DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

HIGH-VOLTAGE TRANSMISSION FACILITIES IN WASHINGTON

Chapter 1 - Introduction

March 2025

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1.0 CHAPTER 1 – INTRODUCTION

1.1 Programmatic Environmental Impact Statement Purpose and Overview

This Draft Programmatic Environmental Impact Statement (EIS)[1] evaluates potential future construction and operation of electrical transmission facilities with a nominal voltage[2] of 230 kilovolts (kV) or greater (referred to herein as "transmission facilities") throughout the State of Washington. The Washington Energy Facility Site Evaluation Council (EFSEC) is fulfilling the directive of Revised Code of Washington (RCW) 43.21C.405 by completing this Draft Programmatic EIS for electric power system transmission planning.

This Draft Programmatic EIS generally evaluates adverse impacts associated with different types of transmission facility developments; it does not propose, evaluate, or approve a specific project. This nonproject environmental review[3] document is intended to be used for future planning and development of transmission facilities, which would require a subsequent environmental review of the project-specific application. That review would consist of evaluating the project's consistency with the Programmatic EIS, including the applicability of the identified general conditions[4], avoidance criteria[5], and mitigation[6] measures, and analysis of additional impacts and mitigation, should any be identified. Overall, the Programmatic EIS is intended to:

- **Provide a Broad Environmental Impact Assessment:** It presents a comprehensive evaluation of environmental impacts associated with transmission facility development at a broad level throughout the State of Washington, rather than focusing on specific sites or corridors.
- **Facilitate Streamlined Planning:** It assesses common impacts and mitigation strategies early in the planning process, which helps to streamline review and approval processes for individual transmission facility projects in the future. Streamlining the process can save time and resources for both developers and regulatory agencies.
- **Support Informed Decision-Making:** It provides information that can help developers understand impacts up front and make initial siting[7] and design choices that could avoid or minimize impacts at earlier phases of project consideration, potentially expediting the permitting timeline for future transmission facility development.

[1] A type of EIS that evaluates the environmental impacts of broad policies, plans, or programs. This approach allows for a comprehensive analysis of potential impacts at a higher level, which can then be used to inform more specific, subsequent environmental reviews.

[2] The standard voltage level assigned to a transmission facility. The voltage level is used as a reference point for the design, operation, and regulation of the facility.

[3] Defined in WAC 197-11-70(b) as an environmental analysis of governmental actions that are not tied to a specific project. These actions typically involve decisions about policies, plans, or programs that set standards for controlling or modifying the environment, or that govern a series of connected actions.

[4] As used in this Draft Programmatic EIS, a measure that provides a consistent baseline for evaluating the potential impacts of project-specific applications for transmission facility development. This Draft Programmatic EIS assumes that applicants adhere to the general conditions specified in Section 3.1.

[5] Criteria that limit the scope of the environmental review and provide a consistent baseline for evaluating the potential impacts of project-specific applications. This Draft Programmatic EIS assumes that applicants would comply with the avoidance criteria specified in Section 3.1. When projects cannot meet the avoidance criteria, additional environmental review and mitigation measures would be required to address related project-specific impacts.

[6] WAC 197-11-768 outlines the concept of mitigation in the context of environmental impact. Mitigation includes 1. Avoiding the impact, 2. Minimizing impacts, 3. Rectifying the Impact, 4. Reducing or eliminating the impact, 5. Compensating for the impact, and 6. Monitoring the impact and taking the appropriate corrective measures.

[7] Identifying and evaluating potential routes for transmission facilities.

- **Identify Mitigation Strategies:** It identifies effective avoidance, minimization, and mitigation measures to address adverse environmental impacts, which can be applied to future transmission facility projects that fall within the scope[8] of the Programmatic EIS.
- **Initiate Public and Stakeholder Engagement:** It provides an up-front platform for public and stakeholder input, ensuring that community concerns and interests are considered early in the planning process.

Overall, the Programmatic EIS is intended to help facilitate project-specific applications for future transmission facilities in the State of Washington in an environmentally responsible and efficient manner.

1.2 Background

The Washington State Legislature passed the Clean Energy Transformation Act (CETA) in 2019, which requires Washington's electric utilities to meet 100 percent of their retail electric load[9] using non-emitting and renewable resources by January 1, 2045; eliminate coal-fired resources from their allocation of electricity by December 31, 2025; and make all retail sales of electricity greenhouse gas–neutral by January 1, 2030. The Legislature also found that the electric power system serving Washington requires additional high-voltage transmission capacity to achieve the state's objectives and legal requirements.

Consistent with Section 25 of CETA, the Transmission Corridors Work Group (TCWG) was formed in September 2021, and continued its efforts until June 2022. The TCWG's responsibilities included:

- *Reviewing the need for upgraded and new electricity transmission and distribution facilities to improve reliability, relieve congestion, and enhance the capability of the transmission and distribution facilities in the state to deliver electricity from electric generation, non-emitting electric generation, or renewable resources to retail electric load;*
- *Identifying areas where transmission and distribution facilities may need to be enhanced or constructed; and*
- *Identifying environmental review options that may be required to complete the designation of such corridors and recommend ways to expedite review of transmission projects without compromising required environmental and cultural protections.*

The TCWG provided a Cover Letter and Final Report to Governor Inslee and the appropriate legislative committees on August 1, 2022 (EFSEC 2022a, 2022b). The Final Report identifies recommendations to guide transmission facility development in the state, while the Cover Letter summarizes the TCWG's work completed to date. The Cover Letter highlights the following key points that emerged from the work of the TCWG:

- ***Regional and interregional planning.*** *Washington has long relied on out-of-state sources for its energy needs. Reliance on those sources is likely to increase in our clean energy future. It will be critical to have a strong state presence at the table for enhanced regional and interregional transmission planning. Timely engagement in clean energy transmission planning will ensure that the renewable energy Washington State needs can get to the homes and businesses that require it.*

[8] The range of proposed actions, alternatives, and impacts to be analyzed in an environmental document. For this Draft Programmatic EIS, the scope is high-voltage transmission facilities within the defined Study Area.

[9] The total amount of electricity consumed by end-use customers, such as residential, commercial, and industrial users, within a specific area or market.

- ***Staff resources in state agencies.*** *The state's critical role in transmission planning would be enhanced by the designation (and funding) of a team dedicated to coordinating state input to regional planning processes. We also need sufficient staff to perform the transmission siting work that will be required in the coming years, particularly in the realm of archeology and historic preservation.*
- ***Enhanced resources for Tribes.*** *The burden of paying for siting-related archeological and cultural review should not fall on the Tribes. It is critical that we identify mechanisms for funding Tribal governments to carry out this vital work.*
- ***Pre-application planning and coordination.*** *Key stakeholders believe the state currently lacks sufficient transmission infrastructure to meet CETA's 2030 targets for renewable energy. Given that it can take over 10 years to properly site a major transmission project, the needed planning work is already overdue and should begin as soon as possible.*

Subsequently, the Legislature passed Senate Bill (SB) 5165, which focuses on aligning the needs of utility providers with CETA and enhancing electric transmission planning; SB 5165 was codified into RCW 43.21C.405. RCW 43.21C.405 indicates that EFSEC shall prepare a nonproject environmental review (Programmatic EIS). The Programmatic EIS shall assess and disclose any probable significant[10] adverse environmental impacts, and identify related mitigation measures, for transmission facilities in Washington. This Draft Programmatic EIS presents this requested nonproject environmental review.

1.3 Need for Transmission Facilities

To meet the goals of CETA, the state needs more transmission facilities to integrate produced energy into the electricity grid. The Western Energy Coordination Council (WECC) released the Western Assessment of Resource Adequacy report (Western Assessment), which examines resource adequacy and reliability in the Western Interconnection[11] over the next 10 years (WECC 2024). The Western Assessment notes that current resource plans forecast staggering demand growth over the next decade. Annual demand for the Western Interconnection is forecasted to grow approximately 20 percent, from 942 terawatts per hour (TWh) in 2025, to 1,134 TWh in 2034. That growth rate is more than double the 9.6 percent growth forecast in resource plans filed in 2022, and over four times the historical growth rate of 4.5 percent between 2013 and 2022 (WECC 2024).

Transmission facility development would increase the capacity of the state's transmission system to achieve the following:

- Meet the electricity needs of the state's increasing population and growing economy.
- Enhance the reliability of the electric power system to ensure continuous delivery of electricity to consumers in the state.
- Address existing congestion and constraints on transmission capacity throughout the state, particularly in the central Puget Sound area, to meet end-user demands.

