

*State Environmental Policy Act*  
Scoping Document

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**For Programmatic Environmental Impact Statement on  
Transmission Facilities in Washington State**

**June 2024**



STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

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## List of Acronyms and Abbreviations

CFR	Code of Federal Regulations
DAHP	Washington State Department of Archaeology and Historic Preservation
DOE	United States Department of Energy
EFSEC	Energy Facility Site Evaluation Council
EPA	Environmental Protection Agency
kV	kilovolts
NRHP	National Register of Historic Places
PEIS	Programmatic Environmental Impact Statement
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
TCP	Traditional Cultural Property
WAC	Washington Administrative Code

## Summary

The Washington State Legislature has, through the implementation of the Revised Code of Washington (RCW) Chapter 43.21C.405, directed the Energy Facility Site Evaluation Council (EFSEC) to prepare a nonproject environmental review of electrical transmission facilities with a nominal voltage of 230 kilovolts (kV) or greater – referred to as “transmission facilities” in this document – in Washington.

A Programmatic Environmental Impact Statement (PEIS) is a type of nonproject environmental review used for planning under the State Environmental Policy Act (SEPA). A PEIS considers potential significant adverse environmental impacts at a broad level. This PEIS will analyze transmission facilities generally – not individual projects – to identify probable significant adverse environmental impacts and possible mitigation measures.

A PEIS:

- Provides information for project applicants, SEPA lead agencies, permitting agencies, Tribes, interested parties, and the public.
- Helps developers understand potential impacts and make siting and design choices that could avoid or minimize impacts at an early phase of project consideration.
- Identifies effective, relevant, and available mitigation that may be used to reduce adverse environmental impacts.

## Scoping

Scoping is the first step in developing a PEIS. The purpose is to seek public comment on the environmental issues that should be studied in a PEIS.

This scoping document includes initial information for feedback and input on:

- Types of facilities to be evaluated
- Assumptions to use to identify the geographic scope of study for the PEIS analysis
- Potential adverse impacts to environmental resources
- Potential mitigation measures

## Resources being considered for analysis

The PEIS will analyze probable significant adverse environmental impacts to resources. Initial information is provided in Chapter 4 for the following resource areas:

- Earth resources (including seismic hazards)
- Air quality
- Water resources
- Vegetation
- Wildlife and Habitat
- Energy and natural resources
- Land and shoreline use, including military, agricultural, and ranching uses

- Historic and cultural resources, including tribal rights, interests, and resources
- Visual aspects
- Noise and vibration
- Recreation
- Public health and safety
- Transportation
- Public services and utilities
- Socioeconomics, including environmental justice and overburdened communities as defined by RCW 70A.2.010
- Cumulative impacts, including landscape scale habitat connectivity and wildlife migration corridors

## Geographic area of study

The scoping phase of the PEIS considers transmission statewide. Based on input received during scoping, EFSEC will consider the broad geographic areas where transmission facilities are likely to be built. The [report](#) that was issued by the Transmission Corridors Work Group will also be considered for potential transmission routes. This will be based on data like the distance to existing infrastructure such as roads and transmission lines as well as identification of areas of need for connecting energy production with energy use. The PEIS is not required to include geographic areas that lack the characteristics necessary for transmission facilities. After scoping, EFSEC will determine the geographic area of study and use it as the basis of the analysis that will be performed in the Draft PEIS.

## Scoping Period June 28, 2024 – July 28, 2024

Scoping comments will be accepted from June 28, 2024, through 11:59 p.m. on July 28, 2024. There are multiple ways to comment and provide feedback. All comments are valued equally.

**Online comment form:** <https://comments.efsec.wa.gov/>

**Physical mail address:** PO Box 43172  
Olympia, WA 98503-3172

## EFSEC is asking for feedback and input

### Next Steps

EFSEC will consider comments on this scoping document and use them to develop the Draft PEIS. There will be a public comment period for the Draft PEIS, which is planned for release in late 2024. After EFSEC has received public comments on the Draft PEIS, EFSEC will consider them and determine if additional work is needed in the preparation of the Final PEIS.

It is important to note that the transmission PEIS is intended to provide baseline environmental impact and mitigation information for this technology, but will not exclude any future projects



from their SEPA requirements. All future proposed transmission projects will still be required to undergo project-specific SEPA reviews.

## 1.0 Chapter 1 – Introduction and Background

### 1.1 Purpose of the Scoping Document

SEPA allows agencies to conduct nonproject environmental reviews, with the contents of such a review outlined in Washington Administrative Code (WAC) Chapter 197-11-442. A PEIS is a type of nonproject environmental review that evaluates a specific technology type, policy, or program. A PEIS evaluates probable significant environmental impacts at a broad scale and identifies potential mitigation to avoid or reduce impacts. This scoping document is the first step in developing a PEIS for transmission facilities.

The Washington State Legislature has, through the implementation of RCW 43.21C.405, directed EFSEC to prepare a PEIS for electrical transmission facilities with a nominal voltage of 230kV or greater in Washington. This scoping document begins that process. It provides initial information for feedback and comment.

EFSEC is asking for feedback and input on the following:

- Types of transmission facilities to be evaluated
- Assumptions to identify the geographic scope of study used for the PEIS analysis
- Potential impacts to environmental resources to analyze
- Potential mitigation measures to consider

EFSEC will consider comments on this scoping document and use them to develop the Draft PEIS. There will be a public comment period for the Draft PEIS, which is planned for release in late 2024. After EFSEC has received public comments on the Draft PEIS, EFSEC will consider them and determine if additional work is needed in the preparation of the Final PEIS.

It is important to note that a PEIS is not a review of a specific project. The PEIS will evaluate probable significant environmental impacts for general types of energy transmission facilities. It provides information for project applicants, SEPA lead agencies, permitting agencies, Tribes, interested parties, and the public. A PEIS helps developers understand potential impacts and make siting and design choices that could avoid or minimize impacts at an early phase of project consideration. It also identifies how anticipated impacts could be mitigated. Proposed transmission facilities will each need individual environmental review under SEPA using project- and site-specific information.

The PEIS development process will include early and meaningful Tribal engagement and communication on Tribal treaty rights, interests, and resources. The PEIS will also consider impacts to overburdened communities and vulnerable populations and provide opportunities for local communities to voice concerns early in the process so that relevant concerns can be considered and incorporated in the impact analysis.

## 1.2 SEPA Process

SEPA is intended to provide information to state and local agencies, project applicants, and the public to encourage the development of proposals that avoid, minimize, and mitigate potential impacts.

The SEPA environmental review process provides a way to identify and assess alternatives, probable environmental impacts, and mitigation and to provide information to the public, Tribes, and agencies. The process helps decision makers and the public understand how a proposed action would affect the natural and human environments. This environmental information, along with other documents, is used by decision makers to decide whether to approve a proposal, approve the proposal with conditions, or deny the proposal.

EFSEC is the lead agency for this PEIS process, as directed by the Legislature in RCW 43.21C.405. EFSEC will prepare a PEIS under SEPA requirements described in RCW 43.21C and WAC 197-11.

