EFSEC WASHINGTON

Programmatic Environmental Impact Statement

High-Voltage Transmission Facilities in Washington

Chapter 1 - Introduction

October 2025

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1.0 Chapter 1 – Introduction

1.1 Programmatic Environmental Impact Statement Purpose and Overview

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

This Programmatic EIS generally evaluates adverse environmental impacts associated with different types of transmission facility developments; it does not propose, evaluate, or approve a specific project or project-specific application. As a nonproject environmental review[3] document, it is intended for use in future planning and development of transmission facilities, which would require a subsequent environmental review of each project-specific application. That review would evaluate the project's consistency with this Programmatic EIS, including the applicability of the

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

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

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

identified General Measures,[4] Avoidance Criteria,[5] and Mitigation[6] Measures[7]; all of which make up Mitigation Strategies[8] for this Programmatic EIS. The project-specific environmental review[9] would also include additional project-specific environmental analyses[10] and mitigation, should any be identified. This Programmatic EIS is intended to:

- **Provide a Broad Environmental Impact Assessment:** It presents a comprehensive evaluation of adverse environmental impacts associated with transmission facility development at a broad level throughout Washington, rather than focusing on specific projects, sites, or corridors.
- **Facilitate Streamlined Planning:** It assesses common adverse environmental impacts and identifies Mitigation Strategies early in the planning process, which helps to streamline the environmental review[11] for individual transmission facility projects in the future. Streamlining the project-specific environmental

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

[5] Within this Programmatic EIS, criteria that provide a consistent baseline for evaluating the potential adverse environmental impacts of project-specific applications for transmission facility development. This Programmatic EIS assumes that project-specific applications would meet the Avoidance Criteria during design and siting in order to be consistent with the analysis in this Programmatic EIS. When a project-specific application does not meet the Avoidance Criteria, additional environmental analyses would be expected, and project-specific mitigation may be required as appropriate to address adverse environmental impacts associated with the noncompliance.

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

[7] In the context of this Programmatic EIS, a Mitigation Measure is defined as a strategy or action designed to eliminate, reduce, or compensate for adverse environmental impacts associated with the new construction, operation and maintenance, upgrade, or modification of transmission facilities.

[8] A comprehensive set of analysis, planning, and implementation tools specific to this Programmatic EIS designed to reduce or eliminate adverse environmental impacts associated with the new construction, operation and maintenance, upgrade, and modification of transmission facilities. These strategies are inclusive of three key components identified in Chapter 3 and detailed in Appendix 3.1-1: General Measures, Avoidance Criteria, and Mitigation Measures. Together, these elements form a hierarchical and integrated approach to environmental management, ensuring that transmission projects in Washington are planned and executed with a strong emphasis on sustainability, regulatory compliance, and ecological stewardship.

[9] While this Programmatic EIS provides a broad framework for evaluating transmission-related actions, individual projects will still require separate, project-specific environmental review. Environmental review for project-specific applications may be phased under both the EFSEC certification and local government SEPA review processes. As defined in WAC 197.11.060(5), “phased review” may allow the use of broader environmental documents followed by narrower documents. A phased review can result in a more effective environmental analysis by incorporating prior general discussion by reference and concentrating solely on project-specific information and effects.

[10] The substantive evaluation of how a specific project may affect the environment.

[11] The procedural framework established under SEPA to evaluate the potential environmental impacts of a proposed action. This process includes determining whether SEPA applies to a proposal and conducting a threshold determination to assess whether the proposal is likely to have significant adverse environmental impacts. Environmental review is the formal decision-making process that agencies must follow to ensure environmental considerations are integrated into project planning and permitting.

review process can save time and resources for both applicants and the State Environmental Policy Act (SEPA) Lead Agency.[12]

- **Support Informed Decision-Making:** It provides information that can help applicants understand potential adverse environmental impacts upfront and make initial siting[13] and design choices[14] that could avoid or minimize impacts at earlier stages of project consideration, potentially expediting the permitting timeline for future transmission facility development.
- **Identify Mitigation Strategies:** It identifies effective avoidance, minimization, and Mitigation Measures to address adverse environmental impacts, which can be applied to future transmission facility projects that fall within the scope[15] of this Programmatic EIS.
- **Initiate Public and Stakeholder Engagement:** It provides an up-front platform for public and stakeholder input, ensuring that community concerns and interests are considered early in the planning process.

Overall, this Programmatic EIS is intended to help facilitate project-specific applications for future transmission facilities in Washington in an environmentally responsible and efficient manner. This Programmatic EIS allows for the possibility that some projects may proceed without additional environmental analyses, provided they are consistent with the scope of this Programmatic EIS and do not introduce new or increased probable significant[16] adverse environmental impacts. However, the determination of whether additional project-specific environmental analyses and mitigation are needed remains at the discretion of the SEPA Lead Agency.

1.2 Background

The Washington State Legislature passed the Clean Energy Transformation Act (CETA) in 2019, which requires Washington's electric utilities to meet 100 percent of their

[12] The agency with the main responsibility for complying with the procedural requirements of the Washington State Environmental Policy Act (SEPA).
[13] Identifying and evaluating potential routes for transmission facilities.
[14] Engineering and structural options that may be considered to better suit or adapt to site-specific conditions. Design choices would be included in the description of a project-specific application and are required to comply with all applicable legal, environmental, and safety requirements, including public engagement. Additionally, design choices would align with the Mitigation Strategies outlined in this Programmatic EIS.
[15] The range of proposed actions, alternatives, and impacts to be analyzed in an environmental document. For this Programmatic EIS, the scope is high-voltage transmission facilities within the defined Study Area.
[16] A SEPA term defined in WAC 197-11-794 as "a reasonable likelihood of more than a moderate adverse impact on environmental quality."

retail electric load[17] using non-emitting and renewable resources by January 1, 2045; eliminate coal-fired resources from their allocation of electricity by December 31, 2025; and make all retail sales of electricity greenhouse gas–neutral by January 1, 2030. The Legislature also found that the electric power system serving Washington requires additional high-voltage transmission capacity to achieve the state's objectives and legal requirements.

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

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

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

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

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

renewable energy Washington State needs can get to the homes and businesses that require it.

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

Subsequently, the Legislature passed Senate Bill (SB) 5165, which focuses on aligning the needs of utility providers with CETA and enhancing electric transmission planning. SB 5165 was codified into RCW 43.21C.405 and RCW 43.21C.408. RCW 43.21C.405 indicates that EFSEC shall prepare a nonproject environmental review—commonly referred to as Programmatic EIS—that assesses and discloses any probable significant adverse environmental impacts, and identifies related Mitigation Measures, for transmission facilities in Washington. This Programmatic EIS presents this requested nonproject environmental review.

1.3 Need for and Benefits of Transmission Facilities

1.3.1 Need for Transmission Facilities

To meet the goals of CETA, Washington needs more transmission facilities to integrate produced energy into the electricity grid. This need is explained in the Western Assessment of Resource Adequacy report (Western Assessment), released by the

Western Energy Coordination Council (WECC[18]), which examines resource adequacy and reliability in the Western Interconnection[19] over the next 10 years (WECC 2024). The Western Assessment notes that current resource plans forecast staggering demand growth over the next decade. Annual demand for the Western Interconnection is forecasted to grow approximately 20 percent, from 942 terawatt-hours (TWh) in 2025 to 1,134 TWh in 2034. That growth rate is more than double the 9.6 percent growth forecast in resource plans filed in 2022, and over four times the historical growth rate of 4.5 percent between 2013 and 2022 (WECC 2024).

RCW 19.280 requires electric utilities to develop resource plans to assess their specific future load and resource requirements. The Washington State Department of Commerce (Commerce) is tasked with analyzing the utility resource plans and creating a summary report for the Legislature. In 2013, the Legislature amended the resource planning statute to address concerns about the potential for overgeneration[20] events. Utilities are required to consider this potential in their planning, and Commerce is required to include an assessment of utility approaches to overgeneration.

An oversupply of energy can occur in instances where high river flows and wind volumes coincide, hours of solar generation misalign with peak electricity demand, or the capacity of the hydroelectric system to store extra river flow is limited. When these scenarios occur, there may be more electricity being produced than what is required to meet regional loads and export opportunities (Commerce 2024).

Electric power systems require constant, second-by-second balancing of power supply, power demand, and power transmission capability. Transmission system operations are organized into "control areas," where operators continuously balance electricity demands with electricity generation while keeping power flows within specific limits for system operating reliability. Overgeneration and failure to maintain control over the transmission facilities can result in an overload, leading to a failure of the electrical system and causing a power blackout (NWPCC 2025). To avoid these

[18] WECC promotes bulk power system reliability and security in the Western Interconnection. WECC is the regional entity responsible for compliance monitoring and enforcement and oversees reliability planning and assessments. In addition, WECC provides an environment for the development of reliability standards and the coordination of the operating and planning activities of its members (Commerce 2025).

[19] One of the five alternating current power grids or interconnections that make up the power grid in North America. The Western Interconnection is the geographic area containing the synchronously operated electric grid in the western part of North America, which includes parts of Montana, Nebraska, New Mexico, South Dakota, Texas, Wyoming and Mexico and all of Arizona, California, Colorado, Idaho, Nevada, Oregon, Utah, Washington and the Canadian provinces of British Columbia and Alberta (Commerce 2024).

[20] An event within an operating period of a balancing authority when the electricity supply, including generation from intermittent renewable resources, exceeds the demand for electricity for that utility's energy delivery obligations and when there is a negatively priced regional market (RCW 19.280).

situations, generation curtailment[21] may be required. Generation curtailment can be considered a lost opportunity in reaching the state's clean energy goal and there is a greater demand for new or improved transmission systems.

Developing transmission facilities would increase the capacity of the state's transmission system to achieve the following:

- Meet the electricity needs of the state's increasing population and growing economy.
- Enhance the reliability of the electric power system to ensure the continuous delivery of electricity to consumers in the state.
- Address existing congestion and constraints on transmission capacity throughout the state, particularly in the central Puget Sound area, to meet end-user demands.
- Increase access to more affordable sources of electricity within the state and across the western United States and Canada.
- Increase the state's capability to not only connect individual generating resources to the grid but also transfer electricity across the state and the West as a region.

