

# DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

## *HIGH-VOLTAGE TRANSMISSION FACILITIES IN WASHINGTON*

Chapter 5 - Consultation and Engagement

March 2025

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## **APPENDICES**

### **APPENDIX 5.1-1**

Scoping Memorandum

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## 5.0 CHAPTER 5 – CONSULTATION AND PUBLIC ENGAGEMENT

This chapter describes the public scoping efforts; government-to-government consultation; and agency cooperation, consultation, and coordination that helped support the development of the Draft Programmatic Environmental Impact Statement (EIS).

In defining the scope of nonproject review of electrical transmission facilities with a nominal voltage of 230 kilovolts or greater (transmission facilities), the Washington Energy Facility Site Evaluation Council (EFSEC) requested input from agencies, federally recognized Indian Tribes, industry partners, stakeholders, local governments, and the public.

### 5.1 Public Scoping

Public scoping was used to inform the scope and geographic areas analyzed for the siting of transmission facilities. The 30-day public scoping period for the Draft Programmatic EIS began when EFSEC sent the public scoping notice to Tribal governments, agencies, and interested parties on June 28, 2024.

#### 5.1.1 Public Scoping Meetings

Public scoping meetings are an essential part of the environmental review process, particularly under the State Environmental Policy Act (SEPA). These meetings serve several important purposes, including the following:

- **Early Public Involvement:** Scoping meetings invite the public to participate early in the EIS process. This early involvement helps identify the range of issues and concerns that need to be addressed.
- **Defining the Scope:** The meetings help define the scope of the EIS by gathering input on the potential environmental impacts, alternatives, and mitigation measures that should be considered as well as the geographic extent.
- **Transparency and Communication:** Scoping meetings ensure transparency by providing information about the project and the EIS process. They also offer a platform for open communication between the public, industry partners, and regulatory agencies.
- **Public Input:** These meetings provide an opportunity for the public to voice their opinions, ask questions, and submit written comments. This input is crucial for ensuring that the EIS addresses all relevant concerns and reflects the community’s interests.
- **Regulatory Compliance:** Holding public scoping meetings is a requirement under SEPA. It ensures that the environmental review process complies with legal standards and incorporates public participation.

EFSEC held the following public scoping meetings for the Programmatic EIS:

| Meeting Date and Time <sup>(a)</sup> | Meeting Location          | Approximate Number of Attendees |
|--------------------------------------|---------------------------|---------------------------------|
| July 18, 2024, 5:00 p.m.             | Virtual (Microsoft Teams) | 20                              |
| July 23, 2024, 5:00 p.m.             | Virtual (Microsoft Teams) | 15                              |

Notes:

<sup>(a)</sup> All times are Pacific Standard Time

### 5.1.2 Public Scoping Comment Period

The public scoping comment period was held from June 28, 2024, to July 28, 2024. EFSEC accepted written scoping comments online, by postal mail, and verbally during online public scoping meetings.

A variety of scoping materials were available on EFSEC's Programmatic EIS website, <https://www.efsec.wa.gov/energy-facilities/programmatic-eis>, for public review throughout the scoping period. The website provided information on scoping, including how to comment and a link to an online comment form. The Scoping Summary Memo can be found in **Appendix 5.1-1**.

## 5.2 EFSEC Public Meetings

In addition to the previously held scoping meetings, EFSEC invites the public to participate in public meetings to discuss this published Draft Programmatic EIS. The public's input is invaluable as EFSEC works to ensure that all potential significant adverse environmental impacts are considered. EFSEC encourages all interested parties to attend and share their perspectives. Participation is crucial in helping make informed decisions that reflect the needs and values of our communities.

### 5.2.1 Public Information Meeting

On April 8, 2025, a public informational meeting will be held featuring a presentation of the Draft Programmatic EIS materials. This meeting will provide an overview of the project, outline key findings, and offer an opportunity for the public to ask questions and learn more about the proposed project before submitting formal comments. No comments will be taken at the public informational meeting. The public information meeting will be held virtually.

### 5.2.2 Public Comment Hearings

Public comment will also be taken at two hearings for the Draft Programmatic EIS. The public comment hearings will be held virtually on April 22, 2025, and April 24, 2025.

For more information about the Draft Programmatic EIS and the upcoming meetings, please visit EFSEC's website at: <https://www.efsec.wa.gov/energy-facilities/programmatic-eis>, contact EFSEC by phone at **(360) 664-1345**, or e-mail at [efsec@efsec.wa.gov](mailto:efsec@efsec.wa.gov).