## 1.3 PEIS Process

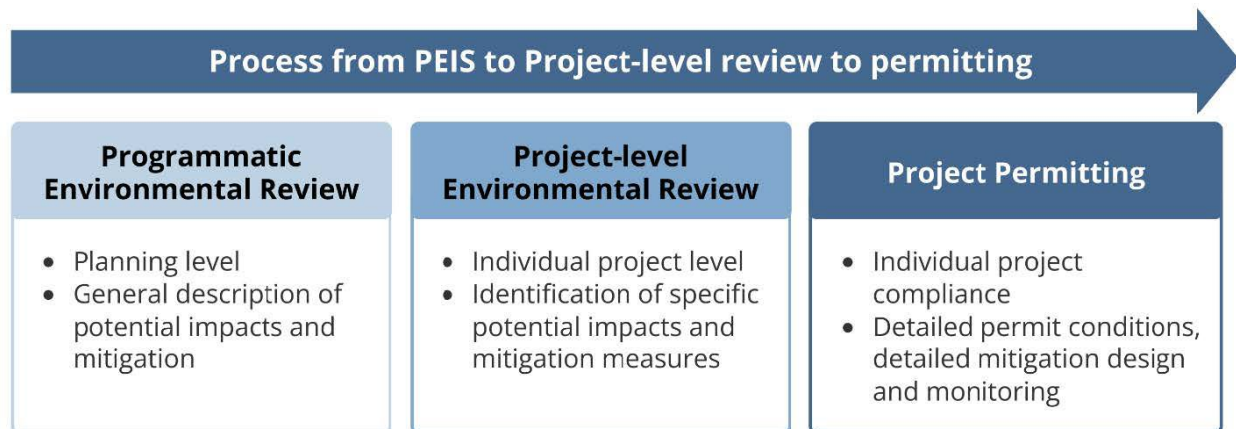
The PEIS will consider potential significant impacts from general types of transmission facilities; it is not site-specific or for a specific project. It evaluates environmental impacts over a broad geographic and time horizon, and the depth and detail of the impact analysis is fairly general, focusing on major impacts in a qualitative manner. Mitigation is also identified at a high level.

The PEIS will not assess site-specific issues associated with any individual transmission development project. Location-specific factors (e.g., soil type, groundwater availability and presence of jurisdictional waters, habitat, vegetation, the presence of threatened and endangered species, and the presence of cultural resources) vary considerably from site to site. The effects of location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis; such effects must be evaluated at the project level.

The PEIS will identify probable significant adverse environmental impacts and relevant mitigation applicable to transmission development in general. Site-specific issues would be addressed during individual project reviews as part of the SEPA process. The impact assessment and mitigation in a PEIS is more qualitative than a project-specific environmental impact statement (EIS).

SEPA analyses for proposed specific transmission proposals would tier to the transmission PEIS. “Tiering” means when a broad nonproject evaluation is later used for a project. Tiering can result in a more effective environmental analysis process for subsequent transmission development proposals.

A PEIS does not approve or deny a proposed project. State and local agencies will use the information in this PEIS, along with other publicly available information and with site-specific details, to inform project-level environmental reviews and permitting.



**Figure 1: Planning, Review, and Permitting Processes**

## 1.4 PEIS Use

Local, state, and federal agencies may use PEISs that have previously been prepared in order to help evaluate proposed actions, alternatives, environmental impacts, or mitigation for a proposed project. Each agency will ensure that the PEIS analysis is valid when applied to the current proposal, knowledge, and technology. If it is not valid, the analysis must be re-evaluated in the project-level environmental review or permit.

### 1.4.1 PEIS informs project-level SEPA reviews

When an applicant submits a project proposal, a project-level SEPA environmental review is done by the appropriate lead agency as required by the SEPA Rules (WAC 197-11). Per RCW 43.21C.408, lead agencies conducting environmental review of transmission projects must consider the PEIS in order to identify and mitigate project-level probable significant environmental impacts.

RCW 43.21C.408 further states that transmission project proposals that follow the recommendations in the PEIS must be considered to have mitigated the probable significant adverse project-specific environmental impacts for which recommendations were specifically developed. If impacts are not addressed in the PEIS, the project-level environmental review must consider these.

A project-level review must address any probable significant adverse environmental impacts associated with the proposal that were not analyzed in the PEIS. The review must identify any mitigation measures specific to the project for probable significant adverse environmental impacts.

Lead agencies reviewing site-specific proposals for transmission projects must use the nonproject review through one of the following methods:

Use of the non-project review unchanged, in accordance with RCW 43.21C.408, if the project does not cause probable significant adverse environmental impacts not identified in the PEIS

- Preparation of an addendum
- Incorporation by reference
- Preparation of a supplemental EIS

### **1.4.2 PEIS informs permitting decisions**

No final permit decisions can be made until a project-level SEPA environmental review is finished. The PEIS, project-level environmental review, and other documents and studies are used by decision makers to decide whether to approve a proposal, approve the proposal with conditions, or deny the proposal.

Permits ensure that projects comply with all applicable state environmental standards to protect land, air, water, wildlife, and people. The required permits for a project depend on its location and the construction and operations involved. A project may need local, state, and federal permits, and each permit has its own regulatory authority and regulatory agency. Information about specific permits can be found in the Washington State Regulatory Handbook.

## **1.5 Energy Facility Site Evaluation Council**

EFSEC is the state agency responsible for evaluating and making recommendations to the governor on the approval or denial of certain major energy facilities in Washington. As described in RCW 80.50.045, EFSEC is also designed as the state authority for the purposes of siting interstate transmission facilities under Title 16 United States Code Section 824p. This nonproject programmatic review is being conducted under the direction of the Washington State Legislature, as described in RCW 43.21C.405.

EFSEC is a council comprising the directors of five state agencies (or their designees) and a chairperson appointed by the governor. The state agencies with designees on EFSEC are:

- Department of Commerce
- Department of Ecology
- Department of Fish and Wildlife
- Department of Natural Resources
- Utilities and Transportation Commission

The directors of other specified state agencies may, at their discretion, choose to participate as council members for a particular application before EFSEC. As this PEIS is not associated with a specific project application, it is not being considered as a Council action and a PEIS-specific Council will not be convened.

EFSEC's review of the proposal is guided by RCW 80.50.010 which states, in part, the following:

- *The legislature finds that the present and predicted growth in energy demands in the state of Washington requires a procedure for the selection and use of sites for energy facilities*

*and the identification of a state position with respect to each proposed site. The legislature recognizes that the selection of sites will have a significant impact upon the welfare of the population, the location and growth of industry and the use of the natural resources of the state.*

- *It is the policy of the state of Washington to reduce dependence on fossil fuels by recognizing the need for clean energy in order to strengthen the state's economy, meet the state's greenhouse gas reduction obligations, and mitigate the significant near-term and long-term impacts from climate change while conducting a public process that is transparent and inclusive to all with particular attention to overburdened communities.*
- *It is the policy of the state of Washington to recognize the pressing need for increased energy facilities, and to ensure through available and reasonable methods that the location and operation of all energy facilities and certain clean energy product manufacturing facilities will produce minimal adverse effects on the environment, ecology of the land and its wildlife, and the ecology of state waters and their aquatic life.*

## 2.0 Chapter 2 – Transmission Facilities and Alternatives

### 2.1 PEIS Purpose and Objectives

As directed by the Legislature, the PEIS will evaluate potential impacts and mitigation for electrical transmission facilities with a nominal voltage of 230kV or greater in Washington State.

Electrical transmission facilities are defined in RCW 80.50.020(12) as “electrical power lines and related equipment.” Therefore, the PEIS will assess, at minimum, the following facilities:

- Overhead transmission lines, including:
  - Transmission structures (towers and poles)
  - Conductors (wires)
  - Ground Wires
  - Insulators
- Underground transmission lines, including:
  - Insulated conductor cables
  - Vaults
  - Transition structures (risers)
- Substations, including:
  - Transformers

The PEIS could be used by the public, project applicants, Tribes, landowners and managers, and decision-makers as a source of information, along with other studies such as Comprehensive Plans, cost-benefit analyses, and health impact assessments. A PEIS does not approve or deny projects or evaluate specific sites.

