

Attachment: G
Comprehensive Plan Policy
Analysis

Attachment G to Staff Report

COMPREHENSIVE PLAN POLICY ANALYSIS

N/A= Not Applicable

Comp. Plan Policies Identified During Land Use Process:	City of Bellevue Comment:
Land Use	
<p>Policy LU-2: Retain the city’s park-like character through the preservation and enhancement of parks, open space, and tree canopy throughout the city.</p>	<p>PSE’s proposal will require the selective removal of vegetation within the wire zone, managed right-of-way, or legal right-of-way if the vegetation matures to a certain height, unless terrain conditions allow for more clearance between the electrical utility facility infrastructure and the height of the vegetation. However, the proposal will utilize the existing transmission corridor, is designed to retain and replace trees within neighborhoods and parks, and to limit tree removal to the amount necessary to ensure safe operation of the proposed transmission lines.</p> <p>Specifically, PSE’s proposal includes the replacement of trees within the existing transmission corridor, and it is anticipated that most replacement trees can be planted in areas where the tree removal is occurring. If this is not feasible, then PSE will focus tree replacement efforts in secondary planting areas outside the managed right-of-way but within PSE’s easement boundaries or on other portions of those properties where trees have been removed as part of the project. Similarly, PSE will give preference to native planting for tree replacement in these areas. If the number of trees cannot be met within the corridor then PSE will identify additional planting areas. The City’s park-like character will be maintained after the project is</p>

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	constructed. See Attachment E to the Staff Report - Vegetation Management Plan – and the Conditions of Approval contained in Section X of the Staff Report for further discussion.
Parks, Recreation and Open Space	
Policy PA-30: Protect and retain, in a natural state, significant trees and vegetation in publicly and privately-dedicated greenbelt areas.	Approximately 29 trees will be removed from parks and other City-owned property outside of the public right of way. This is the minimum amount necessary to ensure safe operation of the proposed transmission lines. PSE proposes to replace vegetation to maintain the natural state of the park's open space. The proposal will also utilize the existing transmission corridor.
Policy PA-31: Manage Bellevue's forest resources, including street trees, formal plantings, and self-sustaining natural stands, to ensure their long term vitality.	With the implementation of a vegetation management plan and the planting of additional vegetation, the project will ensure long term vitality of Bellevue Park's forest resources. See Attachment E to the Staff Report - Vegetation Management Plan – and the Conditions of Approval contained in Section X of the Staff Report for further discussion.
Urban Design	
Policy UD-2: Preserve trees as a component of the skyline to retain the image of a "City in a Park."	Wherever feasible, PSE has proposed to retain and replace trees. With the proposed mitigation the proposal does not significantly impact the image of Bellevue as a "City in a Park". Trees will continue to

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	be a component of the skyline throughout the City. See also City Comment to LU-2, <i>supra</i> .
<p>Policy UD-6: Encourage the green and wooded character of existing neighborhoods.</p>	<p>Because of its linear nature, the proposed transmission line traverses several neighborhoods. The amount of tree removal in any one neighborhood will not significantly alter wooded character of other existing neighborhoods. The replacement of trees and vegetation in individual neighborhoods will also maintain the green and wooded character of neighborhoods that have this character currently. Each neighborhood that includes the existing transmission line corridor has been built next to the existing corridor, and the existing or intended character and appearance of those neighborhoods will be maintained.</p>
<p>Policy UD-55: Exemplify the Pacific Northwest character through the use of appropriate plants in new landscaping.</p>	<p>PSE has proposed a planting palette that includes native and native compatible species. See Attachment E to the Staff Report - Vegetation Management Plan – and the Conditions of Approval contained in Section X of the Staff Report for further discussion. See also City Comment to LU-2, <i>supra</i>.</p>
<p>Policy UD-62: Identify and preserve views of water, mountains, skylines or other unique landmarks from public places as valuable civic assets.</p>	<p>Views from public places will not be significantly impacted by the proposal. See discussion in the Final EIS, Chapter 4.2, regarding views and aesthetic impacts. Private views are not protected under City of Bellevue regulations or policy.</p>