[10] A SEPA term defined in WAC 197-11-794 as "a reasonable likelihood of more than a moderate adverse impact on environmental quality."

[11] One of the five alternating current power grids or interconnections that make up the power grid in North America. The Western Interconnection stretches from western Canada south to Baja California Norte in Mexico, reaching eastward over the Rockies to the Great Plains.

- Increase access to more affordable sources of electricity within the state and across the western United States and Canada.
- Increase the state's capability to not only connect individual generating resources to the grid, but also transfer electricity across the state and the West as a region.

1.4 Overview of Alternatives

This Draft Programmatic EIS evaluates two alternatives: the Action Alternative and the No Action Alternative. The following discussion summarizes the two alternatives, while Chapter 2 describes them in greater detail.

1.4.1 Action Alternative

This Draft Programmatic EIS assesses the impacts of development of different types of transmission facilities. The Action Alternative evaluates the development of both overhead and underground transmission facilities. Three specific stages of the development of transmission facilities are evaluated herein: construction, operation and maintenance, and upgrade or modification.

1.4.1.1 Construction

In general, all transmission facility construction would include the following:

- **Site Characterization:** Site characterization involves conducting desktop analyses and feasibility and site studies. Feasibility studies could include conducting field surveys for data collection.
- **Site Preparation and Mobilization of Construction Crews:** Site preparation includes completing all planning, surveying, and permitting required to begin construction activities, which could take multiple years. Once the process is complete, vegetation clearing, grading, and construction of access roads can begin.
- **Site Construction:** Site construction includes the assembly, testing, and start-up of the transmission facility and involves many overlapping activities. Construction duration would vary based on the length of the transmission facility, type of transmission facility, and environmental setting of the proposed project-specific transmission corridor[12]. It is generally assumed that underground transmission facilities would take longer to construct, per mile, than overhead transmission facilities.
- **Post-Construction Restoration:** Once the transmission facility has been constructed, site restoration or reclamation activities would commence. These activities could include backfilling trenches, holes, and tunnels; restoring natural conditions to areas used for temporary access roads and laydown yards; and revegetating the right-of-way (ROW) with an appropriate seed mix to stabilize the soil and prevent erosion.

1.4.1.2 Operation and Maintenance

The activities related to the operation and maintenance of transmission facilities would vary based on type of facility, scale, and site characteristics. Generally, all operation and maintenance activities for transmission facilities would include the following:

- **Post-Construction Monitoring and Reporting:** Once all construction and post-construction reclamation activities are completed, any ongoing or long-term environmental measures that require monitoring and reporting would continue as necessary.

[12] A designated pathway or right-of-way where high-voltage transmission lines are constructed and maintained.

- **Routine Inspection:** Although it is not anticipated for transmission facilities to have staff on site daily, inspection and maintenance crews would be regularly deployed to ensure that the facility continues to meet safety and reliability requirements. Inspections can be conducted in a variety of ways, including the use of drones, helicopters, or conventional vehicles.
- **Maintenance and Repairs:** Maintenance of transmission facilities could include repairing old, degraded, obsolete, or inoperable components, conductors, or structures. Maintenance could also include replacing a component, conductor, or structure with a direct, "like-for-like"[13] component to support ongoing facility operation. It is anticipated that required maintenance and repairs would be addressed as soon as warranted, or within a 12-month period.
- **Right-of-Way Maintenance**: ROW would require ongoing maintenance to ensure adequate access to structures. Access roads may require regrading or repairs to water bars or culverts due to flooding or inadequate drainage.
- **Vegetation Management**: Vegetation within transmission facility ROWs and adjacent areas must be inspected and maintained on a regular basis to meet the minimum clearance requirements set forth by the North American Electric Reliability Corporation (NERC) (FAC-003-4). Vegetation management can include manual, mechanical, and/or chemical techniques.

1.4.1.3 Upgrade or Modification

The upgrade or modification of transmission facilities could include a variety of activities varying in size and scale. It is expected that ongoing operation and maintenance of an upgraded or modified transmission facility would be similar to that associated with newly constructed facilities. Generally, actions associated with upgrade or modification can include the following:

- **Replacement:** Upgrading or modifying an existing transmission facility can include replacing transmission towers, transformers, substations, switchyards, underground cabling, and ancillary equipment.[14] Actions associated with replacement can also include reconductoring[15] or upgrading components of a transmission facility to include advanced transmission technologies.
- **Modifying Facilities:** Modifying existing transmission facilities can include constructing additional transmission towers, transformers, substations, switchyards, underground cabling, and ancillary equipment. Construction associated with the proposed modification could increase or decrease the overall disturbance footprint of the facility.
- **Re-Locating Segments:** Modification to an existing transmission facility can include relocating a segment of the transmission facility within or outside of an existing ROW.
- **Converting Segments:** Upgrading or modifying an existing transmission facility can include the conversion of overhead transmission facilities to underground.

[13] "Like-for-like" in the context of a transmission facility generally refers to replacing components with ones that are of the same type, capacity, and function. This means that the new parts should not significantly alter the original design, capacity, or operational characteristics of the facility.

[14] Secondary systems and devices that support main transmission infrastructure.

[15] The replacement of cable or wire on an electric circuit, typically a high-voltage transmission line, to afford a greater electric-current-carrying capability.

1.4.2 No Action Alternative

Under the No Action Alternative, it is assumed that the State Environmental Policy Act[16] (SEPA) Lead Agency[17] would continue to review individual project applications for transmission facility development under existing state and local laws. The No Action Alternative would not use this Draft Programmatic EIS as a reference for SEPA compliance and would require individual environmental review.

1.5 Scope of Analysis

The scope of this Draft Programmatic EIS is limited to geographic areas in Washington that are suitable for siting transmission facilities. This Draft Programmatic EIS is not required to evaluate geographic areas that lack the characteristics necessary for siting transmission facilities.

The scope of this Draft Programmatic EIS, as defined in RCW 43.21C.405, considers, as appropriate, analysis of the following probable significant adverse environmental impacts, including direct, indirect, and cumulative impacts on:

(i) Historic and cultural resources;

(ii) Species designated for protection under RCW 77.12.020 or the federal Endangered Species Act;

(iii) Landscape scale habitat connectivity and wildlife migration corridors;

(iv) Environmental justice[18] and overburdened communities as defined in RCW 70A.02.010;

(v) Cultural resources and elements of the environment relevant to tribal rights, interests, and resources including tribal cultural resources, and fish, wildlife, and their habitat;

(vi) Land uses, including agricultural and ranching uses; and

(vii) Military installations and operations.

1.5.1 Geographic Scope

EFSEC has determined that the Planning Area[19] of this Draft Programmatic EIS includes the entirety of the State of Washington. The Study Area, or geographic scope[20], includes all lands in Washington except lands covered by the exclusion criteria identified in **Table 1.5-1**.

[16] A Washington law designed to ensure that environmental values are considered during decision-making by state and local agencies. SEPA requires these agencies to evaluate the environmental impacts of their actions, including issuing permits, adopting regulations and funding projects. The goal is to identify and mitigate potential environmental harm before decisions are made.

[17] A Lead Agency is defined as the agency with the main responsibility for complying with the procedural requirements of the Washington State Environmental Policy Act (SEPA).

[18] The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. This definition emphasizes addressing disproportionate environmental and health impacts on vulnerable populations and overburdened communities.

[19] For this Programmatic EIS, the entire State of Washington.

[20] For this Programmatic EIS, the entire State of Washington excluding the areas identified in Chapter 1.

Table 1.5-1: Exclusion Criteria

Exclusion No.	Exclusion Type	Description
1	**Tribal Lands**	For the purposes of this Draft Programmatic EIS, Tribal lands are not included in the Study Area. Tribal lands are sovereign territories, and decisions regarding their use typically fall under the jurisdiction of the respective Tribal government. Tribal lands often have their own regulatory processes and environmental review requirements, which may differ from state or federal processes. Federal agencies are required to engage in government-to-government consultation[21] with Tribes. This process ensures that Tribal concerns and perspectives are adequately addressed.
2	**Undersea or Oceanic**	Programmatic EIS documents address broad, overarching policies, plans, or programs rather than specific projects. Undersea cables for transmission facilities are considered to be too specific or detailed for the broad focus of this Draft Programmatic EIS. Additionally, undersea cables, especially those that cross international water or state boundaries, may fall under different regulatory frameworks or jurisdictions, requiring separate, more specific environmental reviews. Lastly, the environmental impacts and technical considerations of siting undersea cables for transmission facilities can be significantly different from those of land-based transmission facilities. These differences might necessitate a distinct, focused environmental review to adequately address the unique challenges and impacts. Islands with physical bridges to the mainland are included in the Study Area for the potential siting of transmission facilities along the bridges; undersea connections to these islands are beyond the scope of this Draft Programmatic EIS.