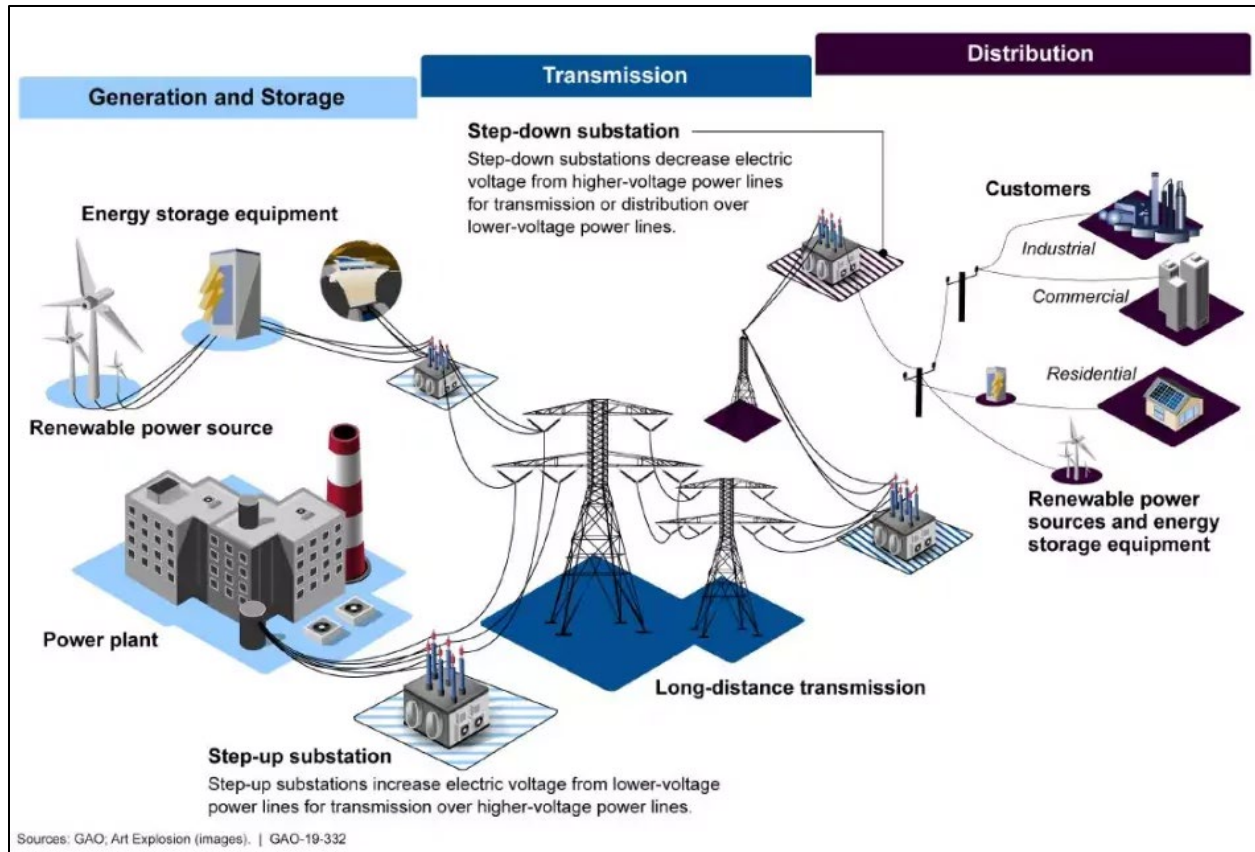
The intent of the PEIS is to:

- Support the state’s energy goals while protecting the environment, Tribal rights and resources, and local communities.
- Identify probable significant adverse environmental impacts at a broad level.
- Identify general potential mitigation measures for impacts.
- Provide information for transmission facility applicants to propose projects that avoid or minimize adverse environmental impacts.
- Provide information for lead agencies to consider when conducting environmental reviews for transmission facilities.

### 2.2 Transmission Facilities

Transmission facilities are used to transfer electricity from energy production facilities to homes, businesses, and industries where the electricity is used. These transmission facilities are composed of an intricate network of high- and low- voltage power lines, substations, transformers, and associated equipment that effectively and efficiently transport electricity over long distances. As shown in Figure 2, electricity is generally produced at utility-scale power generation facilities, passes through a substation that steps up the voltage level to allow for more

efficient transmission through long-distance overhead or underground lines, is again passed through a substation to step down the voltage level to a safer and more usable intensity, and is then disseminated through a series of local distribution lines to individual customers (DOE 2023).



**Figure 2: Transmission Facility Components (GAO, 2022)**

Electrical transmission facilities are essential for maintaining reliable and stable power supply, ensuring that there is minimal loss during transit and that electricity reaches consumers efficiently and safely. The development of transmission facilities allows for more effective incorporation of renewable energy facilities such as wind and solar as they facilitate the connection of remote sites with high renewable energy production potential, but little demand, with sites that have high renewable energy demand, but little production potential. Increased development of transmission facilities also serves the benefit of improving grid resilience by providing redundancy, backups, and inter-grid connectivity that can help to compensate for the impacts and struggles associated with outages or disruptions. A more comprehensive transmission grid has the further benefit of reducing electricity prices for consumers as energy producers face fewer costs associated with power delivery (DOE 2023).

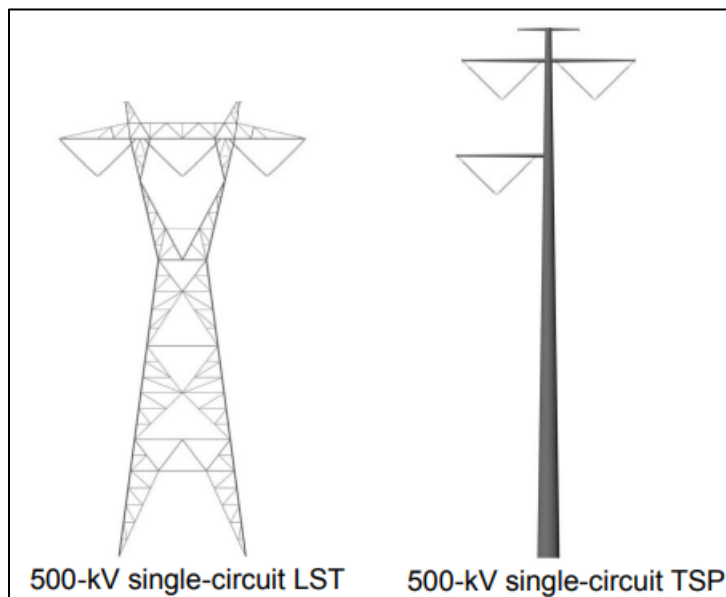
Safety and construction, operations, and training requirements for transmission facilities will be discussed and analyzed in the draft PEIS. The following sections are intended to provide information on the technologies and facility types that will be assessed as part of the PEIS.



## 2.2.1 Overhead transmission lines

Following a potentially multi-year process of planning, surveying, and permitting that results in a developer identifying the preferred route for an overhead transmission line, the construction process begins with extensive site preparation. This preparation involves clearing vegetation, site grading, and constructing access roads. A prepared site allows for developers to then excavate and construct the steel-reinforced concrete foundations for the towers or poles that will hold the transmission lines in the air (CPUC n.d. [a]).

There are a variety of transmission structures that are regularly used, but two of the more common, shown in Figure 3, are lattice steel towers (LST), which consist of a steel framework of individual structural components that are bolted or welded together, and tubular steel poles (TSP), which are hollow steel poles fabricated as one piece or as several pieces fit together (CPUC n.d. [b]). For the higher-voltage transmission facilities covered in this PEIS, the transmission structures are generally large enough that they arrive to the site in separate pieces and are assembled in sections from the ground up, with cranes or helicopters being used to lift sections in place (CPUC n.d. [a]).