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Economic Development	
Policy ED-33: Maintain and improve communications, electric utility, and other infrastructure needed to support the city's economic needs and growth.	PSE's proposal and the Energize Eastside project maintains and improves electric infrastructure in support of the City's economic needs and growth.
Utilities	
Policy UT-1: Manage utility systems effectively in order to provide reliable, sustainable, quality service.	The stated purpose of the Energize Eastside project is to meet local demand growth and protect reliability in the Eastside of King County. PSE has described the need for the Project and its importance in helping to manage their utility system effectively. This stated need and purpose is consistent with and anticipated by the City's Comprehensive Plan (see Attachment F to the Staff Report [Map UT-7]). In addition, the City of Bellevue's independent technical analysis (see Attachment D to the Staff Report [USE 2015]) confirmed the project is needed to address the reliability of the electric grid on the Eastside.
Policy UT-3: Use design and construction standards that are environmentally sensitive, safe, cost-effective, and appropriate.	PSE's proposal will utilize the existing corridor that is shared with another utility (the Olympic Pipeline system) and will consolidate the transmission lines onto fewer poles. PSE will also be required to adjust pole types and color to limit visual impacts, develop vegetation management that maintains flexibility for property owners, and limit the number of telecommunications facilities that can be located on

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	<p>the transmission line to remain the existing number. In order to ensure that every feasible effort is made to minimize risks involving the Olympic pipeline system and strike a balance between potential health effects and the costs of mitigating those effects, the City has imposed Project-specific mitigation measures, consistent with the Final EIS, as Conditions of Approval.</p>
<p>Policy UT-7: Base the extension and sizing of system components on the land use plan of the area. System capacity will not determine land use.</p>	<p>PSE's proposal is based on anticipated growth and reliability protection in the Eastside of King County. System capacity does not determine land uses but rather responds to anticipated demand.</p>
<p>Policy UT-8: Design, construct, and maintain facilities to minimize their impact on surrounding neighborhoods.</p>	<p>PSE's proposal will utilize the existing corridor and will consolidate the transmission lines onto fewer poles. PSE's proposal complies with LUC 20.20.255's Alternative Siting Analysis (LUC 20.20.255.D) and Design Standards (LUC 20.20.255.F) regulations for Electrical Utility Facilities. Replacement poles will be fewer than are currently installed and will be located approximately in the same location as the existing poles. Access to the pole installation locations will be via existing or historic access routes that were used for original pole installation or maintenance activities. The proposed Richards Creek Substation is located in a light industrial (LI) zoning district and includes adequate screening, per LUC 20.20.255.F, to minimize impacts to surrounding neighborhoods. In</p>

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	the Somerset neighborhood, PSE has sited and designed the proposal to minimize impacts to the extent feasible, including modifications to pole design to reduce the necessary height in the Somerset segment to respond to the existing physical characteristics of the neighborhood, which has developed as a result of private covenants.
<p>Policy UT-45: Coordinate with non-city utility providers to ensure planning for system growth consistent with the city's Comprehensive Plan and growth forecasts.</p>	<p>The City and PSE coordinate regularly on growth projections and meet annually at an Electric Reliability Workshop to discuss electrical system reliability and planned reliability projects. The City shares project growth and key development projects which may impact PSE's service delivery. The Energize Eastside project has been included in and anticipated by the City's Comprehensive Plan for many years (see Attachment F [Map UT-7]).</p>
<p>Policy UT-47: Defer to the serving utility the implementation sequence of utility plan components.</p>	<p>PSE is the serving utility responsible for implementation of their utility plans. The Energize Eastside project is a component of their plan and is part of a larger interconnected, multi-jurisdictional electrical utilities facilities and distribution network. The Energize Eastside project has been included in and anticipated by the City's Comprehensive Plan for many years (see Attachment F [Map UT-7]).</p>
<p>Policy UT-48: Coordinate with the appropriate jurisdictions and governmental entities in the planning and implementation of multi-jurisdictional utility facility additions and improvements.</p>	<p>In 2014, the jurisdictions of Kirkland, Redmond, Newcastle, Renton (Partner Cities) along with Bellevue determined with PSE that the Energize</p>

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	<p>Eastside project was likely to have probable significant adverse environmental impacts and Issued a Determination of Significance. Bellevue assumed lead agency status and coordinated with the Partner Cities for comprehensive environmental review of the Project and the preparation of an Environmental Impact Statement (EIS). The culmination of this environmental review was issuance of the March 1, 2018 Final EIS. The Final EIS built upon the previous Phase 1 Draft EIS and Phase 2 Draft EIS, released in January 2016 and May 2017, respectively.</p>
<p>Policy UT-57: Require notification to the city prior to a utility's maintenance or removal of vegetation in city right-of-way.</p>	<p>N/A: Once the project is built PSE will be required to contact the City regarding any proposed maintenance or removal of vegetation in the City right-of-way consistent with the applicable franchise agreements.</p>
<p>Policy UT-60: Work with Puget Sound Energy, telecom providers, state regulatory agencies, and other responsible parties to develop funding tools that enable full mitigation of the neighborhood impacts of deploying electrical and telecommunications infrastructure.</p>	<p>N/A, but see City Comment to Policy UT-8, <i>supra</i>.</p>
<p>Policy UT-64: Require the reasonable screening and/or architecturally compatible integration of all new utility and telecommunication facilities.</p>	<p>The proposed substation at Richard Creek will include landscape screening and fencing around the new substation. PSE's proposal complies with the City's Design Standards (LUC 20.20.255.F) for Electrical Utility Facilities.</p>