EIS = Environmental Impact Statement

The Study Area includes approximately 62,042 square miles and is identified in **Figure 1.5-1**. This Draft Programmatic EIS assesses and discloses the adverse environmental impacts associated with siting transmission facilities within the Study Area and identifies related avoidance criteria and mitigation measures to minimize probable significant adverse environmental impacts.

[21] The formal process of dialogue and negotiation between sovereign governments.

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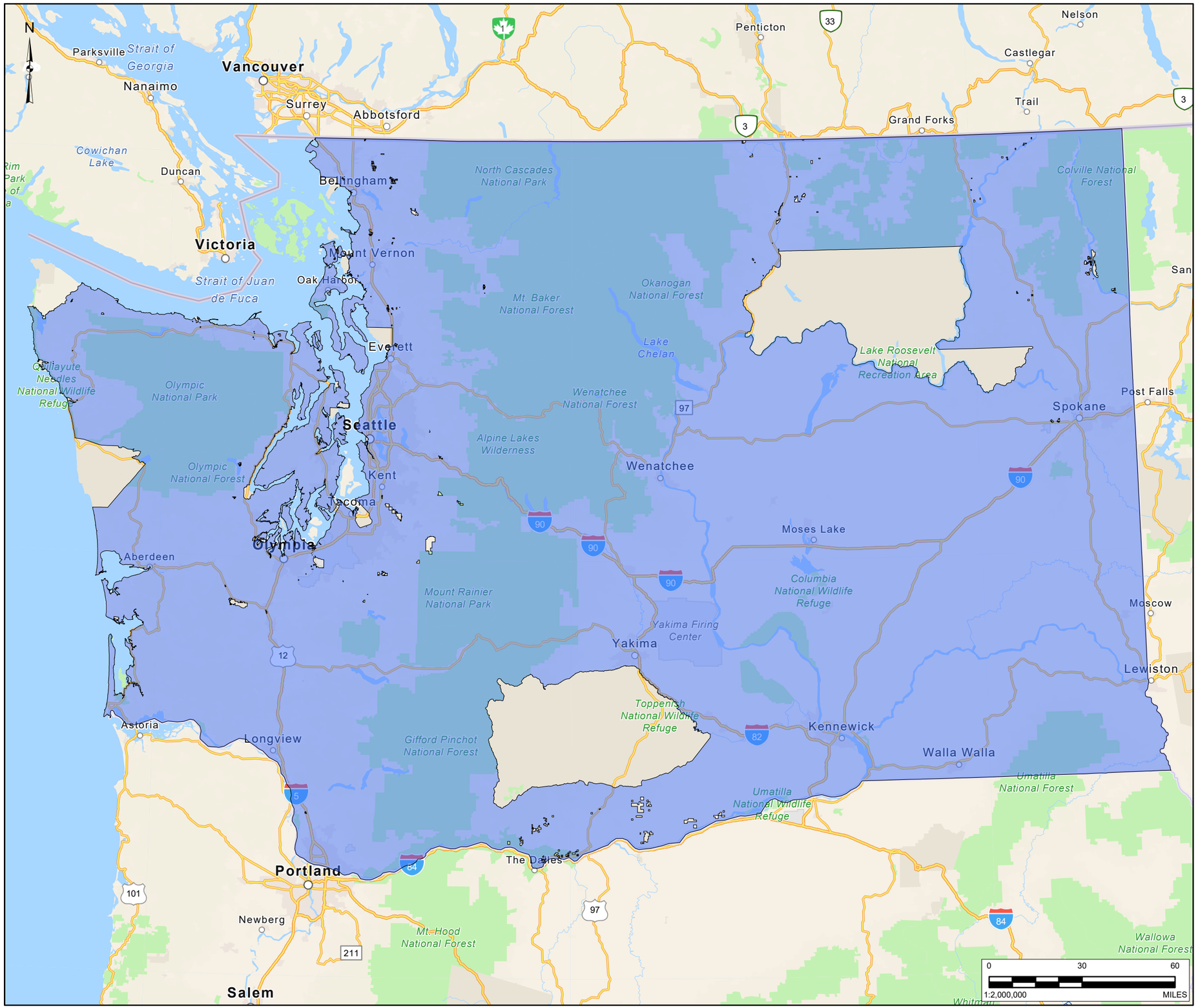

LEGEND

Study Area

EFSEC

Energy Facility Site Evaluation Council

PROJECT

DRAFT PROGRAMMATIC EIS
HIGH-VOLTAGE TRANSMISSION FACILITIES

TITLE

STUDY AREA

YYYY-MM-DD 2024-10-10

CONSULTANT wsp

FIGURE 1.5-1

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1.5.2 Temporal Scope

The temporal scope for this Draft Programmatic EIS covers a broad timeframe. This Draft Programmatic EIS provides a comprehensive analysis of environmental impacts, allowing for more efficient and streamlined reviews of subsequent, project-specific applications that fall under the broader program. While it is expected that project-specific SEPA Lead Agencies will make use of the best available science and existing regulations at their time of review, re-evaluation and/or supplementation of this Draft Programmatic EIS may be necessary when there are significant changes that could affect the scope or analysis provided in this document. The criteria that may require re-evaluation and/or supplementation of this Draft Programmatic EIS could include the following:

- **Regulatory Changes:** Updates or changes in environmental laws, regulations, or policies that affect the Study Area or transmission facility development.
- **New Information:** If new scientific data or environmental information becomes available that could significantly alter the impact analysis
- **Changes in the Study Area:** Significant modifications to the scope, scale, or nature of the Study Area that were not previously considered
- **New Technology:** New construction practices, technologies, or equipment that were not previously considered and have the potential for significant impacts

Any updated information to this Draft Programmatic EIS would be posted to EFSEC's website. Updates to documents referenced within this Draft Programmatic EIS would be available from their agencies of origin. Applicants would be responsible for ensuring they have checked the websites of EFSEC and other relevant agencies for the most current version of documents associated with this Draft Programmatic EIS. EFSEC is investigating other options to ensure applicants have easy access to updated information from EFSEC and other relevant agencies."

1.6 Governance Framework

This section describes the governance framework pertaining to transmission facility development.

1.6.1 State Environmental Policy Act Review Process

SEPA is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The environmental review process involves the identification and evaluation of probable adverse environmental impacts and the development of mitigation measures that would avoid, minimize, reduce, or otherwise address those environmental impacts. This environmental information, along with other considerations, is used by agency decision-makers to decide whether to approve a proposal, approve it with conditions, or deny it. SEPA applies to actions taken at all levels of government within Washington State.

As codified in Washington Administrative Code (WAC) 197-11-060(3) and WAC 197-11-784, SEPA environmental review is required for any state or local agency decision that meets the definition of an "action" and is not categorically exempt. Actions are divided into two categories, "project actions" and "nonproject actions." Project actions can include agency decisions to license, fund, or undertake a specific project. According to WAC 197-11-704, a nonproject action refers to governmental actions involving decisions on policies, plans, or programs that do

not involve a specific project. This Draft Programmatic EIS is the first step of a phased review[22] for transmission facility development and broadly evaluates project-specific impacts; however, it is not a SEPA review for a specific project. It may be adopted[23] or otherwise used, as applicable, by the SEPA Lead Agency for meeting SEPA requirements for a specific project.

As previously described, this Draft Programmatic EIS provides a broad evaluation of environmental impacts and identifies relevant mitigation measures that can be generally applied to transmission facility development. This Draft Programmatic EIS does not evaluate any specific transmission facility project; therefore, the impacts associated with a specific project cannot fully be anticipated or addressed in this document. Impacts associated with project-specific applications could vary considerably based on location, size, scale, and timing. Although this Draft Programmatic EIS identifies potential project-specific impacts, project-specific applications would be required to undergo their own SEPA environmental review to ensure that project-specific impacts are adequately evaluated and addressed.

One of the first steps for an applicant to consider when initiating the SEPA environmental review process and preparing a proposal application is identifying the SEPA Lead Agency. The SEPA Lead Agency would review most new proposals and make sure that procedural reviews comply with SEPA, all environmental information is adequately gathered and assessed, threshold determinations[24] for impacts are made, and, if needed, EISs are prepared (Ecology 2024). SEPA Lead Agency status is determined according to WAC 197-11-922 through 948 and requires defining the total proposal and all necessary permits (Ecology 2018).