1.3.2 Benefits of Transmission Facilities

In addition to addressing the growing need for more transmission facilities and supporting electricity demands, there are also a wide range of other benefits that would occur from the new construction, operation and maintenance, upgrade, and modification of transmission facilities in Washington. Under SEPA, the focus of environmental review is to identify, disclose, and mitigate adverse environmental impacts of proposed actions. SEPA is designed to ensure that decision-makers and the public are informed about potential negative environmental consequences of a project before decisions are made. The emphasis is on:

- Identifying significant adverse environmental impacts
- Considering alternatives to avoid or reduce those impacts
- Recommending mitigation measures

[21] An event when utilities intentionally reduce electricity output even when they are capable of producing more.

While not the primary focus of the analysis, beneficial impacts can still be mentioned and can provide more information on projects for decision-makers and the public. The following narrative summarizes these benefits.

1.3.2.1 Regulatory and Planning Efficiencies

The Programmatic EIS provides a consistent, transparent framework for evaluating transmission facility projects, reducing duplicative analysis and permitting delays. This accelerates project timelines while maintaining environmental protections.

The framework of this Programmatic EIS is designed to be aligned with state and federal regulatory requirements, including SEPA, National Environmental Policy Act (NEPA), and Federal Energy Regulatory Commission (FERC) Order 1920. This alignment supports coordinated planning and efficient project delivery. However, while this Programmatic EIS provides a broad framework for evaluating transmission-related actions, individual projects will still undergo project-specific environmental review. Additional project-specific environmental analyses would be necessary when project-specific details—such as location, design, or potential adverse environmental impacts—warrant further evaluation to ensure compliance with environmental standards and to address localized concerns.

1.3.2.2 Enabling Clean Energy and Grid Modernization

Transmission facilities are essential for delivering renewable energy from resource-rich areas (such as wind in Eastern Washington or Montana) to population centers in Western Washington. This supports the state's climate and clean energy mandates by enabling the integration of wind, solar, and hydroelectric resources, reducing reliance on fossil fuels, and lowering greenhouse gas emissions.

Upgrades and modifications to existing transmission facilities improve system reliability, reduce congestion, and enhance the ability to respond to extreme weather events or unexpected system conditions. Modern transmission facilities can incorporate advanced technologies (e.g., dynamic line ratings, power flow control devices) that increase capacity and operational flexibility.

1.3.2.3 Minimizing Environmental Impacts

The Programmatic EIS framework emphasizes early planning, avoidance of environmentally sensitive areas (such as critical habitats, wetlands, and culturally significant sites), and the use of Mitigation Measures to minimize adverse environmental impacts. This results in more environmentally responsible siting and

greater protection for wildlife, water resources, and other environmentally sensitive areas.

Upgrading or modifying existing transmission facilities, or siting new transmission facilities within established right-of-way[22] (ROW), minimizes new land disturbance, reduces habitat fragmentation, and limits adverse environmental impacts on sensitive resources. This approach is generally less impactful than constructing entirely new transmission facilities.

1.3.2.4 Long-Term Environmental and Climate Benefits

By enabling the delivery of clean energy and reducing the need for new fossil fuel generation, transmission facility development could contribute to improved air and water quality, public health, and ecosystem resilience. The cumulative benefits may include lower emissions of criteria pollutants, reduced water consumption and contamination, and preservation of natural habitats.

Modern transmission facilities are designed to be more resilient to wildfire, severe weather, and other climate-related risks. Upgrades often include fire mitigation plans, vegetation management, and design standards that enhance safety and reduce the likelihood of service disruptions.

1.3.2.5 Socioeconomic and Community Benefits

Consistent with WAC 197-11-330, beneficial impacts have not been analyzed in this Programmatic EIS. Beneficial impacts associated with socioeconomics can be more speculative or variable and are influenced by factors such as project design, timing, and local conditions. These impacts should be evaluated in project-specific applications when deemed necessary by the SEPA Lead Agency. It is recognized that transmission facility development has the potential to generate beneficial impacts on the socioeconomic environment, particularly in rural or under-resourced communities, including:

- Enhanced labor income through job creation and increased earnings of workers and sole proprietors.

[22] The corridor of land under a transmission line(s) needed to operate the line(s). The width of the corridor is established by engineering or construction standards as documented in either construction documents, pre-2007 vegetation maintenance records, or by the blowout standard in effect when the line was built. The ROW width in no case exceeds the applicable Transmission Owner's or applicable Generator Owner's legal rights but may be less based on the aforementioned criteria (NERC 2025). A utility could either own the right-of-way in fee or have an easement on the property where the right-of-way is located (Xcel Energy n.d.).

- Temporary stimulation of local businesses due to increased demand for materials and services, boosting economic activity.
- Increased local tax revenues, including sales taxes on construction materials and property taxes paid by landowners.
- Improved reliability and resilience of the power grid, particularly during weather events, such as heat waves, for residents, businesses, healthcare facilities, educational institutions, and government services.
- Strengthened reliability of essential services, including emergency response, healthcare, and public utilities, through upgraded transmission infrastructure.
- Opportunities for co-location of recreational trails or broadband infrastructure within transmission corridors,[23] providing additional community benefits.

The Programmatic EIS includes Mitigation Strategies to avoid disproportionate adverse environmental impacts on overburdened and vulnerable communities. These Mitigation Strategies recommend that early and ongoing engagement with Tribes, local governments, and stakeholders is conducted so community voices are heard and project benefits are equitably distributed.

Tribes are separate sovereign governments that should be engaged individually and independently of stakeholders or the general public for the purposes of communication and consultation. Future transmission facility projects affecting Tribal Lands may make use of this Programmatic EIS as technical guidance to support their environmental review, but this Programmatic EIS was not developed with the assumption of applying to projects within Tribal Lands.

1.3.2.6 Opportunities for Recreation Resources

The ROWs for transmission facilities can create or improve access for recreationists such as hikers, hunters, birdwatchers, and equestrians by providing cleared, maintained corridors through otherwise dense vegetation or remote areas. These corridors can be used for multi-use trails, including walking, biking, horseback riding, and, in some cases, off-highway vehicle (OHV) use, depending on the landowner and agency policies. The open nature of the ROWs can enhance opportunities for wildlife viewing and birdwatching, as the edge habitat attracts a diversity of species. ROWs may improve access to GMUs and hunting areas, especially in forested or rugged

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

terrain where access is otherwise limited. While ROWs can provide benefits to recreationalists, ROWs must be managed to balance recreation with safety, maintenance, and resource protection. Not all ROWs are open to public use, and opportunities depend on land ownership, existing agreements, and project-specific management plans.

1.4 Overview of Alternatives

This Programmatic EIS evaluates two alternatives: the Action Alternative and the No Action Alternative. The following discussion summarizes the two alternatives, while Chapter 2, Overview of Transmission Facilities, Development Considerations, and Regulations, describes them in greater detail.

1.4.1 Action Alternative

This Programmatic EIS assesses the adverse environmental impacts associated with the development of different types of transmission facilities. The Action Alternative evaluates the development of both overhead and underground transmission facilities. Four specific stages of the development of transmission facilities are evaluated herein: new construction, operation and maintenance, upgrade, and modification.

1.4.1.1 New Construction

In general, the new construction of transmission facilities would include the following:

- **Site Characterization:** Site characterization involves conducting desktop analyses and feasibility and site studies. Feasibility studies could include field surveys for data collection.
- **Site Preparation and Mobilization of Construction Crews:** Site preparation includes completing all planning, surveying, and permitting required to begin new construction activities, which could take multiple years. Once the process is complete, vegetation clearing, grading, and new construction of access roads can begin.
- **Site Construction:** Site construction includes the assembly, testing, and start-up of a transmission facility and involves many overlapping activities. New construction duration would vary based on the length of the transmission facility, the type of transmission facility, and the environmental setting of the proposed project. It is generally assumed that underground transmission

facilities would take longer to construct, per mile, than overhead transmission facilities.

- **Post-Construction Restoration:** Once a transmission facility has been constructed, site restoration or reclamation activities would commence. These activities could include backfilling trenches, holes, and tunnels; restoring natural conditions to areas used for temporary access roads and laydown yards; and revegetating the ROW with an appropriate seed mix to stabilize the soil and prevent erosion.

1.4.1.2 Operation and Maintenance

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

- **Post-Construction Monitoring and Reporting:** Once all construction and post-construction reclamation activities are completed, any ongoing or long-term environmental measures that require monitoring and reporting would continue as necessary.
- **Routine Inspection:** Although it is not anticipated that transmission facilities would have staff on site daily, inspection and maintenance crews would be regularly deployed to ensure that the facility continues to meet safety and reliability requirements. Inspections can be conducted in a variety of ways, including the use of drones, helicopters, or conventional vehicles.
- **Maintenance and Repairs:** Maintenance of transmission facilities could include repairing old, degraded, obsolete, or inoperable components, conductors, or structures. Maintenance could also include replacing a component, conductor, or structure with a direct, "like-for-like"[24] component to support ongoing facility operation. It is anticipated that required maintenance and repairs would be addressed as soon as warranted, or within a 12-month period.

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

- **Right-of-Way Maintenance:** ROWs would require ongoing maintenance to ensure adequate access to structures. Access roads may require regrading or repairs to water bars or culverts due to flooding or inadequate drainage.
- **Vegetation Management:** Vegetation within transmission facility ROWs and adjacent areas must be inspected and maintained regularly to meet the minimum clearance requirements set forth by the North American Electric Reliability Corporation (NERC) (FAC-003-4). Vegetation management can include manual, mechanical, and/or chemical techniques.

1.4.1.3 Upgrade of Existing Transmission Facilities

Upgrading existing transmission facilities is considered to improve the facility's efficiency, reliability, and capacity without expanding the existing facility footprint[25] or causing new ground disturbance.[26] This Programmatic EIS assumes that all temporary and permanent disturbance areas affected by the upgrade have been previously analyzed for adverse environmental impacts. Generally, activities associated with the upgrade of an existing transmission facility can include the following:

- **Reconductoring:**[27] It is anticipated that, as electric power demand increases, more or larger cables and conductors would be needed to increase the capacity and the interconnectivity of the grid to meet this fluctuation in demand.
- **Advanced Transmission Technologies:** Incorporating advanced technology into existing transmission facilities can help to improve the efficiency and effectiveness of electricity delivery and increase the overall reliability of the system. The technology can be applied to both grid software and grid hardware.