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Comp. Plan Policies Identified During Land Use Process:	City of Bellevue Comment:
<p>Policy UT-67: Encourage consolidation on existing facilities where reasonably feasible and where such consolidation leads to fewer impacts than would construction of separate facilities. Examples of facilities which could be shared are towers, electrical, telephone and light poles, antenna, substation sites, trenches, and easements.</p>	<p>The proposed project is located within an existing easement held by PSE in which the Olympic Pipeline Company also has existing pipeline facilities and easements. The proposed substation is located in close proximity to the existing lakeside substation. This consolidation limits impacts to existing environmentally sensitive areas.</p>
<p>Policy UT-68: Encourage the use of utility corridors as non-motorized trails. The city and utility company should coordinate the acquisition, use, and enhancement of utility corridors for pedestrian, bicycle and equestrian trails and for wildlife corridors and habitat.</p>	<p>N/A</p>
<p>Policy UT-69: Avoid, when reasonably possible, locating overhead lines in greenbelt and open spaces as identified in the Parks and Open Space System Plan.</p>	<p>The existing transmission lines do cross greenbelt and open spaces. Because PSE's proposal utilizes the same corridor as the existing transmission lines, proposal includes overhead lines in these same areas, but no new overhead lines will be located in new parks or open spaces.</p>
<p>Policy UT-72: Encourage cooperation with other jurisdictions in the planning and implementation of multi-jurisdictional utility facility additions and improvements. Decisions made regarding utility facilities shall be made in a manner consistent with, and complementary to, regional demand and resources, and shall reinforce an interconnected regional distribution network.</p>	<p>See City Comment to Policy UT-48, <i>supra</i>, for discussion of cooperation between the Partner Cities. In addition, PSE cooperated in the preparation of the Final EIS, including providing information regarding regional demand and operational need. The Energize Eastside project responds to a network need within the Eastside of King County, and the transmission lines span</p>

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	multiple jurisdictions as part of a connected regional network.
<p>Policy UT-74. Encourage system practices intended to minimize the number and duration of interruptions to customer service.</p>	<p>As part of PSE's needs analysis they have determined that without adding transmission capacity for local peak periods in the Eastside a deficiency could develop and with it a potential for load shedding (forced power outages). Load shedding can be avoided with the construction of the proposal which will minimize the number and duration of interruptions to customer services associated with the transmission line. In June 2018, PSE notified the City of Bellevue that the actual peak demand in the summer of 2017 was equal to the peak demand they had projected for summer 2018, and warned that during peak summer demand periods, Corrective Action Plans would be in place that include intentional load shedding (rolling blackouts) for Eastside customers.</p>
<p>Policy UT-75: Prior to seeking city approval for facilities, encourage utilities service providers to solicit community input on the siting of proposed facilities which may have a significant adverse impact on the surrounding community</p>	<p>PSE has engaged in several efforts to solicit community input on the Energize Eastside project. Outreach began in December 2013 and continued into 2014 with the Community Advisory Group (CAG) and other public open houses and meetings. See Attachment B (Alternative Siting Analysis) for a summary of public outreach and involvement conducted as part of the Project.</p>

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<p>Policy UT-77: Require all utility equipment support facilities to be aesthetically compatible with the area in which they are placed by using landscape screening and/or architecturally compatible details and integration.</p>	<p>See City Comment to Policy UT-3, UT-8 & UT-64, <i>supra</i>.</p>
<p>Policy UT-91: Encourage the public to conserve electrical energy through public education.</p>	<p>N/A</p>
<p>Policy UT-94: Require in the planning, siting, and construction of all electrical facilities, systems, lines, and substations that the electrical utility strike a reasonable balance between potential health effects and the cost and impacts of mitigating those effects by taking reasonable cost effective steps.</p>	<p>Studies on Electric and Magnetic Fields (EMF) and Pipeline Safety were included as part of the environmental review associated with the EIS preparation. The operation of the proposed transmission lines would result in a decrease of magnetic field levels relative to the existing transmission facility. The proposed configuration of the wires is in a vertical arrangement which results in a narrower magnetic field profile. The proposed poles also provide a higher minimum clearance for the lowest hanging wires than the existing poles. Higher wires allow more room for magnetic field levels to decrease before they reach the ground.</p> <p>The proposed project also incorporated recommendations from the DNV GL report entitled, "A Detailed Approach to Assess AC Interference Levels Between the Energize Eastside Transmission Line Project and the Existing Olympic Pipelines, OLP16 & OPL20," dated September 9, 2016 (hereinafter "DNV GL 2016"). The DNV GL 2016 report included recommendations to reduce</p>