EFSEC is, or can be, the state authority for siting certain high-voltage electrical transmission facilities. EFSEC provides a single siting process, coordinates all evaluation and licensing steps, and specifies the conditions of construction and operation. RCW 80.50.060 and 80.50.045 outline the types of transmission facilities that either are required to apply, can elect to apply, or are prohibited from applying for site certification through the EFSEC process. These different types of transmission facilities are discussed below.

- **Required:** Facilities that must apply for site certification through EFSEC include transmission facilities that are:
  - At least 500 kV alternating current[25] or at least 300 kV direct current;[26] located in more than one county; and located in the Washington service area of more than one retail electric utility;
  - Located in a national interest electric transmission corridor[27]; or
  - Interstate lines[28]

[22] A SEPA term defined in WAC 197-11-776 as “the coverage of general matters in broader environmental documents, with subsequent narrower documents concentrating solely on the issues specific to the later analysis”.

[23] A SEPA term defined in WAC 197-11-708 as “an agency’s use of all or part of an existing environmental document to meet all or part of the agency’s responsibilities under SEPA to prepare an EIS or other environmental document.”

[24] A SEPA term defined in WAC 197-11-797 as “the decision by the responsible official of the lead agency whether or not an EIS is required for a proposal that is not categorically exempt”.

[25] An electric current that periodically reverses direction and changes its magnitude continuously with time.

[26] An electric current which flows in one direction.

[27] A geographic area designated by the U.S. Department of Energy where there is a significant need for new or upgraded transmission capacity to address electricity transmission limitations that adversely affect consumers.

[28] EFSEC is designated as the state authority for purposes of siting transmission facilities under Title 16 U.S.C. Sec. 824p, including interstate transmission facilities.

- **Optional:** Facilities that may choose to apply for site certification through EFSEC include transmission facilities that are:
  - At least 115 kV; and
  - Located in more than one jurisdiction that has promulgated land use plans[29] or zoning ordinances
- **Prohibited:** Facilities that are prohibited from applying for site certification through EFSEC include those that are:
  - Less than 115 kV;
  - Located in a single jurisdiction that has promulgated land use plans or zoning ordinances; or
  - Proposing normal maintenance and repairs that do not increase the capacity or dimensions.

Based on the criteria outlined above, transmission facility project applications within the scope of this Draft Programmatic EIS generally can or are required to follow one of two SEPA environmental review processes: 1) EFSEC's certification process or 2) local government processes.

1.6.1.1 Local Government SEPA Review Process

For project-specific applications where local governments would operate as the SEPA Lead Agency, the SEPA process involves several key steps to ensure that environmental considerations are integrated into decision-making. The Washington State Department of Ecology (Ecology) provides a comprehensive SEPA Handbook that offers detailed guidance on each step of the process. The SEPA Rules (WAC 197-11) outline the legal requirements and procedures for SEPA review. Additional resources and templates are available on Ecology's website to assist with SEPA compliance.

The SEPA rules recommend, but do not require, that SEPA Lead Agencies provide for a preapplication conference process that allows applicants to discuss a proposal with agency staff before submitting an application. In determining whether an environmental review is required under SEPA for a project-specific application, the SEPA Lead Agency must: 1) define the project in its entirety; 2) identify all agency actions required for the project; and 3) determine whether the project or agency action is categorically or otherwise exempt by statute or regulation.

If the application or agency action is not categorically exempt or otherwise exempt, then SEPA applies, and the SEPA Lead Agency must evaluate the application's likely environmental impacts by using an environmental checklist. The SEPA Lead Agency must then determine whether the adverse environmental impacts of the proposal would likely be significant and issue a threshold determination. The following threshold determinations can be made:

- **Determination of Non-Significance (DNS):** If the project is not likely to have a significant adverse environmental impact, the SEPA Lead Agency must issue a determination of nonsignificance.
- **Mitigated Determination of Non-Significance (MDNS):** If the project changes the proposal or includes mitigation measures that would reduce the identified significant adverse impacts to a nonsignificant level, then the SEPA Lead Agency must issue a "mitigated DNS" in lieu of a DNS and preparation of an EIS.

[29] A document that guides the land use decisions of a local government.

- **Determination of Significance (DS):** If the project is likely to have a significant adverse environmental impact, the SEPA Lead Agency must issue a determination of significance and begin preparing an EIS.

A SEPA Lead Agency conducting a project-specific environmental review for transmission facilities must begin with a review of this Draft Programmatic EIS. The review must consider and further evaluate any probable significant adverse environmental impacts associated with the project-specific application that were not analyzed in this Draft Programmatic EIS. If the review identifies additional probable significant adverse environmental impacts, the SEPA Lead Agency must identify specific mitigation measures to address the probable significant adverse environmental impacts.

1.6.1.2 SEPA Phased Review Process

Environmental review for project-specific applications may be phased under both the EFSEC certification and local government SEPA review processes. As defined in the WAC 197.11.060(5), “phased review” may allow the use of broader environmental documents followed by narrower documents. A phased review can result in a more effective environmental review by incorporating prior general discussion by reference and concentrating solely on site-specific information and effects.

Applicants would consider this Draft Programmatic EIS if the transmission facility is proposed within the prescribed Study Area. Applicants should especially focus on meeting the general conditions, avoidance criteria, and mitigation measures identified herein to the extent practicable. Applicants must also identify any probable significant adverse environmental impacts that were not analyzed in this Draft Programmatic EIS. When general conditions, avoidance criteria, or mitigation measures defined in this Draft Programmatic EIS cannot be met, additional mitigation may be necessary to address these probable significant adverse environmental impacts. Should the SEPA Lead Agency identify inconsistencies or probable significant adverse environmental impacts outside of this Draft Programmatic EIS, additional environmental review would be required.

As directed by RCW 43.21C.408, a SEPA Lead Agency reviewing project-specific applications for transmission facilities would use this Draft Programmatic EIS through one of the following methods:

- **Adopt** the Programmatic EIS without the need for an addendum or supplemental analysis. This indicates that there are no additional project-specific details or analyses of impacts that should be recorded in the SEPA documentation.
- **Prepare an Addendum[30],** in addition to adopting the Programmatic EIS, that adds analyses or information about the project but does not substantially change the analysis of significant impacts and alternatives addressed in this Programmatic EIS.
- **Prepare a Supplemental EIS[31]**, in addition to adopting the Programmatic EIS, that adds new analyses or information related to probable significant adverse environmental impacts of the project that have not been addressed in this Programmatic EIS. This may include project-specific impacts that were not identified in this

[30] A SEPA term defined in WAC 197-11-706 as “an environmental document used to provide additional information or analysis that does not substantially change the analysis of significant impacts and alternatives in the existing environmental document. The term does not include supplemental EISs.”

[31] The supplemental EIS process is outline in Chapter 197-11 WAC, which specifies that a supplemental EIS is required if changes to the proposed action would result in significant environmental impacts not previously evaluated or new information or circumstances relevant to environmental concerns arise, leading to significant impacts not covered in the original EIS.

Programmatic EIS or that were identified in this Programmatic EIS, but are determined by the SEPA Lead Agency through project-specific environmental review to have been insufficiently evaluated.

- **Incorporate by Reference**[32], if the intent is for the SEPA Lead Agency to produce a full, distinct project-specific EIS.

Project-specific applications that follow all of the recommendations in this Draft Programmatic EIS are considered to have fully mitigated all probable significant adverse project-specific impacts addressed in this Draft Programmatic EIS.

1.6.1.3 Implementation of this Programmatic EIS

Applicants are required to provide detailed information as part of their project-specific application initiating a phased review in association with this Draft Programmatic EIS. An application would identify the general conditions, avoidance criteria[33], and design considerations[34] that were reviewed during initial site characterization, and the applicable mitigation measures, to ensure that adverse impacts result in a less than significant level rating. Project-specific applications using this Draft Programmatic EIS would focus on specific impacts and mitigation measures for the phased actions. To highlight the opportunities for efficiency gained by an applicant, the phased review process anticipated by the SEPA Lead Agency is outlined in a decision tree shown in **Figure 1.6-1.**

[32] A SEPA term defined in WAC 197-11-754 as “the inclusion of all or part of any existing document in an agency's environmental documentation by reference”.

[33] Within this Programmatic EIS, criteria that are expected to be met by project-specific applications during design and siting in order to be consistent with the analysis.

[34] May include guidance documents, manuals, and/or best management practices. Design considerations are typically standardized practices designed to prevent environmental impacts and are often included in regulatory compliance programs or implemented as routine practices.