[25] The physical area occupied by a transmission facility or associated infrastructure, including its height and width. This includes the permanent space required for structures such as towers, substations, access roads, and ancillary facilities. The footprint encompasses both the area within the ROW and any additional land area required for permanent infrastructure. It does not include temporary workspaces unless they result in permanent land conversion or long-term environmental impact.

[26] Any previously unanalyzed temporary or permanent alteration of land, vegetation, water, or other natural features resulting from new construction, operation and maintenance, or modification activities associated with new or existing transmission facilities. Disturbance may include soil compaction, vegetation removal, grading, excavation, or hydrologic changes. It is categorized as:
- **Temporary disturbance:** Impacts that are fully restored to pre-project conditions following completion of the activity (e.g., temporary laydown yards or access routes).
- **Permanent disturbance**: Impacts that result in long-term or irreversible changes to land use or ecological function (e.g., installation of new towers or permanent access roads).

[27] The replacement of cable or wire on an electric circuit, typically a high-voltage transmission line, to afford a greater electric-current-carrying capability (DOE 2015).

1.4.1.4 Modification of Existing Transmission Facilities

Modifying existing transmission facilities is considered to improve efficiency, reliability, and increase the existing system's capacity. Modifying an existing transmission facility can include replacing transmission towers, transformers, substations, switchyards, underground cabling, and ancillary equipment.[28] Modifying existing transmission facilities would not result in new or expanded ROWs unless required for safety, regulatory compliance, or necessary access.

- **Right-Size Replacement:** Right-size replacement[29] intends to provide opportunities to modify in-kind replacement of existing transmission facilities to increase their capabilities. Right-size replacements can extend a system's useful life and reduce the need for new transmission facilities.
- **Modifying:** Modifying existing transmission facilities can include constructing additional transmission towers, transformers, substations, switchyards, underground cabling, and ancillary equipment.

1.4.2 No Action Alternative

Under the No Action Alternative, it is assumed that the SEPA Lead Agency would continue to review individual project applications for transmission facility development under existing state and local laws. The No Action Alternative would not use this Programmatic EIS as a reference for SEPA compliance and would require individual environmental analysis.

1.5 Scope of Analysis

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

[28] Secondary systems and devices that support the main transmission infrastructure.
[29] Under FERC Order No. 1920, right-size replacement refers to modifying or upgrading an existing transmission facility to increase its capacity, thereby extending a system's useful life and reducing the need for new transmission facilities.

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

(i) Historic and cultural resources;

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

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

(iv) Environmental justice[30] and overburdened communities as defined in RCW 70A.02.010;

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

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

(vii) Military installations and operations.

The potential use of condemnation or eminent domain is not analyzed in this Programmatic EIS. Project-specific applications that may require ROW or easement acquisitions and are unable to negotiate an agreement with the property owner are required to comply with the legal and procedural processes outlined in Title 8 RCW.

RCW 43.21C.405 does not identify the need to evaluate transmission facility development based on buildout assumptions or specific corridors. It also does not limit the number of subsequent transmission facility projects that consider or use this Programmatic EIS. This Programmatic EIS evaluates adverse environmental impacts associated with transmission facility development at a broad level throughout Washington, rather than focusing on specific sites, corridors, or buildout scenarios.

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

1.5.1 Geographic Scope

EFSEC has determined that the Planning Area[31] of this Programmatic EIS includes the entirety of Washington. The Study Area, or geographic scope,[32] includes all lands in Washington except lands covered by the exclusion criteria identified in **Table 1.5-1**.

Table 1.5-1: Exclusion Criteria

Exclusion No.	Exclusion Type	Description
1	**Tribal Lands**	For the purposes of this Programmatic EIS, Tribal lands are not included in the Study Area. Tribal lands are sovereign territories, and decisions regarding their use typically fall under the jurisdiction of the respective Tribal government. Tribal lands often have their own regulatory processes and environmental review requirements, which may differ from state or federal processes. Federal agencies are required to engage in government-to-government consultation[33] with Tribes. This process ensures that Tribal concerns and perspectives are adequately addressed.
2	**Undersea or Oceanic**	Programmatic EIS documents address broad, overarching policies, plans, or programs rather than specific projects. Undersea cables, including in-water trenching or burial within freshwater bodies (e.g., lakes and rivers), for transmission facilities are considered to be too specific or detailed for the broad focus of this Programmatic EIS. Additionally, undersea cables, especially those that cross international water or state boundaries, may fall under different regulatory frameworks or jurisdictions, requiring separate, more specific environmental review. Lastly, the adverse environmental impacts and technical considerations of siting undersea cables for transmission facilities can be significantly different from those of land-based transmission facilities. These differences might necessitate a distinct, focused environmental review to adequately address the unique challenges and adverse environmental impacts. Islands with physical bridges to the mainland are included in the Study Area for the potential siting of transmission facilities along the bridges; undersea connections to these islands are beyond the scope of this Programmatic EIS.

EIS = Environmental Impact Statement

Consistent with the exclusion criteria identified in **Table 1.5-1**, underwater construction activities (e.g., subaqueous buried cable crossings, pile-supported structures, or other direct in-water work) are not included in the technical analysis of

[31] For this Programmatic EIS, the entire State of Washington.
[32] For this Programmatic EIS, the entire State of Washington excluding the areas identified in Chapter 1.
[33] The formal process of dialogue and negotiation between sovereign governments.

this Programmatic EIS. These components fall outside the technical boundaries of this Programmatic EIS and are therefore not evaluated for adverse environmental impacts in this document. Instead, such activities are expected to undergo a separate environmental review, including a thorough assessment of localized environmental conditions and regulatory requirements.

The Study Area includes approximately 62,042 square miles and is identified in **Figure 1.5-1**. This Programmatic EIS assesses and discloses the adverse environmental impacts associated with siting transmission facilities within the Study Area and identifies related Mitigation Strategies to minimize potential adverse environmental impacts of such facilities.

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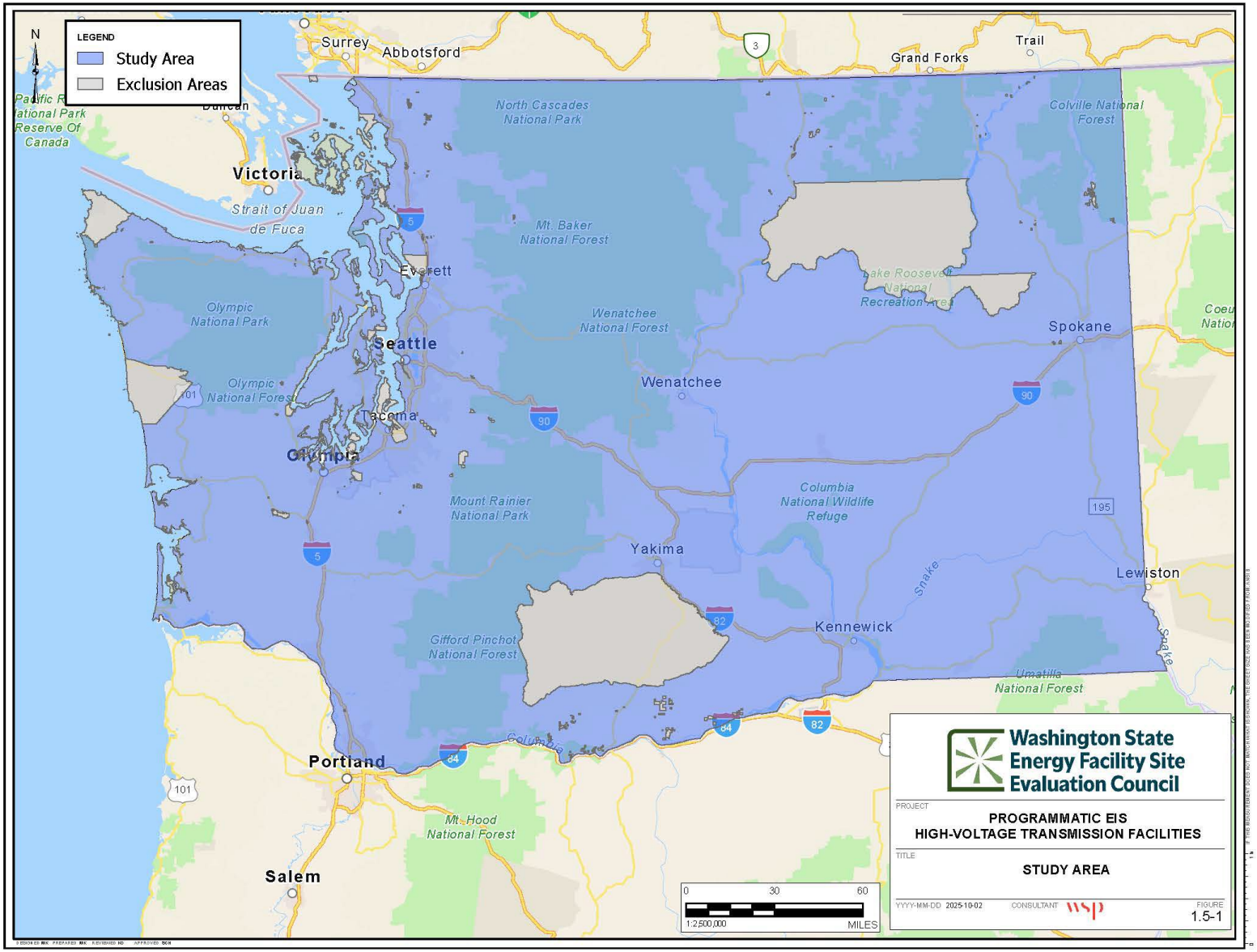
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LEGEND
Study Area
Exclusion Areas
Surrey
Abbotsford
Trail
Grand Forks
Victoria
Strait of Juan de Fuca
North Cascades National Park
Colville National Forest
Mt. Baker National Forest
Everett
Olympic National Park
Wenatchee National Forest
Spokane
Seattle
Wenatchee
Olympic National Forest
Tacoma
Olympia
Columbia National Wildlife Refuge
Mount Rainier National Park
Yakima
Lewiston
Snake
Kennewick
Gifford Pinchot National Forest
Umatilla National Forest
Portland
Columbia
Mt. Hood National Forest
Salem
0 30 60
1:2,500,000
MILES
Washington State Energy Facility Site Evaluation Council
PROJECT
PROGRAMMATIC EIS
HIGH-VOLTAGE TRANSMISSION FACILITIES
TITLE
STUDY AREA
YYYY-MM-DD 2025-10-02
CONSULTANT
FIGURE
1.5-1

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1.5.2 Temporal Scope

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

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

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

1.6 Governance Framework

This Programmatic EIS is prepared in accordance with SEPA, codified at RCW 43.21C. As stated in RCW 43.21C.010 and RCW 43.21C.020, SEPA's purposes include:

1. Encouraging productive and enjoyable harmony between human beings and their environment;
2. Promoting efforts to prevent or eliminate environmental damage and enhance human health and welfare;
3. Enriching understanding of ecological systems and natural resources; and
4. Ensuring that environmental amenities and values are appropriately considered in decision-making alongside economic and technical factors.