## 5.3 Tribal Engagement and Consultation

EFSEC provided notification of the Draft Programmatic EIS to Tribal Chairs and Natural and Cultural Resources Directors of all federally recognized Tribes with lands and territories in Washington and Executive Directors of Tribal organizations. Government-to-government consultation was offered to federally recognized Tribes in Washington as an option at any time during the Draft Programmatic EIS process.

EFSEC will continue to provide opportunities for Tribal input during the public comment period and after the public comment period while the Final Programmatic EIS is being finalized. The following Tribes were notified of this Draft Programmatic EIS:

- Affiliated Tribes of Northwest Indians
- Chinook Indian Nation
- Coeur d'Alene Tribe
- Columbia River Inter-Tribal Fish Commission
- Confederated Tribes and Bands of the Yakama Nation
- Confederated Tribes of the Chehalis Reservation
- Confederated Tribes of the Colville Reservation

- Confederated Tribes of the Grande Ronde Community of Oregon
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of the Warm Springs
- Cowlitz Indian Tribe
- Duwamish Tribe
- Hoh Indian Tribe
- Jamestown S'Klallam Tribe
- Kalispel Tribe of Indians
- Kikiallus Indian Nation
- Lower Elwha Klallam Tribe
- Lummi Nation
- Makah Tribe
- Marietta Band of the Nooksack Tribe
- Muckleshoot Indian Tribe
- Nez Perce Tribe
- Nisqually Tribe
- Nlaka'pamux Tribal Nation
- Nooksack Indian Tribe
- Port Gamble S'Klallam Tribe
- Puyallup Tribe of Indians
- Quileute Nation (Tribe)
- Quinault Indian Nation
- Samish Indian Nation
- Sauk-Suiattle Indian Tribe
- Shoalwater Bay Indian Tribe
- Skokomish Indian Tribe
- Snohomish Tribe
- Snoqualmie Indian Tribe
- Snoqualmoo Tribe of Indians
- Spokane Tribe of Indians
- Squaxin Island Tribe
- Steilacoom Tribe
- Stillaguamish Tribe of Indians
- Suquamish Tribe
- Swinomish Indian Tribal Community
- Tulalip Tribes
- Upper Skagit Indian Tribe
- Wanapum Tribe

## 5.4 Agency Cooperation, Consultation, and Coordination

The following agencies provided input or technical review for this Draft Programmatic EIS:

- Bonneville Power Administration
- U.S. Department of Defense
- Washington Department of Fish and Wildlife
- Washington State Department of Archaeology and Historic Preservation
- Washington State Department of Ecology
- Washington State Department of Natural Resources

- Washington State Department of Transportation
- Washington Utilities and Transportation Commission

## **5.5 Industry Partners**

The following industry partners provided input for this Draft Programmatic EIS:

- Avista Corporation
- PacifiCorp
- Puget Sound Energy, Inc.



**APPENDIX 5.1-1**  
**Scoping Memorandum**

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## TECHNICAL MEMORANDUM

**DATE** November 5, 2024 **Project No.** 31405435.7302

**TO** Zia Ahmed, PhD  
Energy Facility Site Evaluation Council

**CC** Jeremy Paris, Ami Hafkemeyer, Sean Greene

**FROM** Sierra Harmening **EMAIL** [sierra.harmening@wsp.com](mailto:sierra.harmening@wsp.com)

### RE: SCOPING RECOMMENDATIONS FOR THE DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT FOR TRANSMISSION FACILITIES IN WASHINGTON STATE

## 1.0 INTRODUCTION

The Washington State Legislature directed the State of Washington Energy Facility Site Evaluation Council (EFSEC) to prepare a nonproject environmental review of the construction, operation and maintenance, and upgrade or modification of high-voltage transmission facilities (transmission facilities) in the state. A nonproject review refers to the environmental review process for governmental actions that involve decisions about policies, plans, or programs, rather than specific physical projects. The development of transmission facilities requires a systematic environmental review to ensure that potential impacts on the environment and communities are adequately addressed and mitigated. EFSEC has determined that a Programmatic Environmental Impact Statement (EIS) is necessary to analyze probable impacts of this type of project.