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	<p>and control the risk of electrical interference on pipelines present in the corridor. Where feasible, these recommendations have been incorporated into the Conditions of Approval for the proposal.</p>
<p>Policy UT-95: Work with Puget Sound Energy to implement the electrical service system serving Bellevue in such a manner that new and expanded transmission and substation facilities are compatible and consistent with the local context and the land use pattern established in the Comprehensive Plan.</p> <p>Discussion: Where feasible, electrical facilities should be sited within the area requiring additional service. Electrical facilities primarily serving commercial and mixed use areas should be located in commercial and mixed use areas, and not in areas that are primarily residential. Further, the siting and design of these facilities should incorporate measures to mitigate the visual impact on nearby residential areas. These considerations must be balanced with the community's need to have an adequate and reliable power supply.</p>	<p>UT policies work in concert with the Land Use Element to ensure that the City will have adequate utilities to serve both existing development and future growth. (UT Element, p. 122.) While the Comprehensive Plan states that it is critically important to meet growing demand for utility services and provide reliability of the City's utilities systems, the UT Policies also recognize that it important to ensure that new and expanding utility facilities are sensitive to neighborhood character. (Id., p. 139.) The Comprehensive Plan recognizes the tension between the utility's obligation to meet growing demand and provide reliability, and the policies that are designed to ensure that new and expanding utility facilities are sensitive to neighborhood character.</p> <p>The Conditions of Approval assure that the proposal will be compatible with the land use pattern established in the Comprehensive Plan and will minimize impacts of the proposal on neighborhoods that contain, or are adjacent to, the existing corridor. The land use pattern established in the Comprehensive Plan along the existing corridor is a geographic area within the City where</p>

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	<p>the electrical utility facilities have become a fixture of the landscape. Where feasible, the proposal is designed to avoid and minimize impacts to the character of existing neighborhoods by retaining and replacing trees within neighborhoods and parks, and by limiting tree removal to the amount necessary to ensure safe operation of the proposed lines. PSE will also be required to provide landscape screening and fencing of the Richards Creek substation as required by LUC 20.20.255.F. The proposal is sited within an area, the South Bellevue Segment, requiring additional service, and the siting (existing corridor) and design of the proposal incorporate measures to mitigate the visual impact on nearby residential areas. Throughout the environmental review and land use processes, the City has worked with PSE to balance the need to have an adequate and reliable power supply with the existing neighborhood character along the corridor.</p>
<p>Policy UT-96: Require siting analysis through the development review process for new facilities, and expanded facilities at sensitive sites, including a consideration of alternative sites.</p> <p>Discussion: Sensitive facility sites are those new facilities and existing facilities proposed to be expanded where located in or in close proximity to residentially-zoned districts such that there is potential for visual impacts absent appropriate siting and mitigation. The city will update Map UT-7 to the extent needed to</p>	<p>The proposal includes an expanded transmission line within an existing corridor and a new substation. The Energize Eastside project is proposed to address a deficiency in transmission capacity located on the eastside and it was determined that additional 230kV power source would best be centrally located on the Eastside, specifically in Bellevue. The transmission lines will connect the</p>

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<p>stay current with changes in Puget Sound Energy’s system planning.</p>	<p>new transformer at the Richards Creek Substation with existing 230 kV substations in the region in Redmond and Renton. The Project will service all uses in the Eastside including industrial, commercial, residential, and public facilities. Alternatives were considered through PSE’s CAG process as well as in the preparation of the EIS. Comprehensive Plan Utilities Element Map UT-7 reflects PSE’s system planning and specifically identifies the subject project and alignment. PSE submitted an Alternative Siting Analysis that complies with LUC 20.20.255.D and memorializes the methodology employed, the alternative sites analyzed, the technologies considered, and the community outreach undertaken in connection with the proposal (see Attachment B to the Staff Report).</p>
<p>Policy UT-97: Avoid, minimize and mitigate the impacts of new or expanded electrical facilities through the use of land use regulations and performance standards that address siting considerations, architectural design, site screening, landscaping, maintenance, available technologies, and other appropriate measures.</p>	<p>PSE is required to comply with the regulations and performance standards found in LUC 20.20.255, Electrical Utility Facilities. As part of the standards, PSE has prepared an Alternative Siting Analysis and has incorporated appropriate architectural and site design standards including landscaping, pole designs, and pole finish. See Attachments B & J to the Staff Report and the Section X Conditions of Approval.</p>