SEPA applies to actions undertaken by state and local agencies within Washington. While SEPA does not apply to federal or Tribal actions directly, it may apply when such actions require state or local permits. In those cases, SEPA review is integrated into the permitting process to ensure comprehensive environmental consideration.

1.6.1 State Environmental Policy Act Review Process

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

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

Programmatic EIS is the first step of a phased review[34] for transmission facility development and broadly evaluates adverse environmental impacts; it is not a SEPA review for a specific project. It may be adopted[35] or otherwise used, as applicable, by the SEPA Lead Agency to meet SEPA requirements for a specific project.

As previously described, this Programmatic EIS provides a broad evaluation of adverse environmental impacts and identifies relevant Mitigation Strategies that can be generally applied to transmission facility development. This Programmatic EIS does not evaluate any specific transmission facility project; therefore, the impacts associated with a specific project cannot fully be anticipated or addressed in this document. Adverse environmental impacts associated with project-specific applications could vary considerably based on location, size, scale, and timing. Although this Programmatic EIS identifies potential adverse environmental impacts, project-specific applications would be required to undergo their own SEPA environmental review to ensure that project-specific impacts are adequately evaluated and addressed. The framework that this Programmatic EIS establishes for project-specific applications does not replace or diminish the need for project-specific consultation and environmental analyses where Tribal rights and resources may be affected. Furthermore, project-specific applications should include early Tribal consultation, consistent with state law and executive policy.

One of the first steps for initiating the SEPA environmental review process is identifying the SEPA Lead Agency, as outlined in WAC 197-11-922 through 948 (Ecology 2018). The SEPA Lead Agency would review new proposals and make sure that procedural reviews comply with SEPA, all environmental information is adequately gathered and assessed, threshold determinations[36] for adverse environmental impacts are made, and, if needed, EISs are prepared (Ecology n.d.).

1.6.1.1 Energy Facility Site Evaluation Council

EFSEC is, or can be,[37] the state authority for siting certain high-voltage electrical transmission facilities. EFSEC provides a single siting process, coordinates all evaluation and licensing steps, and specifies the conditions of new construction and operation. RCW 80.50.060 and 80.50.045 outline the types of transmission facilities for

[34] A SEPA term defined in WAC 197-11-776 as "the coverage of general matters in broader environmental documents, with subsequent narrower documents concentrating solely on the issues specific to the later analysis."
[35] A SEPA term defined in WAC 197-11-708 as "an agency's use of all or part of an existing environmental document to meet all or part of the agency's responsibilities under SEPA to prepare an EIS or other environmental document."
[36] A SEPA term defined in WAC 197-11-797 as "the decision by the responsible official of the lead agency whether or not an EIS is required for a proposal that is not categorically exempt."
[37] The local government or another state agency may also serve as the SEPA Lead Agency.

which applicants either are required to apply, can elect to apply, or are prohibited from applying for site certification through the EFSEC process. These different types of transmission facilities are discussed below.

- **Required:** Facilities that must have applications for site certification through EFSEC include transmission facilities that are:
    - At least 500 kV alternating current[38] or at least 300 kV direct current;[39] located in more than one county; and located in the Washington service area of more than one retail electric utility;
    - Located in a national interest electric transmission corridor;[40] or
    - Interstate lines.[41]
- **Optional:** Applicants may choose to apply for site certification through EFSEC for transmission facilities that are:
    - At least 115 kV; and
    - Located in more than one jurisdiction that has promulgated land use plans[42] or zoning ordinances
- **Prohibited:** Applicants are prohibited from applying for site certification through EFSEC for facilities that are:
    - Less than 115 kV;
    - Located in a single jurisdiction that has promulgated land use plans or zoning ordinances; or
    - Proposing normal maintenance and repairs that do not increase the capacity or dimensions.

Based on the criteria outlined above, transmission facility project applications within the scope of this Programmatic EIS are subject to project-specific environmental reviews conducted either by EFSEC through its certification process or by local

[38] An electric current that periodically reverses direction and changes its magnitude continuously with time.
[39] An electric current that flows in one direction.
[40] A geographic area designated by the U.S. Department of Energy where there is a significant need for new or upgraded transmission capacity to address electricity transmission limitations that adversely affect consumers. These corridors are identified based on findings from the National Transmission Needs Study and other relevant data.
[41] EFSEC is designated as the state authority for purposes of siting transmission facilities under Title 16 USC Sec. 824p, including interstate transmission facilities.
[42] A document that guides the land use decisions of a local government.

governments through their SEPA Lead Agency responsibilities. While the responsible entity may differ, the project-specific environmental review process follows the procedures and requirements established under SEPA.

1.6.1.2 Local Government SEPA Review Process

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

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

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

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

A SEPA Lead Agency conducting a project-specific environmental review for transmission facilities must begin by considering this Programmatic EIS. The review must consider and further evaluate any probable significant adverse environmental impacts associated with the project-specific application that were not analyzed in this Programmatic EIS. If the review identifies additional adverse environmental impacts, it is expected that the SEPA Lead Agency would require additional environmental analyses and may identify project-specific mitigation to address those impacts.

1.6.1.3 SEPA Phased Review Process

Environmental review for project-specific applications may be conducted in phases under both the EFSEC certification process and local government SEPA procedures. As defined in WAC 197-11-060(5), "phased review" allows broader environmental documents to be followed by narrower, project-specific environmental reviews. This approach enhances efficiency by referencing prior general discussions and focusing subsequent reviews on localized impacts.

Applicants would consider this Programmatic EIS if a transmission facility is proposed within the prescribed Study Area. Applicants are required to provide detailed information as part of their project-specific application, initiating a phased review in association with this Programmatic EIS. Project-specific applications using this Programmatic EIS would focus on specific impacts and Mitigation Measures for the phased actions. The application would identify the Mitigation Strategies and design considerations[43] that were incorporated into the project-specific application to ensure that adverse environmental impacts result in a less-than-significant impact. Additional environmental analyses would be expected for any adverse environmental impacts that were not analyzed in this Programmatic EIS or if Mitigation Strategies provided in this Programmatic EIS are not implemented. Additional project-specific mitigation may be necessary to address adverse environmental impacts, as appropriate.

Project-specific analyses and mitigation may be identified by the SEPA Lead Agency, consistent with SEPA rules. SEPA's core purpose is to identify and mitigate adverse environmental impacts, including those not addressed in existing regulations. Under RCW 43.21C.030, state and local agencies must consider environmental amenities and values, along with economic and technical matters. Adverse environmental impacts

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

may occur even when a project-specific application complies with all applicable federal, state, and local laws and regulations. Therefore, the SEPA Lead Agency's review is not limited to verifying regulatory compliance. For example, if a project's adverse environmental impacts on soil and water quality are not fully addressed by existing regulations, the SEPA Lead Agency may identify additional mitigation measures to address those impacts. Such mitigation can be imposed by any state or local agency through the use of their SEPA "substantive authority" and must be reasonable, capable of being accomplished, and directly attributable to those identified adverse environmental impacts (WAC 197-11-660).

As directed by RCW 43.21C.408, a SEPA Lead Agency reviewing project-specific applications for transmission facilities would use this Programmatic EIS through one of four methods. **Figure 1.6-1** provides a decision tree that outlines the phased review process and highlights the opportunities for efficiency it affords for applicants. The discussions below provide more information on each method for using this Programmatic EIS:

- **Adopt the Programmatic EIS in its entirety** without the need for an addendum or supplemental analysis. This indicates that there are no additional project-specific details or analyses of adverse environmental impacts that should be recorded in the SEPA documentation.

  The general SEPA procedures for adopting this Programmatic EIS in its entirety are provided below. The SEPA Lead Agency should refer to the referenced RCW, WAC, or SEPA Handbook for the latest information.

  - **Complete an Independent SEPA Review:** The SEPA Lead Agency must independently review the content of this Programmatic EIS and determine that the information and analysis to be used are relevant and adequate.
  - **Issue a New Threshold Determination:** The SEPA Lead Agency is required to issue a new threshold determination when adopting this Programmatic EIS in its entirety. Under this scenario, the SEPA Lead Agency would prepare an "Adoption/Determination of Significance (DS)" threshold determination.
  - **Prepare an Adoption Notice:** Although a new comment period is not required, the SEPA Lead Agency must distribute the adoption notice. The adoption notice should identify the document that's being adopted and state the reasons it is being adopted.

- **Distribute the Adoption Notice for Public Review:** The SEPA Lead Agency shall circulate the adoption notice, as outlined in WAC 197-11-630 and the SEPA Handbook.
- **Implement the Proposal:** The proposal may be implemented seven days after the statement of adoption has been issued. Refer to WAC 197-11-630 for more guidance.

- **Adopt the Programmatic EIS and Prepare an Addendum**,[44] in addition to adopting this Programmatic EIS, which adds analyses or information about the project but does not substantially change the analysis of significant adverse environmental impacts and alternatives addressed in this Programmatic EIS.