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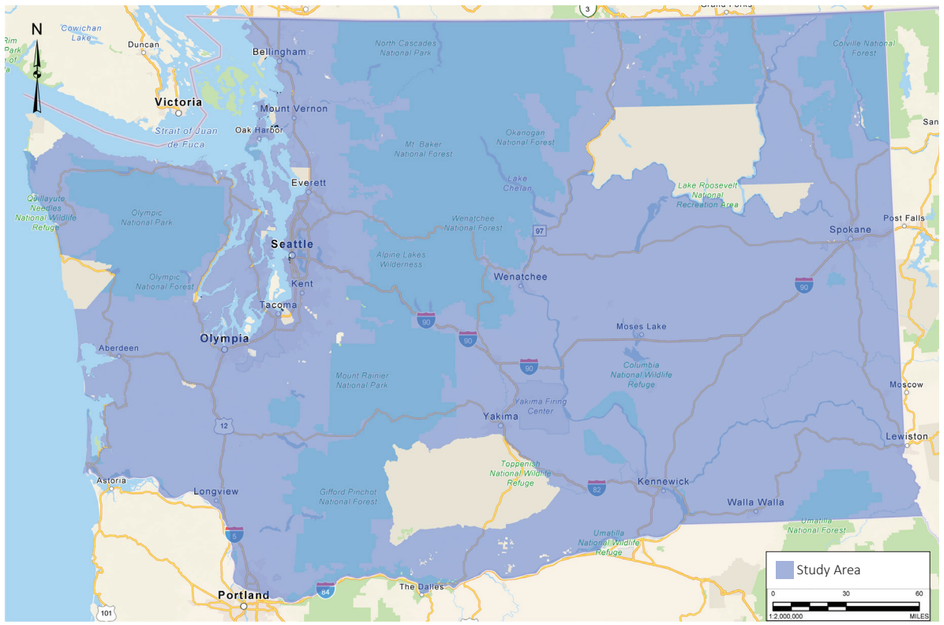
STEP 1

Determine if the project-specific application fits the definition of a **transmission facility**[1] analyzed within the prescribed Study Area[2] of this Programmatic EIS.

NO
Follow applicable SEPA environmental review and permitting processes.

The SEPA Lead Agency would conduct an environmental review in accordance with Chapter 43.21C RCW and Chapter 197-11 WAC for the project-specific application and make a SEPA Threshold Determination.

Regarding this Programmatic EIS, the SEPA Lead Agency could **INCORPORATE BY REFERENCE.**



REFERENCES

SLA	Responsibility of SEPA Lead Agency
APP	Responsibility of Applicant
BMP	Best Management Practice
EIS	Environmental Impact Statement
kV	Kilovolt
NEPA	National Environmental Policy Act
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
WAC	Washington Administrative Code

1 The construction, operation and maintenance, and upgrade or modification of electrical transmission facilities with a nominal voltage of 230kV or greater.

2 For the purposes of this Draft Programmatic EIS, Tribal lands and undersea cables are not included in the Study Area.

3 As applicable to project-specific applications.

4 As used in this Draft Programmatic EIS, a measure that provides a consistent baseline for evaluating the potential impacts of project-specific applications for transmission facility development.

5 Criteria that, when implemented, would narrow the scope of the project-specific environmental review. These broad mitigation measures would be anticipated to avoid otherwise significant impacts for project-specific applications.

6 If all environmental mitigation strategies from this Programmatic EIS have been implemented then mitigation would be deemed sufficient for all probable significant adverse environmental impacts addressed in this Programmatic EIS.

7 A specific step or action taken to address impacts of project development or action.

STEP 2

YES | Would the project-specific application have a federal nexus?

YES
Federal environmental review processes (e.g., NEPA) apply, which would include coordination with EFSEC for environmental review.

Regarding this Programmatic EIS, the SEPA Lead Agency could:

- Adopt the NEPA document as part of their SEPA environmental review process and documentation. **Proceed to Step 3**. *OR*
- Incorporate the NEPA document by reference and complete a separate SEPA analysis. **Proceed to Step 3**.

STEP 3

NO
STEP 3.1
Does the project comply with all state, federal, and local regulations[3]?

NO | This Programmatic EIS did not analyze this scenario.
THE FOLLOWING IS REQUIRED:
- **APP** Identify the regulations that cannot be followed and provide an explanation.
- ***SLA*** Complete additional environmental review and identify mitigation.[3, 7]

Proceed to Step 3.2.

YES
STEP 3.2
Are design considerations and BMPs[3] accounted for in the design of the project-specific application?

NO | This Programmatic EIS did not analyze this scenario.
THE FOLLOWING IS REQUIRED:
- **APP** Identify the design considerations and BMPs[3] that are not proposed as part of the project-specific application and provide an explanation.
- ***SLA*** Complete additional environmental review and identify mitigation.[3, 7]

Proceed to Step 3.3.

YES
STEP 3.3
Would the project comply with the identified **general conditions**[4] within this Programmatic EIS?

NO | This Programmatic EIS did not analyze this scenario.
THE FOLLOWING IS REQUIRED:
- **APP** Identify the general conditions that are not complied with and provide an explanation.
- ***SLA*** Complete additional environmental review and identify mitigation.[3, 7]

Proceed to Step 3.4.

YES
STEP 3.4
Does the project comply with the identified **avoidance criteria**[5] within this Programmatic EIS?

NO | This Programmatic EIS did not analyze this scenario.
THE FOLLOWING IS REQUIRED:
- **APP** Identify avoidance criteria that are not complied with and provide an explanation.
- ***SLA*** Complete additional environmental review and identify mitigation.[3, 7]

Proceed to Step 3.5.

YES
STEP 3.5
Are all probable significant adverse environmental impacts of the project identified and analyzed in this Programmatic EIS?

NO | This Programmatic EIS did not analyze this scenario.
THE FOLLOWING IS REQUIRED:
- ***SLA*** Identify and complete additional environmental review for probable significant adverse environmental impacts not analyzed in this Programmatic EIS and identify mitigation.[3, 7]

Proceed to Step 3.6.

YES
STEP 3.6[6]
Has the applicant committed to the **mitigation**[7] **measures**[3] identified within this Programmatic EIS associated with moderate or high impacts?

NO | This Programmatic EIS did not analyze this scenario.
THE FOLLOWING IS REQUIRED:
- **APP** Identify the mitigation[7] measures[3] that are not proposed as part of the project and provide an explanation.
- ***SLA*** Complete additional environmental review and identify mitigation.[3, 7]

Proceed to Step 4.

YES | **Proceed to Step 4**.

STEP 4[6]

The ***SLA*** has the responsibility to determine the appropriate level and type of environmental review for each project-specific application:

STEP 4.1
ADOPT the Programmatic EIS without the need for an addendum or supplemental analysis. This indicates that there are no additional project-specific details or analyses of impacts that should be recorded in the SEPA documentation.

OR

STEP 4.2
PREPARE A ADDENDUM, in addition to adopting the Programmatic EIS, that adds analyses or information about the project but does not substantially change the analysis of significant impacts and alternatives addressed in this Programmatic EIS.

OR

STEP 4.3
PREPARE A SUPPLEMENTAL EIS, in addition to adopting the Programmatic EIS, that adds new analyses or information related to probable significant adverse environmental impacts of the project that have not been addressed in this Programmatic EIS. This may include project-specific impacts that were not identified in this Programmatic EIS or that were identified in this Programmatic EIS, but are determined by the SEPA Lead Agency through project-specific environmental review to have been insufficiently evaluated.

OR

STEP 4.4
INCORPORATE BY REFERENCE if the intent is for the SEPA Lead Agency to produce a full, distinct project-specific EIS.

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1.6.1.4 EFSEC Certification Process

EFSEC's project siting review, or certification, is the state licensing process for siting, constructing, and operating energy projects, including transmission facilities. This process provides a centralized and streamlined approach for certifying large energy projects. Before initiating the certification process, applicants must go through a pre-application phase, as described in WAC 463-61. The pre-application process is intended to help applicants avoid unnecessary delays and expenditures by identifying information gaps early in the planning process. The preapplication process includes a meeting with EFSEC staff to discuss the proposed project, filing the preapplication request with EFSEC, and EFSEC hosting a public informational meeting. Once the pre-application phase is completed, the formal site certification application process can begin (EFSEC 2019). The formal application for site certification includes the following seven major steps:

1) Application submittal
2) Application review
3) Initial public meeting
4) Land use consistency hearing
5) Determination of Nonsignificance (DNS), Mitigated DNS, or Environmental Impact Statement (EIS)
6) Adjudicative proceedings and permits review
7) Recommendation to the Governor

EFSEC is responsible for coordinating activities to ensure that applications are compliant with SEPA, writing and/or coordinating the preparation of EISs, DNSs, and Mitigated DNSs, including scoping and issuing scoping notices, and working closely with other interested agencies. EFSEC also publishes and distributes its rules and amends them as necessary to stay current with regulatory changes and fulfills other general responsibilities, ensuring that environmental considerations are integrated into the decision-making process.

