The Nature Conservancy
Washington

May 15, 2025 *Submitted Electronically*

Patty Betts & Sean Greene
Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Lacey WA 98503-3172

RE: Draft Transmission PEIS, Docket 181034

Dear Patty Betts and Sean Greene,

The Nature Conservancy (TNC) is a non-profit conservation organization working locally, nationally, and internationally to conserve the lands and waters on which all life depends. On behalf of our Washington members, we thank EFSEC for the opportunity to provide comments for the Draft Transmission Programmatic Environmental Impact Statement (PEIS).
Increasing transmission capacity is necessary to:

- Meet increasing energy demand across the state.
- Meet that demand with clean electricity, lowering greenhouse gas (GHG) emissions.
- Interconnect wind and solar generation in lower conflict sites within Washington to meet Clean Energy Transformation Act (CETA) mandates and lower GHG emissions.
- Access diverse clean energy resources across the west, lowering GHG emissions and environmental impacts of wind and solar development in Washington.
- Lower energy costs for Washington ratepayers by accessing and enabling development of lowest-cost clean energy resources.

The Nature Conservancy acknowledges that infrastructure development, and particularly greenfield development, can have adverse impacts on natural and working lands. At the same time, increased transmission capacity is critical for delivering on our state's commitments to greenhouse gas reductions and 100% clean electricity. According to the Clean Energy Transition Institute's Net Zero Northwest study, expanding transmission maximizes the chances of meeting net-zero goals while minimizing overall decarbonization cost. **Critically, rapidly expanding transmission infrastructure lowers the environmental impact of the energy transition in Washington by shrinking the necessary footprint of wind and solar sited in Washington through increased access to generation in other states, especially Montana and Wyoming wind.** [1]

Therefore, **building all the transmission required for a least-cost decarbonization of Washington's energy needs will reduce adverse environmental impacts and create environmental benefits**, even though the immediate impacts of transmission projects will increase relative to the current transmission system. We urge EFSEC to capture the

environmental benefits of transmission and the adverse environmental impacts of not building transmission in the PEIS.

TNC appreciates the PEIS's role in accelerating transmission permitting without sacrificing environmentally smart planning. TNC commends EFSEC for the comprehensive and in-depth analysis of each resource on the SEPA checklist, and the detailed mitigation criteria assigned to each resource. TNC appreciates that the PEIS seeks to provide an explicit pathway for transmission projects to receive DNS and MDNS decisions by following the specific recommendations in the PEIS as required in RCW 43.21C.408(3).

We urge EFSEC to consider the following recommendations as well as those from other commenters seeking to strengthen the effectiveness of the PEIS to get transmission built in ways that minimize environmental impacts.

Recommendations:

1. **Require compensatory mitigation for greenfield overhead transmission projects impacting class 1 and class 2 habitat types consistent with WDFW Wind and Solar Guidelines, and pursue flexible mitigation pathways such as mitigation banks.** There is no question that building the transmission system Washington needs will impact the environment, and overhead transmission in greenfield areas is the highest impact method of building transmission. It appears that the mitigation recommendations in the PEIS are primarily in the avoid, minimize, and rectify stages of the mitigation sequence (WAC 197-11-768). While avoiding and minimizing impact is critical where possible, compensatory mitigation should also be a tool for addressing unavoidable impacts. TNC recommends EFSEC require compensatory mitigation for unavoidable impacts to class 1 and class 2 habitat types in line with the mitigation requirements and ratios that will be adopted in the WDFW Wind and Solar Guidelines. Establishing functional mitigation banking will help accelerate both transmission development and habitat restoration. Clear requirements for compensatory mitigation will also minimize additional environmental analysis when a project cannot meet avoidance criteria.

2. **Separately identify mitigation criteria for upgrades, modification, and colocation within existing transmission and transportation corridors,** which are the lowest environmental impact way to add capacity to the transmission grid. Any capacity added by these strategies lowers the need for greenfield transmission. Therefore, the PEIS should treat this as a separate alternative for impact determination and mitigation and clarify if any mitigation criteria would not apply. For upgrades and modifications where avoidance criteria cannot be followed due to historical siting of existing infrastructure, TNC recommends limiting any additional environmental analysis, due to the clear environmental benefits of upgrades, modifications, and use of transportation rights of way relative to building greenfield transmission.
    a. **Add road and highway rights-of-way to the upgrade/modification of existing transmission alternative:** Placing new transmission in road rights of way is a low impact way to build new transmission infrastructure and should have mitigation

requirements aligned with upgrades and modifications as opposed to greenfield development.