  The following information is general SEPA guidance and is intended to provide the SEPA Lead Agency with easily accessible information. The SEPA Lead Agency should refer to the referenced RCW, WAC, or SEPA Handbook for the latest information.

  - **Conduct an Independent SEPA Review:** The SEPA Lead Agency must independently review the content of this Programmatic EIS and determine that the information and analysis to be used are relevant, adequate, and that any additional analyses are adequately mitigated for and all adverse environmental impacts have been adequately addressed in this Programmatic EIS. Refer to RCW 42.21C.034 for more information.
  - **Issue a New Threshold Determination:** The SEPA Lead Agency must issue a new threshold determination. The SEPA Lead Agency should issue an "Adoption/DS and Addendum."
  - **Prepare an Adoption Notice:** Per WAC 197-11-630, the SEPA Lead Agency shall prepare a statement of adoption using the adoption form substantially as in WAC 197-11-965.
  - **Distribute the Adoption Notice for Public Review:** The SEPA Lead Agency shall distribute the adoption notice and addenda for public review, as outlined in WAC 197-11-630 and the SEPA Handbook.

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

- **Implement the Proposal:** The proposal may be implemented seven days after the statement of adoption has been issued. Refer to WAC 197-11-630 for more information.

- **Adopt the Programmatic EIS and Prepare a Supplemental EIS**,[45] in addition to adopting this Programmatic EIS, which adds new analyses or information related to probable significant adverse environmental impacts of the project that have not been addressed in this Programmatic EIS.

  The following information is general SEPA guidance and is intended to provide the SEPA Lead Agency with easily accessible information. The SEPA Lead Agency should refer to the referenced RCW, WAC, or SEPA Handbook for the latest information.

  - **Conduct an Independent SEPA Review:** The SEPA Lead Agency must conduct an independent review of this Programmatic EIS and determine the relevant information and analysis.

    The SEPA Lead Agency should prepare a Supplemental EIS to focus on the significant adverse environmental impacts and alternatives, including mitigation measures specific to the proposal and not analyzed in this Programmatic EIS. The scope shall be limited accordingly (WAC 197-11-443[2]).

    The SEPA Lead agency would review this Programmatic EIS to ensure that the analysis is valid when applied to the current proposal, knowledge, and technology. If it is not valid, the analysis shall be reanalyzed in the Supplemental EIS (WAC 197-11-443[3]).

  - **Issue a New Threshold Determination:** An "Adoption/DS and Supplemental EIS" threshold determination would be issued once the SEPA Lead Agency has sufficient information and determines to prepare a Supplemental EIS.

  - **Prepare an Adoption Notice:** Per WAC 197-11-630, when an existing EIS is adopted and a supplemental EIS is being prepared, the SEPA Lead Agency would prepare a statement of adoption using the adoption form substantially as in WAC 197-11-965.

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

- **Distribute the Adoption Notice for Public Review:** The SEPA Lead Agency shall distribute the adoption notice and addenda for public review, as outlined in WAC 197-11-630 and the SEPA Handbook.
- **Implement the Proposal:** The proposal may be implemented seven days after the statement of adoption has been issued. Refer to WAC 197-11-630 for more information.

- **Incorporate by Reference,**[46] if the intent is for the SEPA Lead Agency to produce a full, distinct project-specific SEPA review resulting in a DNS, MDNS, or EIS.

  The general SEPA procedures for incorporating this Programmatic EIS by reference are provided below. The SEPA Lead Agency should refer to the referenced RCW, WAC, or SEPA Handbook for the latest information.

  - **Conduct an Independent SEPA Review:** The SEPA Lead Agency must conduct an independent review of this Programmatic EIS and determine the relevant information and analysis.

    The SEPA Lead Agency would identify and describe the document that's being incorporated in the proposal's environmental checklist, threshold determination, or EIS. No comment period is required specific to this incorporation.
  - **Issue a New Threshold Determination:** The SEPA Lead Agency is required to issue a new threshold determination when incorporating this Programmatic EIS by reference. Under this scenario, the SEPA Lead Agency may prepare a Determination of Nonsignificance, Mitigated Determination of Nonsignificance, or Determination of Significance with Scoping Notice threshold determination. Dependent on the threshold determination, a public comment period may be required.
  - **Distribute the Threshold Determination:** The SEPA Lead Agency shall circulate the threshold determination, as outlined in WAC 197-11-340, 197-11-350, 197-11-360, and the SEPA Handbook.
  - **Complete the SEPA Review:** Depending on the Threshold Determination, drafts, revisions, and final versions of the relevant SEPA review

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

documents should be prepared, noticed, and distributed as outlined in WAC 197-11.

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

As required by RCW 43.21C.030, the SEPA Lead Agency must include a detailed analysis of alternatives to the proposed action in every recommendation or report on legislation or other major actions that may significantly affect the environment. For proposals with probable significant adverse environmental impacts that require an EIS, the SEPA Lead Agency must evaluate a reasonable range of alternatives, consistent with WAC 197-11-440. However, for transmission facility projects that are proposed within an existing transmission ROW or along a designated transportation corridor, the alternatives analysis may be limited to the proposed action and a no-action alternative, as specified in RCW 43.21C.405.

When project-specific applications require an alternatives analysis, it is recommended that the assessment include an explanation on how the proposed route or action was selected and whether other corridors were evaluated. Information on other corridors or alternatives should be provided, including the location and reasons why they were not utilized. It is recommended that a map showing the selected proposed route or action and those alternatives that were rejected be included in the analysis.

More information on how to implement this Programmatic EIS and other resources for project-specific applications can be found in the Programmatic EIS Manual, Determining Applicability of the Transmission Programmatic EIS Form, and Programmatic EIS Conformance Checklist available on EFSEC's website.

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STEP 1 [1]

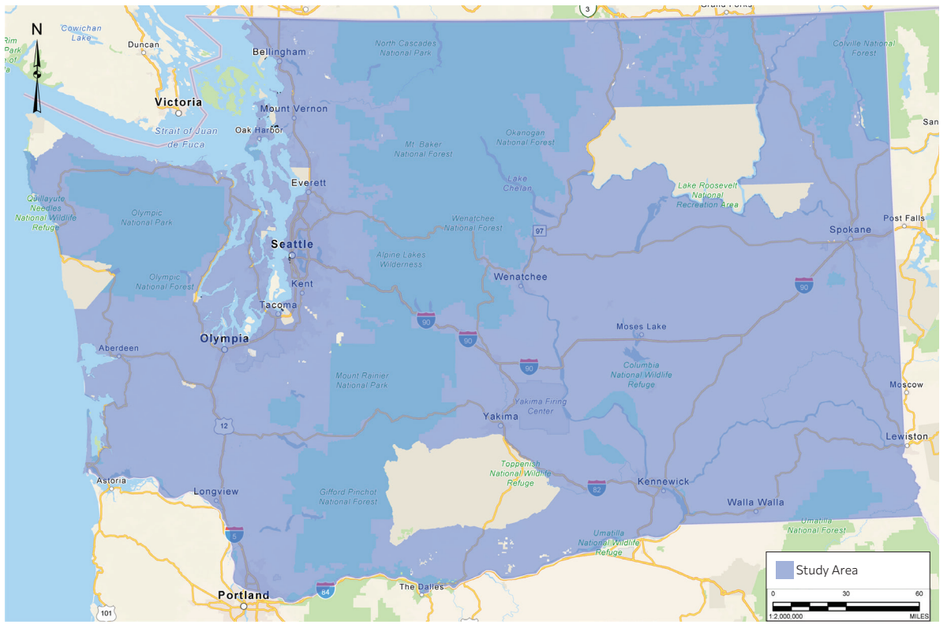
Determine if the project-specific application fits the definition of a **transmission facility**[2] analyzed within the prescribed Study Area[3] of this Programmatic EIS.

NO

Follow applicable SEPA environmental review and permitting processes.

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

Regarding this Programmatic EIS, the SEPA Lead Agency could **Incorporate by Reference**.



REFERENCES

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

1 Early consultation with Lead Agencies and affected Tribes to determine the appropriate scope of additional analysis is encouraged.

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

3 This Programmatic EIS analyzes the siting of transmission facilities across all geographic areas of Washington that are suitable for such linear facilities, excluding: Tribal lands, Undersea cables, and in-water trenching or burial within freshwater bodies (e.g., lakes and rivers).

4 Nonconformance with any of the items identified in Step 2 does not preclude the use of the Programmatic EIS. The project-specific environmental review could adopt the Programmatic EIS for adverse environmental impacts that conform, while addressing nonconforming impacts through additional project-specific environmental analyses, which may require additional project-specific mitigation.

5 As applicable to project-specific applications.

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

7 Criteria that, when implemented, would narrow the scope of the project-specific environmental review. These Avoidance Criteria are anticipated to avoid adverse environmental impacts that may be significant for project-specific applications.

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

9 A specific step or action taken to address adverse environmental impacts of project development or action.

STEP 2 [4]

YES

Step 2.1

Does the project comply with all state, federal, and local regulations[5]?

NO | This Programmatic EIS did not analyze this scenario.

THE FOLLOWING IS REQUIRED:

- **APP** Identify the regulations that have not been complied with and provide an explanation.
- **SLA** Complete additional environmental analyses and identify applicable project-specific mitigation.[9]

Proceed to Step 2.2.

YES

Step 2.2

Are design considerations and BMPs[5] accounted for in the design of the project-specific application?

NO | This Programmatic EIS did not analyze this scenario.

THE FOLLOWING IS REQUIRED:

- **APP** Identify the design considerations and BMPs[5] that are not proposed as part of the project-specific application and provide an explanation.
- **SLA** Complete additional environmental analyses and identify applicable project-specific mitigation.[9]

Proceed to Step 2.3.

YES

Step 2.3

Would the project comply with the identified **General Measures**[6] within this Programmatic EIS?

NO | This Programmatic EIS did not analyze this scenario.

THE FOLLOWING IS REQUIRED:

- **APP** Identify the General Measures that have not been complied with and provide an explanation.
- **SLA** Complete additional environmental analyses and identify applicable project-specific mitigation.[9]

Proceed to Step 2.4.

YES

Step 2.4

Does the project comply with the identified **Avoidance Criteria**[7] within this Programmatic EIS?