**Figure 3: Overhead Transmission Structure Types (CPUC n.d. [b])**

The final phase of construction for overhead transmission is the wire-stringing operation during which conductors, ground wires, and insulators are strung between structures through the use of helicopters, which thread a lead line through the towers, and truck-based pulling machines (CPUC n.d. [a]). Conductors are the primary transmission lines that are usually constructed of aluminum over a steel core and serve as the mechanism through which electricity is transmitted. Conductors are generally not insulated, with air serving as the insulating material. Ground wires are unpowered protective wires strung along the tops of towers to protect the system from lightning strikes. Insulators can be constructed of porcelain, glass, polymer, silicon, or any other nonconductive material and are used to prevent the unintended flow of electricity between conductors and supporting structures (CPUC n.d. [b]).

Overhead transmission lines are anticipated to result in a higher degree of impact than underground lines to some resources considered by this PEIS, including visual aesthetics, public health and safety, and some wildlife species.

### **2.2.2 Underground transmission lines**

Compared to overhead transmission lines, underground lines have the benefit of increased resilience to severe weather conditions and reduced risks of accidental fires or electrocutions but can cost more than 5 times as much to install (EIA 2012), require over 14 times as much soil excavation (DOE 2023), and have approximately half as long of a life expectancy (PRPA 2024). Maintenance and cost concerns result in developers almost exclusively constructing overhead transmission lines when both options are available (Xcel Energy 2014). As of 2009, an estimated 0.5% of all transmission lines of at least 200kV in the US were underground (EIA 2012). Underground transmission lines are much more common when considering lower voltage, local distribution lines that are beyond the scope of this PEIS.

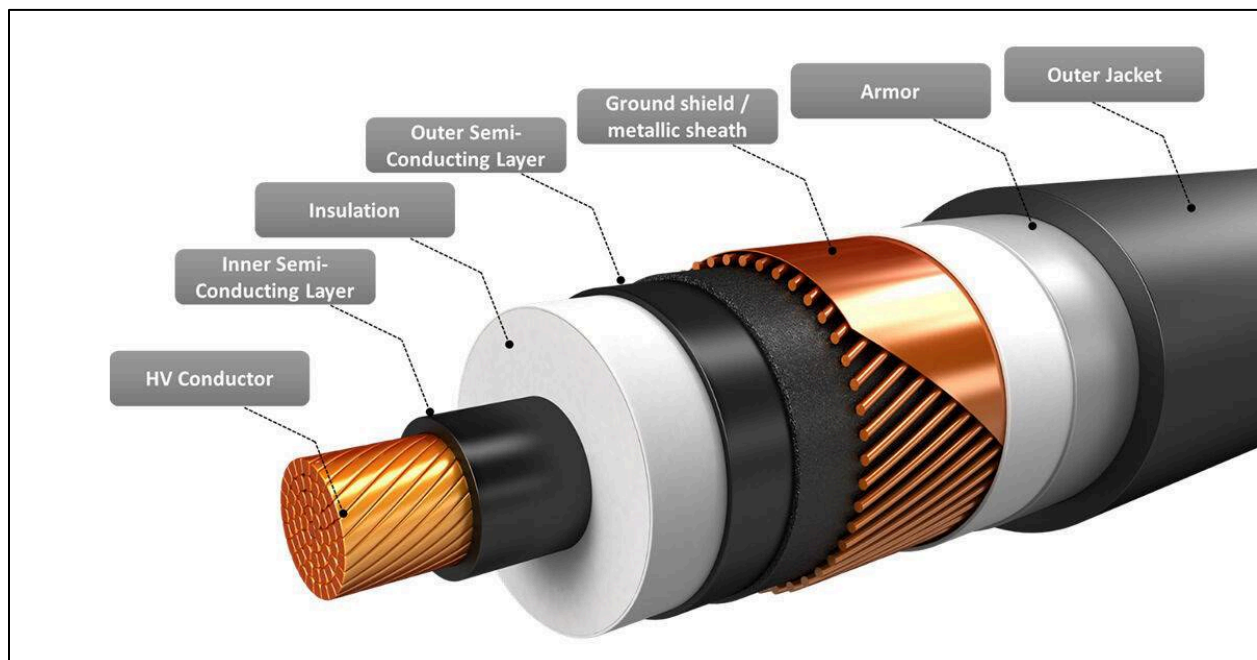
The construction process for underground transmission lines begins similarly to that for overhead lines with vegetation clearing, access road construction, and site leveling where needed. As underground transmission lines must be buried, there is substantially more earthwork involved with two primary methods used for the excavation of the trench that will receive the underground line. The first and most common method when the line is intended to be buried in open ground or under a roadway involves the use of heavy machinery to dig an open trench at a depth of 6 to 8 feet (PSCW 2011). When trenching is not practical due to the presence of structures or sensitive surface resources, geographic concerns, or because the soils won't bear the weight of heavy equipment, directional boring can be used. This process uses a surface-launched drilling rig to dig an underground tunnel without disturbing the surface that a cable can subsequently be fed through (Hair 2015).

Periodically along the path of the underground transmission line, developers must construct large underground concrete boxes that measure approximately 8-10 feet wide by 24-30 feet long by 8-10 feet high (PSCW 2011, Xcel Energy 2014). These boxes, see Figure 4, are referred to as vaults and are used by utility crews during the operation of the transmission facility to perform maintenance and repairs and must be placed every 900 to 3,500 feet depending on the type of cable, topography, and voltage (PSCW 2011). Given the size of the vaults, areas where they must be placed will see substantially more excavation. Higher voltage underground transmission facilities, such as those addressed in this PEIS, may also require that vaults be constructed in adjacent pairs to handle redundant sets of cable during maintenance (PSCW 2011).



**Figure 4: Underground Vault (Xcel Energy 2014, Oldcastle Infrastructure n.d.)**

Once the trench or boring tunnel is prepared and the vaults are constructed, the underground cable can be laid in place, in the case of a trench, or pulled through, in the case of a tunnel. These cables are composed of a number of components, as shown in Figure 5, but can be described generally as a bundle of copper or aluminum conductor wires through which electricity passes surrounded by an insulation layer composed of gas, fluid, polyethylene, or other nonconductive materials, which are both then encased in an outer jacket that protects from water infiltration and external damage (PSCW 2011).



**Figure 5: Parts of an Underground Cable (T&D 2019)**

After the cable and vaults have been installed, the trench is backfilled with the soils previously excavated from the site and a transition structure is constructed to connect the underground lines with existing adjacent overhead lines to maintain grid connectivity. For underground lines less

than 345kV, a 60 to 100 foot tall tower similar in composition and construction to an overhead transmission structure is installed to transition the conductor lines from underground to overhead. For underground lines of 345kV or greater, the transition structure needed is more similar to a small substation, typically covering 1 to 2 acres in size (PSCW 2011). The standard construction process of a substation is discussed below.

Underground transmission lines are anticipated to result in a higher degree of impact than overhead lines to some resources considered by this PEIS, including earth resources, water resources, and transportation, when sited beneath roadways.

### 2.2.3 Substations

The function of a substation is to transform electricity to a higher level of voltage, for efficient transmission over long distances, or a lower level of voltage, for easier and safer local distribution. They can vary greatly in size and complexity depending on the amount of voltage being transferred and number of connecting transmission lines (CPUC n.d.[b]). Based on need, substations can be as small as 500 square feet or cover over 100 acres, but are usually around 1 acre in size in residential areas and 10-20 acres in less developed locations (PSCW 2013, CPUD n.d.). Figure 6 shows a few examples of substations, reflecting the variety of sizes that may be used.



