



May 15, 2025

Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Lacey, WA 98503-3172

Submitted electronically at <https://comments.efsec.wa.gov/>.

Re: Comments on Draft Programmatic Environmental Impact Statement for High-Voltage Transmission Facilities in Washington

Dear Energy Facility Site Evaluation Council,

Conservation Northwest (CNW) appreciates the opportunity to submit this comment regarding Energy Facility Site Evaluation Council's (EFSEC's) Draft Programmatic Environmental Impact Statement (Draft PEIS) under the State Environmental Policy Act (SEPA), pursuant to RCW 43.21C.030, to assess probable, significant adverse environmental impacts in geographic areas that are suitable for electrical transmission facilities with a nominal voltage of 230 kilovolts (kV) or greater and identify related avoidance, minimization, and mitigation measures.¹

We commend the State of Washington for its proactive approach to evaluating the environmental implications of transmission infrastructure at a programmatic level. This effort reflects a necessary step toward achieving the state's clean energy goals. At the same time, we emphasize the importance of ensuring that the development of such infrastructure is aligned with environmental protection, social equity, and long-term sustainability.

CNW supports the strategic expansion and modernization of Washington's transmission infrastructure to facilitate the integration of renewable energy sources and meet the requirements of the Clean Energy Transformation Act (CETA). We endorse this programmatic effort to identify existing transmission infrastructure for potential upgrades or rebuilds on lands suitable for new development with the least conflicts. This includes protecting, connecting, and restoring wildlands and wildlife, traditional and cultural Tribal resources, productive agriculture, and recreational opportunities for future generations. To this end, we offer the following comments.

Recommendations and Comments Regarding Draft Programmatic Environmental Impact Statement Studies That Address Environmental Issues

First, regarding environmental justice and community health, we recommend a stronger the inclusion of environmental justice considerations in the Draft PEIS. To strengthen this aspect, there should be more encouragement of enhanced community engagement to develop a robust

¹ RCW 43.21C.405, <https://app.leg.wa.gov/RCW/default.aspx?cite=43.21C.405>.

framework for engaging with overburdened communities, ensuring their meaningful participation in decision-making processes. There needs to be a stronger cumulative environmental and health impact assessment on communities already burdened by pollution and industrial activities.

The Draft PEIS acknowledges the importance of tribal consultation. However, we recommend building upon this with more early and ongoing consultation and engagement with tribal governments from the earliest planning stages and maintain open communication throughout project development. We support that cultural resources are protected sites of significance for Indigenous communities.

We appreciate that EFSEC's primary focus of this Draft PEIS is to assess the potential environmental impacts of high-voltage transmission facilities through identifying avoidance, minimization, and other mitigation measures and addressing probable significant adverse environmental impacts, as directed by the Washington State Legislature. It would serve as the first phase of SEPA-phased review for future high-voltage transmission facilities [WAC 197-11-060(5)]. Additional SEPA review would be required for any project-specific application.

As directed by the Washington State Legislature in RCW 43.21C.405, this Draft PEIS analyzes potential direct, indirect, and cumulative impacts of the construction, operation and maintenance, and upgrade or modification of transmission facilities in the State of Washington. We appreciate the explanations written out to describe specific considerations. However, we would like there to be acknowledgement that there may be uncommon circumstances that should also have a thorough consideration before impact determinations as made.

We suggest improvements to specific sections related to environmental mitigation:

Ecological Impacts and Wildlife Connectivity

- **Wildlife Movement and Barriers (Section 3.6):** In addition to landscape-scale avoidance, the PEIS should explicitly address structural barriers such as fencing near transmission corridors. These can inadvertently act as predator funnels or migration blockages, fragmenting habitat and posing risks to wildlife.
- **Technological Solutions:** The PEIS should explore the use of technologies such as ultrasonic deterrents to help species like birds and bats navigate safely around transmission lines.
- **Soils and Earth Resources (Section 3.2.2.2):** We recommend discussing dual-purpose and lower-conflict siting options such as fallow agricultural land, brownfields, and previously disturbed lands. These should be analyzed not only for feasibility but for residual ecological value.

Regional Planning and Interstate Coordination

The PEIS briefly references cross-border coordination with British Columbia but omits meaningful discussion on east-west transmission with Idaho and Oregon. We recommend expanding this analysis:

- **Interstate Alignment:** Consider transmission planning implications with adjacent states, especially in eastern Washington, to avoid mismatched policies, incomplete connectivity, or habitat fragmentation across state lines.

Invasive Species and Vegetation Management

We appreciate the PEIS's mention of invasive species. Going forward:

- **Ecoregion-Specific Strategies:** Vegetation management should be tailored to native ecosystems and include species-specific restoration practices. Preventing the spread of invasives should be a central goal of long-term maintenance.

Project Cost and Timeline Considerations

Without early and coordinated planning, transmission development can become significantly delayed and costly—often exceeding \$2–3 million per mile and requiring 7–10 years for permitting, construction, and review. By embedding environmental planning early in the process, Washington can reduce delays and avoid unintended impacts.

Siting Guidelines and Monitoring

We recommend the Final PEIS include the following:

- **Clear Siting Criteria:** Develop a transparent and enforceable framework for siting transmission lines in areas of least environmental and social conflict.
- **Ongoing Monitoring:** Establish protocols for environmental monitoring and compliance reporting from construction through decommissioning. This will ensure long-term accountability and resource protection.

Conclusion

Thank you for considering our comments for the Draft PEIS to help transmission facility applicants understand how to properly analyze all potential direct, indirect, and cumulative impacts. We appreciate the effort behind this transmission PEIS study to identify and assess alternatives, probable environmental impacts, and mitigation and to provide information on how to make siting and design choices that will avoid, minimize, or mitigate adverse environmental impacts at an



early phase of project consideration, during the construction and maintenance, and for decommissioning. We appreciate that transmission projects will project would be design with conservation and wise land use in mind.

We appreciate the opportunity to contribute to this important process and look forward to continued collaboration with EFSEC.

Sincerely,

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