1.6.2 National Environmental Policy Act Review Process

Some project-specific applications may require approvals from federal agencies, thereby requiring compliance with both SEPA and the National Environmental Policy Act (NEPA). As described in the State Environmental Policy Handbook, SEPA's purpose and goals are almost identical to NEPA's, but federal agencies may have environmental review processes that vary slightly from SEPA's. The main areas of divergence typically relate to the scope of the review, types of impacts, and range of alternatives. SEPA provides an expressed substantive provision that authorizes agencies to deny or condition a proposal based on the impacts addressed in the environmental documents. This gives both agencies and the public an important purpose and need for SEPA review regardless of the extent of NEPA review established by the lead federal agency.

Furthermore, proposals that are covered under a specific NEPA exclusion but also involve "agency actions" by state or local agencies may require SEPA review. The environmental review requirements under SEPA are separate and independent from those required or exempted under NEPA. Both the process and criteria are different for establishing and applying exemptions under each statute and their implementing regulations (Ecology 2018).

For projects proposed or sited by a federal agency, the director[35] must coordinate state agency participation in the environmental review that is required under NEPA (RCW 80.50.045(5)). EFSEC, the SEPA Lead Agency (if different from EFSEC), and the federal lead agency would work collaboratively to review the proposed project against this Draft Programmatic EIS.

1.6.3 Overarching Regulations, Policies, and Guidance

Policies are principles or rules adopted by an organization or government to guide decisions and achieve rational outcomes. Policies can be formal or informal and are often used to ensure consistency in actions and decisions. A variety of regulations and policies have been identified throughout this Draft Programmatic EIS, including those listed below.

1.6.3.1 Federal Regulations and Policies

- **National Environmental Policy Act:** This act requires environmental analysis of federal agency actions to consider a project's impacts on urban[36] quality, historic and cultural resources, and the design of the built environment.
- **Federal Clean Air Act:** This comprehensive federal law regulates air emissions from stationary[37] and mobile sources[38]. Among other things, this law authorizes the U.S. Environmental Protection Agency to establish National Ambient Air Quality Standards to protect public health and public welfare and to regulate emissions of hazardous air pollutants.
- **Federal Land Policy and Management Act (FLPMA):** FLPMA is a comprehensive statute that governs the management of public lands administered by the Bureau of Land Management (BLM) under the U.S. Department of the Interior. FLPMA established that public lands should generally remain in federal ownership unless disposal serves the national interest. The act mandates that public lands be managed for multiple uses (e.g., recreation, grazing, timber, minerals) and sustained yield, ensuring that resources are available for future generations.
- **Federal Clean Water Act:** This act establishes regulations for discharging pollutants into Waters of the United States (WOTUS)[39] and regulates water quality standards for surface water. Under this act, it is unlawful to release pollutants into navigable waters unless a permit is obtained.
- **Federal Power Act:** The Federal Power Act, originally enacted in 1920 as the Federal Water Power Act, is a key piece of legislation governing the regulation of hydroelectric power and interstate electricity transmission in the United States. The act grants the Federal Energy Regulatory Commission (FERC) the authority to

[35] Per RCW 80.50.020, director means the director of the energy facility site evaluation council appointed by the chair of the council in accordance with RCW 80.50.360.

[36] The U.S. Census Bureau's urban areas represent densely developed territory, and encompass residential, commercial, and other non-residential urban land uses. An urban area must comprise a densely settled core of census blocks that meet minimum housing unit density and/or population density requirements. This includes adjacent territory containing non-residential urban land uses. To qualify as an urban area, the territory identified according to criteria must encompass at least 2,000 housing units or have a population of at least 5,000.

[37] A fixed site that emits air pollutants. Stationary sources include buildings, structures, facilities, or installations that release pollutants into the atmosphere.

[38] Vehicles, engines, and equipment that emit air pollutants and can move from one location to another.

[39] Defines the scope of waters that fall under federal jurisdiction for regulatory purposes. The definition of WOTUS has been subject to changes and legal interpretations. The most recent update, following the Supreme Court's decision in Sackett v. EPA, refined the criteria for what constitutes WOTUS, particularly focusing on wetlands directly connected to permanent waters.

issue licenses for non-federal hydroelectric projects on navigable waters and federal lands, ensuring that these projects serve the public interest.

- **Coastal Zone Management Act (CZMA):** The CZMA was enacted to protect the coastal environment from growing demands associated with residential, recreational, commercial, and industrial uses. The CZMA encourages coastal states to develop and implement coastal zone management programs to manage and balance competing uses of the coastal zone. The CZMA requires that federal actions that are reasonably likely to affect any land or water use or natural resource of the coastal zone be consistent with enforceable policies of a state's federally approved coastal management program.
- **14 Code of Federal Regulations (CFR) Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace:** The Federal Aviation Administration has broad authority to regulate safe and efficient use of navigable airspace. This regulation outlines the regulations and standards for ensuring the safe and efficient use of the airspace.
- **36 CFR Part 254, Landownership Adjustments:** This regulation sets procedures for conducting exchanges of National Forest System lands and requires consideration of the public interest, including protection of fish and wildlife habitats, cultural resources, watersheds[40], and wilderness and aesthetic values, as well as enhancement of recreation opportunities and public access.
- **Public Law 94-588, National Forest Management Act, 36 CFR Part 219, Subpart A, National Forest System Land and Resource Management Planning:** This act governs the administration of national forests and removal of trees. It includes requirements for consideration, treatment, and protection of intangible resources such as scenery and aesthetics.

  If a project is located on a National Forest System unit, it must comply with the U.S. Forest Service's National Strategic Plan, National Forest System unit plans, and requirements for activity planning established in the U.S. Forest Service directive system.
- **National Wild and Scenic Rivers Act of 1968:** This act protects and enhances river values, including free-flow, water quality, and outstandingly remarkable values of 81 254 designated wild, and scenic, and recreational rivers totaling nearly 13,52,700 miles.
- **National Trails System Act of 1968:** This act designates national scenic trails to be continuous, extended routes of outdoor recreation within protected corridors. It promotes the enjoyment and appreciation of trails while encouraging greater public access. It establishes four classes of trails: national scenic trails, national historic trails, national recreation trails, and side and connecting trails.
- **Endangered Species Act of 1973:** This act establishes protection for fish, wildlife, and plants that are listed as threatened or endangered. Unless authorized by a permit from the U.S. Fish and Wildlife Service, the act prohibits activities that would impact species and their habitats protected under the act.

[40] A watershed is an area of land that drains all streams and rainfall to a common outlet such as the outflow of a reservoir, mouth of a bay, or any point along a stream channel.

1.6.3.2 State Regulations and Policies

- **Clean Energy Transformation Act:** This law commits Washington to an electricity supply free of greenhouse gas emissions by 2045. It includes provision for enhancing transmission infrastructure to support the integration of renewable energy.
- **Washington State Environmental Policy Act:** This act is a process that identifies and analyses environmental impacts that can be related to issuing permits. SEPA helps permit applicants and decision-makers understand how a proposed project would impact the environment.
- **Washington Coastal Zone Management Program:** Ecology administers Washington's Coastal Zone Management Program, which applies to the state's coastal zone, an area comprising 15 coastal counties with marine shorelines. The coastal zone includes all lands and waters within these coastal counties, as well as submerged lands seaward out to 3 nautical miles (about 3.5 miles). Projects within the coastal zone are required to comply with the State of Washington's Coastal Zone Management Program Enforceable Policies.
- **Shoreline Management Act:** The goal of this act is to prevent shoreline disturbance and restore degraded shoreline, including wetlands and riparian[41] and upland vegetation across the state's fresh and marine waters. Washington has a no-net loss goal for its shorelines. Counties are responsible for developing their own Shoreline Master Programs.
- **RCW Chapter 36.70A, Growth Management Act[42]:** This act requires cities and counties to plan for growth while conserving natural resources and protecting critical areas such as wetlands and forests. Under this act, counties are required to adopt comprehensive plans, including a comprehensive land use plan and development regulations. Relevant land management plans and land uses are summarized in Section 3.9, Land Use, and countywide comprehensive plan goals and policies are available in **Appendix 3.1-2**.
- **RCW Chapter 43.21C, State Environmental Policy:** This chapter outlines the legislative framework for SEPA and the requirements for environmental protection and review in Washington.
- **RCW Chapter 76.09:** This chapter establishes standards and regulations for managing the state's forests. Forestland is defined as all land that can produce merchantable timber[43], excluding agricultural land and residential land.
- **RCW Chapter 77.55 Construction Projects in State Waters:** Under the Hydraulics Act, a Hydraulic Project Approval from the Washington Department of Fish and Wildlife (WDFW) would be required when stormwater discharges related to a project would change the natural flow or bed of state waters.
- **RCW Chapter 80.50, Energy Facilities – Site Locations:** This chapter establishes EFSEC's role in siting, construction, and operation of major energy facilities in Washington. It provides the legal framework for EFSEC to streamline the permitting process and ensure compliance with state environmental and safety standards.