As part of the Washington State Environmental Policy Act (SEPA), and in accordance with Chapter 197-11-408 of the Washington Administrative Code (WAC), EFSEC began the initial 30-day public scoping period for the Draft Programmatic EIS on June 28, 2024.

EFSEC invited agencies, Tribes, and members of the public to comment on the content and scope of the Draft Programmatic EIS. It was requested that comments be directed to, but not be limited to, the following topics:

- Alternatives
- Probable significant adverse impacts
- Mitigation measures
- Licenses or other approvals

EFSEC held online public information meetings on July 18 and July 23, 2024. Recordings of the meetings and information are available on EFSEC's website.<sup>1</sup> Additionally, members of the public can register online for the EIS

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<sup>1</sup> <https://www.efsec.wa.gov/energy-facilities/programmatic-eis>

mailing list. As part of EFSEC's process, Tribes are provided an opportunity to comment via separate engagement.

This memorandum sets forth the issues raised during the scoping process and describes the proposed scope of environmental analyses included in the Draft Programmatic EIS prepared under SEPA.

## **2.0 ANALYSIS FRAMEWORK**

A programmatic EIS is a type of nonproject environmental review used for planning specific projects. This Draft Programmatic EIS will consider impacts and standard mitigation measures of siting transmission facilities throughout the state at a broad level, while analyzing general types of facilities but not individual projects. The Draft Programmatic EIS will not approve, authorize, limit, or exclude any projects on a site-specific basis.

The process used to determine the appropriate contents of an EIS is referred to as scoping. Scoping allows the public to provide valuable input as the EIS enters the SEPA environmental review phase. An objective of scoping is to narrow the focus of the EIS to environmental issues of concern, eliminate unanticipated impacts from detailed studies, and identify alternatives to be analyzed in the EIS.

Scoping also notifies the public and other agencies that an EIS is being prepared and initiates their involvement in the process.

## **3.0 SCOPING COMMENT OVERVIEW**

A scoping notice for the Draft Programmatic EIS was published as a legal advertisement in the following newspapers:

- Columbia Basin Herald
- The Olympian
- The Seattle Times
- The Spokesman
- The Tri-City Herald
- Tu Decides

EFSEC sent the announcement to Tribal governments, agencies, and interested parties on June 28, 2024. The notice was also published as file number 181034 on the SEPA Register and on EFSEC's website. This memorandum summarizes comments received during the 30-day public scoping period, which occurred between June 28, 2024, and July 28, 2024, and saved to EFSEC's comment database. The comments may be categorized into the following topics:

- Alternatives to Consider
- Geographic Scope
- Wildlife and Habitat
- Land and Shoreline Use
- Public Health and Safety
- Energy and Natural Resources
- Socioeconomic and Environmental Justice
- Tribal Rights, Interests, and Resources
- Cumulative Impacts

### **Alternatives to Consider**

Several comments received during the scoping period requested that EFSEC consider multiple greenfield “transmission paths”; rebuilds, reconductoring, and upgrades in existing corridors; and prioritization of transmission along highway rights-of-way. Other comments requested that the Draft Programmatic EIS include facilities associated with major transmission buildouts, including the need for access roads, laydown areas, and the potential use of both alternative and direct current options.

Some comments indicated that it may not be correct to assume that underground transmission lines are less impactful than overhead lines and that underground transmission has socioeconomic impacts, impacts on vegetation, and impacts on land use due to more extensive right-of-way requirements. Several comments expressed the view that underground transmission development, maintenance, and decommissioning have more adverse environmental impacts that are difficult to avoid, minimize, and mitigate than overhead transmission. Specifically, they stated that underground transmission is more expensive than overhead transmission and, while utility providers may share the cost of overhead transmission over a service territory, the cost of underground transmission may only be paid for by the local jurisdictions requesting the underground transmission and would force those jurisdictions to cover the difference in cost between overhead and underground facilities.

### **Geographic Scope**

Several comments received during the scoping period requested that the Draft Programmatic EIS consider all lands where legal constraints do not preclude the siting of transmission facilities. Other comments identified the need for the Draft Programmatic EIS to consider and evaluate all lands and to identify areas of least conflict while also disclosing any requirements for additional authorizations or mitigation for transmission facilities that would be sited on areas with land use constraints. Some comments requested that EFSEC coordinate with the Washington State Department of Ecology on its utility-scale wind and solar programmatic EISs and review utility providers’ projected needs for transmission.