NO | This Programmatic EIS did not analyze this scenario.

THE FOLLOWING IS REQUIRED:

- **APP** Identify Avoidance Criteria that have not been complied with and provide an explanation.
- **SLA** Complete additional environmental analyses and identify applicable project-specific mitigation.[9]

Proceed to Step 2.5.

YES

Step 2.5

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

NO | This Programmatic EIS did not analyze this scenario.

THE FOLLOWING IS REQUIRED:

- **SLA** Identify and complete additional environmental analysis for probable adverse environmental impacts not analyzed in this Programmatic EIS and identify applicable project-specific mitigation.[9]

Proceed to Step 2.6.

YES

Step 2.6[7]

Has the applicant committed to the **Mitigation**[9] **Measures**[5] identified within this Programmatic EIS associated with medium or high impact determinations?

NO | This Programmatic EIS did not analyze this scenario.

THE FOLLOWING IS REQUIRED:

- **APP** Identify the Mitigation[9] Measures[5] that have not been incorporated in the project-specific application and provide an explanation.
- **SLA** Complete additional environmental analyses and identify applicable project-specific mitigation.[9]

Proceed to Step 3.

YES | **Proceed to Step 3.**

STEP 3 [8]

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

Step 3.1

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

OR

Step 3.2

Prepare an Addendum, in addition to adopting the Programmatic EIS, that adds analyses or information about the project but does not substantially change the analysis of significant adverse environmental impacts and alternatives addressed in this Programmatic EIS.

OR

Step 3.3

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

OR

Step 3.4

Incorporate by Reference if the intent is for the SEPA Lead Agency to produce a full, distinct project-specific environmental review, resulting in a DNS, MDNS, or EIS.

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1.6.1.4 EFSEC Certification Process

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

1. Application submittal
2. Application review
3. Initial public meeting
4. Land use consistency hearing
5. DNS, Mitigated DNS, or EIS
6. Adjudicative proceedings and permits review
7. Recommendation to the Governor

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

1.6.2 National Environmental Policy Act Review Process

Some project-specific applications may have a federal nexus and may require compliance with both SEPA and NEPA. The determination of a federal nexus, which may trigger federal permitting, consultation, or review requirements, is based on whether a proposed transmission facility project involves the following:

- Federal lands or facilities
- Federal funding or financial assistance
- Federal permits or approvals (e.g., Section 404 of the Clean Water Act, Section 10 of the Rivers and Harbors Act)
- Potential effects on resources protected under federal laws (e.g., Endangered Species Act, National Historic Preservation Act)

The presence and scope of a federal nexus will ultimately be determined during project-specific planning and permitting in coordination with the appropriate federal agencies (e.g., U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, U.S. Forest Service).

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

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

For projects proposed or sited by a federal agency, the director[47] must coordinate state agency participation in the environmental review that is required under NEPA (RCW 80.50.045(5)). EFSEC, the SEPA Lead Agency (if different from EFSEC), and the federal lead agency would work collaboratively to review the proposed project against this Programmatic EIS.

1.6.3 Overarching Regulations, Policies, and Guidance

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

1.6.3.1 Regulations and Policies

- **National Environmental Policy Act:** This act requires environmental analysis of federal agency actions to consider a project's adverse environmental impacts on urban[48] quality, historic and cultural resources, and the design of the built environment.
- **Federal Clean Air Act:** This comprehensive federal law regulates air emissions from stationary[49] and mobile sources.[50] Among other things, this law authorizes the U.S. Environmental Protection Agency to establish National Ambient Air Quality Standards to protect public health and public welfare and to regulate emissions of hazardous air pollutants.
- **Federal Land Policy and Management Act (FLPMA):** FLPMA is a comprehensive statute that governs the management of public lands administered by the Bureau of Land Management (BLM) under the U.S. Department of the Interior.

[47] Per RCW 80.50.020, the director of the energy facility site evaluation council appointed by the chair of the council in accordance with RCW 80.50.360.
[48] The U.S. Census Bureau's urban areas represent densely developed territory, and encompass residential, commercial, and other non-residential urban land uses. An urban area must comprise a densely settled core of census blocks that meet minimum housing unit density and/or population density requirements. This includes adjacent territory containing non-residential urban land uses. To qualify as an urban area, the territory identified according to criteria must encompass at least 2,000 housing units or have a population of at least 5,000.
[49] A fixed site that emits air pollutants. Stationary sources include buildings, structures, facilities, or installations that release pollutants into the atmosphere.
[50] Vehicles, engines, and equipment that emit air pollutants and can move from one location to another.

FLPMA established that public lands should generally remain in federal ownership unless disposal serves the national interest. The act mandates that public lands be managed for multiple uses (e.g., recreation, grazing, timber, minerals) and sustained yield, ensuring that resources are available for future generations.

- **Federal Clean Water Act:** This act establishes regulations for discharging pollutants into Waters of the United States (WOTUS)[51] and regulates water quality standards for surface water. Under this act, it is unlawful to release pollutants into navigable waters unless a permit is obtained.
- **Federal Power Act:** The Federal Power Act, originally enacted in 1920 as the Federal Water Power Act, is a key piece of legislation governing the regulation of hydroelectric power and interstate electricity transmission in the United States. The act grants the FERC the authority to issue licenses for non-federal hydroelectric projects on navigable waters and federal lands, ensuring that these projects serve the public interest.
- **Coastal Zone Management Act (CZMA):** The CZMA was enacted to protect the coastal environment from growing demands associated with residential, recreational, commercial, and industrial uses. The CZMA encourages coastal states to develop and implement coastal zone management programs to manage and balance competing uses of the coastal zone.[52] The CZMA requires that federal actions that are reasonably likely to affect any land or water use or natural resource of the coastal zone be consistent with enforceable policies of a state's federally approved coastal management program.
- **14 Code of Federal Regulations (CFR) Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace:** The Federal Aviation Administration has broad authority to regulate safe and efficient use of navigable airspace. This regulation outlines the regulations and standards for ensuring the safe and efficient use of the airspace.

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

[52] The area where coastal waters and adjacent shorelands interact closely, including various ecosystems such as islands, wetlands, salt marshes, and beaches. It extends to the international boundary in the Great Lakes and to the outer limits of state ownership in other areas. The zone encompasses land necessary to manage shorelands that impact coastal waters and areas vulnerable to sea level rise and excludes lands under federal control.

- **36 CFR Part 254, Landownership Adjustments:** This regulation sets procedures for conducting exchanges of National Forest System lands and requires consideration of the public interest, including protection of fish and wildlife habitats, cultural resources, watersheds,[53] and wilderness and aesthetic values, as well as enhancement of recreation opportunities and public access.
- **Public Law 94-588, National Forest Management Act, 36 CFR Part 219, Subpart A, National Forest System Land and Resource Management Planning**: This act governs the administration of national forests and removal of trees. It includes requirements for the consideration, treatment, and protection of intangible resources such as scenery and aesthetics.

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

1.6.3.2 State Regulations and Policies

- **Clean Energy Transformation Act:** This law commits Washington to an electricity supply free of greenhouse gas emissions by 2045. It includes

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

provisions for enhancing transmission facilities to support the integration of renewable energy.

- **Washington State Environmental Policy Act:** This act is a process that identifies and analyzes adverse environmental impacts that can be related to issuing permits. SEPA helps permit applicants and decision-makers understand how a proposed project would impact the environment.
- **Washington Coastal Zone Management Program:** Ecology administers Washington's Coastal Zone Management Program, which applies to the state's coastal zone, an area comprising 15 coastal counties with marine shorelines. The coastal zone includes all lands and waters within these coastal counties, as well as submerged lands seaward out to 3 nautical miles (about 3.5 miles). Projects within the coastal zone are required to be consistent with the State of Washington's Coastal Zone Management Program Enforceable Policies.
- **Washington State Shoreline Management Act, Chapter 90.58 RCW:** Establishes a state-local partnership for managing, accessing, and protecting Washington's shorelines. The law requires local governments to prepare locally tailored policies and regulations for managing shoreline use in their jurisdictions, called Shoreline Master Programs (SMPs). Local governments review shoreline development proposals for compliance with SMP standards. Applies to shorelines of the state, including marine waters, streams and rivers with greater than 20 cubic feet per second mean annual flow, lakes 20 acres or larger, upland areas extending 200 feet landward from the edge of these waters, biological wetlands and river deltas connected to these waterbodies, and some or all of the 100-year floodplain, including wetlands.
- **State of Washington Executive Order 21-02, Archaeological and Cultural Resources:** This executive order requires agencies to consult with the Washington State Department of Archaeology and Historic Preservation (DAHP) and affected Tribes regarding the potential effects of projects on cultural resources proposed in state-funded construction or acquisition projects that will not undergo Section 106 review under the National Historic Preservation Act (NHPA). Agencies must also take all reasonable action to avoid, minimize, or mitigate adverse effects on cultural resources.

- **RCW Chapter 36.70A, Growth Management Act:**[54] This act requires cities and counties to plan for growth while conserving natural resources and protecting critical areas such as wetlands and forests. Under this act, counties are required to adopt comprehensive plans, including a comprehensive land use plan and development regulations. Relevant land management plans and land uses are summarized in Section 3.9, Land and Shoreline Use, and countywide comprehensive plan goals and policies are available in Appendix 3.9-1 of this Programmatic EIS.
- **RCW Chapter 43.21C, State Environmental Policy:** This chapter outlines the legislative framework for SEPA and the requirements for environmental protection and review in Washington.
- **RCW Chapter 76.09, Forest Practices:** This chapter establishes standards and regulations for managing the state's forests. Forestland is defined as all land that can produce merchantable timber,[55] excluding agricultural land and residential land.
- **RCW Chapter 77.55, Construction Projects in State Waters:** Under the Hydraulics Act, a Hydraulic Project Approval from the Washington Department of Fish and Wildlife (WDFW) would be required when stormwater discharges related to a project would change the natural flow or bed of state waters.
- **RCW Chapter 80.50, Energy Facilities – Site Locations:** This chapter establishes EFSEC's role in siting, construction, and operation of major energy facilities in Washington. It provides the legal framework for EFSEC to streamline the permitting process and ensure compliance with state environmental and safety standards.
- **RCW Chapter 90.48, Water Pollution Control:** This policy aims to maintain the highest standard for Waters of the State[56] to preserve public health and recreation and to protect wildlife and aquatic species. It prohibits the discharge of pollution to state waters. Pollution is defined as any physical, chemical, or biological property that could impact the water's ecological function.