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Comp. Plan Policies Identified During Land Use Process:	City of Bellevue Comment:
<p>Policy UT-98: Discourage new aerial facilities within corridors that have no existing aerial facilities.</p>	<p>The proposal is to replace existing aerial facilities within an existing corridor. No new facilities will be located in new corridors.</p>
<p>Policy UT-99: Work with and encourage Puget Sound Energy to plan, site, build and maintain an electrical system that meets the needs of existing and future development, and provides highly reliable service for Bellevue customers.</p> <p>Discussion: Providing highly reliable service is a critical expectation for the service provider, given the importance of reliable and uninterrupted electrical service for public safety and health, as well as convenience. Highly reliable service means there are few and infrequent outages, and when an unavoidable outage occurs it is of short duration and customers are frequently updated as to when power is likely to be restored. A highly reliable system will be designed, operated and maintained to keep pace with the expectations and needs of residents and businesses as well as evolving technologies and operating standards as they advance over time.</p>	<p>The City of Bellevue and PSE have worked closely to evaluate potential alternatives to plan, site, build, and maintain the electrical system. The policy requires a highly reliable service to meet the expectations and needs of residents and businesses of Bellevue. PSE has demonstrated through their system planning that they are proposing a project that addresses the transmission capacity need in response to growing population and employment on the Eastside, changing power consumption and in response to utility regulations. For further discussion regarding PSE's determination of operational need, see Section VIII of the Staff Report.</p>
Environment	
Environmental Stewardship	
<p>Policy EN-1: Balance the immediate and long range environmental impacts of policy and regulatory decisions in the context of the city's commitment to provide for public safety, infrastructure, economic development and other obligations.</p>	<p>The proposed project is subject to the City's critical area regulations, which recognize the use as allowed in a critical area or critical area buffer. While allowing this use, the project is also required to mitigate for unavoidable impacts to the functions and values. The code recognizes the balancing required between limiting environmental impacts</p>

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	<p>and providing appropriate infrastructure for the city's economic development needs. By utilizing the existing corridor, impacts to critical areas will be minimized. Mitigation for the impacts will provide additional function and enhancement through the planting of native and native-compatible vegetation.</p> <p>In order to ensure that every effort is made to minimize risks involving the Olympic pipeline system and strike a balance between potential health effects and the costs of mitigating those effects, the City has imposed Project-specific mitigation measures, consistent with the Final EIS, as Conditions of Approval.</p>
<p>Policy EN-12: Work toward a citywide tree canopy target of at least 40% canopy coverage that reflects our “City in a Park” character and maintain an action plan for meeting the target across multiple land use types including right-of way, public lands, and residential and commercial uses.</p>	<p>The city of Bellevue is recognized as being a “City in a Park” partly because of its existing tree canopy. The proposed project will include tree removal and selective pruning as well as tree and vegetation replacement.</p> <p>The removal of trees located in the right-of-way will be mitigated using the methods outlined in the Council of Tree and Landscape Appraisers, <i>Guide for Plant Appraisal</i>, and a total value of the trees will be provided to the City of Bellevue for replanting in the City right-of-way or other City-owned parcels.</p> <p>Any trees located in a critical area or critical area buffer shall be replaced at a 3:1 replacement ratio</p>

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	<p>regardless of their size. In order to mitigate for the proposed tree removal, PSE proposes an adaptive Tree Replacement approach. This approach is described in detail in Sections VI and X of the Staff Report.</p> <p>It is anticipated that most replacement trees can be planted in areas where the tree removal is occurring. However, if this is not feasible then PSE will focus tree replacement efforts in secondary planting areas outside the managed right-of-way but within PSE's easement boundaries or on other portions of those properties where trees have been removed as part of the project. PSE will also give preference to native planting for tree replacement in these areas. If the number of trees cannot be met within the corridor then PSE will identify additional planting areas. An emphasis will be placed on finding receiving sites within 0.25 miles of the corridor. A GIS analysis will identify these opportunity areas and PSE will reach out to landowners to discuss interest in receiving plant material.</p> <p>Finally, if tree plantings required to meet the tree replacement ratios proposed cannot be accommodated by the previously discussed approaches, PSE will pursue planting programs to address the final tree planting. PSE has also been participating in the Energy Saving Trees program,</p>