The following individual utility projects were identified in comments that referred to potential future transmission development:

- Bonneville Power Administration’s transmission line from Garrison, Montana, to Ashe, Washington
- Puget Sound Energy Path from Western Washington to Central Washington across the Cascade Mountains
- Paths from load centers in Western Washington to British Columbia
- Paths from Central Washington to Oregon
- Paths from Eastern Washington to British Columbia
- Paths from Central Washington to Idaho and Montana

The comments noted that these projects would expand transmission uses in both existing corridors and greenfield siting.

### **Wildlife and Habitat**

Several comments received during the scoping period focused on birds and their habitat, protecting biodiversity, and the need for habitat management practices. Critical habitats were identified as areas of high conflict with transmission construction, and it was requested that the Draft Programmatic EIS consider mitigation measures,

standards, and ratios to help restore, protect, and connect critical habitats, but that transmission projects should first avoid environmental impacts, then minimize any impacts that cannot be avoided, then mitigate any remaining unavoidable impacts. Some comments also indicated that upgrading or modifying existing lines to higher capacity could have less impact on wildlife and habitat, including vegetation.

Other comments suggested that improvements could be made to the transmission facility siting process by developing a pre-application survey and monitoring protocol that would be provided to proponents, leading to more regionally consistent and systematic siting reviews. It was also recommended that the Draft Programmatic EIS develop site evaluation and project monitoring standards to guide project development responsibly.

Additionally, some commenters requested that any new transmission construction occur within existing corridors, including the three noted by the Transmission Corridor Working Group (TCWG):<sup>2</sup>

- **East-West:** Across the Cascades bringing in wind and solar from eastern Washington, as well as abundant wind power from Montana and Wyoming
- **North-South:** Along the Interstate 5 (I-5) corridor bringing in wind and solar power from eastern Washington, abundant wind power from Montana and Wyoming, solar power from California and the Southwest, plus possible hydrological resources from Canada
- **Southern Coastal Areas:** Connecting to the I-5 corridor for projected offshore wind development referenced in the 2021 State Energy Strategy

### ***Land and Shoreline Use***

Several comments requested that evaluations be mindful of property rights, farmlands and agriculture, and natural resource lands and forestry. The potential use of eminent domain being prioritized over property rights in transmission facility siting was of particular concern, with several comments noting that transmission infrastructure development is expensive and controversial and impacts communities and existing land use. These comments suggested that applying multi- or dual-use opportunities could help mitigate impacts.

### ***Public Health and Safety***

Some comments expressed concern over whether transmission facilities could be hazardous to those living nearby and emphasized that the Draft Programmatic EIS should analyze impacts on public health and safety.

### ***Energy and Natural Resources***

Several comments identified decommissioning of transmission facilities as a concern and recommended that decommissioning plans be adaptive and that evaluations be required to restore the environment to its pre-project conditions through environmental and socioeconomic studies, and revegetation site restoration requirements.

### ***Socioeconomic and Environmental Justice***

Several comments identified that early engagement with overburdened communities and environmental justice communities be required for future transmission facility siting. Some of these comments suggested the use of

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<sup>2</sup> Washington Energy Facility Site Evaluation Council. 2022. Transmission Corridors Work Group Final Report. Available at: [Final TCWG Report 2022 0801.pdf \(wa.gov\)](#)

community benefits agreements between developers and communities as a potential beneficial mitigation measure.

### ***Tribal Rights, Interests, and Resources***

Several comments recommended efforts to begin early engagement with Tribes to facilitate conversations during the development of the Draft Programmatic EIS. Utility providers highlighted the possible need for collocating transmission lines in areas with ongoing Tribal member activities, including hunting, gathering, and access to usual and accustomed fishing areas, to minimize disruptions to Tribal practices and uphold commitments to environmental justice and cultural respect.

### ***Cumulative Impacts***

Several comments indicated that the Draft Programmatic EIS should not determine the scope of potential reasonably foreseeable impacts of future projects. Instead, they stated that specific future projects should be identified in project-specific reviews.

## **4.0 ELEMENTS OF THE ENVIRONMENT**

As directed by the Washington State Legislature in Revised Code of Washington 43.21C.405, the scope of the Draft Programmatic EIS will be to analyze the potential direct, indirect, and cumulative impacts of transmission facilities in the State of Washington. The Draft Programmatic EIS will include an analysis of potential impacts on the elements of the natural and built environment specified under WAC 197-11-444. It will contain a comprehensive evaluation of impacts and identification of standard mitigation measures for the following topics listed below. Although not listed among the elements of the environment in WAC 197-11-444, socioeconomics was added to the list of elements analyzed to reflect information on potential socioeconomic impacts provided in response to WAC 463-60-535.