**Figure 6: Transmission Substations**

Construction of a substation begins with site preparation, including clearing of vegetation, site grading, and installation of concrete foundations. A gravel pad is placed over the concrete foundations and a tall chain link fence is installed surrounding the site for safety and security purposes (PSCW 2013). Unlike other components associated with transmission facilities, substations may be manned by staff on a daily basis during operations and typically have a permanent access road constructed connecting the site to the nearest public road (PSCW 2013).

Transformers are the primary component of substations and they serve the mechanism to complete the primary role of a substation, stepping up or down the voltage on transmitted power. Given the amount of electricity passing through these transformers, ensuring that the components remain cool is a central concern of substations. Smaller transformers are typically self-cooling as

their internal components are immersed in oil and are designed to allow for the oil to cycle through the system and transfer heat to the external parts of the transformer. Larger transformers may need additional external cooling equipment like pumps to force the cycling of oil or fans to force air across heat exchange surfaces (USDA 2001).

Substations have the largest permanent footprint of any single component of a transmission facility and are therefore anticipated to result in a higher degree of impact than transmission lines to area-based resources considered by this PEIS, such as vegetation, some wildlife species, and historic resources.

## 2.3 Phases of Transmission Facilities

### 2.3.1 Site characterization phase

Project applicants would conduct desktop analyses and feasibility and site studies during the site characterization phase with agreement from the landowner(s). During the site characterization phase, generally very little modification of the site would occur. Work would include conducting surveys to gather data on ecological, cultural, Tribal, and historical resources. Surveys would need to follow appropriate regulatory requirements and procedures.

Siting considerations typically include the identification of points of interconnection need, the geography of an area, and access to existing transmission infrastructure such as rights-of-way and substations. Considerations would also include zoning requirements and identification of critical areas.

Activities that would involve minimal or no site disturbance include:

- Mapping surface hydrology assessment and floodplain
- Tribal, cultural, and historic resource studies
- Slope evaluation and soil stability studies
- Habitat mapping, including wetland identification
- Water type mapping, including identification of fish waters and water crossings
- Species identification (plants and wildlife)
- Due diligence assessment for lands with previous industrial uses
- Evaluation of seismic stability and potential storm event runoff
- Baseline air quality assessment

Activities that could include ground disturbance include:

- Soil coring
- Tribal, cultural, and historic resource surveys

### 2.3.2 Construction phase

Construction of transmission facilities would occur similarly to other linear industrial facilities. After environmental review and permitting is complete, it is expected that several years will be needed to construct a transmission facility, with the time needed varying based on the length of the transmission line.

Activities for the construction phase would vary based on the type of facility (overhead or underground), scale, and site characteristics. Construction could include a site preparation phase of relatively short duration (e.g., a few months) followed by a longer construction and start-up phase.

General construction activities include:

- Finalizing preconstruction surveys or additional surveys
- Establishing site access
- Grading and constructing temporary staging and laydown areas
- Improving public roads, if needed
- Constructing roads or access routes on the site
- Clearing of trees and other vegetation
- Overhead Only:
  - Constructing foundations for poles or towers
  - Assembling and installing poles or towers
  - Stringing conductor wire through poles or towers
- Underground Only:
  - Trenching, blasting, or boring
  - Pipe and cable installation
  - Backfilling of trenches, holes, and tunnels
- Conducting revegetation and site restoration

Typical construction equipment includes bulldozers, front-end loaders, backhoes, dump trucks, graders, concrete trucks, mobile cranes, pile-drivers, trucks, portable generators, and pumps (PSCW 2011, Xcel Energy 2021).

### 2.3.3 Operations and maintenance phase

Activities for the operations phase would vary based on type of facility, scale, and site characteristics. Facilities are not expected to have staff on-site on a daily basis, but maintenance crews are anticipated to be regularly deployed. Transmission facilities will require ongoing maintenance for equipment and rights-of-way similar to any other linear industrial facility.

General operation activities include:

- Completion of ongoing environmental monitoring and adaptive management
- Clearing vegetation from rights-of-way
- Remote monitoring
- Scheduled maintenance inspections



- Repair of damaged or worn lines or cables
- Overhead Only:
  - Repair of damaged poles or towers
- Underground Only:
  - Repair of gas/fluid leaks from underground pipes (PSCW 2011)
- Conducting revegetation and site restoration

### **2.3.4 Site decommissioning**

A transmission facility will be decommissioned following the end of its useful life, which generally ranges from 40 to 80 years. Underground transmission lines typically have a life expectancy closer to 40 years while overhead transmission lines can approach 100 years (PRPA 2024).

An applicant may prepare a decommissioning plan as part of its proposal. EFSEC and some cities and counties require financial security as part of a decommissioning plan.

The project site would be restored to its pre-project conditions and uses unless the project owner, permitting authority, and regulatory agencies agree on alternate actions. Special consideration of the type of technology employed and disposal of associated components would be required.

General decommissioning activities include:

- Completion of decommissioning-phase environmental and socioeconomic studies
- Removal of project components, including foundations
- Recycling, when appropriate, or disposal of project materials
- Conducting revegetation and site restoration

## **2.4 Alternatives Being Considered for the PEIS**

The PEIS will evaluate the types of transmission facilities likely to be proposed in Washington. These types of facilities are described below in Sections 2.4.1 and 2.4.2. The PEIS will not evaluate the source of the power used in the production, transportation, or end uses of electricity. This would be done during the project-level environmental review.

### **2.4.1 Facility Type 1: Overhead Transmission Lines**

This transmission facility would transmit electricity using overhead lines through the process described in Section 2.2.1. The footprint of the facility would vary widely based on the technology used, capacity, and length.

### **2.4.2 Facility Type 2: Underground Transmission Lines**

This transmission facility would transmit electricity using underground lines through the process described in Section 2.2.2. The footprint of the facility would vary widely based on the technology used, capacity, and length.

### **2.4.3 No Action Alternative**

The PEIS is a planning document, so under the No Action Alternative, city, county, and state agencies would continue to conduct environmental review and permitting for transmission facilities under existing state and local laws on a project-by-project basis without the use of a PEIS. Per RCW 43.21C.405, for transmission projects utilizing an existing transmission right-of-way or transportation corridor, the PEIS will be limited to the proposed action and the no action alternative.

### **2.4.4 Alternatives not Proposed for Evaluation in the PEIS**

The PEIS will not evaluate the source of power, electricity, or inputs used to the energy that will be sent through transmission facilities. For example, the PEIS would not evaluate whether a solar energy facility or a natural gas facility will provide the electricity transmitted. The source of electricity would vary depending on the project and this would be evaluated during project-level reviews.

The PEIS will not evaluate end uses of electricity. These facilities will vary widely and impacts would be site-specific based on the type and scale of anticipated use. These would be evaluated separately during project-level reviews.



## 3.0 Chapter 3 – Study Area

As directed by the Legislature in RCW 43.21C.405,

“The scope of a nonproject environmental review is limited to the probable, significant adverse environmental impacts in geographic areas that are suitable for the electrical transmission facilities with a nominal voltage of 230kV or greater. The energy facility site evaluation council may consider standard attributes for likely development, proximity to existing transmission or complementary facilities, and planned corridors for transmission capacity construction, reconstruction, or enlargement. The nonproject review is not required to evaluate geographic areas that lack the characteristics necessary for electrical transmission facilities with a nominal voltage of 230kV or greater.”

The scope of the PEIS analysis is limited to development of transmission facilities. The PEIS considers the potential direct, indirect, and cumulative impacts of transmission projects. This programmatic analysis considers potential environmental effects over a broad geographic and time horizon and, as a result, is fairly general, focusing on probable significant impacts in a qualitative manner. Transmission facilities could be built on private, city, county, state, federal, or Tribal lands. In all cases, project applicants would need to work directly with the landowner, land manager, or Tribes for individual project assessment and approval.

