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May 15, 2025

Energy Facility Site Evaluation Council
PO Box 43172
Olympia, WA 98503-3172

RE: Comments on Draft Transmission Programmatic Environmental Impact Statement

Dear Energy Facility Site Evaluation Council:

Thank you for the opportunity to submit comments on the draft transmission PEIS. Please find attached comments by the Energy Policy Office of the Washington Department of Commerce.

We are generally in support of the analysis that EFSEC has developed of potential environmental impacts of transmission projects in our state. We would like to highlight two priority suggestions to strengthen the final PEIS:

- Develop an analysis of transmission upgrade actions that is more distinct from actions to construct new transmission facilities. We believe the draft PEIS does not adequately capture the lesser impacts from improvements to existing facilities, relative to construction of new facilities. It would be especially helpful to transmission operators in making transmission upgrades if the potential impacts of upgrades are more carefully and specifically identified in the PEIS.
- Provide a more thorough analysis of the indirect and cumulative impacts of transmission projects by including the environmental benefits that will result from reduced use of fossil fuels in electric power generation as a result of expanded transmission capacity. These include reduced impacts of climate change, reduced emission of criteria pollutants, reduced public health effects, and reduced environmental harm from fossil fuel generation, which could be provide positive indirect benefits for air quality; water resources; vegetation; habitat, wildlife, and fish; public health and safety; land and shoreline use; transportation; recreation; and socioeconomics.

Please direct any questions concerning these comments to George Lynch, Senior Energy Policy Specialist, Transmission Policy, at george.lynch@commerce.wa.gov.

Sincerely,

Glenn Blackmon
Director, Energy Policy Office

Page ES-9; Figure ES-2 Decision Tree

- This Decision Tree is a very helpful illustration of the SEPA environmental review process. Could this concept be expanded to include additional guidance on the entire application and review process, such as timelines of when documents are due, lists of resource reports and other documents that must be submitted, and any other information that an applicant or state agency can reference to understand exactly what will be expected and when in the process? I understand that this would not be able to be done in a neat one-page decision tree or flow chart, but possibly as a type of guidebook?

Page 1-19

- **Text**: "…SEPA's purpose and goals are almost identical to NEPA's, but federal agencies may have environmental review processes that vary slightly from SEPA's. The main areas of divergence typically relate to the scope of the review, types of impacts, and range of alternatives.
- **Comment**: Recognizing that all federal agencies have their own NEPA processes, can the PEIS identify certain processes that generally differ between SEPA and NEPA? Perhaps. DOE NEPA processes that serve as a proxy since DOE can be the lead agency for transmission permitting under the Energy Policy Act of 2005 Section 216(h).

Pages 2-8; 2.2.1.3 Upgrade/Modification of Existing Transmission Facilities

- **Comment:** The PEIS should distinguish between upgrade/modification projects that include Advanced Transmission Technologies and reconductoring that does not require new transmission towers (which would likely fall into the "Nil" or "Negligible" Impact Determinations) versus larger upgrading and reconductoring that would have additional land disturbances.
- This section differentiates various types of upgrades/rebuilds, such as reconductoring, advanced transmission technologies, right-size replacements, modifying, re-routing, and converting. Making a general differentiation between upgrades/modifications that involve additional disturbances, and environmental impact would be useful. For example, a distinction can be made between reconductoring, advanced transmission technologies, and right-size replacement (which generally do not require much additional disturbances) versus modifying, re-routing, and converting, (which involve additional disturbances).
- The absence of a distinction between different scales of upgrade/modification can be found throughout the document, such as the Water Resources section, the Vegetation Management section, Wildlife and Fish section, etc.
- The U.S. Department of Energy recognized the nominal environmental impact of upgrading and rebuilding transmission lines when it provided categorial exclusions to the National Environmental Policy Act in April 2024 (Federal Register / Vol. 89, No. 84 / Tuesday, April 30, 2024.).
    - DOE found that the record shows "that the actions normally do not have significant environmental impact, individually or cumulatively."
    - DOE stated in the Federal Register: "To establish the record in this rulemaking, DOE evaluated environmental assessments prepared by DOE and by other Federal agencies, categorical exclusion determinations, technical reports, applicable requirements, industry practices, and other publicly available information."

- In the Technical Support Document for DOE's categorical exclusions for upgrading and rebuilding transmission lines, it stated: " BPA and WAPA have documented no potential for significant environmental impacts in NEPA reviews for the types of actions covered" by the categorical exclusions. Page 3.

Chapters 3 and 4: Indirect Effects and Cumulative Impacts of Transmission Development

- Provide a more comprehensive analysis of the indirect effects and cumulative impacts, particularly indirect and cumulative benefits of transmission development
- Expand upon the indirect and cumulative benefits of reduced impacts of climate change, reduced emission of criteria pollutants, reduced public health effects, and reduced environmental harm from fossil fuel generation, which could be provide positive indirect benefits for air quality; water resources; vegetation; habitat, wildlife, and fish; public health and safety; land and shoreline use; transportation; recreation; and socioeconomics.
- See Pages 111-112 of the "*Draft Generic Environmental Impact* Statemen", prepared for the Office of Renewable Energy Siting and Electric Transmission, New York Department of Public Services", *available at* https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={90DADA93-0000-C713-811A-3B1771FEE38B}, for example:
  - "By accelerating the State's transition to renewable energy, the proposed action is expected to contribute to the State reducing its reliance on fossil fuels. This shift will curtail climate change-inducing GHG emissions, reduce criteria air pollutants, improve public health, and preserve natural resources. **The following section provides a summary of the potential environmental benefits indirectly generated by the proposed action.**" Page 111.
  - "**The proposed action, by accelerating the phasing out of fossil fuel generation plants, will contribute to the reduction of criteria air pollutants like SO2 and NOx, especially in disadvantaged communities which have been disproportionately exposed to pollutants resulting from dependence on fossil fuels**." Page 111.
  - "Emissions from fossil fuel-based electric generation can negatively affect human health. Exposure to ozone can aggravate lung diseases including asthma, emphysema, and chronic bronchitis, as well as increase the risk of premature mortality from heart or lung disease. Health effects from PM2.5 include aggravated asthma, irregular heartbeat, decreased lung function, nonfatal heart attacks, and premature mortality in those with heart or lung disease. NOx can increase the risk of respiratory diseases and exacerbate existing respiratory symptoms, especially in children, the elderly, and the poor. Individuals with asthma may experience aggravated symptoms when exposed to NOx. Additionally, exposure to NOx can cause irreversible structural changes to the lungs. One study estimated health impacts from fossil fuel energy sources at $362 to $886 billion in economic value annually, based on premature mortality, workdays missed, and direct costs to the U.S. healthcare system resulting from PM2.5, NOx, and SO2. The same study estimated that the economic value of negative health impacts was equal to approximately $0.14 to $0.31 per kWh. These costs may be even higher if GHG emissions are included. Outdoor PM2.5 pollution from burning fuels in our buildings led to an estimated 1,300 early deaths and roughly $14.4 billion in health impact costs in New York in 2017. **The proposed action is expected to contribute to further reductions in such air emissions and related costs and health impacts.**" Pages 111-112.

- Coal combustion in traditional legacy baseload generating plants generates significant amounts of solid waste. Much of this waste is disposed of in abandoned mines or landfills, potentially allowing pollutants to leach into ground or surface water. Soil contaminated by pollutant deposition near coal-fired power plants can take years to recover. Acid rain due to emissions of NOX and SO2 also impairs the growth of trees or kills them. **The proposed action will contribute to accelerated reductions in these types of resource impacts.**