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	<p>which provides trees to those residents that want to add trees to their property in a manner that can help offset energy usage. While in most cases these trees are not along the project corridor, they are in the City and help advance mitigate for potential tree loss due to factors such as mortality and property owner changes (i.e., a new property owner removes existing trees due to landscaping preferences). PSE initiated this program in early 2018 in an effort to offset anticipated tree removal associated with the Energize Eastside project.</p> <p>All of these efforts will contribute towards the City's tree canopy goals. As memorialized in the recommended Conditions of Approval described in Section X of the Staff Report, PSE shall submit a final Tree Replacement plan as part of the required clearing and grading permits consistent with Attachment E (Vegetation Management Plan) to the Staff Report.</p>
<p>Policy EN-13: Minimize the loss of tree canopy and natural areas due to transportation and infrastructure projects and mitigate for losses, where impacts are unavoidable.</p>	<p>PSE is proposing to minimize tree removal by pruning trees where possible and where tree removal is required to replant vegetation. See also City Comment to LU-2, PA-30, PA-31, UD-2, UD-6, UD-55, EN-1 & EN-12, <i>supra</i>.</p>
<p>Water Resources</p>	

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<p>Policy EN-19: Retain existing open surface water systems in a natural state and restore conditions that have become degraded.</p>	<p>All streams within the project transmission corridor will remain open surface water systems. As part of PSE's proposal, they will be replacing an existing culvert under the access road on the proposed Richards Creek Substation site and realigning and restoring a degraded stream channel.</p>
<p>Policy EN-26: Manage water runoff for new development and redevelopment to meet water quality objectives, consistent with state law.</p>	<p>Minimal new impervious surfaces and development are proposed, except for improvements and impervious surface on the Richards Creek Substation site. PSE's proposal includes a new stormwater vault and all aspects of the project will be required to meet the city's current Stormwater Engineering Design standards and State requirements.</p>
<p>Geo Hazards</p>	
<p>Policy EN-30: Regulate land use and development to protect natural topographic, geologic, vegetational, and hydrological features.</p>	<p>The proposed project will include minimal grading associated with the installation of the transmission poles. The transmission line and the Richards Creek substation will comply with the City's regulations regarding Electrical Utilities Facilities design and site landscaping (LUC 20.20.255.F) and the City's critical areas regulations (Part 20.25H LUC). Compliance with City land use regulations is discussed throughout the Staff Report.</p>

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Policy EN-39: Use specific criteria in decisions to exempt specific small, isolated, or artificially created steep slopes from critical areas designation.	The City's Critical Areas regulations exempt slopes that are less than 1000 square feet in size and do not contain a rise of at least 10 feet. These areas are not designated as critical areas.
Policy EN-40: Minimize and control soil erosion during and after development through the use of best management practices and other development restrictions.	A clearing and grading permit will be required to construct the proposed project. A temporary erosion and sedimentation control plan will be required to implement BMPs for erosion control.
Fish and Wildlife Habitat	
Policy EN-63: Preserve and maintain fish and wildlife habitat conservation areas and wetlands in a natural state and restore similar areas that have become degraded.	PSE's proposal is required to comply with the City's critical areas regulations (Part 20.25H LUC). The critical areas regulations protect existing fish and wildlife habitat, including wetlands and streams. The proposal includes the enhancement of degraded wetlands and associated buffers. Additionally, the project will replace a culvert and enhance a degraded fish bearing stream through channel realignment and bed stabilization.
Policy EN-67: Prohibit creating new fish passage barriers and remove existing artificial fish passage barriers in accordance with applicable state law	PSE's proposal is required to comply with the City's critical areas regulations (Part 20.25H LUC). The critical areas regulations protect existing fish and wildlife habitat, including wetlands and streams. The culvert replacement and associated stream realignment will enhance fish passage. The proposal will also be required to comply with applicable state law and receive approval from state