The PEIS does not approve, authorize, limit, or exclude projects on a site-specific basis.

### 3.1 Assumptions for Determining Geographic Scope of PEIS

EFSEC will use feedback received during the scoping process to determine assumptions that will be used in the PEIS to identify the geographic area to be analyzed for transmission facilities.

EFSEC will meet with state land managers to determine the state lands that could be included in the geographic scope. State parks will be excluded from the geographic scope.

For projects on Tribal reservation lands, each federally recognized Tribe would determine use of their lands. For the purposes of this scoping document, Tribal reservation 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, they will be added to the study area for the Draft PEIS.

For federal lands, the federal agency responsible will make land use decisions. Areas determined to be applicable for transmission facilities will be included in the study area for the Draft PEIS. If no determination has been made, any federal lands meeting the above assumptions will be included in the general analysis.

## 4.0 Chapter 4 – Affected Environment, Significant Impacts, and Mitigation

### 4.1 Evaluating Impacts and Mitigation in the PEIS

“Impacts” are the effects or consequences of actions. The following three types of impacts will be evaluated in the PEIS:

- Direct effects, which are caused by the action and occur at the same time and place.
- Indirect effects, which are caused by the action and occur later in time or are farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems including ecosystems.
- Cumulative effects, which are impacts on the environment that result from the incremental impacts of the action when added to other past, present, and reasonably foreseeable developments.

Under SEPA (WAC 197-11-768), “mitigation” means:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts.
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing, enhancing, or providing substitute resources or environments.
- Monitoring the impact and taking appropriate corrective measures.

The PEIS will describe the analysis and methods used for each resource, impact findings, whether adverse environmental impacts would be expected to be significant or not, and mitigation measures. If an impact is not expected to be mitigable below a level of significance, it will be identified in the PEIS as a likely unavoidable significant adverse environmental impact. General impacts and mitigation are described in the rest of this section.

The PEIS will also identify siting and design considerations, types of permits and plans that may be required, and best management practices (BMPs). BMPs are activities, maintenance procedures, managerial practices, or structural features that prevent or reduce pollutants or other adverse impacts. These may be required in permits or plans by a regulatory agency.

EFSEC will offer early and meaningful consultation with any affected federally recognized Tribes with lands and territories in Washington State on the PEIS for the purpose of understanding potential impacts to Tribal rights and resources, including Tribal cultural resources, archaeological sites, sacred sites, fisheries, or other rights and interests in Tribal lands

and lands within which a Tribe or Tribes possess rights reserved or protected by federal treaty, statute, or executive order. Certain information obtained by EFSEC under this section is exempt from disclosure, consistent with RCW 42.56.300. Through formal consultation and informal engagement with Tribes, the PEIS will seek to reflect and incorporate the Tribes’ perspectives of, values about, and relationships with aspects of the environment potentially impacted by transmission development.

#### 4.1.1 Siting and design considerations

Siting and design considerations are actions that could be taken by a developer in developing a facility design or considering a site. They are intended to result in the avoidance, minimization, and/or mitigation of potential resource impacts. However, not all siting or design actions will apply to all projects (e.g., if a resource is not present on a given site).

In the early stages of siting and design, project applicants should coordinate with appropriate federal, state, and local agencies and potentially affected Tribes to identify potential impacts and take action to avoid and minimize them to the greatest extent possible. Applicants should specify the actions taken to avoid and minimize impacts through siting and design as part of their project description.

#### 4.1.2 State and local permits and reviews

Table 1 provides a list of permits and approvals that may be required for a transmission facility.

**Table 1: Possible State (or Federally Delegated) and Local Permits and Approvals**

Permit or Approval	Agency/Statute and/or Regulation
<b>State</b>	
Site Certification Agreement	EFSEC RCW 80.50 RCW 80.50.040
Water Quality Permits	Ecology Section 401 of the CWA
Water Right Permit	Ecology RCW 90.03, 90.44, and 90.90 WAC 193-152
Authorization to Use State-owned Lands	DNR RCW 79.36
State Protected Species	WDFW WAC 220-610, State species status and protections WAC 232-23, Classification of wildlife species, including “Priority Habitats and Species” WDFW Wind Guidelines (2009) RCW 77, Hydraulic Code

**Table 1: Possible State (or Federally Delegated) and Local Permits and Approvals**

<b>Permit or Approval</b>	<b>Agency/Statute and/or Regulation</b>
Access Permit, Utility Permit	WSDOT WAC 468-34-100
Oversize and Overweight Permit	WSDOT WAC 468-38-075
Electrical Construction Permit	WDLI WAC 296-746A, Washington Department of Labor and Industries Safety Standards: Installing Electrical Wires and Equipment – Administration Rules
Noise Control	RCW 70.107, Noise Control WAC 173-58, Sound Level Measurement Procedures WAC 173- 60, Maximum Environmental Noise Levels WAC 463-62-030, Noise Standards
Construction Stormwater General Permit	Ecology CWA (42 U.S.C. 1251-15; CFR 923-930) RCW 90.48, establishes general stormwater permits for Ecology under the Water Pollution Control Act WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington
Sand and Gravel General Permit	Ecology WAC 197-200 WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington WAC 173-204, sediment management standards WAC 173-226, procedures for issuing general permits
Air Permits: New Source Review, Portable Air Containment Sources -Notice of Construction, and Notice of Intent	Local Government or Ecology Clean Air Act WAC 463-78 and 173-400
Shoreline Substantial Development Permit	Ecology and Local Government WAC 173-18, Shoreline Management Act, Streams and Rivers Constituting Shorelines of the State WAC 173-22, Adoption of Designations of Shorelands and Wetlands Associated with Shorelines of the State RCW 90.58.140[9]
Coastal Zone Management Federal Consistency	Ecology Coastal Zone Management Act
State Environmental Policy Act(SEPA)	State Agency or Local Government RCW 43.21C, Washington Environmental Policy Act WAC 197-11, Washington Department of Ecology SEPA Rules

**Table 1: Possible State (or Federally Delegated) and Local Permits and Approvals**

<b>Permit or Approval</b>	<b>Agency/Statute and/or Regulation</b>
Archaeological Sites and Resources, Archaeological Site Alteration and Excavation Permit	DAHP RCW 27.53, Archaeological Sites and Resources
Forest Practices Application	DNR or Local Government WAC 222-16 WAC 222-20 WAC 222-24 WAC 222-30 WAC 222-34 WAC 222-38 Forest Practices Board Manuals
Hydraulic Project Approval	WDFW and DNR RCW 77.55 WAC 20-660-050 WAC 222-20-017
<b>Local</b>	
Conditional Use Permit	Local Government
Critical Areas Regulations	Local Government RCW 36.70A WAC 365-190-(080-130) WAC. 365-195, Best Available Science Section WAC 365-196-485 and WAC 365-196-830
Building Permits	Local Government
Special Permit - General	Local Government International Fire Code (2015 Edition)
Oversized Load Permit	Local Government RCW 46.44.090
Road Approach Permit	Local Government RCW 36.75.130
ROW Encroachment Permit	Local Government RCW 36.75.130
Franchise Agreement	Local Government RCW 36.55.040
Fire Marshall Special Permit	Local Government

## Notes:

CFR = Code of Federal Regulations; CWA = Clean Water Act; DAHP = Washington Department of Archaeology and Historic Preservation; DNR = Washington Department of Natural Resources; Ecology = Washington Department of Ecology; EFSEC = Energy Facility Site Evaluation Council; RCW = Revised Code of Washington; ROW = right-of-way; SEPA = Washington State Environmental Policy Act; U.S.C. = United States Code; WAC = Washington Administrative Code; WDFW = Washington Department of Fish and Wildlife; WDLI = Washington Department of Labor and Industries; WSDOT = Washington State Department of Transportation