[41] Relating to a feature on the edge of a waterbody.

[42] A Washington State law that requires state and local governments to manage growth by identifying and protecting critical areas and natural resource lands, designating urban growth areas, and preparing and implementing comprehensive land use plans.

[43] Trees that have a commercial value and can be harvested or sold.

- **RCW Chapter 90.48 Water Pollution Control:** This policy aims to maintain the highest standard for Waters of the State[44] to preserve public health and recreation and to protect wildlife and aquatic species. It prohibits the discharge of pollution to state waters. Pollution is defined as any physical, chemical, or biological property that could impact the ecological function.
- **WAC 173-201A Water Quality Standards for Surface Waters of the State of Washington:** This code establishes surface water quality standards for surface waters in Washington that are consistent with public health standards, recreational use, and the protection of fish and wildlife. Surface waters include lakes, rivers, streams, ponds, wetlands, inland waters, and saltwater.
- **WAC 480-100 – Electric Companies:** This legislation establishes standards for the reliability and quality of electric service. This law requires that utilities meet certain performance criteria regarding the frequency and duration of outages.
- **State of Washington Priority Habitat[45] and Species List:** The WDFW maintains a catalogue of habitats and species that are prioritized for conservation and management. Priority habitats are unique habitats or features that support biodiversity. Priority species[46] require protection due to population trends, sensitivity to disturbance and habitat alteration, or importance to communities.

Guidance includes non-binding recommendations or interpretations issued by agencies to help understand and comply with laws and regulations. Guidance documents clarify expectations but do not have the force of law. Several guidance documents have been identified throughout this Draft Programmatic EIS, including the following:

1.6.3.3 Federal Guidance

- **Recommended Siting Practices for Electric Transmission Developers:** This document outlines best practices for siting electric transmission facilities (ACEG 2023). Recommended practices include:
  - Early, consistent, and transparent engagement
  - Treat communities and landowners respectfully
  - Compensate landowners fairly
  - Consult tribal governments, tribal communities, and environmental justice communities
- **Institute of Electrical and Electronics Engineers (IEEE) Standards:** The IEEE Standards Association is an operating unit within IEEE that develops global standards in a broad range of industries, including standards relevant to electrical transmission.
- **American Society of Civil Engineers (ASCE) Standards:** ASCE provides guidelines for the structural loading and design of transmission facilities, to ensure they can withstand environmental and operational stresses.

[44] All salt and fresh waters that are waterward of the ordinary high water line and within the territorial boundaries of the state. This includes lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the state's jurisdiction.

[45] Habitat that is given priority for conservation and management by the Washington Department of Fish and Wildlife; may refer to a unique vegetation association (e.g., shrubsteppe) or a particular habitat feature (e.g., cliffs).

[46] In Washington, species of concern for which special conservation actions may be required. These include, but are not, limited to, species that are state listed as endangered, threatened, sensitive, or candidate, or considered vulnerable.

- **Federal Energy Regulatory Commission Guidelines:** FERC provides guidelines for the siting of interstate electric transmission facilities, including environmental and community impact assessments.
- **North American Electric Reliability Corporation:** NERC develops reliability standards for the electric grid to ensure reliability and security of the North American bulk power system. NERC works with federal organizations like FERC for the review, approval, and enforcement of standards.
- **U.S. Department of Energy (DOE):** The DOE coordinates federal authorizations and environmental reviews for interstate transmission projects, aiming to streamline the permitting process while ensuring compliance with environmental and cultural protection laws.

1.6.3.4 State Guidance

- **Transmission Corridors Work Group:** Established under CETA, this group identified areas in Washington where transmission facilities may need to be enhanced or constructed. The group recommended ways to expedite project reviews without compromising environmental protection in the Final Report (EFSEC 2022b).
- **Ecology's Stormwater Management Manuals:** The stormwater manuals provide stormwater permit implementation and management guidance for eastern and western Washington (Ecology 2024). The manual for western Washington provides guidelines for managing stormwater in areas west of the Cascade Mountains crest to protect water quality and aquatic habitats. The manual for Eastern Washington provides guidelines for managing stormwater in areas east of the Cascade Mountains crest to protect water quality and aquatic habitats.
- **Riparian Ecosystems, Volume 2: Management Recommendations:** This publication provides updated riparian ecosystem management recommendations, including regulatory protections, delineation of riparian management zone, recommendations for restoring riparian ecosystems, and improving protection of riparian areas through adaptive management (WDFW 2020).
- **Best Management Practices Field Guide for ESA Habitat Protection:** This guide provides guidance for Washington State Department of Transportation (WSDOT) maintenance crews and regional maintenance environmental coordinators who work within sensitive priority areas. This guide was developed to train and alert staff as to when and where to apply and report implementation of the Regional Road Maintenance Endangered Species Act (ESA) Program Guidelines Best Management Practices (WSDOT 2018).
- **Regional Road Maintenance Best Management Practices:** This document includes checklists and guidance for minimizing impacts of soil movement during a project (WSDOT n.d.).
- **Wetland Mitigation in Washington State Part 1: Agency Policies and Guidance, and Part 2: Developing Mitigation Plans:** These publications provide an overview of the wetland regulatory process, approaches to compensatory mitigation, and technical guidance for developing compensatory mitigation (Ecology 2006a, 2006b).
- **WSDOT Manuals and Handbooks:** WSDOT manuals and guidelines provide comprehensive frameworks and standards for the planning, design, construction, and maintenance of transportation infrastructure in Washington. These documents cover a wide range of topics, including highway geometric design, materials specifications, ROW acquisition, rail safety oversight, and environmental considerations. They emphasize safety, efficiency, and best practices, ensuring that projects meet regulatory requirements and align with state and federal standards.

1.6.4 Executive and Secretarial Orders

Executive orders are directives issued by the President to manage operations of the federal government. Executive orders have the force of law and are used to direct the actions of government officials and agencies.

Secretarial orders are issued by heads of departments (e.g., the Secretary of the Interior). These orders provide direction on specific issues within the department's jurisdiction.

Several executive and secretarial orders have been issued to address transmission infrastructure and related energy policies, including the following:

- **Executive Order on Actions to Expedite Energy-Related Projects (May 18, 2001):** This order mandates that agencies act expediently and in a manner consistent with applicable laws to increase the "production and transmission of energy in a safe and environmentally sound manner."
- **Executive Order on Tackling the Climate Crisis at Home and Abroad (January 27, 2021):** This order directs federal agencies to accelerate clean energy generation and transmission projects. It emphasizes the need for a whole-of-government approach to the climate crisis, including the expansion of transmission infrastructure to support renewable energy.
- **Executive Order on America's Supply Chains (February 24, 2021):** While primarily focused on supply chains, this order includes provisions for strengthening the resilience of critical infrastructure, including the electric grid.
- **Executive Orders on Energy and Climate Technologies (January 2025)[47]:** These orders, issued by President Trump, focus on expediting environmental reviews and permitting for high-voltage interstate electricity transmission infrastructure. They aim to streamline the construction and maintenance of these facilities to support reliable, diversified, and affordable supply of energy.
- **Secretarial Order No. 3285 (February 22, 2010):** This order establishes the development of renewable energy as a priority for the U.S. Department of the Interior and establishes a Departmental Task Force on Energy and Climate Change.
- **Secretarial Order No. 3355 (August 31, 2017):** This order aims to streamline the NEPA review process for infrastructure projects, including transmission lines, to expedite their development.
- **Secretarial Order No. 3399 (April 16, 2021):** Issued by the Secretary of the Interior, this order prioritizes the development of renewable energy projects on public lands and waters, which includes the necessary transmission infrastructure to support these projects.

[47] At the time of completing this Draft Programmatic EIS, several of President Trump's executive orders from January 2025 are facing legal challenges. These orders, which include measures to expedite high-voltage transmission infrastructure and other policy changes, have prompted a series of lawsuits. The legal opposition is primarily focused on the environmental, regulatory, and administrative impacts of these orders. Despite facing legal challenges, these orders remain in effect unless they are overturned by a court or rescinded by a subsequent executive order.