3. **Use levels of impact aligned with the language of SEPA in "Impact Determination" sections.** Align nomenclature in Impact Determination Scale with SEPA triggers. That would include non-significant impact, moderate significant impact where PEIS mitigation is adequate to achieve an MDNS, and significant impacts requiring additional SEPA analysis.

4. **Amend Action Alternative and No Action Alternative to include high and low buildout scenarios, enabling the cumulative impacts assessment to reflect the pace and scale of transmission construction needed to meet CETA targets and GHG mandates.** To adhere to WAC 197-11-440, which asserts that "reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation", this Transmission PEIS should include alternatives that avoid and minimize the potential impacts of building transmission while still meeting CETA and GHG mandates. The Draft PEIS does not acknowledge that no action will lead to insufficient development to meet our state's climate laws and commitment to greenhouse gas reductions, and should account for the climate, socio-economic, environmental justice, and grid reliability costs associated with no increase in the pace of transmission buildout from current practice. TNC recommends analyzing an alternative that assumes constructing enough transmission to meet forecasted demand by 2050 and an alternative that assumes status quo rates of transmission development. If EFSEC would like to maintain its current structure of assuming the only difference between action and no action alternatives is the following of avoidance criteria, then this would require four alternatives (high and low buildout scenarios each with an action and no action alternative). It is critical to first analyze the full transmission buildout needed to meet GHG and CETA goals and then use the cumulative impacts analysis and mapping analysis to identify where transmission should be developed to minimize the cumulative impact of that full buildout.

5. **Clarify treatment of avoidance criteria when they prove unavoidable, minimizing additional environmental analysis required in step 3.4 of Figure 1.6-1: Decision Tree.** Transmission lines are linear infrastructure, nearly guaranteed to cross some of the avoidance criteria areas. When avoidance criteria are unavoidable, EFSEC should clarify the applicability of the PEIS for the rest of the project, and specify the level of additional analysis required to identify alternatives or mitigation.
    a. **Identify compensatory mitigation ratios for unavoidable conflicts with avoidance criteria.** TNC recommends providing clear compensatory mitigation ratios for avoidance criteria in line with the WDFW Wind and Solar Guidelines where applicable so that projects have clarity on their responsibility to mitigate when impacts are truly unavoidable. This will help limit the scope of the additional analysis required in the Decision Tree.

6. **Identify priority corridors for transmission development and provide "Corridor/Route Optimization" from GoldSET Data.** The maps in the PEIS "must be prepared with the intention to illustrate probable, significant impacts **and areas where impacts are avoided or capable of being minimized or mitigated**, creating a tool that may be used by project proponents, tribes, and government to inform decision making" RCW 43.21C.405 (6). This requires:
    a. **Make the underlying GoldSET data easily accessible** to project proponents, tribes, and governments, and
    b. **Overlay the GoldSET maps of different resources and conduct the corridor/route optimization step for areas with known transmission needs in a high transmission buildout scenario**, potentially with multiple starting and ending points to account for different possible substations. There are several projects that EFSEC knows have been proposed, including the Garrison to Ashe line from Montana to the Tri-Cities area as well as the Cross Cascades North line from the mid-C to the west side of the Cascades, as well as other lines identified in utility and/or regional transmission planning.
    c. **Use the cumulative impacts analysis and GoldSET mapping to identify the transmission routes needed in a high buildout scenario with minimum cumulative impacts on avoidance criteria.** A key role of the PEIS is identifying transmission corridors with the lowest cumulative impacts to meet system needs. We recommend keeping the option of conducting addendum or supplemental route-specific PEISs that retain the benefits of teiring to this PEIS.

7. **Account for the environmental benefits of building transmission and the environmental harms of insufficient transmission in the cumulative impacts analysis.** The analysis of sufficient and insufficient transmission analysis should include the GHG and socioeconomic impacts of transmission enabling the development and use of clean energy, and the potential land use impacts of meeting CETA requirements if lack of transmission leads to extra wind and solar resources needing to be sited in Washington.

This Transmission PEIS is a critical opportunity to achieve a smart-from-the-start, landscape-scale approach for a balanced build out of transmission infrastructure in Washington. We hope our comments can contribute to a comprehensive Transmission PEIS that evaluates a range of alternatives and directs transmission buildout towards approaches that conserve cultural, natural, agricultural, and community resources while meeting our state's transmission needs for reducing GHGs and achieving CETA targets. Thank you for your consideration of these comments. Please feel free to follow-up with any questions by contacting me at joshua.rubenstein@tnc.org.

Sincerely,

Joshua Rubenstein
The Nature Conservancy
Climate Policy Associate