### 4.1.3 Potential plans, approvals, and actions

Several mitigation plans may be required for a transmission facility project as part of state or local permits. The need for each plan will be determined during the project-level review. Some plans may be combined to meet local government requirements. The mitigation plans that may be required are listed below and described in more detail in the following sections:

- Decommissioning and Site Reclamation Plan (may be local requirement)
- Revegetation and Noxious Weed Management Plan
- Emergency Management Plan (may be local requirement)
- Erosion and Sediment Control Plan (ESCP) for a Construction and Operation Stormwater General Permit
- Habitat Mitigation Plan (WAC 463-60-332) or Wildlife Habitat Management and Mitigation Plan (WAC 463-62-040)
- Inadvertent Discovery Plan (Washington State Department of Archaeology and Historic Preservation [DAHP] requirement)
- Water Quality Monitoring and Protection Plan
- Spill Prevention, Control, and Countermeasures (SPCC) Plan (40 Code of Federal Regulations [CFR] 112)
- Stormwater Pollution Prevention Plan (SWPPP) for a Construction and Industrial Stormwater General Permit
- Traffic Management Plan or Transportation Plan (may be local requirement)
- Wetland Delineation and Mitigation Plan
- Federal Aviation Administration Aeronautical Study

## 4.2 Earth Resources

The PEIS will consider impacts to geomorphology and geology for the types of facilities evaluated. A transmission facility project could affect geomorphology including erosion, soil compacting, and mixing. Construction of a facility could increase the risk of landslides and erosion. Seismic activity and related hazards, such as surface rupture, liquefaction, and ground-shaking, or volcanic activity could pose a risk to transmission facility development, depending on the study area.

## 4.3 Air Resources

The PEIS will consider impacts to air quality for the types of facilities evaluated. A new emissions source must demonstrate compliance with all applicable federal and state air quality requirements including emissions standards and ambient air quality standards. Washington State has established rules for permitting new sources in both attainment and non-attainment areas of the state, and additional requirements may be imposed by local air authorities.

## 4.4 Water Resources

The PEIS will consider impacts to water resources for the types of facilities evaluated within the geographic scope of study. This includes surface and ground water quality and water availability

and use. Transmission facilities could affect surface water and groundwater in several ways, including the use of water resources, modification of the natural surface water and groundwater flow systems, alteration of the interactions between groundwater and surface waters, on- or off-site wastewater treatment, and water quality degradation by runoff.

## 4.5 Vegetation Resources

The PEIS will consider impacts to vegetation resources for the types of facilities evaluated. Transmission facility development could temporarily or permanently affect vegetation species and habitats in and near a project area. Activities associated with transmission facility development could incur short- or long-term changes in habitat and species composition, abundance, and distribution. Impacts could include habitat removal, changes in habitat, and introduction of invasive species, as well as erosion, fugitive dust, habitat fragmentation, changes in the hydrologic regime, increased human presence, spills, soil compaction or removal, or sedimentation.

For Tribes, impacts to species and habitats could affect the gathering, harvest, and cultural activities of Tribal members. Section 4.9 further discusses Tribal interests, treaty rights, and resources. As part of the PEIS process, EFSEC will offer consultation with potentially affected federally recognized Indian Tribes regarding identification and mitigation of probable, significant, adverse environmental impacts.

The PEIS will evaluate potential impacts on endangered, threatened, and special status species once the study area is determined.

## 4.6 Wildlife Resources

The PEIS will consider impacts to wildlife resources for the types of facilities evaluated. Transmission facility development could temporarily or permanently affect wildlife species and habitats in and near a project area. Activities associated with transmission facility development could incur short- or long-term changes in habitat and species composition, abundance, and distribution. Impacts could include habitat removal, changes in habitat, and introduction of invasive species, as well as erosion, fugitive dust, habitat and movement corridor fragmentation, changes in the hydrologic regime, increased human presence, spills, soil compaction or removal, or sedimentation.

For Tribes, impacts to species and habitats could affect the fishing, hunting, and cultural activities of Tribal members. Section 4.9 further discusses Tribal interests, treaty rights, and resources. As part of the PEIS process, EFSEC will offer consultation with potentially affected federally recognized Indian Tribes regarding identification and mitigation of probable, significant, adverse environmental impacts.

The PEIS will evaluate potential impacts on endangered, threatened, and special status species once the study area is determined.

## 4.7 Energy and Natural Resources

The PEIS will consider impacts to energy and natural resources for the types of facilities evaluated within the geographic scope of study.

## 4.8 Land and Shoreline Use

The PEIS will consider impacts on land use for the types of facilities evaluated within the geographic scope of study. The PEIS will consider changes to existing uses on public, state, Tribal, and private lands and shorelines that surround or are near transmission facilities.

## 4.9 Historic, Cultural, and Tribal Resources

Indigenous Tribes and populations have been in the Northwest since time immemorial. Federally recognized Tribes with lands and territories in Washington State continue to have close connections to its aboriginal territories. Tribes in Washington have reserved rights to fish and harvest natural resources throughout much of the state. Additionally, several out-of-state Tribes have treaty rights and usual and accustomed territories within the state.

Under treaties negotiated by Territorial Governor Isaac Stevens on behalf of the United States, Tribes ceded 64 million acres of land to the U.S. for non-Indian settlement and the subsequent establishment of Washington State. Tribes retained about 6 million acres of reservation land and specifically reserved the right to take fish in their “usual and accustomed” areas, including ceded territories, along with the right to harvest and hunt on “open and unclaimed lands,” among other things. Tribes retained reserved rights to gather and access cultural foods and religious sites in their treaties with the federal government.

Tribes are recognized as unique sovereign people who exercise self-government rights that are guaranteed under treaties and federal laws. Each Tribal reservation in the state constitutes a bordering sovereign jurisdiction subject to federal and Tribal environmental laws. Transmission facilities could affect Tribal interests, treaty rights, and resources in and around the areas where they are built. Impacts could occur from land disturbance during construction, during operations, and from the location of facilities, affecting the cultural landscape and reducing accessibility to cultural site locations.

The term “Tribal resources” refers to the collective rights and access to traditional areas and times for gathering resources associated with an Indian Tribe’s sovereignty since time immemorial. It includes inherent rights or formal treaty rights associated with usual and accustomed territories. In addition, Tribal resources include areas important to traditional cultural practices and the natural and cultural resources associated with those practices, including plants, wildlife, or fish used for commercial, subsistence, and ceremonial purposes.

Resources may also include archaeological or historic sites or Traditional Cultural Properties (TCPs) associated with Tribal use and sites considered sacred by Tribes. Historic and cultural resources are unique, non-renewable resources. Historic resources include prehistoric or historic districts as well as historic and archaeological sites, structures, or objects that are listed in (or



eligible for listing in) preservation registers such as the National Register of Historic Places (NRHP), the Washington Heritage Register, or local preservation registers. The term “cultural resources” refers to a broad range of resources associated with human manipulation of the environment. This includes all resources that are potentially eligible for listing in the NRHP, including sites, buildings, structures, districts, and objects.

Cultural resources include Tribal sites and TCPs, archaeological sites and other archaeological resources, historic properties, historic resources, homesteads, and landmarks. TCPs include locations that may be eligible for listing in the NRHP because of their association with cultural practices or beliefs of a living community. TCPs may be associated with Tribal ethnographic locations such as villages, geographical features, and resource gathering areas. Tribal traditions are interwoven into the ecosystems in which Tribal members live, from hunting and gathering to sacred sites. Places and activities have spiritual and cultural meaning for Tribes. Tribal resources, archaeological sites, historical and cultural sites, TCPs, and natural resources often can be interconnected and overlapping as Tribal resources.