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	agencies responsible for stream and fish habitat protection.
Policy EN-70: Improve wildlife habitat especially in patches and linkages by enhancing vegetation composition and structure, and incorporating indigenous plant species compatible with the site.	The proposed wetland enhancement and stream realignment will improve wildlife habitat and provide a link to adjoining critical areas on the Lakeside substation site and properties to the south of Richards Creek substation. The mitigation includes native vegetation appropriate for wetland and stream riparian areas.
Policy EN-71: Preserve a proportion of the significant trees throughout the city in order to sustain fish and wildlife habitat.	The proposal will minimize tree removal to the amount necessary to ensure safe operation of the proposed transmission lines, and PSE will plant vegetation when avoidance is not feasible. Fish and wildlife habitat will be sustained and improved when the project is completed, particularly on the Richards Creek substation site.
Policy EN-75: Protect wildlife corridors to minimize habitat fragmentation, especially along existing linkages and in patches of native habitat.	The existing transmission corridor acts as a wildlife corridor. The proposed project will not further fragment this habitat because the proposal includes fewer poles and is located in an already managed utility corridor.
Critical Areas	
Policy EN-84: Use science based mitigation for unavoidable adverse impacts to critical areas to protect overall critical areas function in the watershed.	The applicant has prepared a Critical Areas Report that demonstrates impacts, particularly to wetlands, are mitigated using science-based enhancement and restoration techniques. The techniques use

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	appropriate native plantings and stream restoration elements such as large woody debris and bed stabilization. The project will protect the critical area functions in the watershed through these enhancement and restoration actions.
<p>Policy EN-92: Require mitigation proportional to any adverse environmental impacts from development or redevelopment in the Protection Zone.</p>	<p>Unavoidable impacts to critical areas will be mitigated through the implementation of restoration planting plans. The project includes both permanent impacts to wetlands and buffers on the Richards Creek substation site as well as vegetation conversion within the transmission line corridor. Specific mitigation measures are discussed throughout the Final EIS and Staff Report, and are memorialized in Attachments E (Vegetation Management Plan) and I (Critical Areas Report) to the Staff Report, the Final EIS Mitigation Analysis, and Section X of the Staff Report (Conditions of Approval).</p>
<p>Subarea Policies</p>	
<p>Richards Valley</p>	
<p>Policy S-RV-1: Enhance the natural environment within the industrial area by encouraging redevelopment to consider natural features in site design, including but not limited to reducing impervious surfaces, improving the functions of wetlands and stream corridors, incorporating natural drainage features, retaining trees, and restoring vegetated corridors.</p>	<p>The proposed Richards Creek substation is within an area zoned light industrial (LI). Impervious surfaces are limited to the access road and the substation improvements. Wetlands and streams on the site will be enhanced through native plantings. The project includes a soldier pile</p>

Attachment G to Staff Report

COMPREHENSIVE PLAN POLICY ANALYSIS

N/A= Not Applicable

Comp. Plan Policies Identified During Land Use Process:	City of Bellevue Comment:
	retaining wall to minimize impacts to natural features and minimize tree removal. For a full discussion of the Richards Creek substation and the applicable mitigation measures, see Sections II.C, III and X of the Staff Report.
<p>POLICY S-RV-6: Protect and enhance the capability of Richards Creek, Kelsey Creek, and Mercer Slough and their tributaries to support fisheries along with other water-related wildlife.</p>	<p>The streams and wetlands on the proposed substation site drain to Richards Creek. The proposed mitigation and stream enhancements will support fish and other water-related wildlife by removing invasive plants and stabilizing the stream channel. The proposed culvert replacement and stream realignment will improve fish passage and in-stream and riparian habitat. See Attachment I to the Staff Report and the discussion of mitigation measures related to the culvert replacement and stream realignment at the Richards Creek substation site throughout the Staff Report.</p>
<p>POLICY S-RV-7: Retain and enhance existing vegetation on steep slopes, within wetland areas, and along stream corridors to control erosion and landslide hazard potential and to protect the natural drainage system.</p>	<p>Vegetation on the Richards Creek substation site will be enhanced within slope, wetland, and stream corridors. Landslide hazard potential will be minimized through the use of construction BMPs and the construction of a soldier pile retaining wall.</p>
<p>POLICY S-RV-20: Use common corridors for new utilities if needed.</p>	<p>The project proposes to replace existing transmission poles within an already developed transmission corridor.</p>