- Earth Resources (including seismic hazards)
- Air Quality (including greenhouse gases)
- Water Resources
- Vegetation
- Habitat, Wildlife, and Fish
- Energy and Natural Resources
- Public Health and Safety
- Land and Shoreline Use (including military, agricultural, and ranching uses)
- Transportation
- Public Services and Utilities
- Visual Aspects
- Noise and Vibration
- Recreation
- Historic and Cultural Resources (including Tribal rights, interests, and resources)
- Socioeconomics (including Environmental Justice and Overburdened Communities)

## **5.0 ALTERNATIVES**

### ***Preferred Alternative***

The Draft Programmatic EIS will examine the Preferred Alternative and a No Action Alternative. The Preferred Alternative will consider the potential direct, indirect, and cumulative impacts of overhead transmission facility

development, underground transmission facility development, including underwater<sup>3</sup> development, and modification or upgrading of existing transmission facilities. It will evaluate the impacts of the construction, operation, and maintenance of different types of transmission facilities.

The purpose of the evaluation of the Preferred Alternative is to identify impacts common to all transmission facilities and identify, analyze, and adopt, as appropriate, potential mitigation measures for such facilities so that subsequent project-specific SEPA reviews can focus on project-related impacts that rise to a level of severity that requires additional analysis and review and/or coordination with other stakeholders.

### **No Action Alternative**

SEPA requires the analysis of a No Action Alternative. Under the No Action Alternative for this Draft Programmatic EIS, the SEPA Lead Agency would continue the current process of review and management of individual transmission facilities under approved land use plans, SEPA, and regulations for transmission.

## **6.0 GEOGRAPHIC SCOPE**

In regard to identifying the proper geographic scope of impact analysis, EFSEC will consider standard attributes for likely development, proximity to existing transmission or complementary facilities, and planned corridors for transmission capacity construction, reconstruction, or enlargement.

The scope of the Draft Programmatic EIS is limited to the probable, significant adverse environmental impacts in geographic areas suitable for the electrical transmission facilities with a nominal voltage of 230 kilovolts (kV) or greater. The Draft Programmatic EIS is not required to evaluate geographic areas that lack the characteristics necessary to support electrical transmission facilities with a nominal voltage of 230 kV or greater.

The following areas will be excluded from the geographic scope of study for this Draft Programmatic EIS:

- Undersea or oceanic transmission<sup>4</sup>
- Tribal reservation lands<sup>5</sup>

