redmond.gov.