1.6.5 Relevant Environmental Impact Statements

The following key EISs are related to transmission facilities or the need for transmission in Washington State.

- **Programmatic EISs for solar, wind, and green hydrogen[48] development in Washington.** These programmatic EISs, currently under development by Ecology, provide broad environmental assessments to guide future project decisions and are described below.
  - Utility-scale solar energy facilities: This draft programmatic EIS evaluates the following types of utility-scale solar energy facilities, as well as a No Action Alternative: utility-scale solar facilities, utility-scale solar facilities with battery energy storage systems, and utility-scale solar facilities that include agricultural uses. The final programmatic EIS is planned for release in June 2025.
  - Utility-scale onshore wind energy facilities: This draft programmatic EIS evaluates the following types of utility-scale onshore wind energy facilities, as well as a No Action Alternative: utility-scale onshore wind facilities, utility-scale onshore wind facilities with battery energy storage systems, and utility-scale onshore wind facilities that include agricultural uses. The final programmatic EIS is planned for release in June 2025.
  - Green electrolytic[49] and renewable hydrogen facilities: The draft programmatic EIS is planned for release in early January 2025. The scoping summary report identifies the study area, alternatives, and resources to be analyzed in the draft programmatic EIS. Three types of green hydrogen facilities are evaluated in the programmatic EIS: green hydrogen production facility, green hydrogen production facility with co-located battery energy storage system, and a green hydrogen storage facility (gas or liquid form).
- **Energize Eastside EIS:** Puget Sound Energy (PSE) proposed to construct and operate a major new transformer served by approximately 16 miles of new high-capacity electric transmission lines extending from Redmond to Renton, Washington. The purpose of the Energize Eastside project is to address a projected deficiency in transmission capacity resulting from growth in electrical demand, which could affect the future reliability of electrical service for the Eastside area in King County, Washington (City of Bellevue 2018). Project construction was completed in December 2024 and is fully operational (PSE n.d.).
- **Vantage to Pomona Heights 230 kV Transmission Line Project FEIS:** Pacific Power proposed to construct, operate and maintain a new 230 kV transmission line from Pacific Power's Pomona Heights substation in Yakima County to the Bonneville Power Administration (BPA) Vantage Substation in Grant County, Washington. Pacific Power's proposed project would eliminate the potential for redistributed loads and the overloading of the adjacent transmission system; would ensure continued reliable and efficient service to the Yakima Valley; and would address future reliability issues within the Mid-Columbia transmission system. In October of 2017, BPA decided to interconnect the Vantage to Pomona Heights transmission line into the Federal Columbia River Transmission System via the Vantage Substation (DOI 2016). The Vantage-Pomona Heights 230 kV line was completed in August 2020 (PacifiCorp 2023).
- **South of Tri-Cities Reinforcement Project:** BPA is proposing to construct a new 18-mile-long 115 kV transmission line between BPA's existing Badger Canyon Substation in Benton County, Washington and

[48] Hydrogen produced through the electrolysis of water using renewable energy sources such as wind, solar, or hydropower.

[49] Refers to the process of producing substances, particularly hydrogen, through electrolysis powered by renewable energy sources.

BPA's existing Ashe-Marion 500 kV transmission line to the west. The primary goals of this project are to improve long-term electric reliability, improve short-term operational flexibility and address system maintenance needs. BPA has concluded scoping and the comment period closed on November 20, 2023. (BPA 2023). BPA is currently evaluating the project's potential environmental impacts and considering public input. The draft environmental assessment is anticipated to be released for public review in early 2025 (Tri-Cities Area Journal of Business 2024).

- **I-5 Corridor Reinforcement Project FEIS:** BPA proposed to build a 500 kV lattice-steel-tower transmission line that would have run from a new 500 kV substation near Castle Rock, Washington, to a new 500 kV substation near Troutdale, Oregon. On May 17, 2017, BPA announced their decision to not build the proposed transmission line (BPA 2017).
- **West-Wide Energy Corridor Final Programmatic EIS:** As directed by Section 368 of the Energy Policy Act of 2005 the Secretaries of Agriculture, Commerce, Defense, Energy, and the Interior designated energy corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land in the 11 contiguous western states. The Bureau of Land Management (BLM) and USDA Forest Service (Forest Service) prepared the West-wide Energy Corridor Programmatic EIS, and a record of decision (ROD) was signed in 2009. The ROD amended 92 BLM land use plans and designated approximately 5,000 miles of Section 368 energy corridors on BLM-administered lands. These designated corridors cross BLM-managed public lands in Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming (BLM n.d.).

  In November 2023, BLM announced that it will begin assessing targeted updates to energy corridors across the West, to help speed deployment of transmission infrastructure. The BLM published a Notice of Intent in the Federal Register on December 1, 2023, to prepare an EIS and resource management plan amendments (RMPAs) for 19 land use plans. This effort includes evaluating modifications to seven existing Section 368 energy corridors across seven western states. The next step is for the BLM to develop a Draft RMPA/EIS (BLM 2024).

1.7 Organization of this Programmatic Environmental Impact Statement

This Draft Programmatic EIS is organized into nine separate chapters and has multiple technical appendices. Chapter 3 is subdivided into 15 sections that address specific resource topics. **Table 1.7-1** presents additional details on the organization of the Draft Programmatic EIS chapters.

Table 1.7-1: Environmental Impact Statement Organizational Structure

Document Contents	Content Description
Front Matter	The front matter of this Draft Programmatic EIS includes publication and contact information, as well as a fact sheet with general information about this Draft Programmatic EIS.
Executive Summary	The executive summary introduces this Draft Programmatic EIS and provides background information. It also describes the purpose and need, Action and No Action Alternatives, and the ways this Draft Programmatic EIS can be used.
Chapter 1, Introduction	Chapter 1 provides greater detail on the Draft Programmatic EIS background, summarizes the alternatives considered, the need for transmission facilities, alternatives considered, and scope of analysis. This chapter also outlines the various steps and requirements for project-specific environmental analysis.

Document Contents	Content Description
Chapter 2, Overview of Transmission, Development Considerations, and Regulations	Chapter 2 describes the proposed alternatives and provides general assumptions used for environmental analysis. It discusses typical transmission systems and the activities related to the construction, operation and maintenance, and upgrade or modification of these transmission systems. This chapter also identifies laws, regulations, policies, processes, and other environmental analyses that are relevant to the development of transmission facilities.
Chapter 3, Affected Environment and Environmental Impact	Chapter 3 focuses on the pre-project environmental conditions within the Study Area and the impacts that may occur for environmental resources from the construction, operation and maintenance, and upgrade or modification of transmission facilities. This chapter is subdivided into separate sections that describe the existing environment and probable impacts for the 15 separate resources, as follows: ▪ Earth Resources ▪ Air Quality, including Greenhouse Gases[50] ▪ Water Resources ▪ Vegetation ▪ Habitat, Wildlife, and Fish ▪ Energy and Natural Resources ▪ Public Health and Safety ▪ Land and Shoreline Use ▪ Transportation ▪ Public Services and Utilities ▪ Visual Quality ▪ Noise[51] and Vibration[52] ▪ Recreation ▪ Historic and Cultural Resources, including Tribal Rights, Interests, and Resources ▪ Socioeconomics, Environmental Justice, and Overburdened Communities
Chapter 4, Cumulative Impacts	Chapter 4 describes cumulative impacts of the Action Alternative and No Action Alternative in combination with other past, present, and reasonably foreseeable developments.
Chapter 5, Consultation, Coordination, and Public Engagement	Chapter 5 details information related to public scoping[53]; government-to-government consultation; agency cooperation, consultation, and coordination; and cooperating agencies.
Chapter 6, References	Chapter 6 provides references to the literature cited throughout the Draft Programmatic EIS.
Chapter 7, Glossary	The glossary defines key terms used in the Draft Programmatic EIS.
Chapter 8, List of Preparers	The list of preparers identifies those who contributed to the preparation of the Draft Programmatic EIS.
Chapter 9, Distribution List	The distribution list identifies organizations and individuals that were sent electronic copies of the Draft Programmatic EIS.

[50] Gases in the Earth's atmosphere that trap heat, contributing to the raising of the Earth's average temperature over time.

[51] A sound that is "unwanted"—i.e., this term is based on human perception.

[52] The oscillating movement of a particle or object around its stationary reference position. Vibration can be caused by mechanical processes such as machinery operation, construction activities, or transportation systems.

[53] A process that gives the public an opportunity to provide input on issues.

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