**Figure 6-1** shows the Study Area for this Draft Programmatic EIS.

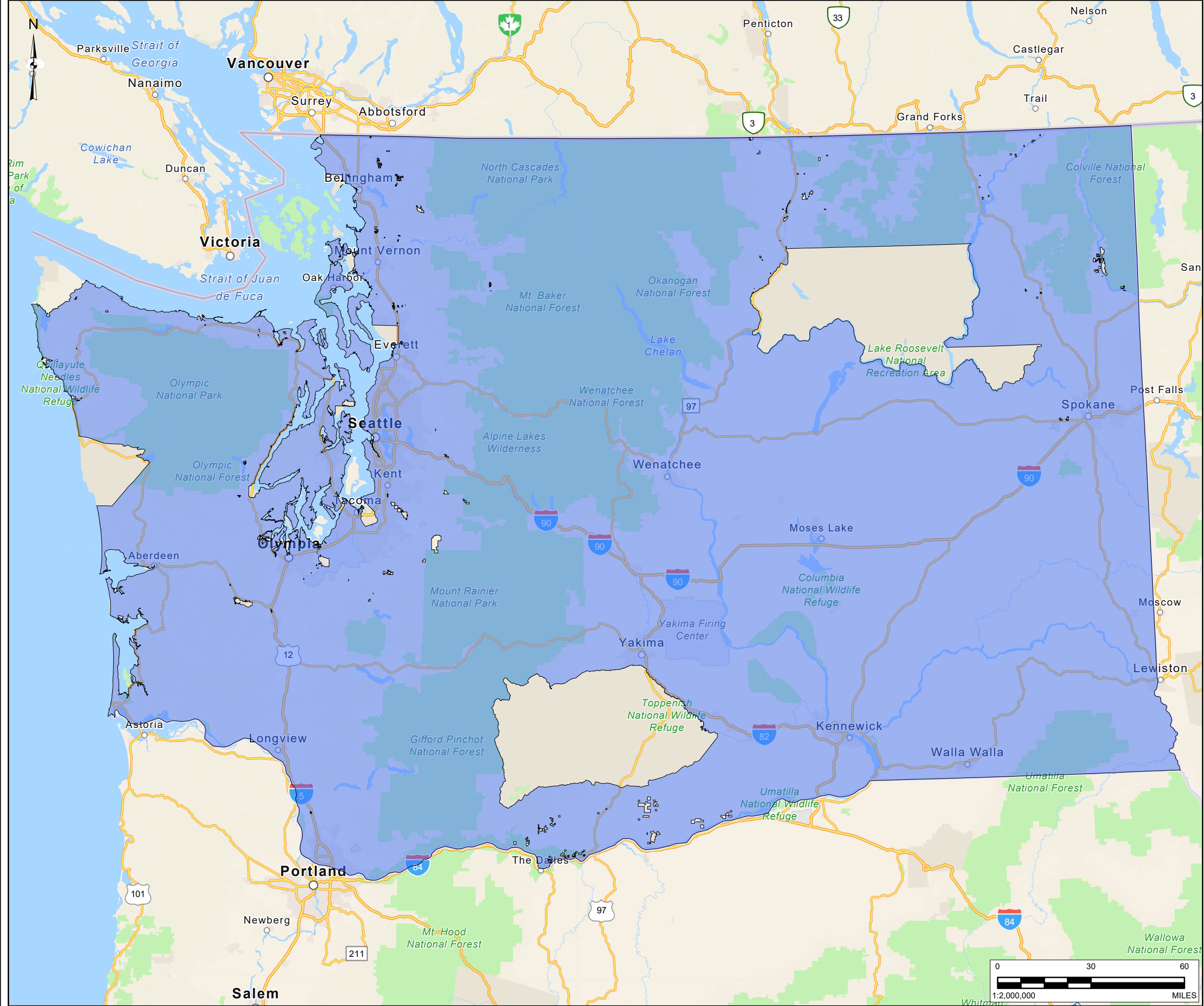
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<sup>3</sup> Refers to the transmission of electrical power through cables laid beneath bodies of water, including rivers, lakes, and seas. The scope of this Draft Programmatic EIS will not include impacts related to the transmission of electrical power through cables laid along seas or in the ocean.

<sup>4</sup> Programmatic EIS documents address broad, overarching policies, plans, or programs rather than specific projects. Sea cables are considered to be too specific or detailed for the broad focus of this nonproject review. Additionally, sea 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 sea cables can be significantly different from those of land-based transmission facilities. These differences might necessitate a distinct, focused EIS to adequately address the unique challenges and impacts.

<sup>5</sup> For the purposes of this scoping document, Tribal lands are not included in the proposed Study Area. EFSEC will consult with each Tribe that has reservation lands in the general scoping area, and if a Tribe chooses to include their lands, those lands will be added to the Study Area for the Draft Programmatic EIS. 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 with Tribes. This process ensures that Tribal concerns and perspectives are adequately addressed.





LEGEND  
 Study Area

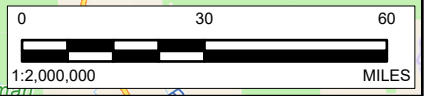
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**EFSEC**  
 Energy Facility Site  
 Evaluation Council

PROJECT  
**DRAFT PROGRAMMATIC EIS  
 HIGH-VOLTAGE TRANSMISSION FACILITIES**

TITLE  
**STUDY AREA**



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## 7.0 CLOSURE

The summary of public comments received during the scoping comment period for the Draft Programmatic EIS herein reflects WSP's review of available comments in EFSEC's database related to the elements of the natural and built environment listed in WAC 197-11-444 and socioeconomic concerns, and is not intended to provide a detailed characterization or quantification of comments received during the scoping period. Recommendations pertaining to the analysis of impacts and mitigation in the Draft Programmatic EIS reflect WSP's review of legislation, public comments, and discussions with EFSEC related to SEPA.

This memorandum only includes the Preferred Alternative and the No Action Alternative; no other alternatives are recommended for the Programmatic EIS.

### WSP USA Inc.



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