Natural resources important to Tribes are also Tribal resources. Hunting, fishing, and gathering are essential subsistence and cultural activities documented in ethnographic literature, Tribal legends and stories, and archaeological sites. Fish and animals were historically and are currently harvested and hunted for food, cultural, and ritual uses. Plants were historically and are currently gathered for food, medicine, and ritual uses as well as for raw materials for tools, clothing, basketry and mats, and other uses.

Preservation of land and culture is essential to the identities of the Tribes. It provides the living space, the sacred and cultural sites, and the natural resources that sustain Tribal peoples and cultures. It provides spiritual and physical sustenance and the means for economic self-sufficiency.

As part of the PEIS process, EFSEC will offer consultation with potentially affected federally recognized Indian Tribes regarding identification and mitigation of probable, significant adverse environmental impacts. As required in RCW 43.21C.405, EFSEC will provide opportunities for the engagement of Tribes that self-identify an interest in participating in the process.

EFSEC will offer early and meaningful consultation with any affected federally recognized Indian Tribe on the PEIS. The goal of this consultation is to understand potential impacts to Tribal rights and resources including Tribal cultural resources, archaeological sites, sacred sites, fisheries, or other rights and interests in Tribal lands and lands within which an Indian Tribe or Tribes possess rights reserved or protected by federal treaty, statute, or executive order. Certain information will be exempt from disclosure, consistent with RCW 42.56.300.

During formal government-to-government engagement and consultation with Tribes, input from Tribes on existing and historical conditions; potential impacts to Tribal interests, rights, and resources; and possible mitigation measures are planned to be discussed. This information will be critical for evaluation in the PEIS.

## 4.10 Visual Aesthetics

The PEIS will consider impacts to visual quality for the types of facilities evaluated. Impacts can be related to aesthetics, light, glare, and rural character. Visual quality involves changes to the scenic attributes of the landscape brought about by the introduction of visual contrasts by development actions and the associated changes in the human visual experience of the landscape. Landscape character is identified by the combination of the scenic attributes that make each landscape identifiable or unique. A region's landscape character creates a sense of place and describes the visual image of an area.

## 4.11 Noise and Vibration

The PEIS will consider impacts from noise and vibration for the types of facilities evaluated within the geographic scope of study. Noise is sound that interferes with normal activities of humans and the natural environment. Vibration is an oscillatory motion through a solid medium that can result in low-frequency ground-borne noise. Transmission facilities may produce noise or vibration impacts on nearby people and wildlife in the area where they are built. Noise and vibration generated by a project would be generally short-term in duration during construction and longer-term during operations.

## 4.12 Recreation

The PEIS will consider impacts to recreation for the types of facilities evaluated. Impacts to recreation use would be determined based on the current use of the site. Transmission facilities are expected to have varied impacts to recreational resources based on the type of recreation. Facilities could also have impacts on recreational use of lands located nearby.

## 4.13 Public Health and Safety

The PEIS will consider impacts to public health and safety for the types of facilities evaluated within the geographic scope of study. Public health and safety hazards that have the potential to occur at a project site include fires, explosion, and inadvertent release of hazardous materials associated with construction and operation of a transmission facility. Federal, state, and local regulations for health and safety that apply to transmission facilities will be discussed in the PEIS.

## 4.14 Transportation

The PEIS will consider impacts to transportation for construction for the types of facilities evaluated. Transportation related impacts are anticipated to primarily occur during construction and decommissioning as there will be limited regular traffic to transmission facilities during operation. The location of a transmission facility could have impacts on the local road network in terms of traffic and wear and tear on roads.

## 4.15 Public Services and Utilities

The PEIS will consider impacts to public services and utilities for the types of facilities evaluated. Public services and utilities that have designated service areas, provide services, or would respond to calls within the study area may be impacted by a transmission facility. They may use solid waste disposal services, stormwater facilities, municipal water supplies, and emergency response services.

## 4.16 Socioeconomics and Environmental Justice

In alignment with WAC 463-60-535, the PEIS will consider socioeconomic impacts for the types of facilities evaluated. Potential resources that could be impacted include housing availability, property values, education facilities, governmental services, and local economies.

RCW 70A.02.010 defines environmental justice (EJ) as 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, rules, and policies. EJ includes addressing disproportionate environmental and health impacts in all laws, rules, and policies that have environmental impacts by prioritizing vulnerable populations and overburdened communities and the equitable distribution of resources and benefits, and eliminating harm (RCW 70A.02.010).

The Environmental Protection Agency (EPA) defines the term “fair treatment” to mean that “no group of people should bear a disproportionate burden of environmental harms and risks, including those resulting from the negative environmental consequences of industrial, governmental, and commercial operations or programs and policies” (EPA 2020). The term “disproportionate impacts” refers to differences in impacts or risks that are extensive enough that they may merit action.

Transmission development could result in impacts to communities that are already overburdened by environmental impacts that affect their health and well-being. These communities could experience additional and cumulative impacts from multiple projects and existing facilities.

Multiple data sources will be used to identify vulnerable populations and overburdened communities in the PEIS. This information will be used to determine if they would potentially experience disproportionate impacts as a result of the development of transmission facilities. The Department of Health’s Health Disparities Map, the EPA’s EJScreen tool, U.S. Census data, Tribal records, and other data sources will be used to identify these groups and determine potential impacts.

The PEIS will evaluate probable significant impacts on overburdened communities or vulnerable populations based on the geographic scope of study for the types of facilities evaluated. This analysis will incorporate the impact findings of other resources in the PEIS such as air resources, noise, recreation, transportation, and others as applicable.

For Tribes, transmission development could have disproportionate impacts on Tribal members and communities. Section 4.9 further discusses Tribal interests, treaty rights, and resources. As part of the PEIS process, EFSEC will offer consultation with potentially affected federally recognized Tribes regarding identification and mitigation of probable, significant adverse environmental impacts.

## 5.0 Chapter 5 – Cumulative Impacts

SEPA requires consideration of how a project or projects could contribute to cumulative impacts from other developments in the region over time. This analysis combines the potential effects of a project or projects with the effects of past, present, and reasonably foreseeable developments.

The cumulative impacts analysis will be prepared in accordance with SEPA requirements (WAC 197-11-060). It will also consider the federal Council on Environmental Quality approach for analyzing cumulative impacts. The following steps will be used:

- Identify the resources that could be adversely affected by the proposed project as identified in Chapter 4.
- Consider other actions in the same geographic study area for each resource.
- Consider other actions with effects during the same time period as effects from the proposed project, during both construction and operation.
- Analyze cumulative impacts using the best available data.

This section will be described in more detail once the geographic scope of study has been determined. There could be cumulative impacts to any of the resource areas. These would be addressed in the cumulative analysis.

For Tribes, cumulative impacts to aquatic, wetland, and terrestrial species and habitats could impact the gathering, harvest, fishing, hunting, and cultural activities of Tribal members. There may be cumulative impacts to other resources such as water resources, environmental and public health and safety, EJ and overburdened communities, cultural resources, and visual quality that could affect Tribal interests, rights, and resources.

### 5.1 Past, Present, and Reasonably Foreseeable Developments

The cumulative impacts analysis will consider past, present, and reasonably foreseeable developments for the geographic area of study. Reasonably foreseeable developments are those that are not considered “speculative” (EPA 1999). Case law has generally defined a reasonably foreseeable development as one that “is sufficiently likely to occur, that a person of ordinary prudence would take it into account in making a decision” (Sierra Club v. Marsh 1987) and “can be described at the time the EIS is drafted with sufficient specificity to make its consideration useful to a reasonable decision maker” (Dubois v. U.S. Department of Agriculture 2001).

## 6.0 Chapter 6 – References

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