Attachment G to Staff Report

COMPREHENSIVE PLAN POLICY ANALYSIS

N/A= Not Applicable

Comp. Plan Policies Identified During Land Use Process:	City of Bellevue Comment:
Discussion: If new power lines are needed in the Subarea, they should be developed in areas that already contain power lines, rather than causing visual impacts in new areas.	
POLICY S-RV-21: Improve the appearance of public streets and power line rights-of-way.	The power line right-of-way is managed by PSE. The proposed poles will be monopole designs replacing existing wood H-frame poles. The consistent design will improve the appearance of the electrical utility facilities and will be consistent with the already developed light industrial area.
POLICY S-RV-33: Develop areas designated for light industrial uses with sensitivity to the natural constraints of the sites	The proposed substation is located within an already disturbed area of the site. The location and design of the proposal is sensitive to and is intended to protect, to the extent feasible, the stream and wetland features on the site. The proposal, as conditioned, complies with the requirements of LUC 20.20.255, Electrical Utility Facilities, and the City's critical areas regulations, Part 20.25H LUC.
Factoria	
POLICY S-FA-8: Protect and enhance the capability of Sunset Creek, Richards Creek, Coal Creek, and their tributaries to support fisheries and water related wildlife.	Mitigation and enhancement occurring at the Richards and Somerset substations will enhance critical area functions that support fish and wildlife habitat. The proposed mitigation and stream enhancements will support fish and other water-related wildlife by removing invasive plants and stabilizing the stream channel. The proposed culvert

Attachment G to Staff Report

COMPREHENSIVE PLAN POLICY ANALYSIS

N/A= Not Applicable

Comp. Plan Policies Identified During Land Use Process:	City of Bellevue Comment:
	replacement and stream realignment will improve fish passage and in-stream and riparian habitat.
POLICY S-FA-9: Retain and enhance vegetation on steep slopes, within wetland areas, and along stream corridors in order to control erosion, reduce landslide hazard and to protect the natural drainage system	Vegetation on the Somerset substation site will be enhanced within slope and wetlands. No significant grading is proposed that would impact slope stability within the transmission corridor. Landslide hazard and erosion potential will be minimized through the use of construction BMPs as described in Section X of the Staff Report.
POLICY S-FA-24: Encourage the undergrounding of utility distribution lines in areas of new development and redevelopment.	N/A because PSE's proposal is for utility transmission lines and not distribution lines. Nevertheless, undergrounding the transmission line was suggested as a mitigation measure in the Final EIS, but it is no longer being considered for the South Bellevue Segment due to cost and feasibility concerns discussed in Section VI.C of the Staff Report.
Newport Hills	
POLICY S-NH-8: Protect significant trees and environmentally-sensitive areas (steep slopes, riparian corridors, and wetlands) in accordance with the provisions of the Land Use Code.	The project is subject to the Critical Areas provisions in the Land Use Code (Part 20.25H LUC) that protect significant trees and sensitive areas. The proposal is also subject to the Electrical Utility Facilities regulations in the Land Use Code, LUC 20.20.255, and the conditional use regulations, LUC 20.30B.140. The Staff Report discusses PSE's proposal's compliance with applicable sections of

Attachment G to Staff Report

COMPREHENSIVE PLAN POLICY ANALYSIS

N/A= Not Applicable

Comp. Plan Policies Identified During Land Use Process:	City of Bellevue Comment:
	the City's Land Use Code, including the impacts to and mitigation measures for significant trees, steep slopes, riparian corridors, and wetlands.
<p>POLICY S-NH-28: Ensure that all new development and redevelopment includes measures to protect and enhance surface water quality.</p>	<p>Surface water quality is protected through the implementation of construction BMPs and through restoration of restored areas. New impervious area is limited to the Richards Creek substation site. The City's Utilities Department has approved the preliminary designs; however, they will review final designs to determine if an enhanced water quality facility will be required because the run off for this site flows to fish bearing stream. All design review, plan approval, and field inspection shall be performed under the individual permits and/or Utility Developer Extension Agreements depending on the extent of the work.</p>
<p>POLICY S-NH-30: Protect and enhance fish and wildlife habitat in environmentally sensitive areas.</p>	<p>The project is subject to the Critical Areas provisions in the Land Use Code (Part 20.25H LUC) that protect environmentally sensitive areas. Impacts to vegetation in Critical Areas will be mitigated through the implementation of native vegetation planting and restoration plans. The Richards Creek substation construction will include wetland mitigation, culvert replacement and stream habitat improvement. In addition to the new culvert crossing, the proposal will restore and/or enhance adjoining habitat areas. This includes realigning and enhancing stream sections extending upstream and downstream, and</p>

Attachment G to Staff Report

COMPREHENSIVE PLAN POLICY ANALYSIS

N/A= Not Applicable

Comp. Plan Policies Identified During Land Use Process:	City of Bellevue Comment:
	enhancing the new stream buffer including associated wetland areas.