[54] A Washington State law that requires state and local governments to manage growth by identifying and protecting critical areas and natural resource lands, designating urban growth areas, and preparing and implementing comprehensive land use plans.
[55] Trees that have a commercial value and can be harvested or sold.
[56] All salt and fresh waters that are waterward of the ordinary high-water line and within the territorial boundaries of the state. This includes lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the state's jurisdiction.

- **WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington:** This code establishes surface water quality standards for surface waters in Washington that are consistent with public health standards, recreational use, and the protection of fish and wildlife. Surface waters include lakes, rivers, streams, ponds, wetlands, inland waters, and saltwater.
- **WAC 480-100, Electric Companies:** This legislation establishes standards for the reliability and quality of electric service. This law requires that utilities meet certain performance criteria regarding the frequency and duration of outages.
- **State of Washington Priority Habitat[57] and Species List:** The WDFW maintains a catalog of habitats and species that are prioritized for conservation and management. Priority habitats are unique habitats or features that support biodiversity. Priority species[58] require protection due to population trends, sensitivity to disturbance and habitat alteration, or importance to communities.

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

1.6.3.3 Federal Guidance

- **Recommended Siting Practices for Electric Transmission Developers:** This document outlines best practices for siting electric transmission facilities (Americans for a Clean Energy Grid 2023). Recommended practices include:
    - Early, consistent, and transparent engagement
    - Treat communities and landowners respectfully
    - Compensate landowners fairly
    - Consult tribal governments, tribal communities, and environmental justice communities

[57] Habitat that is given priority for conservation and management by the Washington Department of Fish and Wildlife; may refer to a unique vegetation association (e.g., shrubsteppe) or a particular habitat feature (e.g., cliffs).
[58] In Washington, species of concern for which special conservation actions may be required. These include, but are not, limited to, species that are state listed as endangered, threatened, sensitive, or candidate, or considered vulnerable.

- **Institute of Electrical and Electronics Engineers (IEEE) Standards:** The IEEE Standards Association is an operating unit within IEEE that develops global standards in a broad range of industries, including standards relevant to electrical transmission.
- **American Society of Civil Engineers (ASCE) Standards:** ASCE provides guidelines for the structural loading and design of transmission facilities to ensure they can withstand environmental and operational stresses.
- **Federal Energy Regulatory Commission Guidelines:** FERC provides guidelines for the siting of interstate electric transmission facilities, including environmental and community impact assessments.
- **North American Electric Reliability Corporation:** NERC develops reliability standards for the electric grid to ensure reliability and security of the North American bulk power system. NERC works with federal organizations like FERC for the review, approval, and enforcement of standards. While FERC oversees NERC as the Electric Reliability Organization under Section 215 of the Federal Power Act, the Bulk Electric System definition—which generally includes transmission facilities operating at 100 kV or higher—is maintained and applied by NERC.
- **U.S. Department of Energy (DOE):** The DOE coordinates federal authorizations and environmental reviews for interstate transmission facility projects, aiming to streamline the permitting process while ensuring compliance with environmental and cultural protection laws.

1.6.3.4 State Guidance

- **Transmission Corridors Work Group:** Established under CETA, this group identified areas in Washington where transmission facilities may need to be enhanced or constructed. The group recommended ways to expedite project reviews without compromising environmental protection in the Final Report (EFSEC 2022b).
- **Ecology's Stormwater Management Manuals:** The stormwater manuals provide stormwater permit implementation and management guidance for eastern and western Washington (Ecology 2024). The manual for western Washington provides guidelines for managing stormwater in areas west of the Cascade Mountains crest to protect water quality and aquatic habitats. The manual for

eastern Washington provides guidelines for managing stormwater in areas east of the Cascade Mountains crest to protect water quality and aquatic habitats.

- **Riparian Ecosystems, Volume 2: Management Recommendations:** This publication provides updated riparian ecosystem management recommendations, including regulatory protections, delineation of riparian management zones, recommendations for restoring riparian ecosystems, and improving protection of riparian areas through adaptive management (WDFW 2020).
- **Best Management Practices Field Guide for Endangered Species Act ESA § 4 (d) Habitat Protection:** This publication provides guidance for Washington State Department of Transportation (WSDOT) maintenance crews and regional maintenance environmental coordinators who work within sensitive priority areas. This guide was developed to train and alert staff as to when and where to apply and report implementation of the Regional Road Maintenance Endangered Species Act Program Guidelines, Best Management Practices (WSDOT 2018, n.d.).
- **Regional Road Maintenance Endangered Species Act Program Guidelines, Best Management Practices:** This document includes checklists and guidance for minimizing adverse environmental impacts of soil movement during a project (WSDOT n.d.).
- **Wetland Mitigation in Washington State Part 1: Agency Policies and Guidance, and Part 2: Developing Mitigation Plans:** These publications provide an overview of the wetland regulatory process, approaches to compensatory mitigation, and technical guidance for developing compensatory mitigation (Ecology 2006a, 2006b).
- **WSDOT Manuals and Handbooks:** WSDOT manuals and guidelines provide comprehensive frameworks and standards for the planning, design, construction, and maintenance of transportation infrastructure in Washington. These documents cover a wide range of topics, including highway geometric design, materials specifications, ROW acquisition, rail safety oversight, and environmental considerations. They emphasize safety, efficiency, and best practices, ensuring that projects meet regulatory requirements and align with state and federal standards.
- **WSDOT Model Comprehensive Tribal Consultation Process:** This document provides a framework for engaging in government-to-government consultation with federally recognized tribes for projects that require NEPA review. While

this document focuses on NEPA, several key topics are pertinent to Tribal engagement under SEPA, including the following:

- How to Consult with Tribes
- Summary of Usual and Accustomed Areas for Washington Tribes
- Consultation Protocols for Each Tribe
- Appendices include template consultation letters, sample consultation plans, individual tribal protocols, and additional helpful tools

1.6.4 Executive and Secretarial Orders

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

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

Several executive and secretarial orders have been issued to address transmission facility infrastructure and related energy policies, including the following:[59]

- **Executive Order on Actions to Expedite Energy-Related Projects (May 18, 2001):** This order mandates that agencies act expediently and in a manner consistent with applicable laws to increase the "production and transmission of energy in a safe and environmentally sound manner."
- **Executive Order on America's Supply Chains (February 24, 2021):** While primarily focused on supply chains, this order includes provisions for strengthening the resilience of critical infrastructure, including the electric grid.

[59] This Programmatic EIS is based on the best available information at the time of publication and project-level environmental reviews will need to consider the current legal and regulatory landscape at the time of permitting. State and local laws remain controlling where federal directives are not legally binding or are in conflict with Washington State policy.

- **Executive Orders on Energy and Climate Technologies (January through April 2025):**[60] These orders, issued by President Trump, focus on expediting certain environmental reviews and permitting, as well as the construction of high-voltage interstate electricity transmission facility infrastructure. They aim to streamline the construction and maintenance of these facilities to support a reliable, diversified, and affordable supply of energy.
- **Executive Order Declaring a National Energy Emergency (January 20, 2025):** Invokes the National Emergencies Act and Title 3, Section 301 of the U.S. Code, addressing what the administration describes as a "precariously inadequate and intermittent energy supply" and an "increasingly unreliable grid". This order expedites leasing, permitting, and development of energy infrastructure, using emergency powers to bypass certain federal environmental and regulatory reviews.
- **Secretarial Order No. 3285 (February 22, 2010):** This order establishes the development of renewable energy as a priority for the U.S. Department of the Interior and establishes the Departmental Task Force on Energy and Climate Change.
- **Secretarial Order No. 3355 (August 31, 2017):** This order aims to streamline the NEPA review process for infrastructure projects, including transmission lines, to expedite their development.
- **Secretarial Order No. 3417 (February 3, 2025):** This order implements President Trump's Executive Order 14156, "Declaring a National Energy Emergency."

1.6.5 Relevant Environmental Documents

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

- **Programmatic EISs for solar, wind, and green hydrogen**[61] **energy facilities in Washington.** These programmatic EISs provide broad environmental

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

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

assessments to inform and guide future project-level decisions and are described below:

  - Utility-scale solar energy facilities: This programmatic EIS evaluates the following types of utility-scale solar energy facilities, as well as a No Action Alternative: utility-scale solar facilities, utility-scale solar facilities with battery energy storage systems, and utility-scale solar facilities that include agricultural uses (agrivoltaics).
  - Utility-scale onshore wind energy facilities: This programmatic EIS evaluates the following types of utility-scale onshore wind energy facilities, as well as a No Action Alternative: utility-scale onshore wind facilities, utility-scale onshore wind facilities with battery energy storage systems, and utility-scale onshore wind facilities that include agricultural uses.
  - Green electrolytic[62] and renewable hydrogen facilities: Three types of green hydrogen facilities are evaluated in the programmatic EIS: green hydrogen production facility, green hydrogen production facility with co-located battery energy storage system, and a green hydrogen storage facility (gas or liquid form).

- **Energize Eastside EIS:** Puget Sound Energy proposed to construct and operate a major new transformer served by approximately 16 miles of new high-capacity electric transmission lines extending from Redmond to Renton, Washington. The purpose of the Energize Eastside project is to address a projected deficiency in transmission capacity resulting from growth in electrical demand, which could affect the future reliability of electrical service for the Eastside area in King County, Washington (City of Bellevue 2018). Project construction was completed in December 2024 and is fully operational (PSE n.d.).
- **Vantage to Pomona Heights 230 kV Transmission Line Project Final EIS:** Pacific Power proposed to construct, operate, and maintain a new 230 kV transmission line from Pacific Power's Pomona Heights substation in Yakima County to the Bonneville Power Administration (BPA) Vantage Substation in Grant County, Washington. Pacific Power's proposed project would eliminate the potential for redistributed loads and the overloading of the adjacent transmission system; ensure continued reliable and efficient service to the

[62] The process of producing substances, particularly hydrogen, through electrolysis powered by renewable energy sources.

Yakima Valley; and address future reliability issues within the Mid-Columbia transmission system. In October of 2017, the BPA decided to interconnect the Vantage to Pomona Heights transmission line into the Federal Columbia River Transmission System via the Vantage Substation (DOI 2016). The Vantage-Pomona Heights 230 kV line was completed in August 2020 (PacifiCorp 2023).

- **South of Tri-Cities Reinforcement Project:** The BPA is proposing to construct a new 18-mile-long 115 kV transmission line between its existing Badger Canyon Substation in Benton County, Washington, and its existing Ashe-Marion 500 kV transmission line to the west. The primary goals of this project are to improve long-term electric reliability, improve short-term operational flexibility, and address system maintenance needs. The BPA has concluded scoping, and the comment period closed on November 20, 2023. (BPA 2023). The BPA is currently evaluating the project's potential adverse environmental impacts and considering public input. The draft environmental assessment is anticipated to be released for public review in early 2025 (Tri-Cities Area Journal of Business 2024).
- **I-5 Corridor Reinforcement Project Final EIS:** The BPA proposed to build a 500 kV lattice-steel-tower transmission line that would have run from a new 500 kV substation near Castle Rock, Washington, to a new 500 kV substation near Troutdale, Oregon. On May 17, 2017, the BPA announced its decision not to build the proposed transmission line (BPA 2017).
- **West-Wide Energy Corridor Final Programmatic EIS:** As directed by Section 368 of the Energy Policy Act of 2005, the Secretaries of Agriculture, Commerce, Defense, Energy, and the Interior designated energy corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land in the 11 contiguous western states. The BLM and U.S. Forest Service prepared the West-wide Energy Corridor Programmatic EIS, and a record of decision (ROD) was signed in 2009. The ROD amended 92 BLM land use plans and designated approximately 5,000 miles of Section 368 energy corridors on BLM-administered lands. These designated corridors cross BLM-managed public lands in Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming (BLM n.d.).

  In November 2023, the BLM announced that it would begin assessing targeted updates to energy corridors across the West to help speed the deployment of transmission facility infrastructure. The BLM published a Notice of Intent in the Federal Register on December 1, 2023, to prepare an EIS and resource

management plan amendments (RMPAs) for 19 land use plans. This effort includes evaluating modifications to seven existing Section 368 energy corridors across seven western states. The next step is for the BLM to develop a Draft RMPA/EIS (BLM 2024).

The following Environmental Assessments (EAs) are related to the upgrade and modification of transmission facilities in Washington and the greater Pacific Northwest:

- **Avista Utilities 115 kV Transmission Line Rebuild Project on the Hanford Site (DOE/EA-2038):** Avista Utilities proposed to rebuild approximately 12.6 miles of the 115 kV Benton-Othello transmission line on the Hanford Site in central Washington. The purpose of the project is to replace aging infrastructure and enhance system reliability for the region. The scope includes replacing existing wooden structures with steel poles, upgrading conductors, and improving access roads. The project area lies within the Hanford Reach National Monument, managed by the U.S. Fish and Wildlife Service under a permit from the Department of Energy. Construction was completed in July 2019, and the line is fully operational (DOE 2019).
- **Big Eddy-Ostrander Conductor Replacement Project (DOE/EA-2287):** BPA proposed to replace aging conductors and associated hardware along approximately 66.5 miles of the Big Eddy–Ostrander No. 1 500 kV transmission corridor between The Dalles and near Eagle Creek, Oregon. The purpose of the project is to address infrastructure deterioration, improve worker safety, and maintain system reliability of this vital regional transmission line. The scope includes conducting eight ground-clearance excavations, replacing conductors, raising 65 transmission structures, installing fall-protection hardware on 294 structures, replacing steel members on 118 structures, upgrading access roads—including approximately 0.3 miles of new road, 7 miles of reconstruction, and 42.5 miles of improvements—as well as enhancements to landings, gates, culverts, and bridges, and vegetation management including clearing danger trees across about 140 acres. Construction was completed in July 2025, and the upgraded line is fully operational (DOE 2025).
- **Bandon-Rogue Transmission Line Rebuild Project (EA-1739):** BPA proposed to rebuild the existing 115 kV Bandon–Rogue transmission line, which spans approximately 46 miles through Coos and Curry Counties in Oregon, extending from the city of Bandon to near Nesika Beach. The purpose of the Bandon–Rogue

Transmission Line Rebuild Project is to replace aging infrastructure, improve system reliability, and address safety concerns associated with deteriorating structures. The proposed action includes replacing the existing line with a new 115 kV line, realigning certain segments to avoid wetlands and minimize impacts on waterways, and adding fiber optic cable to the line. Construction was scheduled to take place from spring through fall of 2011. The project was evaluated through an EA, and a Finding of No Significant Impact (FONSI) was issued in May 2011, concluding that the proposed action would not significantly affect the quality of the human environment. The line is fully operational (DOE 2011).

- **Raymond-Cosmopolis Transmission Line Rebuild Project (DOE/EA-1425):** BPA proposed to rebuild the existing 115 kV Raymond–Cosmopolis transmission line, which spans 18.3 miles through Pacific and Grays Harbor Counties in Washington. The purpose of the project is to replace aging infrastructure, improve system reliability, and address safety concerns associated with deteriorating structures. The proposed action includes replacing the existing line with a new 115 kV line, realigning certain segments to avoid wetlands and minimize impacts on waterways, and adding fiber optic cable to the line. Construction was scheduled to take place from spring through fall of 2004. The project was evaluated through an EA, and a FONSI was issued in August 2003, concluding that the proposed action would not significantly affect the quality of the human environment (DOE 2003).

1.6.6 Tribal Consultation, Cultural Resource Protection, and Sensitive Area Considerations

The siting and development of high-voltage transmission facilities[63] must be conducted in a manner that respects Tribal sovereignty, protects culturally significant landscapes, and avoids adverse environmental impacts on sensitive environmental and community areas. In accordance with RCW 70A.65.305 and RCW 43.376.020, any transmission facility project intersecting or adjacent to Tribal lands requires early, formal government-to-government consultation with the affected Tribe(s). This

[63] As defined in this Programmatic EIS, electrical transmission facilities with a nominal voltage of 230 kilovolts or greater.

consultation would begin during the earliest stages of planning and continue throughout permitting and construction.

Tribal consent and participation are essential to the legitimacy and success of any transmission facility project that may affect Tribal lands, treaty-reserved areas, or usual and accustomed (U&A) areas. Site-specific routing decisions would be disclosed to Tribal governments prior to finalization, and applicants should provide early access to route maps, impact assessments, and cultural resource surveys before submitting project-specific applications.

To support informed decision-making, this Programmatic EIS incorporates publicly available, non-sensitive data on known Tribal resources, sites, and Traditional Cultural Places (TCPs) to help identify areas where adverse environmental impacts should be avoided. Early coordination with Tribes, local governments, and community stakeholders is recommended as a standard practice in route planning to ensure transparency, build trust, and reduce the risk of unanticipated adverse environmental impacts.

1.7 Organization of this Programmatic Environmental Impact Statement

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

Table 1.7-1: Environmental Impact Statement Organizational Structure

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

Document Contents	Content Description
	outlines the various steps and requirements for project-specific environmental review.
Chapter 2, Overview of Transmission, Development Considerations, and Regulations	Chapter 2 describes the proposed alternatives and provides general assumptions used for environmental analysis. It discusses typical transmission facilities and the activities related to the new construction, operation and maintenance, upgrade, and modification of these transmission facilities. This chapter also identifies laws, regulations, policies, processes, and other environmental analyses that are relevant to the development of transmission facilities.
Chapter 3, Affected Environment and Environmental Impact	Chapter 3 focuses on the pre-project environmental conditions within the Study Area and the adverse environmental impacts that may occur for environmental resources from the new construction, operation and maintenance, upgrade, and modification of transmission facilities. This chapter is subdivided into separate sections that describe the existing environment and probable adverse environmental impacts for the 15 separate resources, as follows: ▪ Earth Resources ▪ Air Quality, including Greenhouse Gases[64] ▪ Water Resources ▪ Vegetation ▪ Habitat, Wildlife, and Fish ▪ Energy and Natural Resources ▪ Public Health and Safety ▪ Land and Shoreline Use ▪ Transportation ▪ Public Services and Utilities ▪ Visual Quality ▪ Noise[65] and Vibration[66] ▪ Recreation ▪ Historic and Cultural Resources, including Tribal Rights, Interests, and Resources ▪ Socioeconomics, Environmental Justice, and Overburdened Communities
Chapter 4, Cumulative Impacts	Chapter 4 describes cumulative impacts of the Action Alternative and No Action Alternative in combination with other past, present, and reasonably foreseeable developments.
Chapter 5, Consultation, Coordination, and Public Engagement	Chapter 5 details information related to public scoping;[67] government-to-government consultation; agency cooperation, consultation, and coordination; and cooperating agencies.
Chapter 6, References	Chapter 6 provides references to the literature cited throughout this Programmatic EIS.
Chapter 7, Glossary	The glossary defines key terms used in this Programmatic EIS.
Chapter 8, List of Preparers	The list of preparers identifies those who contributed to the preparation of this Programmatic EIS.

[64] Gases in the Earth's atmosphere that trap heat, contributing to the raising of the Earth's average temperature over time.
[65] A sound that is "unwanted"—i.e., this term is based on human perception.
[66] The oscillating movement of a particle or object around its stationary reference position. Vibration can be caused by mechanical processes such as machinery operation, construction activities, or transportation systems.
[67] A process that gives the public an opportunity to provide input on issues.

Document Contents	Content Description
Chapter 9, Distribution List	The distribution list identifies organizations and individuals who were sent notification of this Programmatic EIS.
Chapter 10, Response to Comments	Chapter 10 presents responses to substantive comments received during the public review period of the Draft Programmatic EIS. It summarizes key themes raised by agencies, Tribes, stakeholders, and the public, and provides responses that clarify, supplement, or revise the analysis where appropriate. This chapter also documents changes made to this Final Programmatic EIS in response to public input and outlines how comments informed the decision-making process.

EIS = Environmental Impact Statement

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